



Briefing on Sexual Entertainment Licensing

Introduction

The briefing aims to provide an overview of the licensing regime surrounding sexual entertainment venues (SEVs) and the duties this places on local authorities, it considers how these duties interact with the Public Sector Equality Duty and Human Rights Legislation.

The briefing sets out the impact SEVs have on gender inequality and violence against women and makes suggestions about the areas local authorities should consider when considering the licensing of SEVs.

It is not a definitive guide but an overview to give some information, form the basis of discussions and support responses to local consultations.

Current Legislative Position

The Scottish Government guidance on provisions for licensing of sexual entertainment venues and changes to licensing of theatres states *'The Air Weapons and Licensing (Scotland) Act 2015 received Royal Assent on 4 August 2015. The provisions of the Act which relate to the licensing of sexual entertainment venues (SEV) come into force on 26 April 2019. However, this is not a mandatory licensing regime and it is for local authorities to determine whether they wish to licence SEV, whether to limit their numbers and to determine individual licence applications. When*



doing so local authorities will need to consider the implications, opportunities and risks of their decisions.'

Section 76 of the 2015 Act inserts sections 45A, 45B and 45C into Part III of the **Civic Government (Scotland) Act 1982**. These provisions establish a specific licensing regime for the regulation of SEV and allow for greater local control over the provision of such venues.

Where a local authority opts to licence SEVs within its area, the provisions at paragraph 4 of Schedule 2 of the 1982 Act will apply and so, a licence will be required for premises operated as SEV.

Premises are classed as an SEV where sexual entertainment is provided before a live audience for the direct or indirect financial benefit of the organiser. Sexual entertainment is any live performance or live display of nudity provided for the sole or principal purpose of sexual stimulation of members of the audience. However, premises where sexual entertainment is provided on no more than 4 occasions in a twelve-month period are not to be treated as SEVs.

When deciding whether to licence, and whether to limit, SEV in their area, local authorities will need to consider the interaction with their own local policies and strategies, along with any potential legal challenges.

SEV Policy Statement

A local authority which chooses to licence SEV will have to publish an SEV policy statement. This should be developed in consultation with relevant interest groups such as the violence against women partnerships, child protection committees which will provide local communities with a clear indication of the local authority's policy.

Where an SEV licence is granted, licence conditions, along with enforcement, will help reduce the risk of criminality such as prostitution and human trafficking; and help protect the safety and wellbeing of performers, customers and the wider public. The community should, in turn, benefit from a safe, regulated environment.

Where a local authority decides to licence SEV, section 45B of the 1982 Act, requires the local authority to pass a resolution in order for SEV licensing to have effect in their area. It also requires at section 45C that where a local authority decides to licence SEV it must prepare an SEV policy statement.

In considering whether to pass a resolution a local authority should consider whether they will wish to control SEVs even if no such premises are currently in operation in their area. If there is no resolution in place, then no licence is required to operate an SEV. Existing SEV could continue to operate and new SEV could come into operation, without an SEV licence. Sexual entertainment in those venues would remain largely unregulated. If a resolution is passed, existing SEV and any new SEV, will require an SEV licence.

Local authorities who have resolved to licence SEV must determine the appropriate number of SEV for both their area and for each relevant locality within their area (see paragraph 9(5A) of Schedule 2 of the 1982 Act). Paragraph 9(5)(c) of Schedule 2 allows local authorities to refuse applications on grounds that, at the time the application is determined, the number of SEV in the

local authority's area or relevant locality is equal to or exceeds the number that the authority considers appropriate for their area or that locality.

Under paragraph 9 of Schedule 2 to the 1982 Act local authorities have a power to impose reasonable licence conditions. In doing this, local authorities need to be flexible in responding to each application and in some cases additional or more tailored conditions reflecting local circumstances may be appropriate. Conditions are specific requirements that the licence holder must comply with, otherwise the licence could be revoked.ⁱ

Sexual Entertainment Venues and The Human Rights Act

According to the Scottish Government guidance on the provisions for licensing sexual entertainment venues, local authorities should bear in mind the rights provided by the European Convention on Human Rights (ECHR). We believe that the focus here should be on both the rights of women contracted in clubs and women as part of the broader general public. The focus should not be on Article 1, Protocol 1 of the European Convention of Human Rights for the owners and operators of SEVs.

