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To: Councillor Al-Samarai, Convener; Councillor Delaney, Vice-Convener; and Councillors Clark, Crockett, Graham, Henrickson, Lawrence, MacGregor and McLeod.

Town House,
ABERDEEN 19 August 2025

LICENSING COMMITTEE

The Members of the **LICENSING COMMITTEE** are requested to meet in **Committee Room 2 - Town House on WEDNESDAY, 27 AUGUST 2025 at 10.00 am**. This is a hybrid meeting and Members may also attend remotely.

The meeting will be webcast and a live stream can be viewed on the Council's website.
<https://aberdeen.public-i.tv/core/portal/home>

JENNI LAWSON
CHIEF OFFICER – GOVERNANCE

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To access the Service Updates for this Committee please click [here](#)

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LICENSING COMMITTEE

ABERDEEN, 14 May 2025. Minute of Meeting of the LICENSING COMMITTEE.
Present:- Councillor Al-Samarai, Convener; Councillor Delaney, Vice-Convener;
and Councillors Clark, Graham, Henrickson, Lawrence, MacGregor and McLeod.

The agenda and reports associated with this minute can be found [here](#).

Please note that if any changes are made to this minute at the point of approval, these will be outlined in the subsequent minute and this document will not be retrospectively altered.

EXEMPT BUSINESS

1. The Convener proposed that the Committee consider item 10.1 (Taxi Licence Renewal), item 10.2 (Request for Revocation - Taxi Driver Licence) and item 10.3 (Request for Suspension/Revocation - Taxi Driver Licence/Taxi Licence/Private Hire Licence) with the press and public excluded from the meeting.

The Committee resolved:-

in terms of Section 50A(4) of the Local Government (Scotland) Act 1973, to exclude the press and public from the meeting during consideration of the above items so as to avoid disclosure of information of the classes described in the following paragraph of Schedule 7(A) to the Act:- articles 15, 16 and 17 (paragraph 14).

DECLARATIONS OF INTEREST AND TRANSPARENCY STATEMENTS

2. There were no declarations of interest or transparency statements intimated.

MINUTE OF PREVIOUS MEETING OF 19 FEBRUARY 2025

3. The Committee had before it the minute of its previous meeting of 19 February 2025, for approval.

The Committee resolved:-

to approve the minute.

MINUTE OF MEETING OF THE LICENSING SUB COMMITTEE OF 22 APRIL 2025

4. The Committee had before it the minute of meeting of the Licensing Sub Committee of 22 April 2025, for approval.

The Committee resolved:-

to approve the minute.

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COMMITTEE BUSINESS PLANNER

5. The Committee had before it the Committee Business Planner as prepared by the Interim Chief Officer – Governance.

The Committee resolved:-

to note the Business Planner.

LOW EMISSION ZONE - WHEELCHAIR ACCESSIBLE TAXI EXEMPTION - CR&E/25/107

6. With reference to article 5 of the minute of meeting of 5 June 2024, the Committee had before it a report by the Executive Director of City Regeneration and Environment which provided an update on proposals for a further one-year exemption from the Low Emission Zone for wheelchair accessible taxis.

The report recommended:-

that the Committee –

- (a) note that wheelchair accessible taxis are to be granted an additional one-year exemption from the Low Emission Zone; and
- (b) instruct the Interim Chief Officer – Governance to communicate this decision to wheelchair accessible taxi operators.

The Committee resolved:-

to approve the recommendations.

TAXI FLEET COMPOSITION - CORS/25/122

7. With reference to article 8 of the minute of meeting of 4 December 2024, the Committee had before it a report by the Executive Director of Corporate Services which provided an update on the options for implementation of a mixed taxi fleet.

The report recommended:-

that the Committee –

- (a) consider the results of the public consultation;
- (b) retain the policy that all new applications for a taxi vehicle licence require to be for a Wheelchair Accessible Vehicle (WAV);
- (c) agree a mixed fleet with a 50/50 split between Saloons and WAVs;
- (d) stipulate a date by which all current licence holders can apply for access to the waiting list for a saloon plate;
- (e) instruct the Chief Officer – Governance to organise the list in order of length of licence held at that date and add applicants to the bottom of the list thereafter;
- (f) agree that each applicant on the waiting list be permitted one opportunity to pass on the chance to change vehicle before being moved to the bottom of the list; and

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- (g) agree that an applicant who accepts the opportunity to change vehicle is given 6 months in which to do so before the opportunity passes to the next applicant on the list.

The Committee resolved:-

- (i) to approve recommendations (a) to (c) and (e) to (g);
- (ii) that in relation to recommendation (d), all current licence holders could apply for access to the waiting list for a saloon plate by 9 July 2025;
- (iii) to instruct the Chief Officer – Governance to conduct a review of the mixed fleet policy within a 12-month period and bring back a report to the Licensing Committee to identify any challenges which have arisen in implementation of the policy and to determine if any changes are required to ensure the effective operation and application of the policy. Such a review to include a note of the current split within the fleet; and
- (iv) to defer any Wheelchair Accessible Vehicle exemption requests to the Committee meeting on 8 October 2025.

SEXUAL ENTERTAINMENT VENUE LICENSING - CORS/25/041

8. With reference to article 8 of the minute of the previous meeting of 19 February 2025, the Committee had before it a report by the Executive Director of Corporate Services which provided information on the position in relation to Sexual Entertainment Venue (SEV) licences and sought to determine whether a formal review process was required.

The report recommended:-

that the Committee consider the current policy in relation to Sexual Entertainment Venue licences and determine whether a formal review process is required.

The Committee resolved:-

to instruct the Executive Director of Corporate Services to undertake a formal review process of Sexual Entertainment Venue licences.

SHORT TERM LET (NEW OPERATOR) - 41 SHIELHILL AVENUE

9. The Committee had before it a report by the Private Sector Housing Manager, which advised that the application was before the Committee for the reason that two letters of objection were submitted to the Private Sector Housing Team.

Mrs Jocelyn Janssen, Private Sector Housing Manager advised that the necessary upgrading works had been completed.

The applicant, Louise Holt and Property Manager, Rebecca Dare were in attendance, spoke in support of the application and responded to questions from members.

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Bruce Lawrie was in attendance, spoke in support of his letter of objection and responded to questions from members.

All parties were given the opportunity to sum up.

The Committee resolved:-
to grant the licence.

SHORT TERM LET (NEW OPERATOR) - FLAT 17, TRINITY HOUSE TRINITY QUAY

10. The Committee had before it a report by the Private Sector Housing Manager, which advised that the application was before the Committee for the reason that one letter of objection, was submitted to the Private Sector Housing Team.

Mrs Jocelyn Janssen, Private Sector Housing Manager advised that the necessary upgrading works had still to be completed.

The applicant Paula Peres was in attendance, spoke in support of the application and responded to questions from members.

George Henderson, on behalf of the Objector Vikki Crombie was in attendance, spoke in support of the letter of objection and responded to questions from members.

All parties were given the opportunity to sum up.

The Committee resolved:-
to defer consideration of the application until the necessary upgrading works were completed, after which time the Chief Officer - Housing could grant or refuse the licence under delegated powers, if appropriate.

SHORT TERM LET (NEW OPERATOR) - 97 OAKHILL GRANGE

11. The Committee had before it a report by the Private Sector Housing Manager, which advised that the application was before the Committee for the reason that one letter of objection was submitted to the Private Sector Housing Team.

Mrs Jocelyn Janssen, Private Sector Housing Manager advised that the necessary upgrading works had been completed.

John Goodlad, on behalf of the applicant was in attendance, spoke in support of the application and responded to questions from members.

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Maureen McMahon was in attendance, spoke in support of her letter of objection and responded to questions from members.

All parties were given the opportunity to sum up.

The Convener, seconded by Councillor MacGregor, moved:-
that the Committee grant the licence.

Councillor McLeod moved as an amendment that the Committee refuse the licence, on the grounds that the premises was not suitable or convenient for the conduct of the activity having regard to the nature and extent of the proposed activity. However, as he did not receive a seconder, the amendment fell in terms of Standing Order 29.14.

The Committee resolved:-
to grant the licence.

TAXI ZONE RELAXATION 2025 REQUEST

12. The Committee had before it an information note prepared by the Interim Chief Officer – Governance which advised (1) that current licensing policy required the operation of two zones for licensed taxis, one which covered the area within the airport boundary and one which covered the rest of the city; (2) that policy also stated that that airport vehicles may only operate within the city zone from 00.00 Saturday to 05.00 Sunday; (3) that a request had been received to suspend the zoning policy (in terms of airport zoned vehicles operating in the city) for the duration of the Tall Ships event and Offshore Europe event as has been done for Offshore Europe previously; (4) that the Tall Ships event will take place from Friday, 18 July until Tuesday, 22 July 2025; and Offshore Europe will take place from Tuesday, 2 September until Friday, 5 September 2025; and (5) that Members would be required to determine whether to suspend the policy and if so suspended, the exact times and dates for the suspension to start and to end.

The Committee resolved:-

to suspend the zoning policy (in terms of airport zoned vehicles operating in the city) for the duration of the Tall Ships event and the Offshore Europe during the following date and time periods:-

- Tall Ships 2025
Friday 18 July 18:00 – Tuesday 22 July 23:59; and
- Offshore Europe 2025
Tuesday 2 September – Friday 5 September 2025 – Full Days.

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PUBLIC ENTERTAINMENT LICENCE (GRANT) - ABERDEEN SPORTS VILLAGE

13. The Committee had before it an information note prepared by the interim Chief Officer – Governance, which advised that the application required to be determined by 17 August 2025.

The Committee resolved:

to defer consideration of the application until 17 August 2025, to allow time for the Licensing Team to receive clear inspection responses from the Council's Building Standards and Environmental Health, after which time, the Chief Officer - Governance could grant the licence under delegated powers or otherwise refuse the licence if the premises did not receive clear inspection responses.

LATE HOURS CATERING (RENEWAL) - WANDALAND LTD, FUSE BOX, 44 BRIDGE STREET

14. The Committee had before it an information note prepared by the interim Chief Officer – Governance, which advised that the application required to be determined by 25 August 2025.

The Committee resolved:

to defer consideration of the application until 25 August 2025, to allow time for the Licensing Team to receive a clear inspection response from the Council's Environmental Health Team, after which time, the Chief Officer - Governance could grant the licence under delegated powers or otherwise refuse the licence if the premises did not receive a clear inspection response.

In accordance with the decision taken at Article 1 of this minute, the following three items were considered with the press and public excluded.

TAXI LICENCE RENEWAL

15. The Committee had before it (1) a report by the interim Chief Officer - Governance; and (2) a letter from the Chief Superintendent, Police Scotland, c/o North East Division, dated 21 November 2024.

The licence holder was in attendance, spoke in support of his application and responded to questions from members.

Sergeant Neil Grant was in attendance and spoke in support of Police Scotland's letter of objection.

Both parties were given the opportunity to sum up.

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The Vice Convener, seconded by the Convener, moved:-
that the Committee grant the licence.

Councillor Clark, seconded by Councillor MacGregor, moved as an amendment:-
that the Committee refuse the licence on the grounds that there is good reason for refusing it.

On a division, there voted:- for the motion (6) – the Convener, the Vice Convener and Councillors Graham, Henrickson, Lawrence and McLeod; for the amendment (2) – Councillors Clark and MacGregor.

The Committee resolved:-
to adopt the motion.

REQUEST FOR REVOCATION - TAXI DRIVER LICENCE

16. The Committee had before it (1) an information note by the interim Chief Officer - Governance; and (2) a letter from the Chief Superintendent, Police Scotland, c/o North East Division, dated 25 February 2025.

The licence holder was in attendance, spoke in support of his licence and responded to questions from members.

Sergeant Neil Grant was in attendance and spoke in support of Police Scotland's letter.

Both parties were given the opportunity to sum up.

The Convener, seconded by Councillor McLeod, moved:-
that the Committee suspend the licence for a period of six months.

The Vice Convener, seconded by Councillor Clark, moved as an amendment:-
that the Committee revoke the licence with immediate effect on the grounds that the carrying on of the activity to which the licence related had caused, was causing or would likely to cause a threat to public safety..

On a division, there voted:- for the motion (3) – the Convener and Councillors Henrickson and McLeod; for the amendment (5) – the Vice Convener and Councillors Clark, Graham, Lawrence and MacGregor.

The Committee resolved:-
to adopt the amendment.

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REQUEST FOR SUSPENSION/REVOCATION - TAXI DRIVER LICENCE/TAXI LICENCE/PRIVATE HIRE LICENCE

17. The Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance; and (2) a letter from the Chief Superintendent, Police Scotland, c/o North East Division, dated 26 February 2025.

As a preliminary matter, Sandy Munro, Legal Advisor indicated that a character reference had been received from Aberdeen Taxis Ltd dated 12 May 2025, therefore the Committee required to consider whether it be accepted into the proceedings.

The Committee resolved:-

to accept the character reference into the proceedings.

The licence holder was in attendance with Dean Purdie, his legal representative and both spoke in support of his licence and responded to questions from members.

Sergeant Neil Grant was in attendance and spoke in support of Police Scotland's letter.

Both parties were given the opportunity to sum up.

The Committee resolved:-

to take no action in relation to all three licences.

CONFIDENTIAL INFORMATION

The press and public were excluded from the meeting for consideration of the following items which contained confidential information in terms of Section 50A 3(b) of the Local Government (Scotland) Act 1973.

TAXI DRIVER LICENCE - RENEWAL (AGENDA ITEM 11.1)

18. The Committee were advised that this item had been granted under delegated powers.

TAXI DRIVER LICENCE - RENEWAL (AGENDA ITEM 11.2)

19. The Committee were advised that this item had been granted under delegated powers.

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TAXI DRIVER LICENCE - RENEWAL (AGENDA ITEM 11.3)

20. The Committee had before it an information note prepared by the Interim Chief Officer – Governance which advised that the application required to be considered by 6 July 2025.

The licence holder was not in attendance, nor represented.

The Committee resolved:-

to defer consideration of the application until 6 July 2025, to allow a medical report to be received and should the applicant meet DVLA Group 2 Standards, the Chief Officer - Governance could grant the licence under delegated powers, otherwise refuse the licence if a medical report does not meet the medical standards by the aforementioned date.

TAXI DRIVER LICENCE - RENEWAL (AGENDA ITEM 11.4)

21. The Committee had before it an information note prepared by the Interim Chief Officer – Governance which advised that the application required to be considered by 15 July 2025.

The licence holder was in attendance and spoke in support of the application and responded to questions from members.

The Committee resolved:-

to defer consideration of the application until 15 July 2025, to allow a medical report to be received and should the applicant meet DVLA Group 2 Standards, the Chief Officer - Governance could grant the licence under delegated powers, otherwise refuse the licence if a medical report does not meet the medical standards by the aforementioned date.

REQUEST FOR EXEMPTION FROM POLICY - WHEELCHAIR ACCESSIBLE VEHICLE (AGENDA ITEM 11.5)

22. The Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance, which advised that the licence holder was seeking an exemption from the Wheelchair Accessible Vehicle policy; and (2) correspondence relating to the exemption request.

The licence holder was in attendance and spoke in support of the request and responded to questions from members.

The Committee resolved:-

to refuse the request for exemption from the Wheelchair Accessible Vehicle Policy.

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REQUEST FOR EXEMPTION FROM POLICY - WHEELCHAIR ACCESSIBLE VEHICLE (AGENDA ITEM 11.6)

23. The Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance, which advised that the licence holder was seeking an exemption from the Wheelchair Accessible Vehicle policy; and (2) correspondence relating to the exemption request.

The licence holder was not in attendance, nor represented.

The Committee resolved:-

to refuse the request for exemption from the Wheelchair Accessible Vehicle Policy.

REQUEST FOR EXEMPTION FROM POLICY - WHEELCHAIR ACCESSIBLE VEHICLE (AGENDA ITEM 11.7)

24. The Committee were advised that this item had been deferred until the meeting on 8 October 2025.

REQUEST FOR EXEMPTION FROM POLICY - WHEELCHAIR ACCESSIBLE VEHICLE (AGENDA ITEM 11.8)

25. The Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance, which advised that the licence holder was seeking an exemption from the Wheelchair Accessible Vehicle policy; and (2) correspondence relating to the exemption request.

The licence holder was in attendance and spoke in support of the request and responded to questions from members.

The Committee resolved:-

to refuse the request for exemption from the Wheelchair Accessible Vehicle Policy.

REQUEST FOR EXEMPTION FROM POLICY - WHEELCHAIR ACCESSIBLE VEHICLE (AGENDA ITEM 11.9)

26. The Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance, which advised that the licence holder was seeking an exemption from the Wheelchair Accessible Vehicle policy; and (2) correspondence relating to the exemption request.

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The licence holder was in attendance and spoke in support of the request and responded to questions from members.

The Committee resolved:-

- (i) to refuse the request for exemption from the Wheelchair Accessible Vehicle Policy; and
- (ii) to approve a Wheelchair Assistance exemption.

DECLARATION OF INTEREST

During discussion of the following item Councillor Graham declared an interest by virtue of him knowing the licence holder. He considered that the nature of his interest would require him to leave the meeting, therefore he took no further part in proceedings for this item.

REQUEST FOR EXEMPTION FROM POLICY - WHEELCHAIR ACCESSIBLE VEHICLE (AGENDA ITEM 11.10)

27. The Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance, which advised that the licence holder was seeking an exemption from the Wheelchair Accessible Vehicle policy; and (2) correspondence relating to the exemption request.

The licence holder was in attendance and spoke in support of the request and responded to questions from members.

The Committee resolved:-

- (i) to refuse the request for exemption from the Wheelchair Accessible Vehicle Policy; and
- (ii) to approve a Wheelchair Assistance exemption.

REQUEST FOR EXEMPTION FROM POLICY - WHEELCHAIR ACCESSIBLE VEHICLE (AGENDA ITEM 11.11)

28. The Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance, which advised that the licence holder was seeking an exemption from the Wheelchair Accessible Vehicle policy; and (2) correspondence relating to the exemption request.

The licence holder was in attendance and spoke in support of the request and responded to questions from members.

The Committee resolved:-

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to approve the request for exemption from the Wheelchair Accessible Vehicle Policy.

REQUEST FOR EXEMPTION FROM POLICY - WHEELCHAIR ACCESSIBLE VEHICLE (AGENDA ITEM 11.12)

29. The Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance, which advised that the licence holder was seeking an exemption from the Wheelchair Accessible Vehicle policy; and (2) correspondence relating to the exemption request.

The licence holder was in attendance and spoke in support of the request and responded to questions from members.

The Committee resolved:-

to approve the request for exemption from the Wheelchair Accessible Vehicle Policy.

- **COUNCILLOR GILL AL-SAMARAI, Convener.**

LICENSING SUB COMMITTEE

ABERDEEN, 4 June 2025. Minute of Meeting of the LICENSING SUB COMMITTEE. Present:- Councillor Al-Samarai, Convener; and Councillors Delaney, Henrickson, Lawrence and McLeod.

The agenda, reports and recording associated with this minute can be found [here](#).

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DECLARATIONS OF INTEREST AND TRANSPARENCY STATEMENTS

1. There were no declarations of interest or transparency statements intimated.

LANDLORD REGISTRATION - REVIEW - STEVEN GEDDES

2. The Sub Committee had before it a report by the Private Sector Housing Manager which sought consideration of whether the applicant was a 'fit and proper' person to be registered as a landlord in relation to property management and condition.

Jocelyn Janssen, the Private Sector Housing Manager provided an update on the current situation, advising that various repairs to the property had not been carried out. The Private Sector Housing Team had asked the Landlord to confirm the dates the works were scheduled and requested that he respond by 2 May 2025, however no response had been received to date.

The applicant was not in attendance, nor represented.

The Sub Committee resolved:-

to revoke the registration on the grounds that the applicant was not a fit and proper person.

- **COUNCILLOR GILL AL-SAMARAI, Convener**

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LICENSING SUB COMMITTEE

ABERDEEN, 25 June 2025. Minute of Meeting of the LICENSING SUB COMMITTEE. Present:- Councillor Al-Samarai, Convener; Councillor , Vice-Convener; and Councillors Delaney, Henrickson, Lawrence and McLeod.

The agenda associated with this minute can be found [here](#).

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DECLARATIONS OF INTEREST AND TRANSPARENCY STATEMENTS

1. There were no declarations of interest or transparency statements intimated.

CONFIDENTIAL INFORMATION

The press and public were excluded from the meeting for consideration of the following item which contained confidential information in terms of Section 50A 3(b) of the Local Government (Scotland) Act 1973.

REQUEST FOR THE SUSPENSION OF A TAXI DRIVER'S LICENCE

2. The Sub Committee had before it (1) an information note prepared by the Interim Chief Officer – Governance, which advised that a request had been received under Paragraph 11, Schedule 1 of the Civic Government (Scotland) Act 1982 for the suspension or revocation of a Taxi Driver's licence; and (2) a letter from the Chief Superintendent, Police Scotland, c/o North East Division dated 27 May 2025.

PC Kevin Skivington, spoke in support of Police Scotland's letter and responded to questions from members.

The licence holder was not in attendance nor represented, however had requested via an email dated 23 June 2025, that a statement be read out on his behalf at the meeting.

Mr Sandy Munro, Legal Adviser, made reference to the information note and read out the statement from the licence holder.

The Sub Committee resolved:-

to suspend the licence with immediate effect for the unexpired portion of the licence on the grounds of public safety.

COUNCILLOR GILL AL-SAMARAI, Convener

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TAXI AND PRIVATE HIRE CAR CONSULTATION GROUP

ABERDEEN, 30 April 2025. Minute of Meeting of the TAXI AND PRIVATE HIRE CAR CONSULTATION GROUP. Present:- Councillor Al- Samarai, Chairperson; and Councillors Clark, Delaney, Henrickson and Lawrence; and Alan Catto (Independent), Chris Douglas (Private Hire Trade), Russell McLeod (Licensed Taxi Booking Offices), Luke Hulse (Independent), Amanda Foster (substitute for Hussein Patwa, Disability Equity Partnership), Peter Campbell (Unite), Stephen Lawrence and Michell Burr (Railway Station Taxi Drivers) and Iain Hamilton (Airport Taxi Drivers).

In attendance:- Sandy Munro, Alexa Last, Dave McKane and Daniel Wright (Licensing Team); John Weir, Derek Jamieson and Kevin Flannigan (Fleet Services), Vycki Ritson (Operations – Roads), Marlene Mitchell (Port of Aberdeen) and Mark Masson and Gogo Okafor (Committee Services).

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WELCOME AND APOLOGIES

1. The Chair welcomed everyone to the meeting.

An apology for absence was intimated on behalf of Hussein Patwa.

DECLARATIONS OF INTEREST OR TRANSPARENCY STATEMENTS

2. There were no declarations of interest or transparency statements intimated.

MINUTE OF THE PREVIOUS MEETING OF 6 NOVEMBER 2024 - FOR APPROVAL

3. The Consultation Group had before it the minute of its previous meeting of 6 November 2024.

The Consultation Group resolved:-
to approve the minute.

SOUTH HARBOUR - MARLENE MITCHELL - PORTS OF ABERDEEN

4. The Consultation Group had before it a note from Marlene Mitchell, Port of Aberdeen which provided details relating to a number of pre-booked taxis (booked directly by the guests based on numbers provided by the Welcome Volunteer team) which failed to turn up at a cruise call at Aberdeen South Harbour. Also attached was a layout plan for cruise operations at South Harbour, which showed the stabling point for pre-booked taxis collecting guests and crew from cruise ships.

TAXI AND PRIVATE HIRE CAR CONSULTATION GROUP

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The Consultation Group heard from Marlene Mitchell regarding the issues at the South Harbour and also from Chris Douglas who responded on behalf of Aberdeen Taxis which provided taxis for that particular cruise ship.

Marlene explained that a list of cruises entering the South Harbour was located on their website.

It was acknowledged that First Aberdeen no longer provided a bus service to the South Harbour.

The Consultation Group resolved:-

- (i) to note that Chris Douglas would liaise with Marlene Mitchell on establishing better communication links between the taxi firm and the Port of Aberdeen; and
- (ii) to note that Marlene Mitchell would seek to determine whether the safety regulations at the South Harbour would prevent taxis picking up at quayside.

TALL SHIPS 2025 - CHRIS DOUGLAS

5. The Consultation Group had before it correspondence from Chris Douglas relating to the Tall Ships 2025 event, which advised that the Taxi Industry was very keen to be proactively involved in ensuring the Local Authority's integrated transport strategy for the event was a success.

The Consultation Group heard from Chris, who explained that the taxi trade were reaching out to organisers and key stake holders on the run up to the event to ensure the taxi industry was considered as part of the planning process for transport related matters. He made reference to a timeline to highlight what they had done to date and sought discussion to see if there was anything more that could be done in the build-up.

During discussion, the following was noted:-

- that taxi trade members had been invited to a Project Team meeting on 12 June 2025 relating to the Tall Ships Event;
- that no new taxi ranks were proposed for the event, although access to Commerce Street would be provided for drop off/pick up at the harbour;
- that bus services would be running more frequently; and
- that ScotRail would be running extra carriages and would be relaxing permit provision for 4 days to access the station.

