

## Appendix 7

### **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 girls<sup>1</sup> 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 change<sup>2</sup>. International evidence identifies inequitable gender attitudes as a key risk factor for perpetrating physical violence against women<sup>3</sup>.

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 Safe*<sup>4</sup>, 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

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<sup>1</sup> 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/>

<sup>2</sup> [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)

<sup>3</sup> 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>

<sup>4</sup> [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.<sup>5</sup>

**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 Aberdeen<sup>6</sup>. 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

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

<sup>6</sup> 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 security<sup>7</sup>. 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”<sup>7</sup>. 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.

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<sup>7</sup> 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.