Human rights law expert Dr James Harrison, Director of the Centre for Human Rights in Practice at the University of Warwick, confirms that refusal to renew is not a breach of human rights law for individual's applying for a license.

*'Sexual entertainment is not a human right; it is sexual exploitation. Sexual exploitation is a practice by which person(s) receive sexual gratification, or financial gain, or advancement through the abuse of a person's sexuality by abrogating that person's human right to dignity, equality, autonomy, and physical and mental well-being.'*ⁱⁱ

In the case of *Belfast City Council v Miss Behavin' Ltd* (Northern Ireland) the House of Lords found that there was **no breach** of Article 10 (freedom of expression) or Article 1, Protocol 1 (right to property) of the European Convention of Human Rights because Belfast City Council had failed to grant a licence for a sex shop on the basis that the appropriate number of sex shops in the relevant locality was nil.ⁱⁱⁱ

'Under Article 1 of the European Convention of Human Rights, the UK is required to convey the Convention Rights and fundamental freedoms of 'everyone within their jurisdiction'. The human rights of a minority of individuals i.e., customers, club owners, managers and some performers as protected by Article 1 of Protocol 1 (protection of property), Article 8 (respect for private and family life) and Article 10 (freedom of expression) are what are called qualifying rights in that they can be limited and must be balanced fairly against the rights of those impacted by SEVs.

They do not take precedence over the systematic exploitation of the majority i.e., those who are harmed through sexual entertainment and other forms of sexual exploitation. Furthermore, a failure by a local authority to protect a woman from sexual exploitation may breach: Article 2 (her right to life); Article 3 (her right to be free of inhuman and degrading treatment); Article 4 (her right to be free of slavery and servitude). The latter two are absolute rights which can never be limited in any circumstance.'^{iv}

Sexual Entertainment Venues and The Public Sector Equality Duty

The Public Sector Equality Duty requires public authorities and those carrying out a public function to consider how they can positively contribute to a fairer society through advancing equality and

good relations in their day-to-day activities. This offers an important mechanism through which public bodies can tackle violence against women and domestic abuse more effectively.

Under the Public Sector Equality Duty 2011 bodies (and those contracted to carry out public functions) are required to have due regard to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
2. Advance equality of opportunity between people who share a relevant protected characteristic and those who do not
3. Foster good relations between people who share a protected characteristic and those who do not.

In practice this means that the equality duty must be integral to the decision-making process and cannot be an after-thought. If public authorities do not have enough information or evidence to have due regard, they must obtain that evidence to ensure they meet the duty properly. This might mean the public authority has to consult on its proposals to ensure they have the right evidence about the possible impact on gender equality. In relation to sexual entertainment venues this could involve consulting with women and girls about the impact these venues have on their feelings of safety in the area where these are situated.

To have “due regard”, public authorities are required to consider each part of the PSED. Having due regard to the need to advance equality of opportunity involves:

- looking at the need to remove or minimise disadvantages,
- to take steps to meet the needs of those with protected characteristics
- to encourage those groups to participate in public life and any other activity in which participation by those people is disproportionately low.

Public authorities, when having due regard to the need to foster good relations, must have due regard to the need to tackle prejudice and promote understanding.^v

In relation to Sexual Entertainment Venues local authorities should take into account the contribution these venues make to the sexual objectification of women and girls.

Research has found that ‘women’s mental health and positive emotions are negatively impacted by being sexually objectified and by witnessing the sexual objectification of others. Whether or not they choose to be in sexually objectifying environments, women’s exposure to sexually objectifying events or environments “is thought to directly cause distress and increase women’s vulnerability to eating disorders, sexual dysfunction, anxiety and depression”—a recent study also found “strong evidence that exposure to objectifying events in daily life primes a state of self-objectification, making women more conscious of how their body appears to others...just as breathing second-hand smoke is unhealthy for non-smokers, we found that objectifying events need not be experienced first-hand to induce the potentially harmful process of self-objectification. Witnessing sexual objectification of other women also reliably predicted ... increases in state self-objectification” which in turn was related to lower positive emotions in everyday life.’^{vi}

Local authorities also need to take into account the impact SEVs have on women and girls' sense of safety, research has found that women and girls feel intimidated and unsafe in areas where SEVs operate which goes against local authorities' duties under the PSED.