The Consultation Group resolved:-

- (i) to note that Vycki Ritson would liaise with the Tall Ships Event Project Group to obtain the Transport Management Plan for circulation to the taxi trade, including any previous notes/minutes of meetings and the possibility of providing Marshalls at the Railway Station; and

TAXI AND PRIVATE HIRE CAR CONSULTATION GROUP

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- (ii) to note that the Convener and Vice Convener would meet with relevant stake holders to progress any issues raised above relevant to the Tall Ships Event.

ENFORCEMENT OFFICER REPORT

6. The Consultation Group had before it a report by the Enforcement Officer and Civic Licensing Standards Officer in relation to general Taxi/Private Hire Car issues and information.

The report provided details of (a) the current numbers of licensed vehicles and drivers compared to August 2023; (b) street knowledge test statistics during the period 10 December 2024 to 8 April 2025; and (c) vehicles failing Hackney Tests.

Daniel Wright provided a summary of the report, making reference to the down take in drivers over 2 years, the rise of private hire vehicles and Airport Taxis and an improvement in the street knowledge test pass rate.

The Consultation Group resolved:-

- (i) to note that the next report would include details relating to the taxi school and the possibility of including statistics of applicants who frequently cancel the street knowledge test;
- (ii) to note that officers would explore options to increase the number of street knowledge tests undertaken each week, to include the utilisation of any cancellations; and
- (iii) that the pass rates from January 2025 be circulated to the taxi trade members.

UPDATED INSPECTION MANUAL - SANDY MUNRO

7. The Consultation Group had before it the updated Aberdeen City Council – Taxi/PHC Testing Manual for information.

Sandy Munro advised that the manual did not contain many changes, however it had been simplified for users.

During discussion, it was noted (1) that the content of the manual produced by the Licensing Team was taken from Government Guidance and other Local Authority areas; and (2) that the specification for wheelchair accessible taxi vehicles had been amended and re-circulated by email.

The Consultation Group resolved:-

- (i) to note that Sandy Munro would liaise with colleagues in Fleet Services to ensure that the reasons for vehicle test failures based on the manual would be included within their test certificate;

TAXI AND PRIVATE HIRE CAR CONSULTATION GROUP

30 April 2025

- (ii) to note that any technical concerns or issues regarding the manual should be discussed with Fleet Services; and
- (iii) to otherwise note the updated Testing Manual.

DATE OF NEXT MEETING - 24 SEPTEMBER 2025

8. The Consultation Group had before it a note of its next meeting date.

The Committee resolved:-

to note that the next meeting would be held at 10.00am on 24 September 2025, in the Town House.

- **COUNCILLOR GILL AL-SAMARAI, Chairperson.**

	A	B	C	D	E	F	G	H	I
1	LICENSING COMMITTEE BUSINESS PLANNER The Business Planner details the reports which have been instructed by the Committee as well as reports which the Functions expect to be submitting.								
2	Report Title	Minute Reference/Committee Decision or Purpose of Report	Update	Report Author	Chief Officer	Directorate	Terms of Reference Number	Delayed or Recommended for removal or transfer, enter either D, R, or T	Explanation if delayed, removed or transferred
3			27 August 2025						
4	Membership of the Taxi and Private Hire Car Consultation Group	to review and consider changes to the membership of the Taxi and Private Hire Car Consultation Group		Mark Msson	Governance	Corporate Services	Intro 3		
5	Sexual Entertainment Venue Policy Consultation 2025	To feed back the results of the formal consultation carried out in relation to the existing Sexual Entertainment Venue (SEV) Licensing Policy		Laura McGhee/Sandy Munro	Governance	Corporate Services	16.3		
6			8 October 2025						
7	No Reports scheduled at this time								
8			17 December 2025						
9	No Reports scheduled at this time								
10			TBC						
11	Taxi and Private Hire Driver Training	The Committee on 5/6/24 agreed to instruct the interim Chief Officer – Governance to submit a report to the Committee in due course following the completion of all necessary background works required to implement the program		Sandy Munro	Governance	Corporate Services	16.3		
12	Second Hand Dealer's Licence Resolution	to review existing resolution and determine if a review exercise is required	On 26/8/24 the Committee were advised that the report was delayed due to a transitional period for consultation exercise providers	Sandy Munro	Governance	Corporate Services	16.3		

	A	B	C	D	E	F	G	H	I
	Report Title	Minute Reference/Committee Decision or Purpose of Report	Update	Report Author	Chief Officer	Directorate	Terms of Reference Number	Delayed or Recommended for removal or transfer, enter either D, R, or T	Explanation if delayed, removed or transferred
2	Public Entertainment Licensing Resolution	to consider the results of the review of Public Entertainment Licensing Resolution	On 26/8/24 the Committee were advised that the report was delayed due to a transitional period for consultation exercise providers	Sandy Munro	Governance	Corporate Services	16.3		
13	Street Trader's Licence Policy	to review existing policy and determine if a review exercise is required	On 4/12/14 the Committee were advised that the report was delayed due to a transitional period for consultation exercise providers	Sandy Munro	Governance	Corporate Services	16.3		
14									

ABERDEEN CITY COUNCIL

COMMITTEE	Licensing Committee
DATE	27 August 2025
EXEMPT	No
CONFIDENTIAL	No
REPORT TITLE	Membership of the Taxi and Private Hire Car Consultation Group.
REPORT NUMBER	CORS/25/123
DIRECTOR	Andy MacDonald
CHIEF OFFICER	Jenni Lawson
REPORT AUTHOR	Mark Masson
TERMS OF REFERENCE	Introduction 3

1. PURPOSE OF REPORT

- 1.1 The purpose of this report is to consider changes to the membership of the Taxi and Private Hire Car Consultation Group (T&PHCCG).

2. RECOMMENDATIONS

That the Committee:-

- 2.1 approve the amendments to the membership of the Taxi and Private Hire Car Consultation Group as outlined in section 3.16 of this report; and
- 2.2 review the membership of the Consultation Group in 12 months' time.

3. CURRENT SITUATION

- 3.1 The T&PHCCG is a discussion group of the Licensing Committee and currently consists of the following:-
- 5 Elected members;
 - 1 representing Aberdeen International Airport Drivers;
 - 1 representing Aberdeen Rail Taxi Drivers;
 - 1 representing Disability Equity Partnership;
 - 2 representing Independent Drivers;
 - 1 representing Licensed Taxi Booking Offices;
 - 1 representing Private Hire Trade;
 - 1 representing Unite Union; and
 - 1 representing GMB Union.
- 3.2 Additional attendees include the Council's Enforcement Officer(s), the Fleet Services Manager, a legal adviser representing the licensing function and a representative from Police Scotland. Other relevant representatives and officers are invited to attend meetings on an ad hoc basis.

- 3.3 Taxi trade members must represent a specific and recognised interest group. It is understood that the representatives will report to their members after meetings.
- 3.4 The group acts without any powers but discusses matters of relevance to the taxi trade at the discretion of the Convener and makes recommendations to the Licensing Committee as appropriate.
- 3.5 Matters of relevance includes all matters relevant to the taxi trade in Aberdeen that are within the remit of the Licensing Committee.
- 3.6 Members may recall that a report was considered by the Committee on 9 October 2024, which sought consideration of possible changes to the membership and remit of the Taxi and Private Hire Car Consultation Group.
- 3.7 The Committee agreed (1) to approve the Taxi and Private Hire Car Consultation Group membership in accordance with the proposed composition at 3.14 of the report; (2) to reduce the number of meetings to three per annum, commencing 2025, noting that there was scope to arrange Special meetings for specific and/or urgent items as indicated in section 3.8 of the report; (3) to approve the updated remit of the Taxi and Private Hire Car Consultation Group, including the process for removing non attendees outlined in 3.11 of the report; (4) to delete the 'Independent Driver' vacancy on the Consultation Group, noting that the position had been vacant for a number of years; and (5) to take no action in relation to increasing the Taxi Trade representation on the Taxi and Private Hire Car Consultation Group.
- 3.8 Currently there are eight Licensed Taxi Booking Offices in Aberdeen, which are:-
- Rainbow City Taxis;
 - Aberdeen Taxis;
 - Aberdeen International Airport;
 - ComCab;
 - Central Taxis (Aberdeen) Ltd;
 - Leadryde Technology Ltd;
 - Chariots Private Hire (Scotland) Ltd; and
 - Uber.
- 3.9 There was an expression of interest from a ComCab representative to join the membership as a Disability Liaison representative, however the Group was covered in that respect by the Disability Equity Partnership representative so that request was declined by the Committee.
- 3.10 A further request was more recently received from an Uber representative, advising that they did not feel that they were being represented at the Consultation Group meetings sufficiently/effectively and were not receiving any correspondence from the Licensed Taxi Booking Office Group representative.

- 3.11 Given these membership requests, Emails were sent out by the Licensing Team to gauge interest from booking offices for membership to the Taxi and Private Hire Consultation group on 30 April 2025. Representatives from Central Taxis (Aberdeen), Chariots Private Hire, ComCab, Leadryde, and Uber were contacted to register their interest, as they did not currently have representatives on the Taxi and Private Hire Consultation Group.
- 3.12 The Licensing Team received responses from Chariots Private Hire, Comcab, Leadryde, and Uber to say that their booking office would be interested in membership to the group. However, a response was never received from Central Taxis (Aberdeen)
- 3.13 It is worth noting that a driver from Aberdeen International Airport had approached Council officers explaining that their drivers were not being represented by the Aberdeen International Airport Taxi Booking Office representative on the Taxi and Private Hire Care Consultation Group and sought the means in which they could be better represented. In January 2025 the Licensing Team held a vote between an Aberdeen International Airport Driver and a representative from the Licensed Taxi Booking Office at the Airport in order to identify a suitable person to represent the drivers who operate from the Airport. The vote was unanimously in favour of the Airport Driver representative, who has been attending meetings of the Consultation Group since.
- 3.14 Aberdeen International Airport had since written to the Clerk and Licensing Committee Convener expressing their disappointment at the decision to remove the Aberdeen International Airport Booking Office from the Consultation Group and requested that their Taxi Manager be reinstated as a member representative on the Group.
- 3.15 Members of the Committee should consider whether to amend the membership of the T&PHCCG, to include representation from Licensed Taxi Booking Offices including Aberdeen International Airport, in order that they can consider taxi trade licensing matters relevant to them and/or their drivers.
- 3.16 In order to facilitate this, members should consider the following amendments:-
- delete reference that there would only be one representative for all 'Licensed Taxi Booking Offices' – currently Rainbow City Taxis representative;
 - delete reference to 'Private Hire Trade' – currently Aberdeen Taxis representative; and
 - include one representative from each of the following Booking offices:- Rainbow City Taxis, Aberdeen Taxis, Chariots Private Hire, ComCab, Leadryde, Aberdeen International Airport and Uber.

This would allow all Licensed Taxi Booking Offices who had expressed an interest to be represented on the T&PHCCG.

- 3.17 If agreed the membership of the T&PHCCG would be as follows:-
- 5 Elected members;
 - 1 representing Aberdeen Airport Drivers;

- 1 representing Aberdeen International Airport (booking office)
- 1 representing Rainbow City Taxis;
- 1 representing Aberdeen Taxis;
- 1 representing Chariots Private Hire;
- 1 representing ComCab;
- 1 representing Leadryde;
- 1 representing Uber;
- 1 representing Aberdeen Rail Taxi Drivers;
- 1 representing Disability Equity Partnership;
- 2 representing Independent Drivers;
- 1 representing Unite Union; and
- 1 representing GMB Union.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no direct financial implications from the recommendations of this report.

5. LEGAL IMPLICATIONS

- 5.1 There are no direct legal implications arising from the recommendations of this report.

6. ENVIRONMENTAL IMPLICATIONS

- 6.1 There are no environmental implications arising from the recommendations of this report.

7. MANAGEMENT OF RISK

Category	Risk	Low (L) Medium (M) High (H)	Mitigation	*Does Target Risk Level Match Appetite Set?
Strategic Risk	N/A			Yes
Compliance	N/A			Yes
Operational	N/A			Yes
Financial	N/A			Yes
Reputational	N/A			Yes
Environment / Climate	N/A			Yes

8. OUTCOMES

- 8.1 There are no links to the Council Delivery Plan.

9. IMPACT ASSESSMENTS

Assessment	Outcome
Impact Assessment	Impact assessment completed previously, no changes required.
Data Protection Impact Assessment	Not required

10. BACKGROUND PAPERS

10.1 None.

11. APPENDICES

11.1 None.

12. REPORT AUTHOR CONTACT DETAILS

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ABERDEEN CITY COUNCIL

COMMITTEE	Licensing Committee
DATE	27 th August 2025
EXEMPT	No
CONFIDENTIAL	No
REPORT TITLE	Sexual Entertainment Venue Policy Consultation 2025
REPORT NUMBER	CORS/25/204
EXECUTIVE DIRECTOR	Andy MacDonald
CHIEF OFFICER	Jenni Lawson
REPORT AUTHOR	Laura McGhee/Sandy Munro
TERMS OF REFERENCE	16.3

1. PURPOSE OF REPORT

- 1.1 To feed back the results of the formal consultation carried out in relation to the existing Sexual Entertainment Venue (SEV) Licensing Policy.

2. RECOMMENDATIONS

That the Committee:-

- 2.1 consider the results of the public consultation, which closed on Commonplace on 31st July 2025;
- 2.2 determine the appropriate upper limit for the number of Sexual Entertainment Venues for Aberdeen city centre;
- 2.3 determine the appropriate upper limit for the number of Sexual Entertainment Venues located outwith Aberdeen city centre (but within the Local Authority area); and
- 2.4 determine whether the Committee would like to make any appropriate changes to the existing Sexual Entertainment Venue Licensing Policy and standard conditions attached to Sexual Entertainment Venue Licences in light of the consultation responses, and if so, instruct the Chief Officer – Governance to make the appropriate changes and report a further draft of the policy and standard conditions attached to Sexual Entertainment Venue Licences back to Committee for approval in due course.

3. CURRENT SITUATION

- 3.1 The current Sexual Entertainment Venue Licensing Policy is attached as Appendix 1.

- 3.2 The Committee resolved on 3rd December 2019 to licence SEVs, with the policy statement being approved on 14th December 2021 and coming into effect on 1st March 2022.
- 3.3 Members resolved to carry out a formal review of the existing policy at the meeting of 14th May 2025 to establish whether the policy remains fit for purpose and to ensure details such as the numerical limit of premises remains at the appropriate level.
- 3.4 A formal consultation was launched on Commonplace on 24th June 2025 and closed on 31st July 2025 to seek views on a number of points including what the appropriate number of Sexual Entertainment Venues in the city centre should be, whether the number of Sexual Entertainment Venues outwith the city centre should remain at zero, whether people have noticed any impact on the community from the introduction of the licensing of Sexual Entertainment Venues, and whether people have any comments on any aspect of the existing Sexual Entertainment Venue Licensing Policy or the existing conditions attached to Sexual Entertainment Venue Licences. The full list of consultation questions is set out at Appendix 2. The consultation link was sent to current licence holders, Violence against Women and Girls Partnership and other key stakeholders and was advertised on the Council's website, as well as promoted on the Council's social media channels.
- 3.5 Approximately 188 responses were received.
- 3.6 The first question of the consultation asked what the appropriate number of Sexual Entertainment Venues in Aberdeen city centre should be. Some of the responses are as follows:-
- 1 venue – around 11 responses;
 - 2 venues – around 6 responses;
 - 3 venues – around 6 responses;
 - 4 venues – around 24 responses;
 - 5 venues – around 7 responses;
 - 6 venues – around 38 responses;
 - Other – around 87 responses.
- A chart showing the split of responses is attached as Appendix 3.
- 3.7 If persons responding to the consultation wished to suggest a number of venues falling outwith the options of 1-6, they were asked to select “other” and provide their alternative suggestions. Around 58 people suggested that the appropriate number of Sexual Entertainment Venues in the city centre should be zero. There were around 6 people who suggested that there should be more than 6 venues. There were also a number of people who selected “other” and provided comments suggesting that there should be as many venues as is commercially viable, or as many as there is demand for. People also commented that there should be no cap on the number of venues.
- 3.8 It was asked at question 3 whether the number of Sexual Entertainment Venues outwith the city centre should remain at zero. Around 123 people suggested

yes, and around 61 people suggested no. A chart showing the split of responses is attached as Appendix 4. It was asked if the response is “no” to explain why, and there were a number of people who suggested that if there is demand for these outwith the city centre, why shouldn’t there be such venues. There were also comments suggesting that Policing, CCTV, and lighting can be provided anywhere, so there is no real reason for these venues being city centre only. People also suggested that these types of venues could be in more isolated/rural areas. Further, people suggested that there should be a wider distribution of facilities across the city to enable people to attend without having to travel to the centre. Additionally, there was further suggestion that these types of venues should be accessible to everyone.

- 3.9 It was asked at question 5 whether people have noticed any impact on the community from the introduction of the licensing of Sexual Entertainment venues. Around 137 people suggested no, and around 42 people suggested yes. Again, a chart showing the split of responses is attached as Appendix 5. If people suggested “yes” they were asked to explain what the impact has been. A number of responses indicated that the licensing of such venues puts women at risk and creates the feeling of being unsafe around these venues. There were also comments suggesting that these venues damage community image and normalise unhealthy attitudes of disrespect and violence, as well as objectifying women.
- 3.10 In relation to the consultation question asking whether people have any comments on any aspect of the existing Sexual Entertainment Venue Licensing Policy (question 7), the responses were wide ranging. Some comments again suggest that the policy promotes a derogatory view of women (although it is believed this relates to the licensing of Sexual Entertainment Venues in general, rather than the policy itself), and that the Licensing Committee should reconsider allowing the licensing of Sexual Entertainment Venues at all. There are further comments which suggest such venues undermine community safety, dignity and the city’s image, and create environments where exploitation and violence can thrive. Others have commented that people performing in these venues are reliant on their jobs, and protections for workers are key to the policy. There is suggestion that the rights of the LGBT+ community should be protected as best as possible in the policy, as well as reference to the Transgender and Non-Binary community currently being overlooked. Additionally, there is a suggestion that there should be safeguarding against human trafficking in these venues with a proposed requirement to have regular inspections at each of the premises and for processes to be put in place to ensure human trafficking is not taking place. Further, there is concern around the age limit of performers, which is suggested should be 21 rather than 18.
- 3.11 At question 8 of the consultation, people were asked whether they have any comments on the standard conditions attached to Sexual Entertainment Venue Licences. There were a couple of comments which indicated that the existing conditions are appropriate and appear satisfactory. However, there are suggestions that there should be a minimum of two members of security staff per 10 entertainers for safety reasons, and there should be a limitation on the number of people permitted to attend the premises at any one time. It has been raised that the information provided to performers should be in their native

language, and that a list of performers should be required as performers are hired and updated as required. It is also suggested that there should be members of security staff at the doors to the premises at all times checking the age of customers. Additionally, it is suggested that the policy can go further to make conditions for workers safer and to ensure that the facilities for the LGBT+ community are equal.

- 3.12 Lastly, in relation to the consultation question asking whether people would like to make any other comments in relation to the existing Sexual entertainment Venue Licensing Policy (question 9), there are a number of comments which take a moral stance on the subject. The existing policy makes it clear from the outset that the Committee does not take a moral stance on SEVs in adopting the policy, rather the role of the Committee is to regulate such venues in accordance with the law. Beyond this, there are comments which suggest that those not operating as a Sexual Entertainment Venue should not be licensed. Further, there are comments which recommend that disability inclusion training should be given to all staff and performers. Additionally, there are comments which indicate that as many performers and staff should be involved with the review as possible. As mentioned above, the consultation link was sent to current licence holders, Violence against Women and Girls Partnership and other key stakeholders, and was advertised on the Council's website and social media channels with a view to seeking as many responses as possible, and for the consultation to reach as many people as possible. There is also a suggestion that there needs to be regular welfare checks on performers at these venues by either Police Scotland or Social Work.
- 3.13 A full list of responses can be accessed at Appendix 6.
- 3.14 A response from an NHS Consultant in Public Health and Organisational Lead for Gender-Based Violence is also attached as Appendix 7. This response was submitted by email rather than through the consultation platform as the NHS Consultant wanted to provide broader context and evidence to the response provided. It is confirmed, however, that the response was provided within the timescales of the consultation being live.
- 3.15 Similarly a response was received from the Violence Against Women and Girls Partnership (VAWGP) and is attached in full as Appendix 8.
- 3.16 Accordingly, in light of the above, and given the wide range of responses, it is believed that a compromise position could be to reduce the upper limit for the number of Sexual Entertainment Venues for Aberdeen city centre from six premises to four premises, with scope to further review this at a future date. This would be more in line with the upper limits for other city centres such as Edinburgh, where the limit is currently three.
- 3.17 Additionally, as the majority of people suggested the upper limit for the number of Sexual Entertainment Venues located outwith Aberdeen city centre (but within the Local Authority Area) remains at zero, the Committee may wish to consider whether the existing policy should remain unchanged on this point.

- 3.18 It is suggested not to make any amendments to the existing Sexual Entertainment Venue Licensing Policy (with the exception of any change to the upper limit of the number of SEVs in each Relevant Locality) or the standard conditions attached to Sexual Entertainment Venue Licences at this time. Firstly, a number of people who contributed to the consultation have taken a moral stance on the licensing of Sexual Entertainment Venues which is reflective in their comments. As set out previously, the existing policy makes it clear from the outset that the Committee does not take a moral stance on SEVs in adopting the policy, rather the role of the Committee is to regulate such venues in accordance with the law. Secondly, the policy should identify the Committee's approach to the regulation of SEVs and the processes to be followed relating to applications for licences of this kind. The policy provides guidance for potential applicants, existing licence holders and members of the public on the licensing of SEVs, and some of the suggestions received through the consultation go beyond what might be covered by the remit of the Committee, and other suggestions would be a matter for Licence Holders to consider when adopting their own venue's procedures. However, the Committee will require to consider whether they wish to make any appropriate changes to the existing Sexual Entertainment Venue Licensing Policy and the standard conditions attached to Sexual Entertainment Venue Licences in light of the consultation responses. If so, officers would require to make the appropriate changes and arrange for a revised version of the policy and standard conditions attached to Sexual Entertainment Venue Licences to be reported back to Committee for approval in due course. It is advisable that there should be scope for further review at a later date.

4. FINANCIAL IMPLICATIONS

- 4.1 Where a Council resolves to licence SEVs, licence fees must be set to comply with the Civic Government (Scotland) Act 1982. Aberdeen City Council's current licence fees for SEVs are £441 for the original licence, and £276 for a licence renewal.
- 4.2 A reduction in the upper limit of the number of Sexual Entertainment venues for Aberdeen city centre would result in a very small reduction in licensing fee income, and may result in two vacant premises in the city centre. However, as was specified in our report to committee which took place on 14th May 2025, there is a suggestion that of the six licensed Sexual Entertainment Venues in Aberdeen city centre, at least one of the premises is believed not to be currently operating as an SEV, and another of the premises is currently up for sale.

5. LEGAL IMPLICATIONS

- 5.1 The current Sexual Entertainment Venue licence for each of the licensed premises in Aberdeen city centre is due for renewal. Accordingly, a decision will require to be made on the upper limit of Sexual Entertainment Venues located in the city centre before any renewal applications can be considered.

6. ENVIRONMENTAL IMPLICATIONS

6.1 There are no direct environmental implications arising from the recommendations of this report.

7. RISK

Category	Risks	Primary Controls/Control Actions to achieve Target Risk Level	*Target Risk Level (L, M or H) *taking into account controls/control actions	*Does Target Risk Level Match Appetite Set?
Strategic Risk	No significant risks identified.	N/A	N/A	Yes
Compliance	No significant risks identified.	N/A	N/A	Yes
Operational	The current Sexual Entertainment Venue licence for each of the licensed premises in Aberdeen city centre is due for renewal. Accordingly, a decision will require to be made on the upper limit of Sexual Entertainment Venues located in the city centre before any renewal applications can be considered.	Determine the appropriate upper limit for the number of Sexual Entertainment Venues for Aberdeen city centre.	M	Yes
Financial	A reduction in the upper limit of the number of Sexual	Determine the appropriate upper limit for the number of Sexual Entertainment Venues for Aberdeen	L	Yes

	Entertainment Venues in Aberdeen city centre would result in a very small reduction in licensing fee income in future years.	city centre, with scope for further review at a later date.		
Reputational	<p>Reducing the upper limit of the number of Sexual Entertainment Venues in Aberdeen city centre may cause upset to business owners, in particular. However, it is deemed that the risk is relatively low given one of the premises is believed not to be operating as an SEV currently, and another of the premises is currently up for sale.</p> <p>There may be wider upset amongst the citizens in Aberdeen if the upper limit of the number of Sexual Entertainment Venues for Aberdeen city centre remains at</p>	Determine the appropriate upper limit for the number of Sexual Entertainment Venues for Aberdeen city centre and outwith Aberdeen city Centre, with scope for further review at a later date.	M	Yes

	six, as although there are mixed views on the subject, the consultation has demonstrated that a significant number of respondents do not wish the upper limit to remain at 6.			
Environment / Climate	No significant risks identified.	N/A	N/A	Yes

8. OUTCOMES

<u>COUNCIL DELIVERY PLAN 2025-26</u>	
	Impact of Report
Aberdeen City Council Policy Statement <u>Working in Partnership for Aberdeen</u>	No significant impact from the recommendations in this report.
<u>Local Outcome Improvement Plan 2016-2026</u>	
Prosperous Economy Stretch Outcomes	No significant impact from the recommendations in this report.
Prosperous People Stretch Outcomes	No significant impact from the recommendations in this report.
Prosperous Place Stretch Outcomes	No significant impact from the recommendations in this report.
Community Empowerment Stretch Outcomes	No significant impact from the recommendations in this report.
Regional and City Strategies	No significant impact from the recommendations in this report.

