

Appendix 2 – List of Consultees for Policy and responses

Respondents:-

Member of the Public (2)
Minister, Knox Church Perth (Free Church of Scotland)
Perth and Kinross Violence Against Women Partnership

Consultation sent to: -

All Community Councils within Perth and Kinross
Elected Members within Perth and Kinross Council
Church of Scotland
Free Church of Scotland
Catholic Archdiocese of Perth
Perth Baptist Church
Perth Mosque
Perth and Kinross Violence Against Women Partnership
Perth and Kinross Council - Planning Department
Perth and Kinross Council - Environmental Services
Perth and Kinross Council - Child Protection Committee
Perth and Kinross Council - Education Services
Perth and Kinross Council – Equalities Strategic Forum
Perth and Kinross Council - Adult Support and Protection Team
Perth and Kinross Council - Environmental Health Service
Perth and Kinross Council – Safer Communities
Perth and Kinross - Health and Social Care Partnership
Perth and Kinross – Rape and Sexual Abuse Centre
GMB Union
Perthshire's Women's Aid
GMB Sex Workers Union
Police Scotland Human Trafficking Department
Police Scotland Tayside Division
International Committee on the Rights of Sex Workers in Europe (ICRSE)
Scottish Fire & Rescue Service
Scottish Trade Union Congress
Sex Workers Advocacy
UNISON
UNITE
Perthshire Chamber of Commerce
United Voices of the World
Perth and Kinross Facebook (link to consultation)
Perth and Kinross Twitter (link to consultation)

Appendix 2 Continued - Consultation Responses

Consultees were asked to provide comments on the draft policy and to provide their views on the following: -

- The Licensing Committee would particularly consider views which have regard to the following objectives: -
 - Preventing public nuisance, crime and disorder
 - Securing public safety
 - Protecting children and young people from harm; and
 - Reducing violence against women

Number of respondents: 2

Member of the public - There should be no SEV licensed in P and K. I support the setting of the number at zero. SEV create a gateway to prostitution and exploitation in my view and we should not have them in P and K. Not sure that licensed SEV particularly is a risk to children but as a principle we should not have them in p and k. SEV, in my opinion, makes prostitution and exploitation more likely. Equally Safe defines prostitution as 'violence against women' therefore we should have no SEV.

The Perth & Kinross Violence Against Women Partnership - The Perth & Kinross Violence Against Women Partnership support the reference made to existing links between sexual entertainment venues and crime. In order to protect our communities and reduce the risk of prostitution and trafficking in Perth & Kinross, the VAWP are in support of the number of sexual entertainment venue's being capped at 0. However, we note that the policy includes the paperwork required to support an application. The VAWP advocate for the removal of this from the policy document. Should anyone seek to submit an application, we feel that the application form should be issued only after they have read the policy and are eligible to apply.

As noted above, the Partnership has concerns regarding public safety and the potential harm to women as a result of sexual entertainment venues. It is the Partnership's view that any sexual entertainment venue would put all individuals at heightened risk of directly experiencing or witnessing criminal activity. This view is a result of the links to crime as highlighted in the policy statement.

Equally Safe recognises activities which would normally take place within a sexual entertainment venue, such as lap dancing and stripping, to be forms of commercial sexual exploitation (CSE). We know that such forms of violence against women are rooted in gender inequality which is driven by harmful messages regarding gender roles and the normalisation of the sexualisation of women and girls. Sexual entertainment venues operate on the basis that women are sexualised and objectified, therefore any licensing in Perth & Kinross would reinforce these harmful messages. Furthermore, licensing of any such venues in Perth would risk contradicting the key messages of consent, equality and respect which are embedded within the sexual violence prevention work with young people living in Perth & Kinross.

Given the links to crime and violence against women, alongside the Scottish Government's recognition that lap dancing, stripping, prostitution and trafficking are all forms of violence against women, the VAWP feel that any sexual entertainment venue would pose a risk to the safety of women living and/or working in our communities.

- The Council is able to include within its Policy a statement which specifies that SEVs should be a certain distance away from "Sensitive Premises" (list included at **Section 6.9** of Policy Statement). The Council would welcome views on whether any other types of premises should be considered for inclusion on this list. Views would also be welcome in relation to how far SEVs should be from such premises. This Policy is currently drafted to make this 500m.

Number of respondents: 2

Member of the public - No view as there should be no SEV. The point is moot.

The Perth & Kinross Violence Against Women Partnership

The VAWP consider that any premises in close proximity to a sexual entertainment venue would be negatively affected. Furthermore, the VAWP acknowledge the risks that exist for women within a sexual entertainment venue itself and therefore we do not consider 500m to be a significant enough distance to protect individuals safety. Given our position on the opening of any such venues, we are unable to suggest what an acceptable distance would be.

