
Report To:	General Purposes Board	Date:	9 June 2021
Report By:	Interim Head of Legal Services	Report No:	LS/059/21
Contact Officer:	Lindsay Carrick	Contact No:	01475 712114
Subject:	Licensing of Sexual Entertainment Venues Update after Initial Consultation		

1.0 PURPOSE

- 1.1 The purpose of this report is to update the Board on the outcome of the initial public consultation exercise on the licensing of Sexual Entertainment Venues in Inverclyde and to seek the Board's view on passing a resolution as set out in Appendix 1.

2.0 SUMMARY

- 2.1 The Air Weapons and Licensing (Scotland) Act 2015 introduced legislation amending the Civic Government (Scotland) Act 1982 which provides local authorities with a discretion to introduce a licensing system for Sexual Entertainment Venues (SEVs).
- 2.2 At its meeting on 9 December 2020, the Board authorised the Head of Legal & Property Services to carry out a public consultation exercise in respect of the proposed licensing of Sexual Entertainment Venues in order to gather the views of the local community in determining whether Sexual Entertainment Venues should be licensed in Inverclyde. The outcome of the consultation exercise will inform the Board when considering whether to make a resolution to licence Sexual Entertainment Venues.
- 2.3 A consultation exercise was carried out by officers between 21 December 2020 and 12 February 2021. The consultation was issued to internal consultees within Inverclyde Council, religious organisations, Community Councils and Police Scotland. Responses to the consultation are attached at Appendix 2. The consultation was also made available to members of the public on the Council's website

3.0 RECOMMENDATIONS

- 3.1 That the Board note the contents of this report and consider the responses received to the initial public consultation on the licensing of Sexual Entertainment Venues in Inverclyde.
- 3.2 In light of the responses received, determine whether to pass a resolution to licence Sexual Entertainment Venues in Inverclyde and specify a date when the resolution will take effect; and if appropriate instruct the Interim Head of Legal Services to publish a notice of the resolution as required at least 28 days before the Resolution comes into effect which can be no earlier than one year after the Resolution is made.
- 3.3 In the event that a resolution is passed by the Board requiring that Sexual Entertainment Venues in Inverclyde be licensed to instruct the Interim Head of Legal Services to:
- a) consult with groups who may have an interest in the matter including, but not limited to, Police Scotland, Violence against Women Partnerships, Inverclyde Women's Aid as well as the public in relation to the formation of a Licensing Policy Statement; and
 - b) report back to the Board providing a proposed note of application process for approval by the Board, including a draft Sexual Entertainment Policy Statement.

4.0 BACKGROUND

- 4.1 The Civic Government (Scotland) Act 1982, as amended allows local authorities to carefully consider whether there would be merit in passing a resolution to licence Sexual Entertainment Venues, now or in the future and setting a number, which may be nil, of such venues operating in their area in the future. If no resolution is in place, then no licence is required to operate a Sexual Entertainment Venue and an existing Sexual Entertainment could continue to operate or new Sexual Entertainment Venues could come into operation within a local authority area without a Sexual Entertainment licence. There are currently no Sexual Entertainment Venues in Inverclyde.
- 4.2 Where a local authority decides to licence Sexual Entertainment Venues, the newly introduced section 45B of the 1982 Act, enables the local authority to pass a resolution in order for Sexual Entertainment Venue licensing to have effect in their area. It also stipulates in terms of section 45C that where a local authority decides to licence Sexual Entertainment Venues it must prepare a Sexual Entertainment Venue policy statement. The resolution must specify a date from when it is to take effect in the area, which must be at least one year from the date the resolution is passed. The proposal must be published for a period of at least 28 days prior to implementation to allow for any representations to be made. If no representations are received then officers can proceed to publish the final notice of resolution in the local newspaper.
- 4.3 In considering whether to pass a resolution a local authority should carefully consider, whether they wish to control Sexual Entertainment Venues even if no such premises are currently in operation in their area. It is important to note that If the Council does not adopt such a power to control Sexual Entertainment Venues then Sexual Entertainment Venues, both existing and new venues, will be able to operate without any direct control from the Council.
- 4.4 Where a Local Authority has passed a resolution that a licensing regime for Sexual Entertainment Venues will have effect in their area, they will then be required to prepare and publish a Sexual Entertainment Venue policy statement. The policy statement should set out clearly the justification of the local authority's position with regard to licensing Sexual Entertainment Venues. Any such policy should provide details of the licensing conditions together with enforcement details. Such a policy statement could potentially include a provision that there will be no Sexual Entertainment Venues permitted within the area or that they are restricted in number , if that is deemed appropriate following consultation.
- 4.5 The Policy Statement should also include details of the impact of the licensing of Sexual Entertainment Venues in the area of Inverclyde taking into account the licensing objectives of preventing public nuisance, securing public safety, protecting children and young people from harm and reducing violence against women.

5.0 PROPOSALS

- 5.1 At its meeting on 9 December 2020 the Board agreed to instruct a public consultation in respect of the proposed licensing of Sexual Entertainment Venues. The Consultation was advertised online on the Council's website and advertised in a local newspaper. In addition the consultation was issued to all religious organisations and Community Councils within Inverclyde, Police Scotland and Inverclyde Womens Aid.
- 5.2 There were a total of 7 responses received in relation to the consultation and these responses are included at Appendix 1. From the responses, following the initial consultation, it is clear that there is broad support for the introduction of a licensing regime for Sexual Entertainment Venues in Inverclyde and for a Nil Policy.