9. IMPACT ASSESSMENTS

Assessment	Outcome
Integrated Impact Assessment	A new Integrated Impact Assessment has been completed.
Data Protection Impact Assessment	Not required.
Other	N/A

10. BACKGROUND PAPERS

10.1 None.

11. APPENDICES

- 11.1 Appendix 1 – Current Sexual Entertainment Venue Licensing Policy
- 11.2 Appendix 2 – Consultation questions
- 11.3 Appendix 3 – Chart of responses to Q1
- 11.4 Appendix 4 – Chart of responses to Q3
- 11.5 Appendix 5 – Chart of responses to Q5
- 11.6 Appendix 6 – Full list of consultation responses
- 11.7 Appendix 7 – NHS response
- 11.8 Appendix 8 – VAWGP response

12. REPORT AUTHOR CONTACT DETAILS

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Sexual Entertainment Venue Licensing Policy

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1. Definitions

“1982 Act” means the Civic Government (Scotland) Act 1982;

“Building Standards” means the Council’s building standards and team;

“CCTV” means closed circuit television;

“Civic Licensing Standards Officer” as defined in section 45G of the 1982 Act;

“Councillors Code of Conduct” means the code of conduct published by the Standard Commission for Scotland;

“Aberdeen City Council”, “the Council” or “Local Authority” means Aberdeen City Council, a Local Authority in terms of the Local Government (Scotland) Act 1994 having its principal place of business at Marischal College, Broad Street, Aberdeen, AB10 1AB;

“Information Commissioner’s Office” means the Information Commissioner’s Office having its head office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF;

“Licensing Committee” or “Committee” means Aberdeen City Council’s licensing committee;

“Regulations” means the UK General Data Protection Regulation (EU 2016/679) and any such amendments;

“Scottish Fire and Rescue Services” is a body corporate established under the Police and Fire Reform (Scotland) Act 2012 and having its registered headquarters at Westburn Drive, Cambuslang, G72 7NA;

“Scottish Government’s Equally Safe Strategy” means Scotland’s strategy for preventing and eradicating violence against women and girls;

“Sex Shop” has the meaning given under Schedule 2 of the 1982 Act;

“SEVs” means sexual entertainment venue

“S.I.A” means Security Industry Authority;

“Sexual Entertainment Venue Policy” or “Policy” means the Licensing Committee’s sexual entertainment policy as required under Schedule 2 of the 1982 Act;

“Standards Commission for Scotland” means the Standards Commission for Scotland having its registered address at Scottish Parliament, Edinburgh, EH99 1SP;

“Performer” means a person who provides sexual entertainment within a venue;

“Police Scotland” means the police service of Scotland having its headquarters at Tulliallan Castle, Kincardine.

2. Introduction

Under section 45C of the 1982 Act the Local Authority is required to produce a Sexual Entertainment Venue Policy where it has passed a resolution to licence SEVs. The Licensing Committee's Policy identifies the Committee's approach to the regulation of SEVs and the processes to be followed relating to applications for licences of this kind. This Policy provides guidance for potential applicants, existing licence holders and members of the public on the licensing of SEVs.

It must be made clear from the outset that the Committee does not take a moral stance on SEVs in adopting this Policy. It is the Committee's role to regulate such venues in accordance with the law. It should be noted that the definition of a SEV is defined in law and not by the Committee. The 1982 Act defines a SEV at section 45A (2) as any premises at which sexual entertainment is provided before a live audience for (or with a view to) the financial gain of the organiser.

This definition is extremely complex and at sections 45A (3) and (4) of the 1982 Act it provides that for the purposes of the definition of a SEV, the following further definitions apply:

A "Sexual Entertainment Venue" (SEV) means: "Premises" *'includes any building, vehicle, vessel or stall, but not a private dwelling to which the public is not admitted'*.(Section 45A(3)(b) of the Act)

The following premises are sexual entertainment venues: *'any premises at which sexual entertainment is provided before a live audience for (or with the view to) the financial gain of the organiser.'* (Section 45A(2) of the Act)

- (a) "Sexual Entertainment"
- (b) "Display of Nudity"
- (c) "Audience"
- (d) "Organiser"
- (e) "Financial Gain"

The following premises are not sexual entertainment venues:

- a) Sex shops and sex cinemas (which are separately defined in Schedule 2 of the 1982 Act)
- b) Premises which provide relevant entertainment on an infrequent basis, further explained in Appendix 2 under "Occasional Use".

‘audience’ includes an audience of one;

‘financial gain’ includes financial gain arising directly or indirectly from the provision of sexual entertainment;

‘organiser’ means either the person who is responsible for the management of the premises or the organisation or management of the sexual entertainment or where that person exercises that responsibility on behalf of another person (whether by virtue of a contract of employment or otherwise), that other person;

‘premises’ includes any vehicle, vessel or stall but does not include any private dwelling to which the public is not admitted;

‘sexual entertainment’ means any live performance or any live display of nudity which is of such a nature, ignoring financial gain, must be reasonably assumed to be provided solely or principally for the purpose of sexually stimulating any member of the audience; and

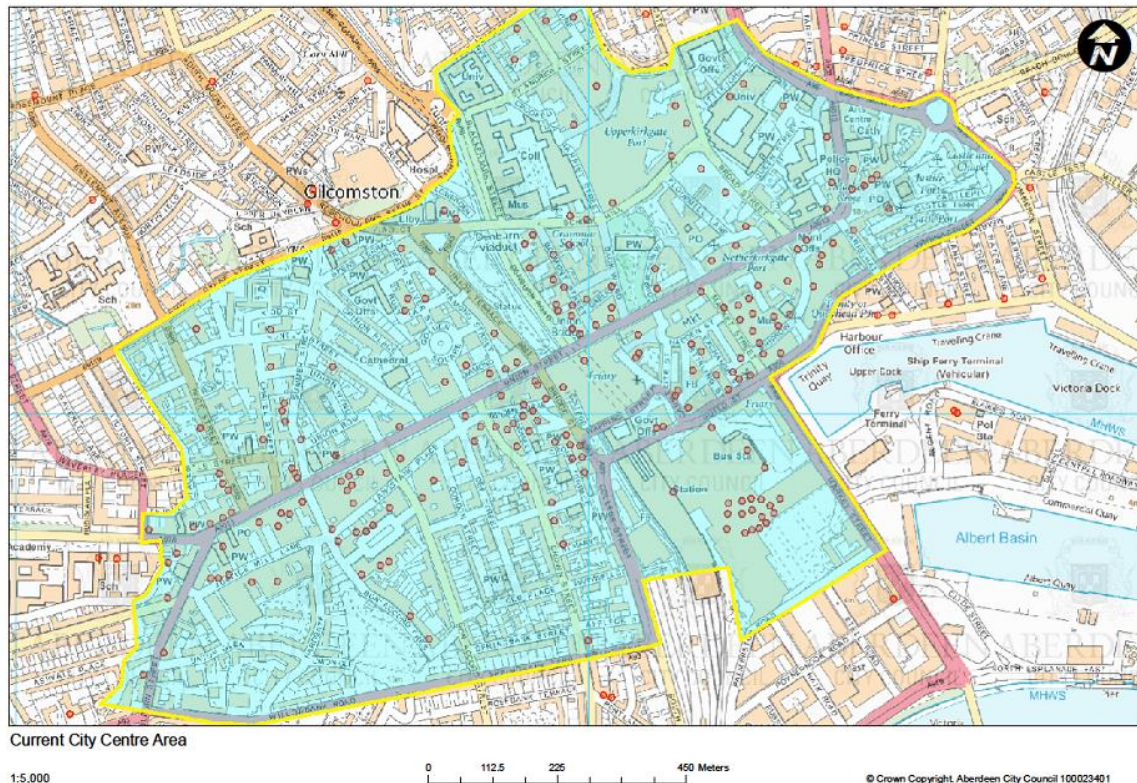
“display of nudity” means: in the case of a woman, the showing of (to any extent and by any means) her nipples, pubic area, genitals or anus; and, in the case of a man, the showing of (to any extent and by any means) his pubic area, genitals and anus.

3. Locality

The Committee considers that the character of the relevant locality, the use to which premises in the vicinity are put, and the layout, character or condition of the venue in respect of which the application is made, are relevant considerations when determining the grant of a SEV licence.

- (a) With reference to paragraph 9(7) of Schedule 2 of the 1982 Act, “relevant locality” means: a. In relation to the premises, the locality where they are situated;
- (b) In relation to a vehicle, vessel or stall, any locality where it is desired to use it as a SEV.

The Committee have decided that there are two localities. The first locality is the City Centre highlighted in blue in the map below and the second locality is Outwith City Centre, comprising all areas outwith the city centre boundary but within the Local Authority area.



Appropriate Number of SEVs in a Relevant Locality

As set out within paragraph 9(5)(c) of Schedule 2 of the 1982 Act, the Council may refuse an application for a SEV if it is satisfied that the number of SEVs in the relevant locality at the time the particular application is made is equal to or exceeds the number which the local authority consider is appropriate for that locality. The Committee can determine that the appropriate number for a locality is nil.

The Committee considers the appropriate upper limit for the City Centre Locality to be six premises.

The Committee considers the appropriate upper limit for the Outwith City Centre Locality to be zero premises.

Character & Vicinity of Relevant Locality

In considering whether the granting, renewal or variation of the licence would be inappropriate given the vicinity in which the SEV premises operates, the Committee shall consider the existing character and function of the area. Due regard will be given to the following:

- (a) Whether the premises are situated in a residential area
- (b) Whether there are any schools and other places of education near the vicinity of the premises

- (c) Whether there are any places of worship in that vicinity
- (d) Whether there are other relevant businesses or charities operating in the area
e.g. homelessness shelters, women's refuges, supported accommodation, recovery units
- (e) Whether there are certain landmarks or facilities in the vicinity (e.g. historic buildings, sports facilities, cultural facilities, family leisure facilities, play areas or parks, youth facilities, retail shopping areas, and places used for celebration or commemoration)
- (f) Whether there have been incidents involving anti-social behaviour, sexual assaults or more minor harassment reported in that area
- (g) Whether there have been incidents of human trafficking or exploitation in that area

The Committee will consider relevant locality on a case by case basis, taking into account the particular circumstances of each application.

Suitability of Premises

Under the 1982 Act the Committee has the discretion to refuse applications relating to SEVs if it is considered that the granting or renewal of the licence would be unsuitable, having regard to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.

It is expected that when an application for a SEV licence is made, that the applicant will be able to demonstrate that the immediate vicinity, layout, character and/or condition of the premises is appropriate to the relevant entertainment proposed at the premises.

The Sensitive Premises Presumption

The presumption of refusal will be regarded as being enhanced if the proposed SEV is within 750 metres of the following Sensitive Premises:

- 1) schools, play areas, nurseries, parks, swimming pools and other sports facilities
- 2) cinemas, theatres and concert halls
- 3) libraries and museums
- 4) premises likely to be frequented by people under 18 or families
- 5) public buildings including Council offices
- 6) retail shopping areas
- 7) residential areas (including care and nursing homes and other elderly accommodation)
- 8) places of worship, celebration or commemoration
- 9) community centres
- 10) services (including businesses and charities) focussed on supporting women, children and young people, such as women's refuges

- 11) services (including businesses and charities) focussed on supporting homeless people, people with substance abuse issues, mental health issues, or other vulnerable people
- 12) historic buildings or tourist attractions
- 13) roads, footpaths and other access routes to any of the above
- 14) medical centres (including hospitals and GP surgeries)

In determining whether or not the Sensitive Premises Presumption applies, the Council will also have regard to:

- (a) Whether any SEVs are already operating, or have operated, in the Relevant Locality (whether under a SEV Licence, under the 'Occasional Exemption', or with a Waiver);
- (b) Whether there have been reports to the Police or Home Office of incidents within the Relevant Locality (whether or not leading to prosecution or conviction) of human trafficking or exploitation, or breaches of immigration laws by the Applicant or anyone else concerned with the proposed SEV;
- (c) Whether there have been reports to the Police of incidents within 50 metres of the proposed SEV (whether or not leading to prosecution or conviction) of crime (including sexual assaults or minor harassment) or anti-social behaviour;
- (d) The existing character and function of the area in which the SEV is to be located; and
- (e) The views of residents and other relevant interested persons as far as is possible.

The Sensitive Premises Presumption is a rebuttable presumption. Each application will be determined on its own merits.

4. Preventing Nuisance, Crime and Disorder

The Licensing Committee is committed to improving the quality of life for the people of the City by adopting and enforcing policies designed to increase community safety and reduce threats of nuisance, crime and disorder.

In terms of this licensing objective the Committee considers there to be a number of relevant factors, including but not limited to:

- Illegal substances
- Violent behaviour
- Anti- social behaviour
- Vulnerability
- Noise nuisance
- Human trafficking

In order to combat the risks, the Committee will seek to operate a partnership approach with licence holders, applicants and partner agencies such as in particular, Police Scotland and Environmental Health:

What the Committee will do:

- Apply appropriate conditions to licences to mitigate potential nuisance, crime or disorder.
- Ensure all policies are kept up to date and fit for purpose
- Work closely with all stakeholders to ensure all relevant information is kept up to date and accessible
- Endorse initiatives designed to prevent nuisance, crime and disorder
- Consider the review of licences where a breach of the licensing objective cannot be rectified by other means

What the Committee will expect of Licence Holders:

- Effective and responsible management of premises including evidence of written procedures for preventing and managing incidents
- Up to date training and supervision of staff
- Provision of effective CCTV in and around premises
- Provision of external lighting and security measures
- Co-operation with police and Civic Licensing Officers
- Accurate and up to date record keeping
- Adequate control of entry and exit of the premises
- Supervision of anyone outside, such as smokers or those queuing to enter

What the Committee will expect of Partner Agencies

- Provision of all relevant up to date information as the Committee requires
- Involvement in mediation/intervention procedures to rectify any problem areas
- Involvement in Licence Review as a last resort

5. Securing Public Safety

The Licensing Committee is committed to ensuring the safety of persons within licensed premises as well as those in the surrounding area.

When considering this Licensing Objective, a number of factors should be considered including, but not limited to:

- Layout and maintenance of premises
- Disabled access and facilities
- Vulnerability of patrons and staff

Again, the Committee will look to operate a partnership approach with all stakeholders in order to ensure that public safety is not compromised by the operation of licensed premises.

What the Committee will do:

- Promote education and awareness of potential risks
- Apply additional licence conditions where appropriate for the purposes of this licensing objective
- Facilitate effective communication between all relevant parties
- Disseminate relevant information from partner agencies as widely as possible
- Review licences as a last resort

What the Committee will expect of Licence Holders/Applicants

- Appropriate layout of premises
- High standards of maintenance of premises
- Functioning CCTV systems of the required specification
- Accurate disability access statements
- Clear and accurate signage in and around premises
- Designation of a “safe space” within the premises in which vulnerable persons can be provided with assistance
- Regular maintenance and testing of security and operating systems
- Clear policies on conduct of staff, performers and customers

What the Committee will expect of partner Agencies

- Co-operative approach
- Effective communication and the sharing of up to date relevant information
- Involvement in a licence review as a last resort

6. Protecting Children and Young People from Harm

The Committee considers SEVs could potentially expose children and young people to harm as a result of them coming into contact with activities intended for adults only if not properly regulated.

What the Committee will do:

- Promote education and awareness of potential risks
- Apply additional licence conditions where appropriate for the purposes of this licensing objective
- Facilitate effective communication between all relevant parties
- Disseminate relevant information from partner agencies as widely as possible
- Review licences as a last resort

What the Committee will expect of Licence Holders/Applicants

- Robust policies on age verification
- Discrete exterior to premises
- Accurate record keeping for staff and performers

What the Committee will expect of partner Agencies

- Co-operative approach
- Effective communication and the sharing of up to date relevant information
- Involvement in a licence review as a last resort

7. Reducing Violence against women

Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls was first published by the Scottish Government in 2014 and updated in 2016 and 2018. It sets out a definition of violence against women and girls which includes 'commercial sexual exploitation, including prostitution, lap dancing, stripping, pornography and human trafficking'. Whilst recognising the conflict between this definition and the licensing of SEV, the Scottish Government seeks to ensure that such activities take place in safe and regulated environments. As detailed under the Securing Public Safety objective, the Committee is committed to taking appropriate and necessary action where the safety of customers visiting and staff and performers working in licensed SEVs has been compromised. However, it remains primarily the responsibility of the SEV licence holder to provide a safe and secure environment for members of staff, performers and the public.

What the Committee will do:

- Scrutinise applications to ensure an applicant is fit and proper to hold the licence
- Promote education and awareness of potential risks
- Apply additional licence conditions where appropriate for the purposes of this licensing objective
- Facilitate effective communication between all relevant parties
- Disseminate relevant information from partner agencies as widely as possible
- Review licences as a last resort

What the Committee will expect of Licence Holders/Applicants

- Robust policies to mitigate against any violence, physical or emotional, against women occurring in the venue
- Clear signage as to required conduct of customers
- Adequate procedures to resolve any incidents which may result in violence against women
- Suitable working conditions for any women employed or performing within the premises

What the Board will expect of partner Agencies

- Co-operative approach
- Effective communication and the sharing of up to date relevant information
- Involvement in a licence review as a last resort

8. Waivers

The Committee can grant a Waiver if they consider that to require a Licence would be unreasonable or inappropriate. The Committee will take into account:

- Any objections or representations
- This Licensing Policy Statement
- Scottish Government Guidance
- Any other relevant considerations.

The Committee will consider each Application on its own merits but is of the opinion that waivers will only be granted in exceptional circumstances.

9. Occasional Use (“The 4 in a year Exemption”)

Premises can be used for Sexual Entertainment for a proposed event, such as a Stag or Hen Party involving a Stripper, if the Premises have not been used for Sexual Entertainment on more than 3 previous occasions in the past 12 months.

Each occasion can last no more than 24 hours. If Premises operate as a Sexual Entertainment Venue for more than a 24 hour period, each period of 24 hours (and any part of a period of 24 hours) is to be treated as a separate occasion.

The rule applies to a rolling year, not the calendar year running from 1st January to 31st December.

You are advised to inform the Council that you are using the 4-in-a-year exemption, by writing to the Licensing Office Licensing@aberdeencity.gov.uk in advance. There is no fee for applying for an exemption.

10. Licensing Conditions

Any SEV Licence will have the following Standard Conditions applied. SEV licences may also be subject to additional conditions as determined by the Council, known as Special Conditions.

Standard Conditions

External Appearance of the Venue and Public Displays of Information

The Licence holder shall ensure:

1. That there is to be no advertisement or promotional material used by the venue on the exterior of the venue that is unsuitable to be viewed by children, for example, by way of sexually provocative imagery. The licence holder shall ensure that any exterior signage is discreet and must not display any imagery or wording that suggests or indicates relevant sexual entertainment takes place within the venue. Any external displays or advertising within the Council area may only be displayed with the prior written approval of the Council.
2. The interior of the venue must not be visible to persons outside.
3. That all charges for products and services shall be displayed in prominent areas within the venue.
4. That an appropriate code of conduct for customers is displayed in prominent areas within the venue, and at each customer table and in the bar area.
5. Performers at the venue should always be covered by a jacket when they are outside the venue at any time it is open and when they are intending to perform within the venue that night/morning/afternoon.
6. That the use of any cruising cars or any other vehicles by the venue to solicit customers or to transport customers to or from the venue is prohibited.
7. The licence must be prominently displayed at all times so as to be easily read by all persons using the venue.

Control of Entry to the Venue

8. No person under the age of 18 years shall be permitted admission to the venue at any time it is being used under this licence.
9. No person under the age of 18 years shall work at the venue as a performer.
10. The Challenge 25 proof of age scheme shall be operated at the venue whereby any person suspected of being under 25 years of age shall be required to produce identification proving they are over 18 years of age. The only acceptable forms of identification are recognised photographic identification cards, such as a driving licence or passport.
11. The venue shall maintain a refusals log, retained for one year, whereby on any occasion where a person is refused entry it shall be recorded and available upon request by Police Scotland or an authorised officer of the Council.
12. A person who holds a licence granted under section 8 of the Private Security Act 2001 must be positioned at every entrance to the venue from 1am (on any day when the venue is open at that time) until whichever is the earlier: The time at which the venue next closes or such other time as the Committee may specify.

13. That any person who appears to be intoxicated or presents as being under the influence of drugs shall not be permitted entrance to the venue.
14. That a policy of random searches of persons entering the venue is operated at all times when the venue is open to customers.
15. Any person found to be in possession of illegal drugs upon entry shall be prevented entry to the venue.
16. Reasonable steps must be taken to ensure that any person found using illegal drugs in the venue shall be appropriately removed from the venue.

Conduct of Performers and Rules relating to Performances of Sexual Entertainment

17. The licence holder shall ensure there is a written code of conduct for performers who work in the venue and staff who are employed in the venue. This must include explaining the conditions of the SEV licence to all staff and performers and also that their activities will be recorded on CCTV.
18. The licence holder must also provide an information pack to all performers and staff which should include at least the following information:
 - a. A copy of the SEV licence;
 - b. Details of how to report a crime to Police Scotland;
 - c. Details of unions, trade organisations or other bodies that represent the interests of performers;
 - d. A copy of the code of conduct referred to in condition 17 above;
 - e. A copy of the code of conduct for customers referred to in condition 4 above; and
 - f. Price lists for drinks and separately sexual entertainment.
19. There must be no topless nudity by performers in public areas of the venue with the exception of topless performances within any performance area within the venue.
20. Performers must replace their tops at the end of each private performance and at the end of any stage performance.
21. Performances of sexual entertainment may only take place in designated areas of the venue as detailed in the licence.
22. There shall be no photography permitted by customers, owner, licence holder, staff or performers in the venue.
23. Customers must remain seated for the duration of a performance with the exception of requiring the toilet or using the bar within the venue.
24. Performers shall not arrange to meet, or have further contact with, customers outside of the venue when working.

The Protection of Performers and the Prevention of Crime in the Venue

25. Performers must be provided with secure and private changing facilities so that no customers in the venue can access these facilities.
26. All entrances to private areas within the venue to which members of the public are not permitted access shall have clear signage stating that access is restricted.
27. Any exterior smoking area for use by performers shall be kept secure and separate to any public smoking area.
28. The licence holder shall implement a written policy to ensure the safety of performers when leaving the venue following any period of work.
29. Private booths must not be fully enclosed.
30. There must be a minimum of one member of security staff present on any floor where a performance of sexual entertainment is taking place and one member of security staff at the entrance to the venue, at all times when the venue is open to the public.
31. There shall be no alterations to the layout plan of the venue without a variation of the licence.

Record Keeping and Management

32. All performers and staff shall be required to provide to the manager of the venue, valid identification prior to first performing or working at the venue. Valid forms of identification are recognised photographic identification such as passport or driving licence.
33. All performers and staff shall be eligible to work in the UK and proof of eligibility records shall be kept securely and confidentially in the venue. Management shall ensure that such records are regularly checked to ensure compliance, and these should be provided to Police Scotland or an authorised officer of the Council on request.
34. Accurate payment and remuneration records must be maintained for one year and made available upon request to Police Scotland or an authorised officer of the Council.
35. A fully operational CCTV system must be used within the venue which complies with the Data Protection Act 2018 Act and Regulations, covering all areas of the venue to which the public have access, including entrances, exits, private booths and bar area. The CCTV must be fitted and maintained in full working order in accordance with the guidance provided by the Information Commissioner's Office and to the satisfaction of Police Scotland.
36. CCTV footage must be made available to Police Scotland and authorised officers of the Council on request.
37. Throughout the SEV licensed hours a member of staff fully trained on the operation of CCTV must be present in the venue.

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Appendix 2

Consultation questions: -

1. As there are currently six licensed premises in the city centre at the time of writing, but only four are in operation, what would be an appropriate number of Sexual Entertainment Venue premises in Aberdeen city centre?

