

Email
Website

Bluesky
Insta

Additional submission from

We have collated the following comments and responses to the Equality Impact Assessment circulated to us by email on January 20th 2025. We would be grateful if the licensing panel could take these further points into consideration.

Overall comments on the EIA

The EIA contains several statements of opinion that we feel are inappropriate in a document of this kind. In particular, we find these two statements offensive and we would ask the panel to disregard them as outside the scope of an EIA:

"We also have to recognise and acknowledge that women working at SEVs may also be making active individual choices and be free of oppression and are empowering themselves to be able to act on 'my body my choice' which should also not be eclipsed due to those who are sexist and socialised into discriminatory behaviours and judgments of SEVs and those who work there." (in section 6.5: Gender Identity and Sex)

"Equally some women may exercise their agency and rights as a human being to actively work in the sexual entertainment industry and should not be fetishised, diminished, demonised, or have their agency diminished because of potential risk and opinions of other sectors of society, or other conditioned belief systems that exist in wider society."

Systems of ensuring safety, strongly regulated spaces and protections for Sex Workers or those working in SEVs should instead be strengthened if we want to ensure a systematic change-based approach and not a deficit model approach where individual choice, agency and person-centred working and assessments are negated." (in section 6.18: Cumulative, multiple intersectional, and complex impacts)

1. We would urge the panel to read [this comprehensive report](#) covering multiple ways in which strip clubs are incompatible with equality law, compiled by the Not Buying It campaign.
2. Referencing contentious ideas that working in an SEV can be 'empowering' is not relevant to licensing considerations. For example the 'empowerment' of restaurant/bar staff is not considered when reviewing an

alcohol licence. The notion that The Pussy Cat Club exists as a beacon of empowerment for women and girls is absurd.

Additional points on specific sections of the EIA

Age

3. Reinstatement of previous licensing conditions

The owner of the Pussycat Club's building is a convicted sex offender, who coerced a 17 year old girl into sex while she was “employed” by him on a boat.

Previous licence conditions have stipulated that this man must not be on the premises while the club is in operation. The club later received a written warning after photographs of him with club employees were leaked to the press. Why has this condition been dropped, and why is a similar condition not mentioned as a mitigation for the potential danger posed to young women employed at the club?

4. Normalisation of the ‘male gaze’

[BHCC's Safe and Well at School Survey 2023](#) found that:

- At key stage 2 (KS2) (20%), KS3 (20%) and KS4 (15%) there has been an increase in bullying since the previous survey in 2021 (15%, 16%, and 9% respectively). This is the highest bullying has been since 2011.
- The most commonly perceived reason for bullying was to do with appearance - 44% in primary schools, 66% in secondary.
- At secondary, the most common reason for not taking part [in physical activity] was 'I don't like other people watching me' (31%).
- In 2023 there has been a decrease in:
 - children's enjoyment coming to school
 - enjoyment learning at school
 - feelings of safety at school
 - their sense of belonging in school

These findings indicate a growing issue with unhappiness linked to an intense focus on appearance among young people. It is unfortunate that the published results are not disaggregated by sex.

The existence of SEVs in the city normalises the ‘male gaze’ which adds to this pressure for girls and young women in particular.

5. Undermining of PSHE objectives and White ribbon accreditation

The 2021 Safe and Well at School Survey found:

19% of 14-16 year olds said they had experienced someone at school touching them sexually when they did not want it. This was more common in girls than boys (source: [Community Safety Strategy 2023-26](#))

In order to attain White Ribbon accreditation, the council is required to ensure that there are education programmes about domestic abuse and healthy relationships, specifically directed towards boys, within the PSHE curriculum. Any such efforts are undermined by the licensing of venues that exist to profit from and perpetuate sexist and objectifying attitudes towards women.

6. Brighton exceptionalism with no supporting evidence

This section contains the comment:

“While national research and data provide useful context, the findings do not necessarily apply to a Brighton-specific context.”

This is in relation to statistics on the increasing number of students turning to sex work because of financial hardship. The document gives no reasons why students in Brighton would be different in this respect from those elsewhere in the UK.

In fact, we would expect students in Brighton to be more likely than those elsewhere to be pushed by financial hardship into taking up sex work, because of the extremely high cost of housing in the city.

Sex

7. Sex-based inequality is inherent in a strip club

The purpose of a sexual entertainment venue is to present women as objects for the entertainment of men. There is an inherent inequality between women and men built into the business model. Nude dancing and lap dancing is required of the women employed in the club, regardless of their own desires. All the people coerced into sexualised behaviour in this way are women. This is an obvious disproportionate impact of the licensing decision, on the basis of sex.

8. Brighton exceptionalism with no supporting evidence

There is no evidence given to support the following statement, relating to the prevalence of sexual harassment and violence in the night-time economy:

“While national research and data provide useful context, the findings do not necessarily apply to a Brighton-specific context.”

In fact, there is considerable local evidence of a connection between the night time economy and sexual violence in the city.

From [BHCC's Community Safety Strategy 2023-26](#):

In 2021/22 the police recorded 1,239 sexual offences in Brighton & Hove, of which 1,077 were serious sexual offences, including 397 rape offences.

Both police recorded offences, and the numbers presenting at support services (for both females and males) have also increased over the last few years. **Sexual offences often happen in the context of the night-time economy as demonstrated by location and temporal patterns.** (Emphasis added)

There were 463 crimes and incidents of stalking in Brighton & Hove recorded by the police in 2021/22 with 83% having female victims, and 9 police recorded crimes of honour based violence in 2021/22 with all victims being female.

News reports in The Argus in 2023 and 2024 described rapes and sexual assaults carried out by 20 different men in public spaces in Brighton & Hove. Four of these 20 men were not resident in the city. Of the 30 separate assaults, 2 were reported as having taken place in Pavilion Gardens, with a further 7 in unidentified 'public spaces in the town centre' and one in a nightclub in Pool Valley.

We know that very few cases of rape and sexual assault result in arrests and convictions such as those reported in the media. In 2023-24, just [one in 50](#) rapes reported to Sussex police resulted in a court case.

A decision to refuse this licence would send a clear message that women in Brighton & Hove deserve to be treated with respect. This would be a meaningful action to fulfil the council's Public Sector Equality Duty to foster good relations between people who have protected characteristics and those who don't (in this case, between men and women).

Expatriates, migrants, asylum seekers and refugees

9. Trafficking, exploitation and coerced labour are commonplace in the sex industry

The EIA says:

"Potential risk of risk of trafficking or coerced participation for some individuals.

Should a member of staff, management or a customer have a safeguarding concern regarding potential trafficking or coerced involvement in the industry, there should be an awareness of where to report Information."

There has been no attempt made to assess the likelihood of trafficking and coercion at this establishment.

We would urge the panel to read [this report](#) on the reality of lapdancing clubs in the UK and consider whether it is likely that this club is an exception to the industry norm.

In particular, please note the widespread use of 'house fees', which mean that lap dancers begin each shift in debt to the club and have to perform private dances and offer additional services in order to make any money at all.

In this context, we found it shocking that the EIA states "SEV might provide job opportunities for migrants, asylum seekers, and refugees who may face barriers in other sectors."

Asylum seekers are not permitted to work in the UK while awaiting a decision on their application for asylum. Is the EIA suggesting that asylum seekers risking their status by working illegally in a strip club would be a positive impact of this licensing decision?

We would hope that Brighton & Hove could offer a more respectful and dignified response to the fact that migrants and refugees face barriers to employment, than to suggest working in a lapdancing club as an option.

4th February 2025