In a study for the Journal of Sex Research, more than half the men interviewed said they were motivated to visit strip clubs to get away from what they saw as the rules for behaviour that constrained them -that is, treating women equally-for example when interacting with female colleagues at work. That is not an insignificant minority of men. One participant said of visiting a club:

“You can go in there and shop for a piece of meat, quote unquote, so to speak. I mean, you want to see a girl run around naked, have her come over, pay her to do a dance or two or three and walk away and not even ask her name. Total distancing.”

Another customer said,

“With all of this sexual harassment stuff going around these days, men need somewhere to go where they can act like they want”^{vii}

This should be taken into account when local authorities are considering their duty to foster good relations.

There have been two successful challenges on Sheffield Council for failing to properly consider the PSED around SEV. The judge said: “.. [The Council] had wrongly ignored objections based on the potential impact of gender equality, treating them as moral objections and irrelevant”.^{viii} This judgement means that “It is now clear that a local authority considering any such licence applications must look long and hard at the adverse impact on gender equality of letting such an enterprise exist at all. Otherwise, it will be acting unlawfully and will be subject to legal challenge.”^{ix}

Sexual Entertainment Venues and the Convention on the Elimination of All Forms of Discrimination Against Women

The UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) requires the UK to take action to eliminate sexual harassment and other forms of violence against women, recognising that this is a form of discrimination and related to inequality between the sexes. In March 2019 the UN concluded its observations on the UK’s compliance with CEDAW, and made the following recommendation about this ‘principal area of concern’:

“Take effective measures to reduce demand for commercial sex, including by carrying out education and awareness-raising measures targeted at men and boys and focused on combating all notions of subordination and objectification of women.”¹

The Scottish Government have indicated they plan to embed the principles of CEDAW into new Scottish Human Rights Legislation, local authorities should consider their duties in relation to this international legislation when making decisions around SEVs.

Sexual Entertainment Venues and Equally Safe

Equally Safe: Scotland’s strategy for preventing and eradicating violence against women and girls (2016) provides a national definition of gender-based violence, co-owned by

¹ United Nations Committee on the Elimination of Discrimination against Women: Concluding observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, 35(b).

COSLA. Underpinning the strategy is a gendered analysis of violence against women and girls which includes commercial sexual exploitation within its definition.

Commercial sexual exploitation includes prostitution; trafficking; pornography; lap and pole dancing; stripping; peep shows; internet and phone sex; internet brides, this list is not exhaustive.

Equally Safe recognises that male violence against women stems from deep rooted and systemic gender inequality and the subordinate position women occupy in society in relation to men and that:

‘Activities such as pornography, prostitution, stripping, lap dancing, pole dancing and table dancing, these activities have been shown to be harmful for the individual women involved and have a negative impact on the position of all women through the objectification of women's bodies. This happens irrespective of whether individual women claim success or empowerment from the activity.’^x

There is a clear expectation on local authorities from the Scottish Government and COSLA to action these priorities to prevent and eliminate gender-based violence at a local level.

What is the Women’s Support Project Position?

The adoption of Sexual Entertainment Venue (SEV) licensing for lap dancing and strip clubs affords the council significantly greater powers to control and regulate such clubs, including adopting a ‘nil’ policy for SEVs in the local authority.

As such The Women’s Support Project believes that it is appropriate for local authorities to adopt the discretionary powers now available to them under the 1982 Act, as otherwise SEV venues could continue to operate without regulation or any additional conditions attached, it would also allow new clubs to be opened without any consideration of these other than in relation to alcohol.

The legislation requires local authorities to consider how their policy:

- Prevents public nuisance, crime, and disorder
- Secures public safety
- Protects children and young people from harm, and
- Reduces violence against women

We would argue that having a policy which sets the number of sexual entertainment venues above 0 (nil) contradicts any work to reduce violence against women and in fact contributes to.