Select one option

One; Two; Three; Four; Five; Six; Other

2. If your answer to the above question is "Other" please provide your suggestion below

3. Should the number of Sexual Entertainment Venue premises outwith the city centre remain at zero?

Select one option

Yes; No

4. If your answer to the above question is "No", please explain why

5. Have you noticed any impact on the community from the introduction of the licensing of Sexual Entertainment Venues?

Select one option

Yes; No

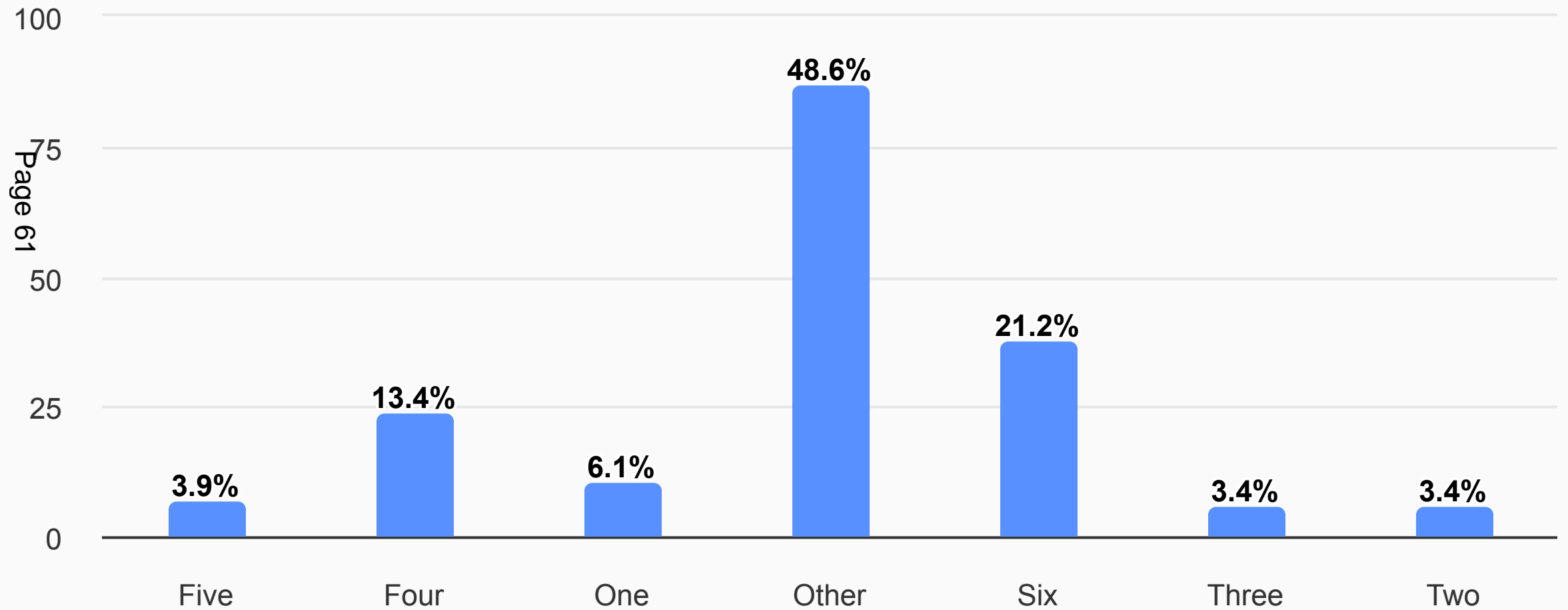
6. If you have answered "Yes" to the above question, please explain what the impact has been

7. Do you have any comments on any aspect of the existing Sexual Entertainment Venue licensing policy? The policy can be found on the above pdf or "About the Project" section of this consultation.

8. Do you have any comments on the existing set of standard conditions attached to Sexual Entertainment Venue licences – these can be found at pages 13-15 of the policy, which can be found on the above pdf or "About the Project" section of this consultation.

9. Would you like to make any further comments relating to the Sexual Entertainment Venue licensing policy?

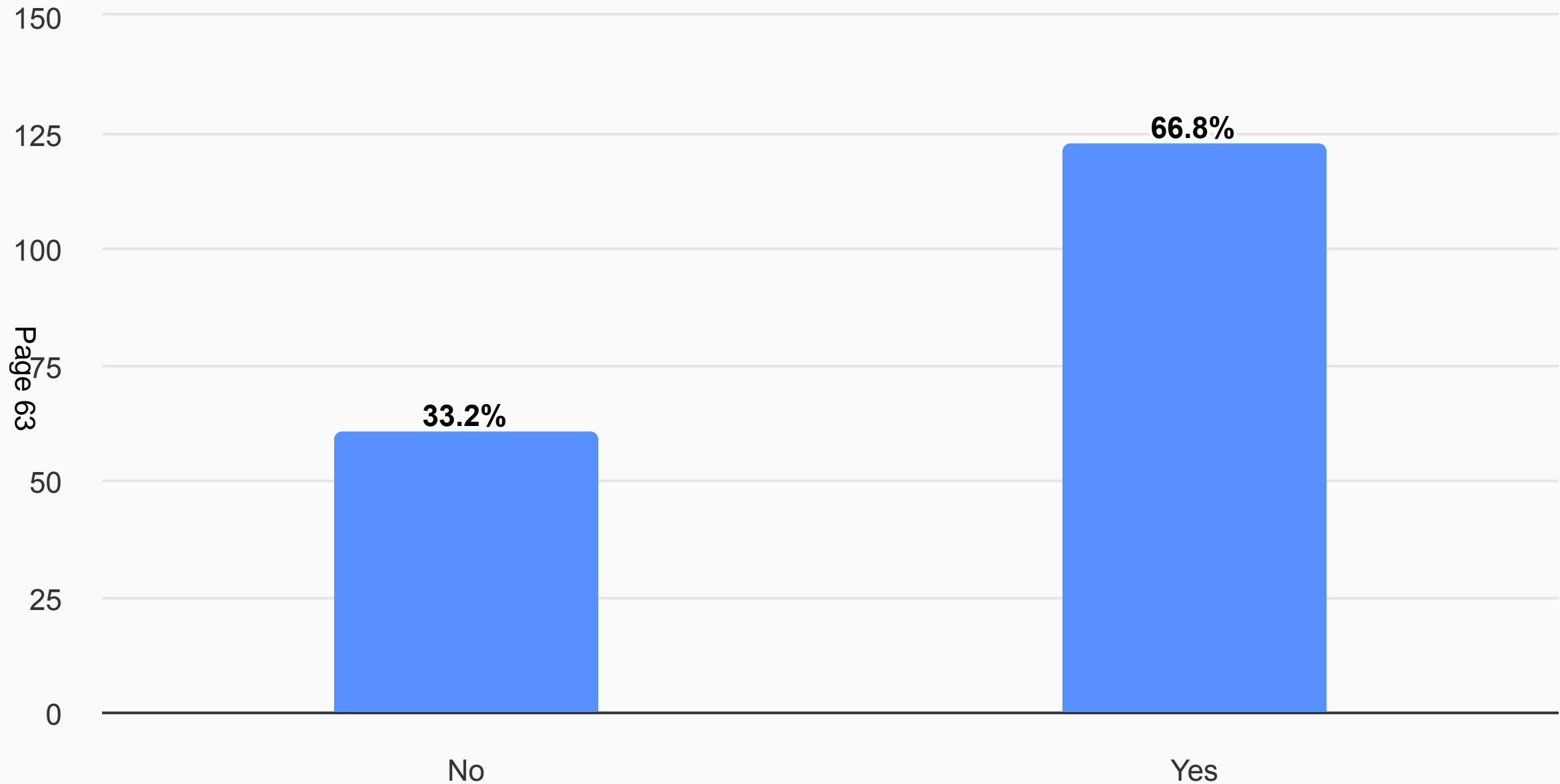
1. As there are currently six licensed premises in the city centre at the time of writing, but only four are in operation, what would be an appropriate number of Sexual Entertainment Venue premises in Aberdeen city centre?



All numbers and percentages are calculated on the total number of answers to the question.

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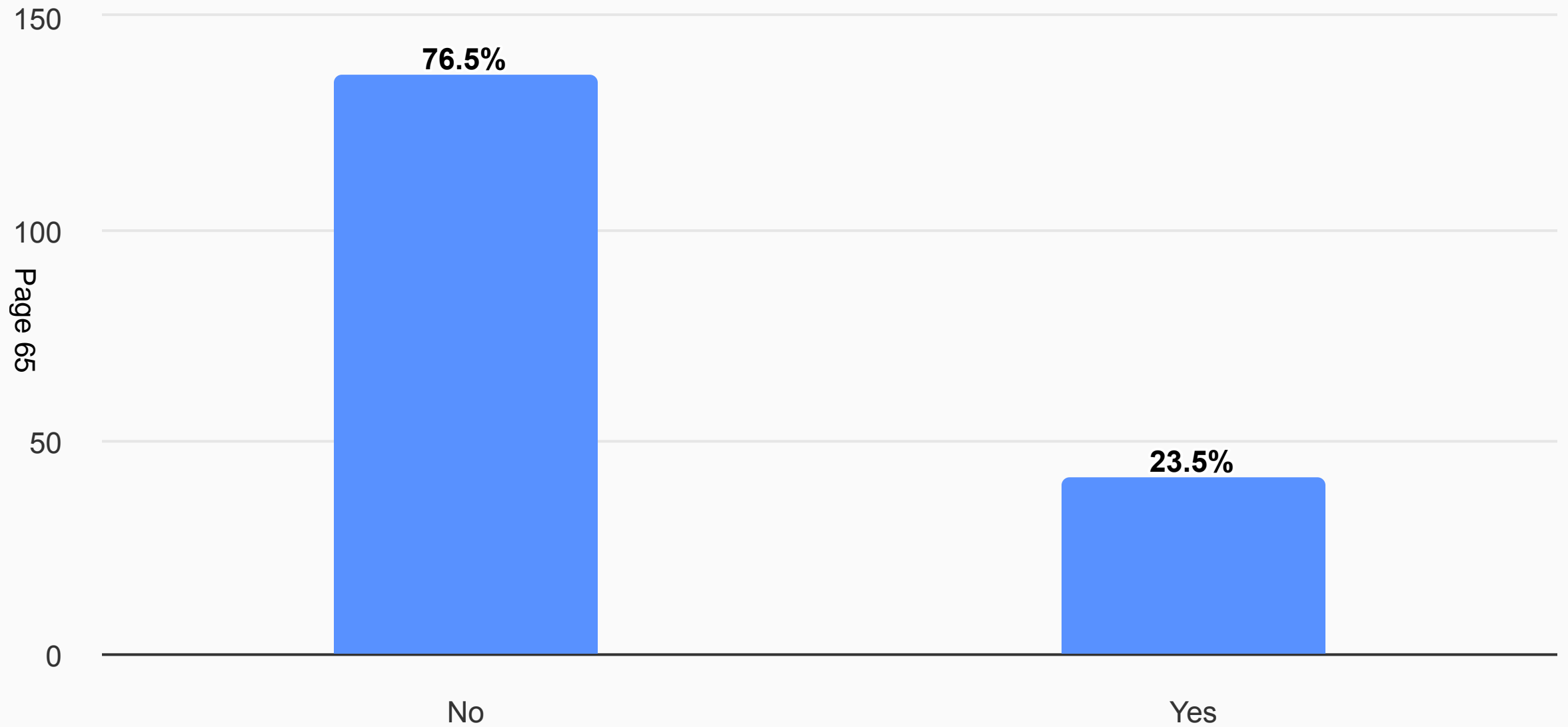
3. Should the number of Sexual Entertainment Venue premises outwith the city centre remain at zero?



All numbers and percentages are calculated on the total number of answers to the question.

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5. Have you noticed any impact on the community from the introduction of the licensing of Sexual Entertainment Venues?



All numbers and percentages are calculated on the total number of answers to the question.

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Appendix 3

Consultation responses: -

(Q1) As there are currently six licensed premises in the city centre at the time of writing, but only four are in operation, what would be an appropriate number of Sexual Entertainment Venue premises in Aberdeen city centre?

- 1 venue – 11 votes;
- 2 venues – 6 votes;
- 3 venues – 6 votes;
- 4 venues – 24 votes;
- 5 venues – 7 votes;
- 6 venues – 38 votes.
- Other – 87 votes

(Q2) If your answer to the above question is "Other" please provide your suggestion below

1. As many as possible in that area that can be licenced, charged, taxed for revenue.
2. None
3. None
4. Zero
5. None.
6. 0
7. 0
8. 0
9. No Limit
10. No Limit
11. None
12. NONE
13. 0
14. None
15. None
16. It should be 3 and also an women club as male strippers instead of women
17. Any number of there is a demand, but there is no demand so will fizzle out anyway.
18. What's ever best for the city and will generate money
19. None
20. 0
21. Zero
22. ZERO
23. More than six, there shouldn't be a limit
24. 8
25. 0
26. 15
27. As many as are commercially viable
28. Zero
29. There should be no cap there should be as many venues as there is the demand and customer base for
30. There should be no cap in or out of the city, there should be as many as needed
31. There should be no cap, there should be as many as demanded
32. There should be no cap

- 33. Unlimited amount
- 34. There should be no cap and there should be as many as there is demand
- 35. 8-10
- 36. No limit
- 37. As many as people want to open
- 38. Zero
- 39. None
- 40. Zero
- 41. None
- 42. As many is commercially viable allowing a free economy
- 43. As many as wished
- 44. 0
- 45. None
- 46. As many as there is demand for
- 47. NONE
- 48. There should be no limit - let the market decide. There is very clearly no danger of the city being overrun by strip clubs!
- 49. None
- 50. None
- 51. No limit as long as they're profitable/properly taxed, well managed, and try not to disrupt the local area too much (with regards to noise/light and potentially unruly clients)
- 52. 20
- 53. Zero
- 54. I feel no limit is necessary
- 55. As many as meet the regulations
- 56. As long as managed correctly, don't see any issue with however many are applied for.
- 57. None
- 58. None
- 59. 0
- 60. None - they are damaging establishments
- 61. Zero 0
- 62. None
- 63. Zero
- 64. None
- 65. None
- 66. None
- 67. There shouldn't be any, the streets are dangerousness enough without encouraging more deviants being invited into town
- 68. 0 - would not want any
- 69. None
- 70. 0
- 71. None
- 72. Like any other businesses as many as people want to open, we don't limit other businesses to only a certain number
- 73. Zero
- 74. None
- 75. 0
- 76. More than enough
- 77. ZERO

- 78. None
- 79. None at all.
- 80. None
- 81. 0
- 82. 0
- 83. 0
- 84. 10
- 85. None
- 86. 0
- 87. None
- 88. None
- 89. As many people as want to open and operate a strip club should be allowed to. However, licenses should only be granted to those who are currently operating. Currently, there is no strip club that specifically caters to the LGBT community.
- 90. 20
- 91. Zero
- 92. There is no need nowadays for a particular venue to cater for sexual entertainment.
- 93. Zero. There should be no sexual entertainment venues. This is a breeding ground for uncontrollable sexual appetite which leads to sexual abuse and exploitation in the city. What happens when individuals can't make time to the sexual entertainment venues. Their neighbours and youths become victims of such untamed appetites. This is wrong and it should not be topic of discussion. There are many refugees in the city whom also become strongly convinced to become sex entertainers due to venues like this existing. What will become of our society if this is given a formal jurisdiction. I say no the sexual entertainment venues in the city. None

(Q3) Should the number of Sexual Entertainment Venue premises outwith the city centre remain at zero?

Yes – 123 votes
No – 61 votes

(Q4) If your answer to the above question is “No”, please explain why

1. Boost economy
2. Persons individual choice to go. Adults should be able to make their own choice of where to visit
3. Policing, CCTV and lighting can be provided anywhere. I see no other real reason for these venues being city Centre only. If anything they could be in more isolated/rural areas.
4. If people live healthy sex lives this isn't an issue that's affecting anyone who doesn't.
5. We should be supporting the women that work in the industry and opening up in areas where there aren't any.
6. providing that the women and men there consent to being there, and enjoy their work, and there are ID-ers at the door, I don't see the issue with however many there be. Aberdeen is a big city, if there were streets upon streets of them, that might be an issue yes, but there's not, there's 4 operating ones. If the issue is women and men being forced to work there, then that's an investigation into specific clubs, which is a different issue altogether.
7. There is a place for this kind of work provided it is regulated to protect the workers and customers.

8. Get rid of them all
9. If people want to open them out with the city centre then let them
10. It's adult entertainment and should be amongst the pub district
11. Business should be allowed to trade anywhere
12. If there is a business case for a bother venue then it should be allowed
13. as I think that at is the best place for them as would not want see them in the community as think that the city centre is the best place for them
14. Provide more options for customers who don't want to travel, and to provide potential jobs for those in more remote areas.
15. There's no valid reason for it.
16. Again, if managed correctly, why does location matter?
17. Sex is for everyone, everyone does it, so again if they meet the criteria there shouldn't be an issue
18. I believe a limit would be enough, like before.
19. people should do what they want - I don't like them but it's everybody's choice
20. I'm sure there would be some demand outside the city
21. Why not ? Have them anywhere.
22. There are other areas such as queens road that could offer ideal facilities for such venues but it's not right in town. If there was say a lap dancing club as part of a hotel in a separate area that would be fine.
23. Needs regulated to protect sex workers
24. I have no objections to them being established outside the city centre (and even outwith the city itself if there's a market for it)
25. Significant risk of underground establishments opening and these then being a opportunity for exploitation of workers and links to organised crime
26. Why not have outwith city centre?
27. While the city centre is probably the most likely place, I don't have any real opinion on having them elsewhere in the right setting.
28. Again, if there is demand then let it happen. Why put restrictions in place.
29. I don't see why there shouldn't be as many as wished
30. It may work better outwith the centre. Anything that can help regenerate the city
31. I don't think it matters where the venues are located, but I think it is important to allow freedom of expression and safe places for women who want to work in SEV's to do that.
32. These places should be accessible to everyone
33. Containing venues to one area adds competition. Spread them out and this will have benefits on venues around too.
34. there should be no cap in or out of the city and there should be enough to satisfy demand in that area
35. These venues offer a safe place for people to who ***** work to do their work without having to rely on unsafe places that have different control
36. In combination with bad transport options, it means that people who work in the city are stranded in the city until buses are available again in the early hours of the morning, putting workers at risk of violence. Closer by options allows for higher safety
37. There should be as many as the demand is.
38. There should be no cap in or out if the city
39. There should be no cap
40. Human need
41. Its arbitrary to decide zero

42. It is a way for people to make money and businesses to and the economy to flourish. As long as the girls + guys are kept safe from unscrupulous behaviour or unwanted solicitation, I cannot see why this could be a problem.
43. If there is a better location, such as for access, or a better building to turn it into one, why should it be limited to the centre? Narrow minded
44. Support businesses what wanna come or support new ones
45. If there is a demand then let it be. But there is no demand.
46. It would be nice to not have to go into the city centre for this type of entertainment
47. I don't think it needs to be limited
48. It should be a couple but should be an place for women to see men strip instead of women as in Aberdeen their is more strip clubs for men and not for women
49. Enable a wider distribution of facilities across the city, enable people to attend without having to travel to the centre.
50. Allow a bit of competition and diversification. The venue would need to be kept low key/discreet if in a residential area.
51. If people want to use these entertainment venues why shouldn't there be more in Aberdeenshire or beyond. Why should people have to travel to Aberdeen to visit this type of show.
52. If we must have them, then let them be far away from the city centre so that the city centre can become a family friendly place to visit instead of being a sleazy run down dump which it is at present
53. allow free trading, this will settle the matter without the council involving itself again
54. Not everyone goes to city centre, venues including nightclubs should be available outwith the city centre.
55. No I've answered because there wasn't a not really bothered a third answer
56. No limit....people should have choice and be free to trade or work
57. Would prefer outwith city centre
58. i have no reason other than business should be allowed to open anywhere, unless there is some issues with regulatory compliance.
59. They shouldn't be in residential areas, but what about business/industrial areas that are not used at the moment, closed factories, business units, large office complexes.
60. It increase sexual appetite and increases the likelihood of people cravings. Untamed sexual appetite can lead to more sexual abuse in the community. It is even worse outside the city centre cause it means less likely to be reported due to the reduced population of people therefore less likely to be caught on time.

(Q5) Have you noticed any impact on the community from the introduction of the licensing of Sexual Entertainment Venues?

Yes – 42 votes
No – 137 votes

(Q6) If you have answered “Yes” to the above question, please explain what the impact has been

1. Backwards outdated place
2. Strange, aroused men lingering around the one near the water in Aberdeen makes the area feel very unsafe for women
3. Come on this type of events cause people to have a drive for women and this is where relationships breakdown! People being sexually abused !
4. Encourages ***** use, anti social behaviour and exploitation of woman and girls

5. Damage to community image: Strip clubs don't fit with efforts to make Aberdeen a vibrant, modern, and inclusive city. They push away families, visitors, and businesses who want a safer and more positive environment. Objectification and exploitation: These venues encourage the view that people (especially women) are objects to be bought and used. This normalises unhealthy attitudes and can fuel wider issues of disrespect and violence. Public safety concerns: Strip clubs can bring increased crime and antisocial behaviour to surrounding areas. Police and council resources are stretched to monitor these venues, resources that could be used to support community safety elsewhere. Negative impact on nearby businesses and property: Local shops, cafés, and family-focused businesses often struggle near these venues, and property values can drop. Many business owners don't want to be associated with this kind of activity. Harm to workers and families: People working in these environments often face stigma, mental health struggles, and risks of exploitation. Families are affected when loved ones get drawn into these venues, whether as workers or as customers.
6. Shady characters hanging around
7. Objectification of women Inflaming unhealthy lusts and putting women at risk
8. Fighting
9. Men are becoming delinquents!!
10. Leads to more provocative behaviour in towns putting under-age people at risk. Leading to grooming like Rochdale and sexual exploitation. Needs to be kept within a city where it can be safely monitored as cities have larger police forces to react to any trouble as towns have smaller police forces and are understaffed. Poverty stricken areas are more likely to be targeted by those that want to exploit and will not improve SIMD in towns it will encourage growth of these pockets attracting more vulnerable people
11. The area around the venue looks rundown and uncared for. Would not like to walk around the venue late at night as a woman.
12. Less visitors in the city centre area that these venues are in. Other venues struggling for certain licences
13. I have known someone who has worked in one of these venues, and it has brought shame to the girls family and they no longer speak to one another.
14. It has encouraged more deviant people into Aberdeen, women are being approached by undesirables and it's getting worse.
15. Public outlook on women. The women behind the scenes who 'choose' to work there. Exploited rights. Fear of walking past these premises for the unknown of who is lurking outside. Encourages ***** inappropriate behaviours.
16. Heard of stories of money laundering and multiple men's cards being tapped for thousands of pounds whilst being inebriated
17. Degradation of women, and harm to relationships
18. Strip clubs harm Aberdeen's community character Strip clubs undermine Aberdeen's efforts to build a safe, family-friendly city centre. Many residents want a welcoming environment that encourages families, students, and tourists — not one overshadowed by adult entertainment venues. The presence of these clubs can make people feel unsafe or uncomfortable, especially at night. They encourage harmful views towards women Strip clubs are often linked to the objectification and exploitation of women. Instead of promoting respect and equality, they normalise the idea that women's bodies are for sale. In Aberdeen, local consultation showed strong public concern that these clubs "damage the lives of the men who attend" and "exploit the women who work there." Public safety risks Aberdeen has already seen violent incidents connected to these venues, including assaults and property

damage. The police and council must allocate extra resources to manage these risks, taking attention and funding away from more constructive community services. Negative impact on local businesses and property Strip clubs can deter other businesses from investing in the area, especially those focused on hospitality, family dining, and retail. Properties close to such venues may lose value or become harder to lease, harming local owners and discouraging growth. Conflicts with Aberdeen's image and economic goals Aberdeen works hard to promote itself as a vibrant, modern city — attractive to students, professionals, and visitors. Allowing strip clubs undermines this image, conflicting with efforts to revitalise Union Street and encourage a safe, lively city centre. Divides and damages community trust Debates over strip clubs often cause division. Many residents feel unheard when venues are approved despite objections, damaging trust in local decision-makers. In Aberdeen, a large number of public responses to the council's consultation opposed these venues, showing a strong desire for change. Supports a wider culture of sexual exploitation The existence of legal adult entertainment venues can create a normalised culture that makes it easier for underground sexual exploitation (including trafficking) to thrive. While not all clubs are directly involved in such practices, they can contribute to a broader system that puts vulnerable people at risk. Conclusion: Prioritise safety and dignity Aberdeen should focus on policies that protect women, support local businesses, and create welcoming spaces for everyone. Limiting or closing strip clubs aligns with these goals, strengthens the city's reputation, and shows commitment to community wellbeing and respect. Questions to ask ourselves about strip clubs in Aberdeen If you are a wife, would you want your husband spending his evenings there? If you are a mother or father, would you want your daughter working there? If you are a brother, would you want your sister dancing there? If you are a son or daughter, would you want your mum working in that environment? If you are a business owner, would you want your shop or café right next door? If you are a teacher, would you be comfortable telling your pupils you support these venues in their city? If you are a neighbour, would you feel safe with a strip club opening in your street? If you are a council leader, would you proudly include these clubs when promoting Aberdeen as a place to visit and raise a family? If you are a visitor, is that the experience you want to associate with Aberdeen's hospitality and nightlife? If you are a young person, is this the example of respect and dignity you want to see for women and men in your community? If the answer to any of these is no, then we must ask ourselves: Why do we allow these clubs at all? They do not reflect the values of respect, safety, and community pride that most people in Aberdeen share.