- Following the initial consultation, Conditions for an SEV Licence were updated to include the suggestions provided. Is there any further Conditions that you think should be added to the current list (**see Annex G - Conditions**)

Number of respondents: 0

- How long do you think a waiver should last? (excludes the requirement for a licence)
 - a) 3 months
 - b) 6 months
 - c) other

Number of respondents: 2

Member of the public - One off events only

The Perth & Kinross Violence Against Women Partnership

The VAWP advocate for a waiver to be set at 0 months. We feel that anything above this contradicts the decision to limit the number of SEVs to 0.

Other comments received

Member of the public: -

My main concern is that the policy states:

6. Policy of Perth and Kinross

6.1. The SEV legislation is related to the Scottish Government Policies:

'Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls' <https://www.gov.scot/publications/equally-safe-scotlands-strategy-prevent-eradicate-violence-against-women-girls/>

'Human Trafficking and Exploitation Strategy'

<https://www.gov.scot/publications/trafficking-exploitation-strategy/>

The Council endorses the objectives of those Policies.

I have read both these documents listed and no where do they state that licensing SEV is beneficial in maintaining the safety of women and girls in our country. In fact listed in the Equally Safe document it states definitions of violence against women as follows:

.....

Our definition

Violence against women and girls encompasses (but is not limited to):

- physical, sexual and psychological violence occurring in the family (including children and young people), within the general community or in institutions, including domestic abuse, rape, and incest;
- sexual harassment, bullying and intimidation in any public or private space, including work;
- commercial sexual exploitation, including prostitution, lap dancing, stripping, pornography and trafficking;
- child sexual abuse, including familial sexual abuse, child sexual exploitation and online abuse;
- so called 'honour based' violence, including dowry related violence, female genital mutilation, forced and child marriages, and 'honour' crimes.

The third bullet above clearly includes SEV. So, I am convinced as a healthy community that values all that permitting SEV can only be destructive to family values, objectification of women and destructive fantasies in our young adult population. As a husband and father of a daughter I believe we can do better than permitting and therefore reinforcing negative attitudes towards women. I also am convinced that women and girls will be at more risk if we permit the legal lust and objectification.

Minister, Knox Church Perth (Free Church of Scotland)

We appreciate the opportunity offered to the Free Church of Scotland to provide views on the council's policy on Sexual Entertainment Venues (SEVs). Knox Church Perth is the local congregation of our denomination and it was therefore felt appropriate that we provide a response to the consultation.

We appreciate that Perth and Kinross Council are taking steps to regulate and license SEVs and not allowing them to operate without restrictions. We are also pleased to see the Council's commitment to the Scottish Government's *Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls* and the *Human Trafficking and Exploitation Strategy* – both of which we consider to have a bearing on the issue of licensing SEVs.

As Christians, we believe that all human beings have inherent worth and value, having been made in the image of God. We also believe it is right for the church to speak up on issues such as prostitution and to strive for a just society --- one which reflects the will of God and His righteousness. The bible says:

- ∞ Speak up for those who cannot speak for themselves, for the rights of all who are destitute. Speak up and judge fairly; defend the rights of the poor and needy (Proverbs 31:8---9);
- ∞ Righteousness exalts a nation, but sin is a reproach to any people (Proverbs 14:34).

We appreciate the steps taken in the policy to try to reduce the harm caused by SEVs. However, it is our view that where these exist, the harm they cause can never be reduced to an acceptable level and the protection of those involved, along with the wider public, can never be guaranteed. SEVs are by their very nature exploitive; they represent a form of violence against women and often serve as a gateway to prostitution. The Scottish Government rightly recognises that prostitution is a form of gender---based violence against women and girls. We would argue that the same is true in the case of women working in SEVs.

Moreover, not only would SEV's potentially lead to other social---harms – for example, organised crime (especially human trafficking) and anti---social behaviour in the area – but they would have a negative bearing on the general ethos and moral standards of the Perth & Kinross area. The licensing of SEVs would, we believe, constitute the crossing of an important ethical line. To do so would be to publicly support the exploitation of women and encourage behaviour which the bible describes as sin and is therefore dishonouring to our Holy God.

For these reasons we welcome the Council's decision that the appropriate number of SEVs within the council area is zero. It is not possible to permit SEVs while also: preventing public nuisance, crime and disorder; securing public safety; protecting children and young people from harm and reducing violence against women. The only way to achieve these objectives is to refuse to license SEVs.

We will therefore be praying to that end, asking that by God's grace, our Councillors' earnest desire will be to do what is pleasing and honourable in His sight.