Research studies carried out by a number of institutions since 2000 have shown the harm to women and girls caused by the presence of strip clubs, lap dancing clubs and other sexual entertainment venues in their locality. Kelly et al (2007) found that the presence of sexual entertainment venues in localities increase the demand for prostitution services.^{xi}

A 2003 study carried out by Eaves Housing for Women in the London Borough of Camden found that there was a 50% increase in sexual assaults in the borough after the rapid expansion of lap dancing clubs.^{xii}

Research commissioned by Glasgow City Council in 2004 from the Child and Women Abuse Studies Unit at London Metropolitan University^{xiii} found that it was common for clubs to ignore the regulations, particularly the 'no touch' rules. Researcher Julie Bindel identified the increase in the number of clubs as "the fastest growing area in Britain's sex industry".

The study states that "*approximately half of customers in Glasgow went to clubs looking for sex. 25% claimed they had sex with a dancer on the premises.*" It continued, "*It can be concluded from the body of evidence that some lap dancing club owners and managers create conditions in which prostitution is likely to occur.*"

The campaign group Not Buying It, state in Still Stripping the Illusion that '*Lap dancing is inherently harmful. Being objectified and/or objectifying yourself is harmful, regardless of whether it is chosen. Psychologists describe it as a form of insidious trauma. Behaving sexually and exposing yourself for men in an exchange that is not based on mutual desire is harmful. Doing this for men who have bought you to behave this way (often multiple times a night), for whom you have no desire/interest (and who might even repulse you) is psychologically damaging. Providing the 'girlfriend experience' is equally part of the work. Women must sit with men, sometimes for hours on end, feigning interest and desire. 'You can never be your true self', 'it is all an act', 'having to .. hang on a punter's every word, act interested'. Many describe it as one of the hardest parts of the job, not least because they cannot dissociate. Testimonies and research indicate that lap dancers' initial feelings of 'empowerment' subside. Over time, 'loving stripping' can turn to disgust. Even during the course of a shift, experiences can rapidly fluctuate from 'good' to 'bad' making for a damaging roller coaster of emotions, particularly given that most dancers will be young - often teenagers at university living away from home for the first time.*'^{xiv}

There is also evidence that the existence of SEVs creates areas where women may not be comfortable to go – creating divisions and exclusion (which is clearly against council's duties under the Public Sector Equality Duty).

The Royal Town planning Institute found that "*In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing clubs make women feel threatened or uncomfortable*" and ". . . "*Women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.*"^{xv}

This feeling of intimidation and avoidance measures women take, goes far beyond when the club is operating at night. Patiniotis & Standing (2012) state that "*Women also reported avoiding certain streets and feeling frightened in the day time, when the clubs are closed. It is the existence of the clubs that causes women to feel alienated in public space at all times, and fearful of the threat of violence posed by the sexual objectification of women.*"^{xvi}

The Royal Town planning Institute explains if women feel threatened and uncomfortable by the presence of a strip club then their very presence amounts to a form of discrimination, as it prevents full access and freedom of movement by women in a city or area , "If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage"^{xvii}

Key considerations

Enforcement

Local Authorities must consider how any imposed conditions will be monitored and enforced whilst developing of their Entertainment Venue Policy. If this is not considered and planned then the licensing regime, they put in place to protect performers and the wider community will be undermined. Local authorities should consider if it is possible to have SEV and reduce VAW or secure public safety because:

1. The main activities of these clubs are out of regular working hours and so any planned monitoring and compliance visits by personnel such as Environment Health Officers can only take place when the main activities are not being carried out.
2. Much of the sexual entertainment or lap dancing is in the form of private dances which will need to be considered in any such inspection.
3. Inspections are likely to arise from complaints which is problematic. Given that the women who dance there are not employed, may have precarious financial situations and can be transient and vulnerable to exploitation, it is unlikely that they will make complaints.
4. There is a direct conflict between the desires of the customers and business owners – respectively to sexually exploit the performer and to make money and the health and safety of the employee.

Public Sector Equality Duty

Local authorities must consider how these venues impact on their responsibilities under the public sector equality duty. If they are setting a value above nil then they must be able to show that they have considered how this impacts on their duties to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
- Advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not.