19. no but I think if they were to move in to the community and out with the city centre the I think that they would be a impact on the community
20. Cheapens the city. Makes aberdeen look dirty.
21. INFLIX OF TRAFFICD ROMANIAN WOMEN AND MALE SUICIDES DUE TO SHAME OF LOSING SO MUCH MONEY TO THESE ROMANIANS
22. Objectification of women. Potentially dangerous for women passing close by these venues as men think they are sexually available. Frightening atmosphere fir women.
23. Girls seducing and inviting men in the streets.0
24. Various time have been approached while passing and pressured into going in. They didn't like when I didn't.
25. Lowers the tone of the city. The first things you see when you come off the train/bus in Aberdeen going up bridge street are strip clubs. Bad first impression to our city. The strippers standing outside smoking is a terrible look too.

26. The sexist sexual objectification of women and girls has become normalised. It can, and does, lead to male violence against women and girls. In the era of e.g. *** Personal details have been removed *** , ACC should not be complicit in this violence.
27. The community of women. Exploitation of women and promotion of patriarchal structures which affect women not in the sex industry.
28. More exploitation of women
29. Increases general misogynist views of all women and girls which in turn leads to increased risk of harm to females in society. Destructive impact on morals, marriage, relationships and sex.
30. Brings an unpalatable and disreputable look to the city centre.
31. There is now too many venues for the size of Aberdeen. There is a noticeable degeneration in the city centre area, partly due to the number of venues drawing in too many people. Too little policing of the area has also meant that the city centre is a no go zone at night, especially for women.
32. The City Centre is full of dangers now and not as safe as it once was with lots of anti social behaviour and its just not the kind of patrons we want in the city centre. I am scared for my daughter to go up the town.
33. There appears to be less sexual harassment of scantily clad young ladies in the streets and bars of Aberdeen. Men can get their kicks at the licensed sexual entertainment venues instead.
34. Young men talking openly about buying sexual time with women. On public transport. In beer gardens. Expecting women who pole dance or strip to perform other sexual services.
35. Rapes and sexual violence against women is up 15% per the news today. Many young men are already addicted to pornography which is destructive in terms of their attitude towards women and their approach to sex. These venues further demean women, turning them into sex objects. This tragically spills over into family relationships and shapes many men's attitudes towards their partners and where sexual activity does not meet expectation causes harm and family and therefore societal breakdown.
36. It makes the city centre, specially near the transport hub area, seem ***** and unsafe. Women should not be dehumanised as a commodity.
37. It enhance moral decadence among the under aged loitering around city centre.
38. Behaviour around venues makes it feel less safe
39. I know that one application has been turned down due to the policy and was able to use the policy to respond to it.
40. Yes, it has invades the society and affect Aberdeen which is known for it decency and safety. Rape and sexual harassment reports have increased especially amongst young people. Victims are emotional affected and no longer value there bodies. Results in self harm which leads to drug addiction, or becoming sexual predators or increase sexual exploration which leads to lots of teenager motherhood, STDs etc

(Q7) Do you have any comments on any aspect of the existing Sexual Entertainment Venue licensing policy?

1. Why in this age would you want people in your towns who would want this. Just another reason to avoid a place that is already on the way down
2. No

3. The whole policy promotes a derogatory, offensive and abusing view of women in a negative manner that promotes amusement, pleasure and sexual gratification from men as acceptable in society - promoting such behaviour no matter how it is addressed is insulting, offensive, abusive and undermining to all women
4. Why does it not cover people offering paid sexual services from their place of residence (paying no taxes and breaking visa provisions). Which if it's your Neighbour it's far more intrusive than in the city centre business properties.
5. There's no comments on the moral implications and the encouragement of sexual deviancy on families and young people, particularly young men.
6. Shouldn't be happening
7. Nope
8. No
9. No, as I feel these venues are unnecessary.
10. Objectifies women, encourages sexist behaviour and reinforces certain cultures attitudes to treating women badly. Should all be closed down
11. No
12. None other than it shouldn't be allowed
13. Na
14. As per previous
15. It is extremely concerning that it is even a consideration to expand sexual entertainment venues. I do NOT want this in my town.
16. My comment on the Sexual Entertainment Venue (SEV) licensing policy I believe Aberdeen should strongly reconsider allowing SEVs at all. These venues undermine community safety, dignity, and the city's image. They contribute to the objectification of women and create environments where exploitation and violence can thrive. Many local residents do not want these venues near homes, schools, or family-friendly businesses. I ask everyone to reflect: as a wife, would you want your husband there? As a mother or father, would you want your daughter working there? As a brother, would you want your sister there? As a business owner, would you want your shop next door? If the honest answer is no, we must ask why we continue to permit them in our community at all. Instead of licensing and regulating these venues, we should be protecting vulnerable people and promoting a culture of respect and safety. Aberdeen deserves better. Let's focus on building a city that reflects dignity, respect, and care for all its residents.
17. Yes, there's no overprovision in this area, as out of the four that are currently operating, three of them are all on the same road. There are only two takeaways nearby, and all you need to do is walk five minutes around the corner to find one. Also, there's no mention of alcohol in this application. I think they need to speak to the Licensing Board about how alcohol is regulated and considered. Additionally, both the City Centre and Ferryhill & Ruthrieston Community Councils have previously raised points when new premises have been proposed or when changes to existing ones were suggested.
18. None
19. No
20. It looks like you are trying to relocate the dirty smutty little venues to industrial estates, has no one been to anywhere other than this uptight country, visit Denmark, Netherlands .
21. A lot of people performing these services are reliant on their jobs. I believe making this a public issue is damaging to their reputation and livelihoods. I believe sex work is no different from any other profession. I agree protections for workers are key to this policy and the most important aspect. A lot of the LGBT+ community make up lot

- of those involved in this industry, their rights and dignity should be protected as best a possible. There is nothing shameful about sex work.
22. Must ensure that the exterior of the venues are discreet, so as not to impose on the public
 23. It's reasonably thorough. But it should be compulsory for all to have a changing places bathroom as even disabled people have the right to experience adult entertainment
 24. No, as long as the policy is upheld properly and infractions are dealt with with appropriate severity. It is important to ensure that the employees are protected and supported as much as possible
 25. Sex shops and sex cinemas should be included in sexual entertainment.
 26. No the licensing conditions appear satisfactory
 27. The whole exercise seems like a lot of bureaucracy and meddling for no reason. Please just stick to the stay job and run the city to the best of your ability. This isn't puritan America.
 28. No
 29. INDUSTRY IS OVERRUN BY ROMANIAN CRIMINALS
 30. No I agree with all safety precautions.
 31. It is important to regulate and allow these spaces to exist the banning or reduction of SEV premises would potentially push sex workers into underground work such as illegal solicitation which is unregulated and potentially incredibly dangerous. Sex workers have a right to feel safe and have such workspaces that are licensed by organisations such as HSE, ACC and Police Scotland
 32. This policy seeks to legitimise the sexualisation, objectification and exploitation of (predominantly) women. The council needs to take the ambitious step of ridding the city of sexual 'entertainment' and support those involved to less exploitative jobs/retraining. The very concept of 'Sexual entertainment' is outdated, misogynistic and deeply harmful, not just to the people directly involved, but to all women.
 33. There is a failing to provide safeguarding against human trafficking in these venues. It is also widely ignored that illegal substances are sold and consumed in more than one of these premises.
 34. They should all be closed down
 35. The policy should be unnecessary past a total ban on all such venues
 36. The violence against women strategy should include Transgender and Non Binary people as they also work within sexual establishments and are more likely to experience violence and aggression from customers. They are both over represented in the industry but overlooked within these strategies. This may also cause issues for creating and securing queer options for sexual entertainment in the city centre, as there is no policy in place to protect those individuals.
 37. NO
 38. Seems reasonable
 39. I believe the city should have stricter policy, given these venues are known to attract specific behaviours, there's a clear surplus in license slots, the venues that do exist dominate a small area of town with their presence. If the city operates with one LGBT focused venue, I see no reason for more than one SEV, as these target a potentially even lower amount of consumers. The current location of some of these venues is also highly prominent and next to major travel links to the city, giving it a more 'grim' appearance to fresh tourists potentially. Furthermore, after working in one of these venues for a very short period myself, I don't believe the legislation is taken seriously - "These rules are just a suggestion, It's better to do what we want and then apologise, than to not do what we want" was a phrase I was told after voicing a

- concern. One venue should be plenty, and will be easier to keep an eye on should negative situations occur.
40. I would even go as far as to legalise prostitution. The reality is that it is happening, but with no protection for the individuals providing the service. Was just reading a piece on people abusing universal credit and benefits. By legalising it like in Netherlands more control, tax and and safety can be introduced.
 41. It is disgusting, immoral, sinful and dangerous to have these venues in operation. There should be NONE.
 42. The proposal appears to cover off all the concerns, apart from the age limit. 18 year olds are not as mature as they once were, so 21 would be an additional protection of minors.
 43. Much more important issues to be resolved and money spent on
 44. There is no requirement for regular inspection and this needs to be in place, otherwise they should not be licensed. A lot of the women in the establishments appear to be from Eastern Europe and there is a likelihood of human trafficking. In order to employ the women there should be a process in place to ensure that the women have not been trafficked, there should have a list of the women which should be updated when a woman leave or enters employment and each woman should be interviewed by social work/police before being allowed to be employed to ensure they are not a victim of trafficking. The cost of these checks should be passed to the businesses.
 45. No
 46. Allow gentle touching between customer and performer. Online prostitutes allow full sex acts for sometimes less than the price of a dance at a sexual entertainment venue. This discourages customers from using these venues.
 47. Would have thought 21 to be more appropriate before being allowed to perform
 48. No - It is acceptable.
 49. None
 50. Not about policy. They are filthy. I mean hygiene not morals. Often connected to cocaine use and dealing. As well as other crimes. Of course verbal and physical abuse of women. Bar maids are encouraged to get into sexual entertainment.
 51. Personally, I don't see any reason to have a Sexual Entertainment venue at all.
 52. No
 53. No
 54. The policy is paradoxical. Women's safety is key to the policy, but the policy itself promotes activity where women deliberately make themselves personally very vulnerable. The policy needs to recognise the current climate where sex crime within and outwith consensual relationships is alarmingly increasing. Come on Aberdeen City Council: Be progressive, fight for woman, make a statement, be daring and do Aberdeen and it's residents a favour - Buck the trend!
 55. Sexual entertainment Venues are okay as long as there are sufficient protections in place.
 56. This is a totally unacceptable "business activity" in a modern, civilised society.
 57. Why bother going to these premises??? if people do well up to them
 58. They should all be closed and funds should be directed to aspects of the economy that need immediate and urgent interventions such as mental health, addiction control etc
 59. Exploitation and Abuse of Workers Coercion or trafficking: Some workers may be victims of coercion or trafficking, especially foreign nationals. Lack of worker protections: Dancers are often treated as independent contractors, potentially limiting access to employment rights. Pressure to perform sexual acts: Despite regulations,

there can be pressure on performers to engage in illegal activity. 2. Links to Organised Crime or Illicit Activity Money laundering: Strip clubs have been known to be used for laundering criminal proceeds. Drug activity: There may be a higher risk of illegal drug use or sales on premises. Gang presence: Some clubs can attract or be controlled by local gangs. 3. Gender and Cultural Concerns Objectification of women: Critics argue strip clubs reinforce harmful stereotypes and the sexual objectification of women. Hostile environments: They may contribute to a culture where sexist or misogynistic behaviour is normalized. Cultural tension: In diverse communities, strip clubs can clash with local cultural or religious values. 4. Regulation and Policing Challenges Undercover crimes: Illegal activities can be hard to detect or prove. Licensing loopholes: Some clubs operate under loopholes (e.g. as "private members' clubs") to bypass restrictions. Strain on law enforcement: Regular monitoring can divert police and council resources. 5. Impact on Patrons Addiction and financial harm: Some patrons may develop compulsive spending behaviours. Mental health issues: Regular patronage may be linked with loneliness, addiction, or escapism.

60. my only concern is that there is no provisions of male performers. While I know there is no venue that provides this service as of yet, and there is no reason for that being prevented when taking the current publican and social norms have developed since 1982.
61. Attempting to police/regulate people who are immoral enough to be in this business practice is oxymoronic
62. Exploits young women. No sexual entertainment venues where men are used in the same way as young women. Leaves vulnerable women open to abuse and trafficking.
63. None
64. I don't propose closing existing SEV providers, but I would like them to 'wither away'. They encourage the trafficking of, and general abuse of women and probably discourage people from engaging with the 'night time economy'
65. The existing policy covers many of the issues which arise for residents living close to a sexual entertainment venue. However, I know that complaints can take months, even years, to get sorted. All council departments ought to be able to work together in order to swiftly deal with breaches of the policy.
66. Entry access to such venues should increase to 21. If the age of a driver who can monitor a learning driver is 21. It shows that it has been already observed that there is a higher sense of maturity in men and women whom are the age of 21. The age access to such premises ought to be to be increased. There is danger in giving such sexual access at a young age. Even though youngsters at the age are pushing for it. We should advocate for 18 year olds to invest in legit money making endeavours and sporting prowess.

(Q8) Do you have any comments on the existing set of standard conditions attached to Sexual Entertainment Venue licences?

1. No
2. No
3. As per previous response -these venues should not be permitted therefore there would be no need for the policy
4. None
5. What is the definition of a Stall?
6. No comment

7. No
8. All seem appropriate
9. No
10. No
11. These seem clear and appropriate. Enforcement should be straightforward
12. Fronts for money laundering
13. No
14. Na
15. I don't have any issue with them.
16. None
17. No
18. I reference back to my last point, sex shops are on the high street in grown up countries, Odense for example have the contents of the shop on view, it may be uncomfortable for parents but guess what sex is normal.
19. A review should be made in regards to these details using feedback from the workers themselves.
20. No
21. Conditions appear satisfactory
22. No
23. None
24. See previous comments
25. There should be a minimum of 2 security staff per 10 entertainers for their own safety
26. No
27. No
28. no
29. I find the legislation fair, no major issues - I just don't know how well it's being enforced or rather upheld in each premises.
30. I think clause 19 + 20 are a bit over the top, if a professional dancing act has happened and the person picks up their items and walks off stage it is a reasonable act to not first cover their top - apply some common sense here and remove this part. Number 20 is a bit vague, but almost implies one must pay for a personal viewing in a private place or dance area. I think this is silly as by entering the property you understand what you are going to see, I would say relax this, if people could earn more by say watering while *****, then why not as long as those people are protected and not touched inappropriately.
31. Limitation of number of people in the premises at any one time.
32. Waste of money
33. Section 18 should include that information provided to performers must be provided in the native language of the performer. Section 33 - list of performers should be required to be provided as performers are hired and be updated as required to police Scotland and/or officer of council.
34. It should be stipulated what kind of ID is acceptable and that police will be called if there is trouble and if there is sexual exploitation of under 18's
35. No – they are acceptable
36. None
37. It's funny how people under the influence of drugs should not be allowed entry. But it is known that drug users go to these places to buy cocaine.
38. A fee should apply if licence exceptions are requested. There should be personal at all doors at all times checking customer age
39. No
40. No

41. See previous response
42. None they are sufficient
43. This is just so inappropriate - it should be happening at all never mind being licensed by a local government organisation.
44. No
45. I do t kniw what these are
46. None
47. I think you can go further to make conditions for workers safer. Why do men need such facilities? Do you have the same facilities for LGBTQ or women? What culture and ethos do we want to promote in Aberdeen? More strip clubs = less family values
48. Require more evidence that human trafficking and modern slavery aren't involved
49. No, they seem to be quite well thought out.
50. Conditions are all good but enforcement may be an issue
51. The policy is quite comprehensive, but my concerns are around council departments being able to work collaboratively to deal with problem venues/staff.
52. Conditions attached are reasonable if there must be a venue. Which I totally disagree that there is a need for one. The only change is for the Entry admissions to such venues should increase from 18 to 21 year olds. If the age of a driver who can monitor a learning driver is 21. It shows that it has been already observed that there is a higher sense of maturity in men and women whom are the age of 21. The age access to such premises ought to be to be increased. There is danger in giving such sexual access at a young age. Even though youngsters at the age are pushing for it. We should advocate for 18 year olds to invest in legit money making endeavours and sporting prowess.

(Q9) Would you like to make any other comments relating to the Sexual Entertainment Venue licensing policy?

1. Those not operating as a strip club should not be licensed
2. Would no longer come to a town/city that had such venues
3. No
4. I feel like in 2025, we should have moved on from using humans as entertainment
5. The licensing committee should be ashamed of allowing, supporting or promoting such business
6. I think this form of adult entertainment should remain available as part of the variety of of adult entertainment on offer within the city.
7. No
8. Very sad to be thinking this is expanding
9. I think the consultation is unnecessary. I've not known these venues to cause anti social issues anymore than that pub and clubs do. If you want to be inclusive, include those who enjoy sexual entertainment
10. It's disgusting and outdated and should be removed.
11. I don't agree with any sexual entertainment venue which objectify woman
12. No
13. Consensual, passionate people who work at these places because they want to should not be put out of jobs, for some, its their main source of income - They are doing no harm, don't harm them.
14. I do not think SEV's should be allowed to operate in Aberdeen or Aberdeenshire, due to the reasons I outlined already in this questionnaire.

15. Just wrong, find a willing partner keep it to yourselves
16. Get rid of them all
17. Please do not allow any more venues in Aberdeen or Aberdeenshire as they are an outdated anachronism in today's world. They always have the reputation of being involved in the ***** and ***** trafficking industries and have no good role models for anyone to admire.
18. I think they should maximise the number of strip clubs to 2 as I completely agree woman should not be used to earn money and emotionally and verbally abused etc
19. In general these venues are not required. However, it is better to have regulated and licensed venues than 'underground ' venues where increased exploitation could occur
20. Do not issue any licences
21. No
22. Strip clubs harm community safety and go against the values of respect and dignity that we want to see in our city and towns. They encourage the objectification of woman and undermine healthy family environments, allowing exploitation and violence to grow.
23. I think there should be 0 venue, no need for this venue anywhere
24. As long as it is clearly licensed and operated properly there should not be any issues. If any venue is not operating correctly it should be closed immediately
25. These are demeaning to women, they harm relationships, and no good comes from them.
26. No think I have made in the report
27. None
28. I feel uncomfortable with the idea. I know it provides women with an income but in some aspect, it feels wrong for people to pay to see someone in a sexual manner
29. Keep it as low as possible and it should be very expensive as well so that the working conditions are all well above board, but also so that the business can be taxed more to help with matters such as sexual education etc.
30. If promoted in an adult way there shouldn't be any issues, by having it displayed the same as cigarettes in shops you are making it intriguing for undesirables, open it up and everyone knows what is going on.
31. As many performers and staff should be involved with this review as possible.
32. In this day and age, I feel they are not appropriate. A lot of known "under-the-table" acts go on there, and the law turns a blind eye. They are demeaning, often run-down eyesores also.
33. No
34. Disability inclusion training that's actually effective to be given to all staff and dancers
35. I think ensuring more safe spaces for sex workers to perform in is ultimately a good idea and could potentially help tackle the issues with exploitation they risk in the streets. I have no issues with this proposal, and frankly would go as far to support further moves in this direction (such as Australia's initiatives)
36. No. I feel if those venues are necessary, the licensing policy seems robust.
37. As above - leave businesses alone to get on with it. The fact that there are already only 4 premises operating under the current limit of 6 suggests that the provision is self limiting so stop wasting council time and money on yet more unnecessary bureaucracy.
38. No
39. SHUT THEM DOWN. DO NOT LEGITIMISE ROMANIAN SEXUAL TRAFFICKING AND LET MEN NOT GET EXPLOITED
40. Supply and demand should be the driver for the amount of venues.

41. Written rules must exist for PR staff and the promotion of clubs, PR staff are essential to clubs performance but there must be protection in place for those staff as they generally operate outwith a club. Additionally the license should identify a "host" who is separate to bar staff who is there to monitor sexual services provided and be focused on dancer welfare this "host" should have right of refusal on the premises and be allowed to instruct bar staff to cut off dancers access to alcohol additionally they should have a responsibility to make sure all dancers leave the venue safely.
42. There isn't a need for this outwith the main city centre and the number of these needs reduced
43. Be brave and get rid.
44. There is no place for continued promotion of women as second class citizens in this day and age
45. I think there needs to be SEV's for the woman who want to pursue this line of work to be able to do so safely
46. We are in the 21st Century, Aberdeen needs to catch up with the rest of Europe.
47. The violence against women strategy should include Transgender and Non Binary people as they also work within sexual establishments and are more likely to experience violence and aggression from customers. They are both over represented in the industry but overlooked within these strategies
48. I would not wish to see an increase in venues but as six are currently licences and only four in operation, I would like to see it at four max.
49. The only concern I have about these venues is that the people who work there are suitably protected and that there are systems in place to ensure this.
50. Most comments were made in prior response
51. I think it should become legal countrywide as it could be another source of income for many and also earn additional 'sin taxes' to our government. My opinion is to give people the choice and not nanny them as if they are babies needing to be controlled. Legalise it, tax it and ensure safety for this and prostitution.
52. It is harmful to women and girls. We all know it.
53. Prevention of kerb crawlers
54. There shouldn't be too many and especially not in city centre or any town centres. It makes the place look cheap and tacky to tourists.
55. There needs to be regular welfare checks on performers at these venues by either police or social work.
56. I think Aberdeen is too small for these types of venues. It attracts the worst kinds of patrons and is demeaning to women. They are not sexual objects to be desired by men. There is a danger of money laundering, crime via gangsters, sexual exploitation and unsafe city centre.
57. If it's good for the city and brings in business and income welcome them
58. Performers should be tested for substance abuse to ensure this is not habit feeding
59. No
60. None
61. No
62. Just to say Keep them far away from the city centre
63. Sexual entertainment is unstoppable online, sex and pornography are big sellers, but like gambling, drugs and alcohol they can be destructive and undermine lives, relationships, our City's values and those of Aberdeen City Council. The Council needs to be radical in its approach and adopt true zero tolerance by giving no licence which encourages sexually motivated crime. Sexual entertainment venues duty of care guidelines and policies should not be used as a mask for these businesses. If these places can't be situated beside a woman's refuge - they have no place in

Aberdeen. It is hypocrisy to teach our young people the unacceptability of inappropriate sexual behaviour towards women, while licensing sexual entertainment venues.

- 64. Leave it as it is, male or female strippers etc etc makes n difference to me
- 65. Very relaxing and no hassle most venues have very nice staff
- 66. It doesn't go far enough, and should also include so called massage parlours, staffed by modern day slaves.
- 67. None
- 68. Thank you to everyone on the committee who are doing their best to keep dancers safe.
- 69. N/A
- 70. SEV such as Private Eyes should relocate further away from schools - Gilcomstoun and Grammar. It's in the vicinity of residential flats.
- 71. The moral fabric of this society is already in tatters, don't put another nail in the coffin
- 72. none
- 73. Policy in general seems fine but would like to think no need for such establishments in 21st century Aberdeen. Since most seem congregated in the Bridge Street area I don't think they give a very good 'first impression' for visitors to the city.
- 74. The tendency for such venues to either congregate together in one area, or to tuck themselves away in back streets is, in my view, an unwholesome reality. These locations tend to be avoided by people who go out in the city centre for more mainstream activities in pubs and restaurants.
- 75. It is dangerous to the society and creates a safe haven for sexual predators to hide. There should be none in the city

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NHS Grampian Public Health Response to Aberdeen City Sexual Entertainment Venue (SEV) Licensing Consultation

Background

Gender-Based Violence (GBV) is a major health and human rights issue whereby women and girls are subject to a wide range of forms of violence due to broader gender inequalities in society, especially inequalities of power. Endemic levels of violence towards women and girls¹ cannot be seen in isolation, but as a consequence and a cause of attitudes and norms which place the value of women and girls as below that of men and boys. Increasing public discussion has focused on attitudes towards gender equity and violence and where these attitudes might stem from (see e.g. discussion around online misogyny arising from the *Adolescence* TV programme). The most recent Scottish data on young people's attitudes to violence against women and girls shows that young women's attitudes have been changing positively in recent years while young men's attitudes have only seen limited change². International evidence identifies inequitable gender attitudes as a key risk factor for perpetrating physical violence against women³.

Sexual Entertainment Venues (SEVs) are commercial premises where partly-clothed, naked or stripping women are presented, marketed and profited from as sexual objects for purchase as a means of sexual stimulation principally for fully-clothed men. As such, they can help to normalise the objectification of women and men's power over them, and contribute to a culture of sexual exploitation. At present, Aberdeen City has more licensed SEVs than any other local authority area in Scotland.

Scotland's strategy for preventing and eradicating violence against women and girls, Equally Safe⁴, defines lap dancing, prostitution, stripping and pornography as forms of Commercial Sexual Exploitation (CSE) and therefore forms of violence against women and girls. This has been further strengthened in the local Violence Against Women and Girls Partnership's recent position paper on Commercial Sexual Exploitation.

Previous critiques of SEV licensing policies have also highlighted the lack of focus on the working conditions for the women who work in these venues; and have consistently highlighted the absence of workers' voices in policy discussion with the exception of venue owners/operators. Key issues raised by these workers include:

- Lack of employment protections
- Financial exploitation
- Safety and security
- Customer behaviour

¹ Schmid C, Fearnside H & Rohregger N (2024) Measuring gender equality in the UK: data on violence against women and girls. Findings from the UK Gender Equality Index. [measuring-gender-equality-in-the-uk-data-on-violence-against-women-and-girls.pdf](https://www.measuring-gender-equality-in-the-uk-data-on-violence-against-women-and-girls.pdf)

Zero Tolerance (no date) Statistics: Violence in Scotland. <https://www.zerotolerance.org.uk/vaw-facts/>

² [Results - Young People in Scotland Survey 2021: attitudes to violence against women and girls - gov.scot](https://www.results.gov.scot/young-people-in-scotland-survey-2021/attitudes-to-violence-against-women-and-girls)

³ McNaughton Reyes HL *et al.* (2015) Gender Role Attitudes and Male Adolescent Dating Violence Perpetration: Normative Beliefs as Moderators. *Journal of Youth and Adolescence*. <https://doi.org/10.1007/s10964-015-0278-0>

McCarthy KJ, Mehta R & Haberland NA (2018) Gender, power, and violence: A systematic review of measures and their association with male perpetration of IPV. *PLOS One*. <https://doi.org/10.1371/journal.pone.0207091>

Fleming P *et al.* (2015) Risk Factors for Men's Lifetime Perpetration of Physical Violence against Intimate Partners: Results from the International Men and Gender Equality Survey (IMAGES) in Eight Countries. *PLOS One*. <https://doi.org/10.1371/journal.pone.0118639>

Lacasse A & Mendelson MJ (2007) Sexual coercion among adolescents: victims and perpetrators. *Journal of Interpersonal Violence*. <https://doi.org/10.1177/0886260506297027>

⁴ [Equally Safe 2023 - preventing and eradicating violence against women and girls: strategy - gov.scot](https://www.equally-safe.gov.scot/preventing-and-eradicating-violence-against-women-and-girls-strategy)

- Lack of voice.⁵

1. As there are currently six licensed premises in the city centre at the time of writing, but only four are in operation, what would be an appropriate number of Sexual Entertainment Venue premises in Aberdeen city centre?

Zero.

2. If your answer to the above question is "Other" please provide your suggestion below.

Zero. Failing this, reduce to the number currently operating (four) and consider planning to phase this number down further.

3. Should the number of Sexual Entertainment Venue premises outwith the city centre remain at zero? 4. If your answer to the above question is "No", please explain why.

Yes.

5. Have you noticed any impact on the community from the introduction of the licensing of Sexual Entertainment Venues? 6. If you have answered "Yes" to the above question, please explain what the impact has been.

There currently appears to be a lack of data available as to the impact of SEVs or of the licensing policies to date. Investigation should be undertaken into whether the working conditions of performers in SEVs has improved and impacts on surrounding communities. A recent report by the Scottish Women's Budget Group on Gender Inequality and Poverty highlighted feeling unsafe on the streets as a key concern for women in Aberdeen⁶. As the SEVs in Aberdeen are clustered close to transport hubs, it would be helpful for work to be undertaken to understand women's feelings of safety in these areas.

7. Do you have any comments on any aspect of the existing Sexual Entertainment Venue licensing policy? The policy can be found on the above pdf or "About the Project" section of this consultation.

The "Sensitive Premises Presumption" (pg. 6) highlights the presumption within 750 metres of various premises including "4) Premises likely to be frequented by people under 18 or families" and "6) retail shopping areas". However, some of the licensed premises are situated within a few hundred metres of the train station, bus station and shopping areas frequented by children, young people and families. As such, it is difficult to ascertain the relevance of this presumption and if/when it is applied.

The policy does not include any information on how license conditions are to be monitored or enforced. To effectively improve conditions for workers and the public, there must be clear consequences for breaches of the policy.

The policy does not include any mention of how the Public Sector Equality Duty is considered in licensing decisions. The Equality Duty requires that equality is considered in all functions of public services. Given the intrinsically gendered nature of SEVs, licensing decisions must take into account different impacts on women and men. For example, equality impact assessments or integrated impact assessments should be

⁵ Sanders T & Hardy K (2014) Flexible Workers: Labour, regulation and the political economy of the stripping industry. Routledge: Abingdon. Pp. 50-70.

⁶ Scottish Women's Budget Group (2025) Aberdeen Gender Inequality and Poverty Report. <https://www.swbg.org.uk/content/publications/SWBG-Aberdeen-Report.pdf> Pp.50-58.

undertaken to determine the potential for discrimination or harm which disproportionately impacts on people who share a protected characteristic.

8. Do you have any comments on the existing set of standard conditions attached to Sexual Entertainment Venue licences – these can be found at pages 13-15 of the policy, which can be found on the above pdf or "About the Project" section of this consultation.

Standard Condition 1. The policy does not suggest any restrictions on online advertising or promotional material. This should be considered as with other public displays as this is likely to be the main avenue of promotion to the public.

Standard Condition 4: This condition stipulates an “appropriate code of conduct for customers” but does not indicate what should be in this. This code should be required to include a zero tolerance approach requiring respectful behaviour and clear language around consent. It should be highlighted that any unwanted sexual touching or harassment is criminal behaviour which will be reported to the Police.

Standard Condition 18: The information pack for performers should have clear advice on what constitutes inappropriate and/or criminal behaviour of customers, a clear statement that such behaviour should be reported to management and a commitment for action to be taken by management. Such reported behaviour or complaints should be logged and reviewed by management to identify improvements to ensure such behaviour is prevented in future. This log of complaints and inappropriate behaviour and action taken to reduce future risk should be available to the licensing committee when licenses come up for renewal.

The pack should also include information on local services including local sexual health services and the local Sexual Assault Response Coordination Service (SARCS): [Turn to SARCS | NHS inform](#). Information on these services should also be prominently displayed in staff and performer areas.

Standard Condition 28: This condition requires a written policy to ensure the safety of performers, but does not state anything that should be in it. Safety and security concerns by SEV workers elsewhere has highlighted issues related to unsafe environments including escorting to cars following shifts; incidents of violence or harassment with little intervention; and lack of support by management or security⁷. These should be highlighted as required areas in the written policy.

Suggested Condition: All staff should receive regular training on how to identify and respond to signs of exploitation, including human trafficking and coercion. Training should include how to escalate concerns appropriately and where to seek help.

Suggested Condition: Payment of staff must be based on clear and transparent recording. Employment and payment practices in SEVs have been highlighted by workers elsewhere as a particular issue, with the risk of financial exploitation. Most dancers in SEVs are classed as self-employed, meaning they can lack basic rights such as sick pay, holiday pay and protection from unfair dismissal. However, clubs usually operate significant control over schedules, behaviour and appearance creating a “myth of self-employment”⁷. Workers may be required to pay house fees to work and receive additional deductions such as commission or fines, meaning some workers report leaving shifts with little or no earnings, especially on quiet nights. This should be seen as financial exploitation and measures put in place to provide transparency and protection.

⁷ Sanders T & Hardy K (2014) Flexible Workers: Labour, regulation and the political economy of the stripping industry. Routledge: Abingdon. Pp. 50-70.

9. Would you like to make any further comments relating to the Sexual Entertainment Venue licensing policy?

The licensing committee should consider how the voices of workers at SEVs can be included in the policy review, particularly in terms of conditions of licensing. This should include provision for anonymity given the potential for impacts on their employment.



Dear Chair and Members of the Licensing Committee,

Thank you for the opportunity to respond to the review of Aberdeen City Council's Sexual Entertainment Venue (SEV) Licensing Policy.

The Aberdeen Violence Against Women and Girls Partnership (VAWGP) brings together key statutory and third sector partners working to tackle violence against women and girls in Aberdeen. Our work is guided by Equally Safe, Scotland's national strategy to prevent and eradicate violence against women and girls, which is co-owned by the Scottish Government and COSLA. Equally Safe recognises that violence against women, including commercial sexual exploitation (CSE), is both a cause and a consequence of wider gender inequality. This includes activity within SEVs, where gendered power dynamics and the commodification of women's bodies are central to the business model.

Strategic Position on Sexual Entertainment Venues

Sexual entertainment venues are commercial spaces where predominantly men, who are fully clothed, pay to watch women, who are undressed or partially dressed, perform for their sexual gratification. The Violence Against Women and Girls Partnership holds the position that sexual entertainment venues are a form of commercial sexual exploitation. This is in line with Equally Safe, Scotland's national strategy to prevent and eradicate violence against women and girls. This position is also reflected in our local Commercial Sexual Exploitation Position Paper, which has been endorsed by the Public Protection Committees and Chief Officer Group (see Appendix 1).

This stance is not based on moral judgement and is not intended to disregard the diverse experiences of people working in SEVs. Rather, it recognises the broader context in which SEVs operate, as a business model that profits from the sexual objectification of women, most often for the entertainment of men. While some individuals see their participation as a personal choice, it's important to recognise that such choices are often shaped by wider systemic inequalities, such as poverty, gender-based violence, insecure housing and limited economic opportunities. For many women, engagement in the sex industry reflects a lack of choice rather than truly free and informed consent.

The continued licensing of SEVs undermines the city's broader efforts to tackle violence against women and promote gender equality. These venues normalise gender inequality by reinforcing harmful stereotypes that portray women as objects for male consumption. Their visibility in prominent public spaces send a message that the objectification and sexual exploitation of women is acceptable. This also shapes how boys and men understand gender, relationships and masculinity, reinforcing gendered expectations that can harm their wellbeing and how they relate to others. We also recognise that SEVs sit within a wider landscape of

commercial sexual exploitation, including prostitution, pornography and trafficking. Ending commercial sexual exploitation is not only important for women's safety, but also for building a more equal and respectful community for everyone.

This position reflects not only our commitments under Equally Safe but also international frameworks such as the Istanbul Convention¹, which recognises sexual exploitation as a form of violence against women and a violation of human rights. Local authorities have a legal duty under the Public Sector Equality Duty to eliminate discrimination, advance equality of opportunity and foster good relations between people. This requires actively considering how decisions affect different groups, particularly those already facing disadvantage. Licensing decisions such as those relating to SEVs are not just administrative, they can have real implications for advancing equality and building a more inclusive society.

The Violence Against Women and Girls Partnership holds the view that the appropriate number of SEV licences in Aberdeen is zero. In the absence of an immediate move to this position, we strongly urge Aberdeen City Council to adopt a clear policy of phased reduction, with a long-term goal of reaching zero.

Response to Consultation Questions

1. As there are currently six licensed premises in the city centre at the time of writing, but only four are in operation, what would be an appropriate number of Sexual Entertainment Venue premises in Aberdeen city centre?

Other

2. If your answer to the above question is "Other", please provide your suggestion below.

The Violence Against Women and Girls Partnership holds a clear position that there should be no sexual entertainment venues operating in Aberdeen. SEVs are a form of commercial sexual exploitation, as recognised within Equally Safe, Scotland's national strategy co-owned by the Scottish Government and COSLA. Their existence is fundamentally incompatible with the aims of Equally Safe and with Aberdeen's commitments to the equality, safety and wellbeing of women.

The council has the legal power to regulate and limit SEVs under the Air Weapons and Licensing (Scotland) Act 2015. This gives Aberdeen the opportunity to determine the appropriate number of SEVs in the city, including the option of setting a zero limit.

In our view existing SEV licences should not be renewed. This would allow for a managed approach to ending SEV provision in the city and sends a clear message that the public licensing of commercial sexual exploitation is not aligned with Aberdeen's values or policy direction.

If the committee is currently not willing to set a zero limit, we recommend that the number of SEV licences be capped at four, reflecting the current number of operational venues. This number should then be reassessed each time a venue closes or a licence is surrendered, with

¹ The Istanbul Convention, ratified by 45 countries including the UK, is formally titled The Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence.

a clear policy that no new licences are issued to replace them. This would result in a phased reduction in SEV provision, ultimately leading to zero.

3. Should the number of Sexual Entertainment Venue premises outwith the city centre remain at zero?

Yes.

4. If your answer to the above question is "No", please explain why.

N/A

5. Have you noticed any impact on the community from the introduction of the licensing of Sexual Entertainment Venues?

Yes.

6. If you have answered "Yes" to the above question, please explain what the impact has been.

While the introduction of SEV licensing has provided a degree of oversight, there has been no assessment of whether it has actually improved the experiences or safety of performers working in these venues, a key aim of regulation. Without meaningful monitoring or evaluation, it's difficult to know whether the licensing system is achieving the intended outcome.

Members of the Violence Against Women and Girls Partnership, and others working across the VAWG sector, continue to raise concerns about the broader impact of SEVs on women and the community. These concerns are grounded in professional experience and a wider understanding of how venues that centre the sexual objectification of women can shape attitudes, reinforce harmful gender norms and influence behaviour.

We don't currently have strong national or local data on the impact of SEVs and more work is needed to understand the experiences of performers, women who live, work or socialise in areas where SEVs are based, and women in the wider community. We recommend that the Council explore ways to better understand these impacts, including through community engagement, equality impact assessments, and conversations with both performers and women's support organisations.

There is also concern that the presence of SEVs contributes to an environment where some women feel less safe, particularly at night, potentially influencing how they use and move through public spaces. This is especially relevant in Aberdeen, where SEVs are located in the heart of the city centre, close to major transport links, shopping areas, and hospitality venues. Safety in public spaces (including accessing public transport and fear of sexual harassment) was a key issue raised by local women in the recent Aberdeen Gender Inequality and Poverty Report². The visibility of SEVs in the city centre contributes to the normalisation of the objectification of women and raises questions about the kind of city we want to be and the

² <https://www.swbg.org.uk/content/publications/SWBG-Aberdeen-Report.pdf>

message we send about gender equality. Aberdeen has an opportunity to shape a city centre that reflects its commitment to inclusion, safety, and equality for everyone.

The impact of SEVs extends beyond women and girls. In a culture where sexual entertainment is often very visible and accepted without much question, it can send messages about what is expected of men and boys, to be sexually dominant, emotionally detached and entitled to women's bodies. The normalisation of sexual objectification for commercial purposes reinforces unhelpful gender roles and unhealthy, unrealistic expectations of masculinity. This is not good for the wellbeing of men and boys, as it can reinforce limiting ideas of what it means to be a man and also the idea that women are less equal or less deserving of respect, making it harder to form healthy, equal relationships.

7. Do you have any comments on any aspect of the existing Sexual Entertainment Venue licensing policy?

The current policy states that the appropriate upper limit of sexual entertainment venues in Aberdeen City Centre is six. The Violence Against Women and Girls Partnership holds the position that the appropriate number of SEVs is zero. We therefore believe the policy should be revised to reflect this, or at the very least, support a phased reduction in licences rather than maintaining a cap of six.

While we do not support the continued licensing of SEVs, we believe it's important to contribute to the policy review to help ensure that, if any licences are granted, they are subject to the strongest possible safeguards.

We note that the policy states the Licensing Committee does not take a moral stance on SEVs. However, recognising SEVs as a form of commercial sexual exploitation, as defined in Equally Safe, Scotland's national strategy jointly owned by the Scottish Government and COSLA, is not about morality. It is about meeting our public sector equality duties and addressing the structural gender inequalities that underpin all forms of violence against women and girls.

We recommend that the policy is strengthened through a clearer and more explicit recognition that SEVs are part of the broader landscape of commercial sexual exploitation, as defined in Equally Safe. While the policy does reference Equally Safe in the section on violence against women and girls, we believe this could be developed further.

In particular, we suggest:

- Including a statement in the policy introduction acknowledging that SEVs contribute to the normalisation of gender inequality and are recognised as a form of commercial sexual exploitation in Equally Safe, the national strategy co-owned by the Scottish Government and COSLA.
- Acknowledging that many women working in SEVs do so within the context of structural inequalities, such as poverty and other intersecting forms of disadvantage. These factors can limit women's choices and lead to engagement in the sex industry when there are a lack of genuine alternatives.

- Explicitly referencing the local authority's responsibilities under the Public Sector Equality Duty, including the requirement to consider how SEV licensing decisions affect women's safety and gender equality.
- Requiring equality impact assessments for all SEV licence applications, renewals, and any future policy changes, with specific consideration of the impact on women's safety, wellbeing and equality.
- More clearly applying the location considerations in line with the Air Weapons and Licensing (Scotland) Act 2015. The act requires local authorities to consider the character of the locality, including the presence of schools, places of worship and services supporting women, children and young people. It also requires consideration of whether there have been incidents of anti-social behaviour, sexual assault, prostitution, harassment, trafficking or exploitation in the area. Despite this several current SEVs are within close proximity to such spaces, in many cases less than a kilometre away. There is little evidence to suggest that these location and contextual factors have been assessed in practice. We would recommend the policy include a clear commitment to applying these transparently and consistently.

We also believe the policy could be strengthened by providing more clarity on how licence conditions are monitored and enforced. This should include the use of unannounced inspections and clear consequences for non-compliance. Transparent and consistent enforcement helps make sure that venues are meeting the required standards and that performers' safety and wellbeing are prioritised.

8. Do you have any comments on the existing set of standard conditions attached to Sexual Entertainment Venue licences – these can be found at pages 13–15 of the policy?

While the Partnership does not support the continued licensing of SEVs, we believe it is important to help strengthen existing safeguards should any licences remain in place.

There are a number of areas where we believe the current standard conditions could be improved to better protect performers.

- The customer code of conduct should include clear language on consent, respectful behaviour and zero tolerance for harassment, with prominent signage at entrances, tables and in toilets to reinforce expectations and promote safety.
- The use of the phrase "conduct of performers" places undue responsibility on individual workers rather than venue management and licence holders. We recommend replacing this with "conditions of performance" or "performance regulations".
- The performer information pack should include clear signposting to advice and support services, such as those offering information on health care, domestic abuse, sexual assault (SARCS), mental health, sexual health and financial/debt support. Key information about these services should also be displayed in staff

and performer areas.

- Add a condition requiring venues to have a clear and accessible reporting process for complaints or concerns raised by performers, including an option to report anonymously.
- Clarify that any breach of performer boundaries, including attempts by customers to negotiate services outside the venue or violate rules, should be logged and trigger a review by management.
- All staff should receive regular training on how to identify and respond to signs of exploitation, including human trafficking and coercion. Training should include how to escalate concerns appropriately.
- The current condition (28) requires a written policy but does not specify what it should cover. We recommend this include details such as access to safe transport home, staff support at the end of shifts and protocols for responding to harassment or unwanted attention outside the venue.
- While the policy currently requires booths not be fully enclosed (condition 29), we recommend also requiring that any semi-private spaces have either real-time CCTV coverage or direct staff supervision to prevent breaches of boundaries, exploitation or violence.
- Payment and remuneration records should clearly distinguish between wages, tips, and any venue-imposed fees or charges. This ensures transparency and protects performers from exploitative financial practices.

9. Would you like to make any further comments relating to the Sexual Entertainment Venue licensing policy?

This is an opportunity for Aberdeen to align its licensing approach with national policy commitments and take a practical step to reduce gendered harm in the city. As a modern and progressive city, Aberdeen should adopt a licensing policy that supports a managed approach to ending SEV provision.

We recognise that this position may feel like a radical departure from current practice. However, strong and proactive action is necessary if we are to tackle the root causes of violence against women and girls and uphold our shared commitments under Equally Safe.

Appendix 1: CSE Position Paper



Commercial Sexual Exploitation: Position Paper and Information Briefing

Introduction

The purpose of this paper is to state the position of the Aberdeen City Violence Against Women and Girls Partnership on commercial sexual exploitation (CSE). This paper provides an overview of key issues, highlighting the inherently exploitative nature of CSE and its disproportionate impact on women and girls, while acknowledging the diverse experiences of those involved. It explores the factors that lead to individuals becoming involved in the sex industry, the impact on those involved, the motivations and attitudes of men who consume sexual services, and the broader social implications of CSE. By establishing our position, we aim to advocate for policies and practices that reduce harm, support those affected, challenge demand, and tackle the normalisation of CSE.

Our Position

Commercial sexual exploitation is a pervasive form of gender-based violence that disproportionately impacts women and girls, though men, boys, and non-binary individuals are also affected. CSE often involves coercion, lack of genuine choice, and systemic inequalities rooted in patriarchal structures that commodify and dehumanise individuals. Tackling gender inequality as a root cause of violence against women and girls (VAWG) is central to our approach.

While recognising diverse experiences and perspectives within the sex trade, our position, aligned with the principles of *Equally Safe: Scotland's Strategy for Preventing and Eradicating Violence Against Women and Girls* (2023), prioritises addressing instances of CSE that are involuntary or exploitative.

We emphasise the importance of disrupting and deterring demand for sexual exploitation, recognising that without demand, the cycle of exploitation cannot continue. Addressing this demand is essential to breaking the cycle and preventing further harm.

Our commitment extends to improving access to support services, reducing stigma, and advocating for compassionate approaches that support, protect, and empower individuals providing sexual services. We recognise the social and economic factors that can drive involvement in CSE, such as poverty, lack of housing, and limited access to education or employment opportunities, and are committed to addressing these challenges. This includes developing safe exit pathways, providing vital services such as housing, healthcare, and

employment support, and promoting harm reduction strategies to improve safety and wellbeing for those who remain in the industry.

We oppose approaches that broadly legitimise or regulate all forms of CSE as "work" without addressing the inherent power imbalances involved. Instead, we advocate for accountability for those who purchase sex, challenge societal normalisation of sexual exploitation, and work towards a society where no one is compelled to sell sex as a means of survival.

Definition

Commercial sexual exploitation refers to the exploitation of another person's body through coercion, manipulation, or abuse of vulnerability. Most commonly, it involves men purchasing sexual services from women or benefiting financially from their exploitation. CSE includes activities such as prostitution, internet or phone sex, stripping, lap dancing, the production of sexually explicit materials (e.g. pornography), sex tourism, and trafficking.

For many, involvement in CSE is driven by coercion, manipulation, or economic desperation, with systemic barriers compromising genuine consent. Women make up the majority of those in the sex industry, with estimates suggesting they account for 85–90% (Scambler, 2007). However, accurately quantifying the scope of the sex industry is challenging. Some activities, such as stripping or creating sexual content online, are more socially accepted and not widely reported on, while others, such as trafficking-related exploitation, are hidden due to their criminal nature.

Even when framed as voluntary, CSE reinforces power imbalances and perpetuates cycles of oppression. Its acceptance sustains harmful stereotypes, contributing to women and girls being viewed as sexual objects, and fosters a culture tolerant of gender-based violence.

Understanding the Gendered Drivers of Women's Exploitation in CSE

CSE is not solely the result of individual choices but is shaped by systemic factors that disproportionately impact women and girls. Understanding why women are more at risk of becoming involved in CSE requires us to look at the economic, social, and cultural drivers that perpetuate gender inequality and create vulnerability to exploitation. While some individuals may view their involvement in CSE as a form of empowerment or a way to exercise agency, our focus is on addressing the experiences of the majority who are impacted by coercion, limited choices, systemic inequities and other overlapping factors.

Economic hardship is a significant factor driving involvement in CSE. Systemic inequalities, such as the gender pay gap, discrimination in hiring, and limited access to education and stable employment, mean women, particularly from marginalised communities, are more likely to live in poverty. Large gender disparities in unpaid labour, particularly in parenting and care work, further exacerbate financial inequalities. In the UK, 45% of single-parent households, most of which are headed by women, live in poverty (Gingerbread, 2022). This economic vulnerability is intensified by women's overrepresentation in informal, low-paid, and insecure work; 25% of women are in severely insecure jobs compared to 15% of men (Florrison, 2022).

A person's intersecting identities, such as ethnicity, immigration status, disability, and LGBTQ+ identity, can amplify factors which may lead someone to become involved in CSE by creating structural barriers and limiting access to essential resources. For instance, women with disabilities, who may face systemic barriers to education, employment, and support services, are up to three times more likely to experience sexual violence, including trafficking and CSE, than non-disabled women (World Health Organisation, 2021). In 2021 the English Collective of Prostitutes estimated that 41% of people involved in selling or exchanging sex in the UK are migrants, with the majority from Eastern Europe. They may face heightened risks around becoming involved in CSE or difficulties exiting CSE. This could be due to factors such as fears of deportation, limited social networks, and limited access to suitable services. These overlapping factors not only increase the risk of becoming involved in CSE but also create significant obstacles to accessing support or resources to exit, perpetuating cycles of exploitation.