Equality Impact Assessments should be carried out on any policy and should consider the impact of their policy on women and girls in society generally in terms of the role these venues play in the objectification of women, women and girls who live/work near localities in terms of how venues impact on their feelings of safety and women performers, within this the role that these venues play in the objectification of women should be considered.

Occasional Sexual Entertainment Venues

Regarding the provision of occasional sexual entertainment, SEV licenses will not be required for venues that do not provide sexual entertainment more than 3 times per 12 months. Authorities should consider how this will be regulated, especially if this entertainment takes place in a private space within a business such as a hotel or a short-term let flat. The authority should ensure there is clarity as to where the onus of monitoring sexual entertainment in such venues and the subsequent requirement of a license application lies.

Protecting Performers

If Local Authorities decide to license SEVs then it must accept a certain level of responsibility for women's safety in these venues and include license conditions that will help mitigate the harm caused by this form of exploitation. We believe there should be a set of mandatory conditions held within the local authority policy statement on SEVs. The focus must be on the requirements of the SEV operator and not a set of expectations on individual performers to regulate their own working environment nor manage paying customers inappropriate behaviour.

The focus of any conditions should be on the licence holder to ensure customers do not offer inducements to performers or ask for sexual activity within or outside of the club. It should not be the performers responsibility to manage the customers behaviours and ensure they follow condition and restrictions. that is the venue and licence holders' responsibility. The local authority should also consider whether this mismatch in power relations impacts on their duties under the PSED.

Location of SEV's

In terms of the location of SEV's local authorities need to look at where it is appropriate to have these venues sited, this requires local authorities to consider a range of issues such as:

- the location of schools
- the location of places of worship
- the location of heavily residential areas
- whether there have been incidents involving anti-social behaviour, sexual assaults or more minor harassment reported in any particular area
- whether there have been incidents of human trafficking or exploitation locally.

In addition, we would suggest inclusions of a limit on proximity to:

- women's refuges and shelters,
- support services and agencies dealing with any equality issue or protected characteristic
- supported accommodation or services for vulnerable young people or adults,
- support services and agencies dealing with any social or health issue e.g. housing, mental health, addictions, housing / homelessness
- any youth projects or community projects.
- prevalence of other forms of commercial sexual exploitation, including prostitution
- areas where there have been reported crimes involving violence against women and girls

While making these venues less visible could reduce the negative impact they have, the role these venues play in creating conditions which cause women to be sexually objectified should be considered by authorities and how these impact on women's inequality. It is unlikely that making venues less visible will mitigate the overall harms caused by SEVs.

Current SEV's

If there are current SEVs in the local authority area, then councils will need to consider whether to exempt them from having to go through the licensing regime (by grandfathering rights to them) or include them in any licensing scheme. We would contend that current venues should not be exempted and they should be subject to any conditions or caps set out in the council sexual entertainment venue policy.

SEVs as a Place of Employment

If the local authority is considering how setting a nil position for SEVs will impact on women's employment and employment rights, it should be recognised most women involved in these forms of CSE are self-employed. They do not receive a salary and in many venues they must pay up front to work in a strip club. These 'House Fees' can be up to £200 per night at the weekend. Women have reported losing money as they are in debt to the club before they even start working. Any proposed licensing will have no authority over employment or changing the system that clubs operate under which many performers are currently unhappy with.

Proprietors of clubs often argue that licensing and setting a nil value for SEVs will force women out of work. Setting a nil value for SEVs does not preclude businesses from repurposing premises and offering alternative employment. Councils can, and should, consider resourcing services which can link women to any alternative training or support required if they take a decision to stop licensing strip clubs.

'There is no evidence that a nil cap or licence refusal results in SEV activity going 'underground' or that unregulated activity would increase in response. On the contrary, research suggests that supply, not demand, dictates whether customers engage in SEV activity. SEVs invest in marketing sexual entertainment to drive up demand and they cross-promote other related activities.'^{xviii}

Conclusion

SEVs promote harmful attitudes to women that are the cause of femicides, domestic abuse, rape and sexual violence and other forms of violence against women. These attitudes and beliefs obstruct progress towards equality between women and men and setting a value above nil is contrary to the requirements placed on public authorities by the public sector equality duty and by international obligations.