The Encompass Network, a collective of Scottish services working to support women affected by, or at risk of becoming involved in any area of the sex industry, conducted a snapshot in 2023 that showed among the 53 women supported by their services, 43% had experienced sexual abuse as children, and 28% had been in care as children. Other adverse experiences, such as homelessness and involvement in the justice system, further contribute to this vulnerability, with 49% having been involved in the justice system and 9% having convictions relating to prostitution. 66% had experienced domestic abuse, and 60% had experienced rape or sexual assault, highlighting the pervasive impact of gender-based violence in their lives. Domestic abuse can further entrap women financially, as abusers may control or restrict access to money, damage credit, or interfere with employment. Substance use, which is often a response to trauma, can function as both a coping mechanism and a factor that drives some women into CSE, as they may turn to selling or exchanging sex to fund their alcohol or drug use.

Cultural and social norms play a significant role in women's involvement in CSE. Societal norms that objectify women perpetuate the idea that their bodies are primarily for male consumption. Research shows that sexually objectifying media can lead to the dehumanization of women, reinforcing perceptions of women as objects rather than individuals (Galdi et al., 2021). Media representations that sexualize women and girls and glamorize the commercialisation of sexual services normalize these beliefs, making exploitation seem more acceptable. Studies highlight how such portrayals shape societal attitudes, perpetuating harmful stereotypes and reinforcing gendered power imbalances. (Papageorgiou et al., 2023). These cultural influences intersect with systemic barriers, such as the criminal consequences faced by women involved in CSE, which create significant obstacles to exiting. This reflects broader societal attitudes that place the burden of criminality on women rather than addressing the systemic factors that drive them into CSE. At the same time, the lack of legal consequences for those who buy sex or profit from CSE perpetuates demand, enabling exploitation to continue unchecked (Grenfell et al., 2022).

While CSE primarily affects women, men can also be victims, often experiencing exploitation at the hands of other men. Like women, they may become involved in CSE due to factors such as economic hardship, experiences of violence or abuse or marginalisation due to intersecting identities. Men may also face unique challenges, including less recognition as victims and specific stigmas that make it harder to access support.

Addressing CSE effectively requires understanding these gendered dynamics. Gender-sensitive approaches that promote economic empowerment, challenge harmful norms and provide support for those affected are essential for creating pathways out of exploitation and reducing demand.

Understanding Demand and Men's Attitudes Towards CSE

Understanding why men purchase sex or engage in other forms of commercial sexual exploitation is necessary to disrupting demand and addressing harm. Demand drives the supply of CSE, and men's participation reflects broader societal norms that objectify women and uphold patriarchal systems. These norms perpetuate the belief that men are entitled to access women's bodies to satisfy their own desires or address personal struggles.

Men engage in CSE, including purchasing sex, consuming pornography, and attending sexual entertainment venues, for self-reported reasons often tied to unmet emotional or physical needs. Loneliness, rejection, low self-esteem, and dissatisfaction with traditional relationships are frequently cited as motivations (Farley et al., 2009). For many, these activities provide a sense of control and a way to avoid the complexities of emotional intimacy and accountability, reinforcing patriarchal power dynamics (Bindel, 2017). Self-reported motivations for consuming pornography include sexual curiosity, stress relief, and the exploration of fantasies (Burtäverde et al., 2021). Similarly, men describe attending sexual entertainment venues as a form of escapism, a way to feel dominant, and an opportunity to fulfil fantasies in an environment designed to prioritize male desires and reinforce power over women (Frank, 2005).

Regular consumption of sexual content, particularly violent or degrading pornography, reinforces harmful stereotypes, distorts views on intimacy, consent, and equality, and desensitizes men to real-life violence. Studies show that exposure to such content fosters attitudes that normalize coercion, reduce empathy for women, and trivialize sexual aggression (Malamuth et al., 2000; Garner and Elvines, 2013).

Research also shows that men who purchase sex often rationalise their actions by dehumanising women in prostitution, viewing them as fundamentally different from other women. This enables buyers to justify exploitation while disregarding the systemic harm they perpetuate. Farley et al. (2011) found that while men were aware of the harm caused by prostitution and human trafficking, they often chose to ignore their role in perpetuating it. In the same study, 96% of men claimed prostitution is consensual between two adults, yet 73% acknowledged that women often enter prostitution out of economic desperation, 50% agreed women are victimized by pimps, and 85% believed women do not enjoy the sexual encounters.

Although some men report feelings of guilt or shame after purchasing sex these emotions often coexist with rationalizations that minimize harm or shift blame onto women. For others, reliance on transactional relationships becomes a way to cope with personal struggles, further perpetuating exploitation and cycles of emotional distress (Farley et al., 2011). However, these personal conflicts do not absolve men of responsibility for the harm caused by their actions.

Impact on Those Involved in CSE

Women involved in selling or exchanging sex face a range of complex and overlapping risks that can significantly affect their health, safety, and overall wellbeing. These risks are shaped by factors such as economic hardship, social marginalisation, past trauma, and, in many cases, coercion or trafficking. The true scale of harm experienced by women trafficked into CSE is difficult to capture in statistics, as their experiences frequently remain hidden due to fear, criminalisation, and systemic barriers to disclosure.

Physical violence is a widespread danger; Church et al. (2001) found that 81% of women in street prostitution had experienced violence from clients, compared to 48% of those working indoors. Similarly, Hester and Westmarland (2004) reported that three-quarters of UK women in prostitution had been physically assaulted, with over half experiencing rape or serious sexual assault. Women involved in CSE also face a significantly higher risk of homicide than the general population, as highlighted by Cunningham et al. (2018).

Despite these risks, incidents of violence often go unreported or are not adequately addressed by the legal system. Research from National Ugly Mugs, a UK charity focused on ending violence against individuals in the sex trade, highlights a lack of engagement with law enforcement among those reporting victimisation. In 2020, only 7.7% of off-street independent workers chose to involve the police, and just 69% consented to share information anonymously with them. These figures reflect a mistrust of law enforcement, leaving many cases unresolved and contributing to ongoing cycles of harm and exploitation.

The psychological impact on women in CSE is profound. Many experience chronic anxiety, depression, and complex trauma. Substance use can become a coping mechanism to manage these stressors, further entrenching women in cycles of exploitation. A snapshot exercise conducted by the Encompass Network in November 2023 revealed that 89% of the 53 women supported on a single day had mental health issues, with 68% experiencing depression, 49% anxiety, and 19% PTSD. Substance use was also prevalent, with 83% using drugs, including crack cocaine (47%) and heroin (42%). These figures underscore the interconnected nature of mental health challenges, substance use, and systemic barriers, which make exiting CSE incredibly difficult. Although there is limited research directly linking commercial sexual exploitation to physical health issues, studies have shown that experiences of trauma and poor mental health can significantly contribute to long-term physical health problems (Schnurr et al, 2021). Trauma has been associated with conditions such as chronic pain, cardiovascular issues, gastrointestinal problems, and a weakened immune system. These physical health issues may compound the difficulties faced by those involved in CSE, further limiting their access to essential support and healthcare.

Stigma and discrimination compound these challenges by creating barriers to accessing services. Healthcare and mental health support are often inaccessible or inadequate for women in CSE. A survey of frontline workers by Potter et al. (2022) found that while nearly half felt primary care was somewhat accessible, the majority believed these services failed to meet women's needs. Access to mental health support was even more limited, with three-quarters of respondents stating it was inaccessible or mostly inaccessible. Contributing factors include trauma, fear of stigma, and challenges in navigating referral processes. Without adequate support, many women face ongoing financial instability, social isolation, and limited alternative employment opportunities, making a different future seem unattainable (UK Government, 2020).

While the online sex industry is often perceived as safer than in-person exploitation, it comes with its own set of risks. Women involved in activities such as camming, sexting, or live interactions frequently face digital abuse, including harassment, threats, and privacy breaches. Beyond the Gaze (2017) reported that nearly half of women in the online sex industry had experienced repeated unwanted contact, with many subjected to verbal abuse. A BBC investigation highlighted additional dangers, including doxing (publishing private or identifying information online) and digital stalking, which can lead to significant emotional distress. Moreover, the pressure to continuously produce explicit content to maintain income can lead to psychological harm and financial instability. Women in this industry often face coercion or manipulation to perform acts they find uncomfortable, and the unauthorized distribution of their content can result in ongoing harm, including social stigma and difficulty finding alternative employment (Donevan, 2021). These risks illustrate that even in perceived safety, exploitation and harm persist.

The experiences of men involved in the sex industry differ but are similarly shaped by social norms and expectations. Men face risks such as physical violence, sexual assault, and psychological harm, though these often manifest differently compared to women. Jamel (2011) found that men are less likely to experience physical violence from clients, possibly due to perceptions that male clients, particularly gay men, are less confrontational or that those who identify as straight may wish to keep their involvement with male individuals providing sexual services a secret. Additionally, the power dynamics between male clients and male providers are often less pronounced than those between male clients and women in CSE.

Despite these differences, men in CSE also encounter significant structural barriers. They may face heightened stigma due to societal perceptions of masculinity, which can make their experiences of harm less visible and discourage them from seeking help. Support services often focus on women, leaving men with limited access to tailored resources. This gap in services further entrenches men in cycles of exploitation, as they lack the support needed to safely exit CSE (Hester et al., 2019).

The complex and varied risks faced by individuals in CSE, whether in-person, online, or through the production of pornographic content, are shaped by systemic inequalities that perpetuate harm and exploitation. Addressing these risks requires a nuanced understanding of how these factors intersect and contribute to the challenges faced by those involved.

Broader Societal Impacts of CSE

CSE both reflects and shapes societal attitudes and behaviours that contribute to gender inequality and normalise harmful practices. Societal norms that objectify women and tolerate exploitation create an environment where CSE is more likely to occur. In turn, the prevalence and visibility of CSE perpetuate these harmful attitudes, making exploitation seem more acceptable and further entrenching gender inequality. This cycle undermines efforts to promote equality and has far-reaching consequences for society as a whole.

CSE plays a role in normalising violence against women and girls. When sexual exploitation is accepted or overlooked, it suggests that coercion, control and violence against women's bodies is permissible. This normalisation fosters an environment where gender-based violence is more tolerated or dismissed, making it harder for survivors to seek justice and support.

CSE can reinforce harmful stereotypes about women and girls. By commodifying women's bodies, the sex industry creates a culture where women are valued primarily for their physical appearance and sexual availability, which undermines efforts to achieve gender equality (Papageorgiou et al, 2023). The visibility of CSE impacts how men and boys view women, often reducing them to objects for male consumption, diminishing empathy for women's experiences and perpetuating disrespectful or abusive behaviours (Farley et al, 2011). Exposure to CSE through media, pornography, or every day conversations can negatively influence how boys and young men perceive relationships and consent, fostering attitudes that prioritise male entitlement over mutual respect and equality (APA, 2010).

While these impacts are significant, it is important to recognise that not all women involved in selling sexual services view their experiences in the same way. For some, participation in the sex industry may represent a form of empowerment, self-expression or control over their own bodies and choices. Nonetheless, despite individual perceptions, the broader context of CSE contributes to shaping social norms which impacts all women and girls. These varied perspectives remind us that discussions about sexual freedom and rights must balance both personal autonomy and the reality of exploitation within CSE.

Local Context: Aberdeen

Local Initiatives

In Aberdeen efforts are underway to address commercial sexual exploitation through local initiatives:

Operation Begonia: This initiative involves a dedicated team of Police Scotland officers focused on identifying women involved in 'on-street' prostitution. The aim is to provide tailored support to help these women exit the sex trade, in collaboration with multi-agency partners. In 2023, Operation Begonia engaged with 237 women, conducted 58 patrols, and reached 13 new women (with an additional 20 who have not been involved in selling sex for over a year).

Quay Services: Provided by Alcohol and Drugs Action (ADA), Quay Services offers dedicated support to women involved in prostitution in Aberdeen and Aberdeenshire. In total, there were 218 contacts in 2023, with 12 unique clients receiving ongoing support and 39 clients receiving support specifically for involvement in selling or exchanging sex.

These initiatives are an important starting point for addressing CSE locally. They provide essential support and services to individuals affected by exploitation and are a key part of the city's response to this issue.

Conclusion

Commercial sexual exploitation is a pervasive form of gender-based violence that exploits systemic inequalities, disproportionately affecting women and girls, but also impacting men, boys, and non-binary individuals. It perpetuates harmful stereotypes, reinforces gender inequalities, and normalises violence, creating a culture where exploitation is tolerated. While acknowledging the diverse experiences of those involved, our position remains clear: CSE is inherently exploitative and incompatible with gender equality and human rights.

To reduce the harm associated with CSE, we believe it is important to challenge the societal norms that allow it to continue, reduce demand for sexual services, and provide meaningful support to those affected. This includes supporting policies that discourage the purchase of sex, expanding access to support services, and fostering greater public understanding of the realities of CSE.

We call on policymakers, service providers, and community members to join us in this effort to challenge all forms of CSE, protect and empower those affected, and build a society where no one is compelled to sell sex as a means of survival. By working together, we can help create a safer, more just society for all.

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LICENSING COMMITTEE INFORMATION SHEET

27 August 2025

Public Application

TYPE OF APPLICATION: HMO LICENCE APPLICATION (NEW)

APPLICANT: SCOTT FORRESTER

AGENT: STEWART PROPERTY SERVICES LIMITED

ADDRESS: 51 LESLIE ROAD, ABERDEEN

INFORMATION NOTE

- Application Submitted 03/04/2025
- Determination Date 02/04/2026

This HMO licence application is on the agenda of the Licensing Committee for the reason that 1 representation/objection letter was submitted to the Private Sector Housing Team.

If, after consideration of the representation/objection, the Committee is minded to grant the HMO licence, it may do so since at the time of drafting this information note, the necessary upgrading works and certification have been completed.

DESCRIPTION

The property at 51 Leslie Road, Aberdeen, is the subject of this new HMO licence application and its accommodation is a 2-storey dwelling house comprising, 4 letting bedrooms, lounge, kitchen and bathroom. The applicant wishes to accommodate a maximum of 4 tenants, which is acceptable to the Private Sector Housing Team in terms of space and layout. The location of the premises is shown on the plan attached as Appendix A.

CONSULTEES

- Police Scotland
- Scottish Fire & Rescue Service
- A public Notice of HMO Application was displayed outside the building, alerting the public to the HMO licence application.

REPRESENTATIONS/OBJECTIONS

- Police Scotland – no objections
- Scottish Fire & Rescue Service – no objections
- One objection letter from Objector A (Attached as Appendix B)
- One representation from Scott Forrester (Attached as Appendix C)

The objection was received within the statutory time period therefore the Council must consider.

COMMITTEE GUIDELINES/POLICY

All applications for HMO licences are dealt with in accordance with the Scottish Government's document:

['Licensing of Houses in Multiple Occupation: Statutory Guidance for Scottish Local Authorities'](#)

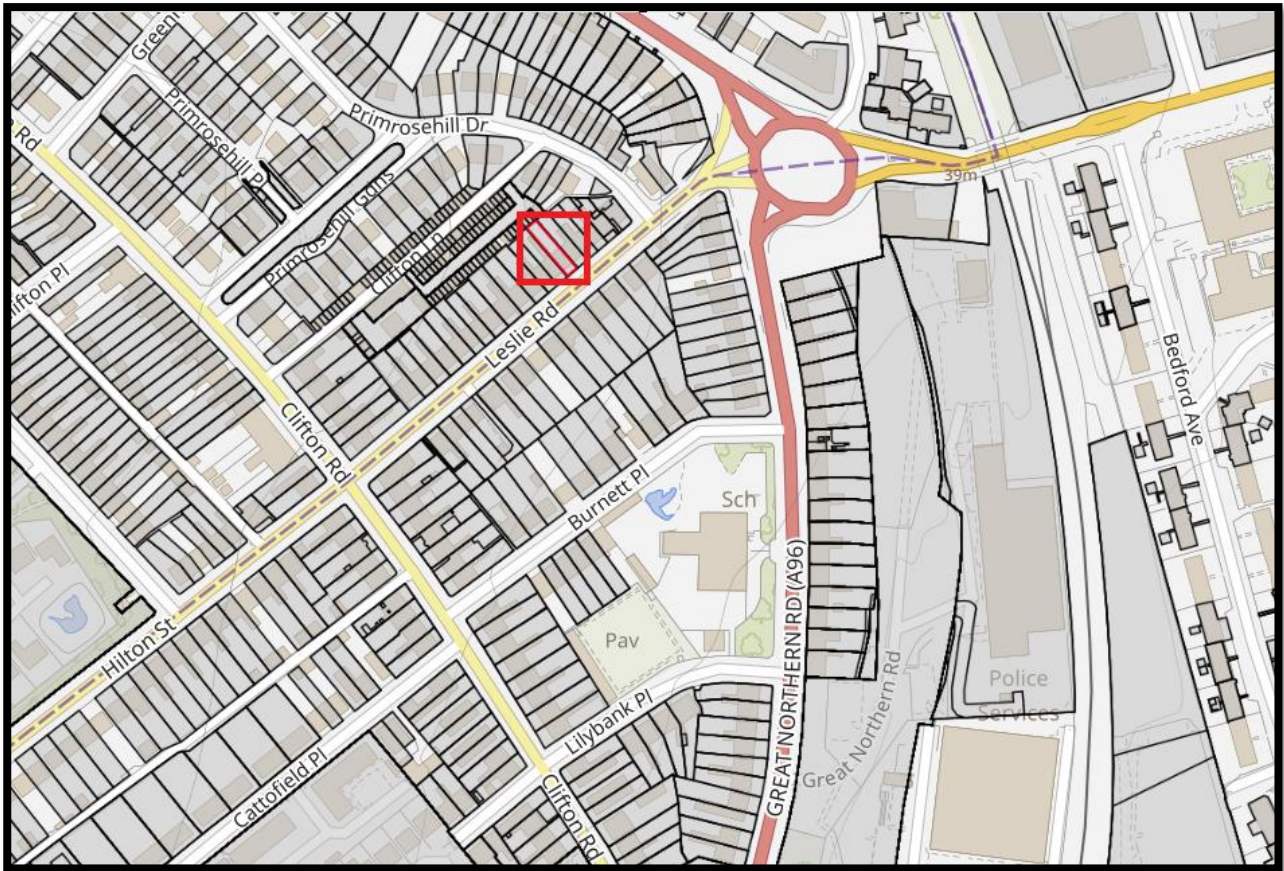
GROUNDINGS FOR REFUSAL

This application is being dealt with under the provisions of [Part 5 of the Housing \(Scotland\) Act 2006](#), as amended. Available grounds of refusal are as follows:

- 1) The applicant and/or agent is not considered to be a 'fit & proper' person to hold an HMO licence, and
- 2) The property is unsuitable for occupation as an HMO for one, some or all the following reasons:
 - i) Its location
 - ii) Its condition
 - iii) Any amenities it contains
 - iv) The type & number of persons likely to occupy it
 - v) Whether any rooms within it have been subdivided
 - vi) Whether any rooms within it have been adapted, resulting in an alteration to the water & drainage pipes within it
 - vii) The safety & security of persons likely to occupy it
 - viii) The possibility of undue public nuisance
 - ix) There is, or would be, an overprovision of HMOs in the locality

OTHER CONSIDERATIONS

- The applicant is as a landlord with this Council and their registration includes 51 Leslie Road, Aberdeen.
- The Council's Community Safety Team has no record of anti-social behaviour complaints in respect of 51 Leslie Road, Aberdeen.
- There are currently 5 other HMO licensed properties at Leslie Road (No. 4, 7, 20, 57, and 61).
- The previous property owner did have an HMO Licence.
- The property is currently unlicensed. As this is a new application, the property cannot operate as an HMO until the Licence application is determined.
- The objection mentions car parking. Members may wish to note that car parking is not a consideration of HMO Licensing it is not specifically mentioned in the Statutory Guidance.



From: [REDACTED]
Sent: 04 April 2025 11:23
To: HMOUnit <HMOUnit@aberdeencity.gov.uk>
Subject: HMO Objection

OBJECTION to HMO Licence @ 51 Leslie Road, Aberdeen, AB24 4HU.
Application Reference HOUS702484930

Dear Sir/Madam,

I write to object to an HMO licence at 51 Leslie Road, Aberdeen, AB24 4HU.

My home [REDACTED] is next door to this property and this property had been rented out by the previous owners and caused years of public nuisance to the immediate neighbours.

At [REDACTED] had lived there for over 50 years, had been complaining of the noise from the previous tenants (students) as the noise travels through the dividing walls.
There was a constant stream of noise, banging and slamming of doors throughout the whole day; and through the night.
It became unbearable and eventually they decided to sell their family home, a home they grew up in and left the city.
The new owners of [REDACTED] complained immediately about the noise coming from 51 Leslie Road as soon as they bought their property.
They would get quite emotional about how it was affecting them.
Very soon they were stating they HATED living here, wished they never moved there. The family became quite distressed.
Fortunately, they only had to endure months of this as the students had finished their course and left the property.

However, once 51 Leslie Road was put on the market to be sold, the new owners of [REDACTED] were totally distressed of the slightest possibility that a new landlord would take over the property and they/we would be subjected to the constant noise again.
Sadly, they decided to sell. They informed me they accepted a low offer to sell their home rather than face the prospect of enduring anything remotely like they did when they initially moved in.

Please also note, parking on the street is very limited and not suitable for another Houshold with multiple vehicles.
This street is very congested and is obviously a main route for emergency services.

Finally, I suffer with health conditions. It is undoubtedly not in my best interests to endure the constant stream of noise that emitted previously from 51 Leslie Road when it was previoulsy rented out to multiple people.

Sincerely,

[REDACTED]

From:**Sent:** 03 August 2025 20:08**To:** HMOUnit <HMOUnit@aberdeencity.gov.uk>**Subject:** HMO application, 51 Leslie Road AB24 4HU

To the HMO unit,

I am the new owner of 51 Leslie Road, AB24 4HU, and this is my reply to your request for a response to the objection to my application.

Before I bought the property I was told by the estate agent that the previous owners bought the house more than 20 years ago to rent to students as an HMO. So it has a long history as an HMO, it has repeatedly had its HMO licence renewed in the past, and the chances are that many of the neighbours have moved to the street since it has been an HMO.

The house has now been unoccupied for over two years and according to recent media reports bringing empty properties back into use is supposed to be an priority for local councils.

I am a farmer in Aberdeenshire. On the farm we have two rental properties and there has never been any complaint of anti social behaviour from the tenants. I own two HMOs in Aberdeen and there has never been a complaint of anti-social behaviour from the tenants of them, not to the letting agent, the council or the police. Given my unblemished record as a landlord I do not think an unsubstantiated allegation from one person about alleged events more than two years ago, involving tenants who no longer live at the property, a landlord who no longer owns the property and a letting agent who is no longer involved with the property, can be regarded as relevant to my application.

As to the parking issue, part of the reason I bought the property is that it has a garage. This house has off street parking. Also, as the house is unoccupied it is a condition of my insurance that I have to inspect it every week. I can honestly say I have never been unable to park on Leslie Road. I have visited at different times on different days and have always been able to get a parking space.

As an existing HMO the house is fitted with spring loaded door closers on almost all the doors. It is not possible to slam these doors as the closers offer resistance if they are forcefully pushed shut. The only doors without such closers are the front, rear and bathroom doors.

I am hesitant to make this final point because I might be wrong about the identity of the complainer, however...

I was told by the estate agents that the property had a right of access over a narrow lane that runs behind number 49, 47 and so on, which gives access to the rear lane and the garages. My lawyer also pointed this out during the purchase process. The day I got the keys to the house I had a good look round the garden and realised for the first time that the occupiers of number 49 have removed any wall or fence there ever was between the lane and their garden, incorporating the ground into their garden and that on the boundary with number 47 there was a solid door that was padlocked. I thought this was a bit of a red flag but did nothing. A couple of weeks later as I was leaving the front of the house I met a couple going into number 49. We made polite small talk for a couple of minutes, then I politely raised the issue of the locked gate. I said I had no problem with the gate being locked but my tenants would need a key so they could use the path. Immediately the atmosphere changed, they became "abrupt" and quickly entered their house. I have had no further contact with them at all. I subsequently found out that when the house had been unoccupied another resident of Leslie Road had been cutting the grass for the previous owners who lived outwith the area and that he had a key for the padlock. I eventually got his key but when I tried it, it would not open the lock. I believe the residents at number 49 have installed a new padlock deliberately to deny me access. If, and I realise it is a big if, the objection that has been made is from the residents of number 49 I would ask the committee to consider if it is a malicious vexatious complaint from some "bad neighbours" who do not want students crossing their garden .

If the complainer is not from number 49 I apologise.

Thank you for considering my application

Scott Forrester

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LICENSING COMMITTEE INFORMATION SHEET

27 August 2025

Public Application

TYPE OF APPLICATION: HMO LICENCE APPLICATION (NEW)

APPLICANT: MOHAMMAD NAMAVAR

AGENT: CITO CIMO LETTING LTD

ADDRESS: 36 ELMFIELD AVENUE, ABERDEEN

INFORMATION NOTE

- Application Submitted 03/06/2025
- Determination Date 02/06/2026

This HMO licence application is on the agenda of the Licensing Committee for the reason that 1 representation/objection letter was submitted to the Private Sector Housing Team.

If, after consideration of the representation/objection, the Committee is minded to grant the HMO licence, it may do so under delegated powers since at the time of drafting this information note, the necessary certification has not been completed.

DESCRIPTION

The property at 36 Elmfield Avenue, Aberdeen, is the subject of this new HMO licence application and its accommodation is a 2-storey dwelling house comprising, 3 letting bedrooms, lounge, kitchen and bathroom. The applicant wishes to accommodate a maximum of 5 tenants, which is acceptable to the Private Sector Housing Team in terms of space and layout. The location of the premises is shown on the plan attached as Appendix A.

CONSULTEES

- Police Scotland
- Scottish Fire & Rescue Service
- A public Notice of HMO Application was displayed outside the building, alerting the public to the HMO licence application.

REPRESENTATIONS/OBJECTIONS

- Police Scotland – no objections
- Scottish Fire & Rescue Service – no objections
- One objection letter from Objector A (Attached as Appendix B)
- One representation letter from the applicant (Attached as Appendix C)

The objection was received within the statutory time period therefore the Council must consider.

COMMITTEE GUIDELINES/POLICY

All applications for HMO licences are dealt with in accordance with the Scottish Government's document:

['Licensing of Houses in Multiple Occupation: Statutory Guidance for Scottish Local Authorities'](#)

GROUNDINGS FOR REFUSAL

This application is being dealt with under the provisions of [Part 5 of the Housing \(Scotland\) Act 2006](#), as amended. Available grounds of refusal are as follows:

- 1) The applicant and/or agent is not considered to be a 'fit & proper' person to hold an HMO licence, and
- 2) The property is unsuitable for occupation as an HMO for one, some or all the following reasons:
 - i) Its location
 - ii) Its condition
 - iii) Any amenities it contains
 - iv) The type & number of persons likely to occupy it
 - v) Whether any rooms within it have been subdivided
 - vi) Whether any rooms within it have been adapted, resulting in an alteration to the water & drainage pipes within it
 - vii) The safety & security of persons likely to occupy it
 - viii) The possibility of undue public nuisance
 - ix) There is, or would be, an overprovision of HMOs in the locality

OTHER CONSIDERATIONS

- The applicant is as a landlord with this Council and their registration includes 36 Elmfield Avenue, Aberdeen.
- The Council's Community Safety Team has no record of anti-social behaviour complaints in respect of 36 Elmfield Avenue, Aberdeen.
- There are currently 27 other HMO licensed properties at Elmfield Avenue.
- The property is currently unlicensed. As this is a new application, the property cannot operate as an HMO until the Licence application is determined.



DEAR SIR/MADAM,

I AM WRITING TO
OBJECT TO THE APPLICATION TO TURN
THE PROPERTY AT 36 ELMFIELD AV, ABDN
AB24 3PB BY MOHAMMAD NAHAVAR
ON 3/6/26 INTO ANOTHER HMO.

I HAVE LIVED ON THIS STREET
FOR MANY YEARS AT [REDACTED]
HAVING RECENTLY MOVED TO [REDACTED]
THE AMOUNT OF HMO'S ON THE
STREET IS VERY HIGH AND I DO
NOT THINK THERE SHOULD BE YET
ANOTHER ONE GRANTED. I AM
NOT OPPOSED TO SUCH PROPERTIES
BUT A STREET SHOULD HAVE A
LIMIT TO MAINTAIN A GOOD MIX OF
RESIDENTIAL TYPES AND OCCUPANTS,
IT IS BEST TO MANTAIN A MIX OF

USES WITH THE VAST MAJORITY
FULL-TIME OCCUPANTS, HMO'S
TEND TO HAVE MORE TRANSIENT
PERSONS/ STUDENTS ECT. I WOULD
LIKE TO SEE THE STREET RETAIN A
MORE PERMANENT FAMILY CHARACTER.
IT IS ON THIS GROUND I STATE MY
OBJECTION.

YOURS SINCERELY



23/JUNE/25.

Aberdeen City Council
Housing & Environment
DATE RECEIVED
25 JUN 2025
Private Sector Housing Unit

8 August 2025

Jocelyn Janssen
Private Sector Housing Unit
Aberdeen City Council

Dear Jocelyn

**APPLICATION FOR LICENCE FOR A HOUSE IN MULTIPLE OCCUPATION (HMO)
36 ELMFIELD AVENUE, ABERDEEN**

Thank you for your letter of 30 July 2025 regarding the above subject.

In response to the letter of objection you have received in respect of our application, I note that the objector wishes to limit the amount of HMO's in the street and have more permanent residents. HMO's are a vital source of accommodation for many people in the city who can make a positive contribution to the area whilst maintaining balanced communities. This particular property has been renovated to a high standard at considerable expense and so it would be in our interests as well to ensure that it will be well maintained and leased to appropriate tenants.

As you may be aware, we currently successfully manage three HMO's in Aberdeen with no problems and are a well respected landlord in the city. We continue to provide high standard accommodation and feel it would be beneficial to the area and the citizens of Aberdeen for the licence to be granted.

I trust this addresses the concerns raised and can confirm that I will attend the Committee meeting on 27 August 2025 via Meet and my letting agent will attend the meeting in person. In the meantime, please do not hesitate to contact me should you require anything further.

Yours sincerely,



Mohammad Namavar



LICENSING COMMITTEE INFORMATION SHEET

27 August 2025

Public Application

TYPE OF APPLICATION: SHORT TERM LET LICENCE APPLICATION
NEW HOST-HOME LETTING

APPLICANT: DEAN DICKSON

PROPERTY MANAGER: DEAN DICKSON

ADDRESS: 21 GRIMOND COURT, ABERDEEN

INFORMATION NOTE

- Application Submitted 04/06/2025
- Determination Date 03/04/2026

This Short Term Let licence application is on the agenda of the Licensing Committee for the reason that 5 representations/objections were submitted to the Private Sector Housing Team.

If, after consideration of the representations/objections, the Committee is minded to grant the Short Term Let licence, it may do so since at the time of drafting this report, the necessary upgrading works and certification have been completed.

DESCRIPTION

The property at 21 Grimond Court, Aberdeen, is the subject of this new Short Term Let licence application and its accommodation comprises of a flat, with 2 bedrooms, bathroom, kitchen and living room. The applicant wishes to accommodate a maximum of 4 guests, which is acceptable in terms of space and layout. The location of the premises is shown on the plan attached as Appendix A.

CONSULTEES

- Police Scotland
- Scottish Fire & Rescue Service
- Aberdeen City Council's Planning Team
- A public Notice of Short Term Let Application was displayed outside the building, alerting the public to the licence application.

REPRESENTATIONS/OBJECTIONS

- Police Scotland – no objections
- Scottish Fire & Rescue Service – no objections
- Aberdeen City Council's Planning Team – no objections
- One objection from Objector A (Attached as Appendix B)
- One objection from Objector B (Attached as Appendix C)

- One objection from Objector C (Attached as Appendix D)
- One objection from Objector D (Attached as Appendix E)
- One objection from Objector E (Attached as Appendix F)
- Representation from the applicant (Attached as Appendix G)

The objections were received within the statutory time period therefore the Council must consider.

COMMITTEE GUIDELINES/POLICY

All applications for Short Term Let licences are dealt with in accordance with the Scottish Government's document:

[Short term lets - licensing scheme part 2: supplementary guidance for licensing authorities, letting agencies and platforms](#)

GROUND FOR REFUSAL

This application is being dealt with under the provisions of '[Civic Government \(Scotland\) Act 1982 \(Licensing of Short Term Lets\) Order 2022](#)' (the 2022 Order)

Available [grounds of refusal](#) are as follows:

A licensing authority shall refuse an application to grant or renew a licence if, in their opinion—

(a)the applicant or, where the applicant is not a natural person, any director of it or partner in it or any other person responsible for its management, is either—

(i)for the time being disqualified under section 7(6) of this Act, or

(ii)not a fit and proper person to be the holder of the licence;

(b)the activity to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant or renewal of such a licence if he made the application himself;

(c)where the licence applied for relates to an activity consisting of or including the use of premises or a vehicle or vessel, those premises are not or, as the case may be, that vehicle or vessel is not suitable or convenient for the conduct of the activity having regard to—

(i)the location, character or condition of the premises or the character or condition of the vehicle or vessel;

(ii)the nature and extent of the proposed activity;

(iii)the kind of persons likely to be in the premises, vehicle or vessel;

(iv)the possibility of undue public nuisance; or

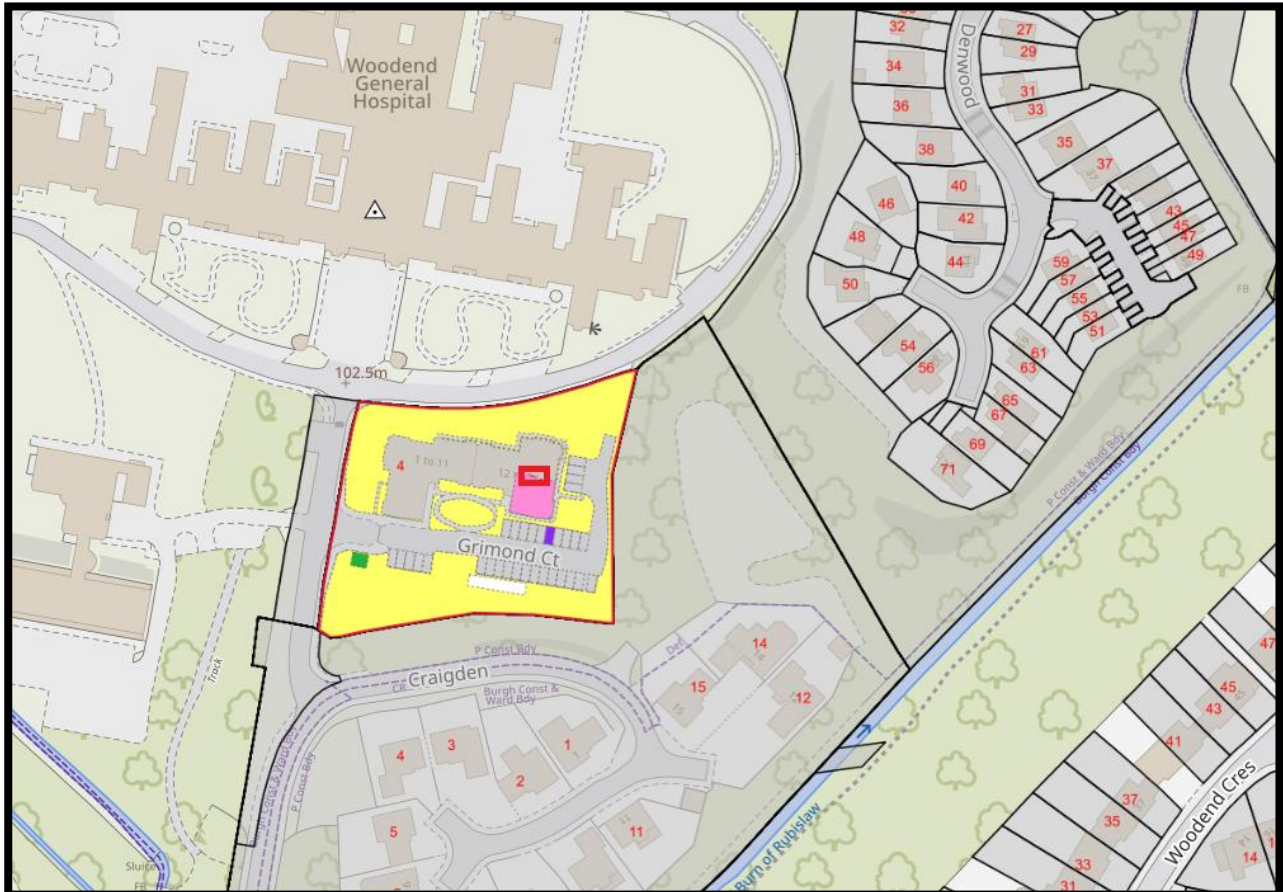
(v)public order or public safety; or

(d)there is other good reason for refusing the application;

OTHER CONSIDERATIONS

- Landlord Registration is not a requirement of Short Term Let licensing.
- The Council's Community Safety Team has no record of anti-social behaviour complaints in respect of 21 Grimond Court, Aberdeen.
- There are no Granted Short Term Let licences at Grimond Court.
- The property is currently unlicensed. As the applicant is a new operator, the property cannot operate as a Short Term Let until the Licence application is determined.

'A'



From:**Sent:** 16 June 2025 15:46**To:** ShortTermLets <ShortTermLets@aberdeencity.gov.uk>**Subject:** Reference HSTL720191048

Good Afternoon

I am emailing to oppose short term lease application no HSTL720191048 at 21 Grimond Court AB15 6XZ. Aberdeen

I am objecting for the following reasons

- I am very concerned regarding the safety of the many young children who live in the building with strangers having access.
- We pay for building insurance through our factors fee and this will likely be affected by the introduction of a short term lease
- The flat in question is on my floor and all occupants will have to pass my door to make their way to their short term lease
- Planning decisions should first and foremost cater for the needs and interests of the city's residents, and this proposed short term lease application runs counter to that.
- The complex is popular with many who work within NHS Grampian due to the closeness to both hospitals, it is unfair to disturb the sleep of these individuals by potentially disruptive individuals
- There is a shared single staircase
- In my experience the noise & nuisance from a short term lease is unacceptable
- The Scottish Government's National Planning Framework 4 states:
- "Development proposals for the reuse of existing buildings for short term holiday letting should not be supported if it would result in:

-an unacceptable impact on the local amenity or character of a neighbourhood or area;
or

- the loss of residential accommodation where such loss is not outweighed by local economic benefits.”

- I strongly maintain that this short term lease would have detrimental effects on the local amenity and character of the area, by removing what should be residential accommodation from local supply. I see no evidence that any local economic benefits outweigh this loss. It also seems clear to me that this lease will place a significant burden on others in the building

Kind Regards



'C'

Private Sector Housing Team
Early Intervention & Community Empowerment
Hub 11, Second Floor West
Marischal College
Broad Street
Aberdeen
AB10 1AB



Sunday, 22 June 2025

To Whom It May Concern,

My wife and I are joint owners of the ground floor flat at [REDACTED] and have been so for just under seven years. Grimond Court is a very quiet and peaceful development off Queens Road close to Woodened Hospital. It has come to our attention via a notice posted on the front of one part of the building that comprises Grimond Court that an application for a Short Term Let at 21 Grimond Court has been submitted to you. By only posting the notice on part of the building, roughly half of the residents i.e. those in 1-12 Grimond Court, may well not see the notice. They too have a vested interest in not granting this application for the same reasons that we have. Hence, my somewhat tardy response for which I apologise.

The reason for our objection to this application has several parts. However, the major one concerns the well-reported anti-social problems associated with so called 'short term lets' or AirB&B lets as they are more commonly known viz. excessive noise and disturbances by people who have no vested interest in the building nor respect for neighbours. Within the grounds of the block there have been several security and anti-social issues ranging from thefts from vehicles, the theft of a vehicle, and there have been several occasions where excessive noise and disturbance from some tenants have resulted in calls being made to the police, Environmental Health, and other agencies. These kinds of issues can only exacerbated by the granting of a licence for short term lets.

In several clauses of the Missives associated with this development it is stated quite clearly that all owners of units in the development should 'take all appropriate steps to prevent creating a nuisance to other owners'. In our opinion, granting this application would not be compliant with this requirement.

By allowing this development, the nature of this type of let will only result in more people in and around the properties, people who are most likely unknown to longer term residents who, over the years, have developed a community spirit whereby they 'keep an eye' on each other and on the areas around the building.

We would strongly and respectfully urge you to reject this application.

Regards,



Aberdeen City Council
Housing & Environment
DATE RECEIVED
25 JUN 2025
Private Sector Housing Unit

'D'

Private Sector Housing Team
Early Intervention& Community Empowerment
Hub 11,
Second Floor West
Marischal College
Broad Street
AB10 1AB



30th June 2025

ACC Ref HSTL720191048

To Whom It May Concern,

We are writing to object to the short-term let licence application made by Mr Dean Dickson for 21 Grimond Court AB15 6XZ.

We own and permanently reside at  having done so for more than 15 years.

When we purchased, it was important to us that the block be residential where neighbours would be able to get to know each other within a quiet and peaceful environment; this natural wish of course remains important to us. Our purchasing documents set out that all owners of units in the development should " take all appropriate steps to prevent creating a nuisance to other owners ".

It is our view that a granting a licence for short-term letting would be in conflict with this requirement. Anti-social behaviour problems associated with short-term lets is well documented, with noise and damage caused by people who have no vested interest in the building or the people whose homes are in the development. There is a good community spirit within this small development. Short-term lettings will inevitably alter the make-up and 'feel' of Grimond Court, with the potential to bring a variety of problems/issues to our homes.

We strongly object to the application and respectfully request that Aberdeen City Council reject the request for the licence.

Kind Regards



'E'

Subject: Objection - Short Term Let's Application - 21 Grimond Court

[Redacted]
To: ShortTermLets

Reply Reply All Forward [Icon] ...
Mon 30/06/2025 21:17

Follow up. Completed on 01 July 2025.
You forwarded this message on 01/07/2025 08:49.

Objection - Short Term Lets Application - 21 Grimond Court

Firstly, where the requirements met re the posting of this notification re the application for Short Term Let?

If it was not for an immediate neighbour parking in the visitors car park at the bottom of the development, who shared the whereabouts and knowledge of the rather discretely and somewhat remotely posted notification, I would never have know. To the best of my knowledge there is only one notification posted, on the entry door to their part of the development and no others.

Having been advised, this is the appropriate method and address to lodge an objection, please therefore accept this submission as my electronic version with email sign off.

I [Redacted] submit this as my objection to the owners of 21 Grimond Court being granted permission to let the property on any short term basis.

My rationality is consistent with that of my immediate neighbours:

This opens the door to an alteration of this small community building. Currently the block is approximately 50/50 owners and renters and currently all the residents can get to know the people who stay in the property for a medium / long period of time.

If the flats begin to be rented out on a ad-hoc basis the complexion of the neighbourhood will be altered and a lack of care to the property and sadly the behaviour of people, with no investment in the community, around the flats is likely to have a detrimental impact on those who have more financial and social investment in the property and community.

The impact of Airbnb rentals has been well documented on many occasions.

In addition, as you will no doubt be aware property value in Aberdeen has already dropped a significant 7% on average, as recently promoted through ASPC. The principal of any short term let would have a further detrimental effect to the Grimond Court development and the local residential area.

I hope my concerns are given due consideration in this matter and I look forward to your response and then any subsequent decisions and outcomes.

Kind regards

[Redacted]

[Redacted]

'F'

Private Sector Housing Team
Early Intervention& Community Empowerment
Hub 11,
Second Floor West
Marischal College
Broad Street
AB10 1AB



1st July 2025

To Whom It May Concern

Re: ACC Ref HSTL720191048

I write to you regarding the request for short-term let licence application by Mr Dean Dickson for 21 Grimond Court AB15 6XZ.

I am owner occupier of [REDACTED] for more than 10 years. I bought this flat as it was a nice, quiet, peaceful, residential property. I have enjoyed good relationships with all the permanent residents.

Our purchasing documents set out that all owners of units in the development should "take all appropriate steps to prevent creating a nuisance to other owners".

Granting a licence for short-term letting would conflict with this requirement and set a precedent for others whereby, there may be very few occupiers left who have a vested interest in maintaining the community spirit of the development.

Anti-social behaviour problems associated with short-term lets is well documented, with noise and damage caused by people who have no vested interest in the building or the people whose homes are in the development.

There is a good community spirit within this small development. Short-term lettings will inevitably alter the make-up and 'feel' of Grimond Court, with the potential to bring a variety of problems/issues to our homes.

I strongly object to the application and respectfully request that Aberdeen City Council reject the request for the licence.

Kind Regards





Letter in Support of Short Term Let 21 Grimond Court

Dear Councillors,

I'd like to submit the below responses to the received complaints in support of my application for a short term let at 21 Grimond Court.

Operating Philosophy

It is my intention to list my property as a short term let out with periods where it will be occupied by myself or my immediate family. The target market for the property is visiting professionals, to the adjacent Woodend hospital on temporary assignments and those visiting the nearby prime four business park and Hill of Rubislaw offices

As I intend to retain the property for some level of personal use, estimated as 2 – 3 weeks per quarter, it is in my own interest to manage the property to the highest standards to minimise the wear and tear on my property and with the highest consideration of other residents in the building.

I've summarised by response to each of the highlighted concerns below to provide commitment and reassurance to the committee on the appropriateness of my property management process.

Guest vetting

Short term let's by their nature involve the coming and going of guests who are not ordinarily resident within the building. I accept that this would be an area of concern to permanent residents. To effectively manage this concern, I would like to reassure the committee that the property will only be listed on a reputable platform, in this case AirBnB, where guests are assigned ratings and reviews from other properties in which they have been hosted. Based on these ratings I will only be considering bookings from persons with positive ratings and no history of unwanted behaviour.

Guest inductions

Guests will be available to collect keys to the property either on a meet and greet basis from myself or from a lock box secured to fencing adjacent to the building. As part of the listing and as a condition of booking guests will be made aware of house rules and policies as well as instructions on how to operate facilities within the property. All key safety certificates and documents will be made available in hard copy within the property. I have also engaged the services of an experienced AirBnB host to advise on good hosting practice.

Property Maintenance

The property has recently been inspected with regards to gas safety, electrical installation and PAT testing by reputable local firms as part of the licensing process. Any defects reported by guests, or the appointed cleaning firm, will be promptly acted on to maintain the property to a high standard. In the event of a maintenance issue occurring outwith normal business hours, I can commit to being at the property within 5 mins – 10 mins as my partner and I live within line of sight of the building.

Noise and nuisance

Noise and antisocial behaviour are a common concern with properties with shared party boundaries. This will be managed through close vetting of potential guests, house rules with quiet hours from 7pm to 7am and a policy of no social gatherings or visitors beyond those on the original booking. Through the lower risk associated with short term visiting business / medical professionals I expect noise and nuisance to be a lower risk than a typical holiday / city centre type let. Should noise, or any other anti-social behaviour become a concern I will be available to personally attend the property to address the issue and can commit to providing my personal mobile number to residents on my floor and those immediately above and below my property. As previously mentioned, my partner and I live within line of sight of the property and I can commit to being at the property within 5 mins – 10 mins should the need arise. I can also add that the other residents located on my floor do not share a party boundary with my property due to the design layout of the building.

Hosting and property turnover

To ensure the highest standard of property available for guests I have organised cleaning and turnover services from a reputable local firm. This will ensure the property is cleaned and maintained to the highest standard with any defects seen promptly reported. Cleaning will be conducted at turnover between guests and no less than once a week when guest bookings stay extend beyond 7 days. This will ensure there is no opportunity for bad hygiene practices to develop from poor waste management.

Conclusions

21 Grimond Court will be available for short term lets in addition to a level of personal use. I would like to emphasise that the need for personal use factors strongly in my management philosophy for the property. Disruptive guests, which would behave in a way that is concerning to other residents, is also a concern to myself and as such I have very strong personal motivation to prevent such occurrences. I would also like to highlight that 3 of 5 objections to the short term let do not live within the portion of the building where the short term let is operated and have a separate self-contained communal door.

LICENSING COMMITTEE INFORMATION SHEET
27 AUGUST 2025

TYPE OF APPLICATION: Request for an Exemption to the Age of Vehicles Policy

APPLICANT: Rainbow Taxis Ltd

Licence Number:

DESCRIPTION

A request has been submitted for an exemption to the Age of Vehicle policy.

Current policy is that any non-WAV must be 5 years old or less when the grant of a licence is applied for.

The vehicle in question is BF68 HHU

CONSULTEES

N/A

OBJECTIONS/REPRESENTATIONS

N/A

COMMITTEE GUIDELINES/POLICY

Any vehicle subject to an application for the grant of a licence must be less than 5 years old (non-WAV)

Driver(REDACTED), badge number (REDACTED), PHV licence (REDACTED).

Came to us a while ago & we finance a vehicle for him, over this weekend he has just dumped car back at our office.

Am aware that in normal circumstance this vehicle is too old for Rainbow to licence, but given the circumstances, can anything be done, or is it the case we would need to go in front of Committee ?

Thanks for any help.

To Licensing Committee,

I would like to ask for an exemption to the vehicle age policy.

Back in March 2023, Rainbow Cars Limited signed a finance agreement for a vehicle for one of our drivers, *Redacted* (badge number *Redacted*) vehicle Skoda Superb registration BF68 HHU, Private Hire licence *Redacted*.

Late July 2025 arriving at office this vehicle was parked in our yard with no PH licence attached, despite many phone calls and unanswered emails, *Redacted* has yet to respond.

This vehicle has been licenced since March 2023 and may well still be, but as Rainbow are now liable for all finance payments, licensing this vehicle would be the only way to recoup these payments.

We would therefore ask that we are given an exemption to licence vehicle in Rainbow's name.

I will be in attendance on 27th to answer any questions the Committee may have.

Russell,

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Exempt information as described in paragraph(s) 14 of Schedule 7A of the Local Government (Scotland) Act 1973.

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