Further Reading

Still Stripping the Illusion, Not Buying It, <https://notbuyingit.org.uk/wp-content/uploads/2022/01/Still-Stripping-the-Illusion.pdf>

Scottish Government Guidance on Licensing of Sexual Entertainment Venues, <https://www.gov.scot/publications/guidance-provisions-licensing-sexual-entertainment-venues-changes-licensing-theatres/>

Coy, M, Horvath, M & Kelly, L (2007) It's just like going to the supermarket: Men talk about buying sex in East London: Child and Woman Abuse Studies Unit

Jackie Patiniotis & Kay Standing (2012) License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres, Criminal Justice Matters, DOI: [10.1080/09627251.2012.695498](https://doi.org/10.1080/09627251.2012.695498)

Safe and Equal Bristol Report (2022), <https://www.bristolwomensvoice.org.uk/wp-content/uploads/2021/11/SEVReport2021FINAL.pdf>

The Women's Support Project

The Women's Support Project works to end violence against women. Based in Glasgow, we work across Scotland to raise awareness of the root causes, extent, and impact of male violence and for improved services for those affected.

Key themes are addressing unmet need and emerging issues, making links between different forms of violence and abuse, and supporting multiagency and partnership approaches. Our work is informed by an understanding of links and overlaps between different forms of violence, discrimination and oppression

If you would like further information or to discuss this briefing, please get in touch - enquiries @womenssupportproject.org.uk

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- ⁱ Scottish Government Guidance on Licensing of Sexual Entertainment Venues, <https://www.gov.scot/publications/guidance-provisions-licensing-sexual-entertainment-venues-changes-licensing-theatres/>
- ⁱⁱ Dundee VAWP response to Sexual Entertainment Venues Consultation
- ⁱⁱⁱ <https://coventrywomensvoices.wordpress.com/2011/09/23/sex-entertainment-venues-and-the-human-rights-act/>
- ^{iv} Dundee VAWP response to Sexual Entertainment Venues Consultation
- ^v Spotted: Obligations to Protect Women Students' Safety & Equality (2015) <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/Spotted-Obligations-to-Protect-Women-StudentsEy-Safety-Equality.pdf>
- ^{vi} Safe and Equal Bristol Report, <https://www.bristolwomensvoice.org.uk/wp-content/uploads/2021/11/SEVReport2021FINAL.pdf>
- ^{vii} Safe and Equal Bristol Report <https://www.bristolwomensvoice.org.uk/wp-content/uploads/2021/11/SEVReport2021FINAL.pdf>
- ^{viii} <https://notbuyingit.org.uk/wp-content/uploads/documents/SheffieldShame.pdf>
- ^{ix} <https://localgovernmentlawyer.co.uk/licensing/399-licensing-news/34572-council-admits-failure-to-comply-with-equality-duty-over-spearmint-rhino-licence>
- ^x Safer Lives: Changed Lives (2009)
- ^{xi} Coy, M, Horvath, M & Kelly, L (2007) It's just like going to the supermarket: Men talk about buying sex in East London: Child and Woman Abuse Studies Unit
- ^{xii} Eden, I. (2003) Lilith Report on Lap Dancing and Striptease in the Borough of Camden, London: The Lilith Project, Eaves Housing for Women
- ^{xiii} Bindel J (2004) "Profitable Exploits: Lapdancing in the UK" CWASU, London Metropolitan University
- ^{xiv} <https://notbuyingit.org.uk/wp-content/uploads/2022/01/Still-Stripping-the-Illusion.pdf>
- ^{xv} Royal Town Planning Institute 'Gender and Spatial Planning Good Practice' Note, 2010
- ^{xvi} Jackie Patiniotis & Kay Standing (2012) License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres, Criminal Justice Matters, 88:1, 10-12, DOI: [10.1080/09627251.2012.695498](https://doi.org/10.1080/09627251.2012.695498)
- ^{xvii} Royal Town Planning Institute 'Gender and Spatial Planning Good Practice' Note, 2010
- ^{xviii} Safe and Equal Bristol Report, <https://www.bristolwomensvoice.org.uk/wp-content/uploads/2021/11/SEVReport2021FINAL.pdf>