- 5.3 The Board requires to consider the responses and determine whether Sexual Entertainment Venues ought to be licensed within Inverclyde. If the Board is minded to pass a Resolution introducing licensing for Sexual Entertainment Venues then the Resolution requires to be published in a local newspaper at least 28 days before the Resolution comes into effect which can be no earlier than one year after the Resolution is made.
- 5.4 If the Resolution is passed, the Act requires the Board to agree to a Sexual Entertainment Venue Policy Statement and this requires to be developed following consultation with interested groups.
- 5.5 If the Board is minded to pass a Resolution it is proposed that a further report be submitted to this Board recommending a process for applications if appropriate including details about the application process. Furthermore, this report will provide, for the Board's approval, a draft Licensing Statement which will be prepared in consultation with interested groups as set out in paragraph 3.2 of this report

6.0 IMPLICATIONS

6.1 Finance

There are no new financial implications at this stage, however if a resolution was passed that Sexual Entertainment Venues should be regulated within the area then an exercise will need to be undertaken in respect of determining fees associated with SEV s.

There are resource implications in terms of staff time in relation to establishing any new licensing regime.

Financial Implications:

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (If Applicable)	Other Comments
N/A					

6.2 Legal

The legal issues are addressed more fully within this report.

6.3 Human Resources

There are no Human Resources implications

6.4 Equalities

(a) Equalities

Has an Equality Impact Assessment been carried out?

	YES (see attached appendix)
x	NO – This report does not introduce a new policy, function or strategy or recommend a substantive change to an existing policy, function or strategy. Therefore, no Equality Impact Assessment is required

(b) Fairer Scotland Duty

If this report affects or proposes any major strategic decision:-

Has there been active consideration of how this report's recommendations reduce inequalities of outcome?

	YES – A written statement showing how this report's recommendations reduce inequalities of outcome caused by socio-economic disadvantage has been completed.
x	NO

(c) Data Protection

Has a Data Protection Impact Assessment been carried out?

	YES – This report involves data processing which may result in a high risk to the rights and freedoms of individuals.
x	NO

6.5 Repopulation

There are no repopulation implications.

7.0 CONSULTATIONS

- 7.1 A public consultation exercise has been undertaken in relation to the proposed licensing of Sexual Entertainment Venues following changes to the Civic Government (Scotland) Act 1982.
- 7.2 A further consultation will be required should the Board decide to pass a resolution that SEV s do require to be licensed within Inverclyde.

APPENDIX 1 To report regarding licensing of Sexual Entertainment Venues

General Purposes Board 9 June 2021

Draft SEV Resolution

RESOLUTION

Civic Government (Scotland) Act 1982 ("the Act")

The Inverclyde Council Entertainment Venues Resolution

The Inverclyde Council, in exercise of its powers in terms of Sections 9 and 45A-45C of the Act, hereby makes the following resolution:-

1. Section 45A-45C of the Act relating to Public Entertainment shall continue to have effect throughout the Council's area.
2. Subject to the terms of the Act, a Sexual Entertainment Venue licence shall be required for the use of the premises specified in (3) below at places of Sexual Entertainment as from (date to be confirmed).
3. The premises in the Council's area which require to be licensed under the Resolution will be those which provide the following activity:
 - (a) the use of any premises at which sexual entertainment is provided before a live audience, for the direct or indirect financial benefit of the organiser

The premises set out at (a) above shall require to be licensed by Inverclyde Council in accordance with the provisions of Schedule 2 of the Act and shall be regulated by those provisions.

Lindsay Carrick

From: Licensing Section
Sent: 18 January 2021 08:54
To: Lindsay Carrick
Subject: FW: Consultation on the Licensing of Sexual Entertainment Venues

From: Morag Cowe [REDACTED]
Sent: 17 January 2021 17:59
To: Licensing Section <licensing.section@inverclyde.gov.uk>
Subject: Consultation on the Licensing of Sexual Entertainment Venues

Dear Lindsay

Inverkip Church Kirk Session met on Wednesday 13th January and the licensing of Sexual Entertainment Venues was discussed. The session was of the opinion that SEVs in Inverclyde should be licensed.

Yours

Morag Cowe, Session Clerk.

Lindsay Carrick

From: Ian Blair [REDACTED]
Sent: 19 January 2021 16:18
To: Lindsay Carrick
Subject: Consultation on SEVs

Consultation on the Licensing of Sexual Entertainment Venues

Response of the Leadership of Greenock Baptist Church

Dear Lindsay

As a church, we have grave concerns about any SEV establishment opening up in the Inverclyde area. These concerns are not just in relation to the spiritual effect such an establishment may have. The concerns also focus on possible exploitation, possible increase in prostitution, alcohol consumption in an area already plagued by alcohol and drug misuse, possible criminal activity and increased social disorder around any such establishment.

Anyway, your consultation is purely focussed on the licensing of such premises. If an individual or group apply to open up such a venue, then licensing would seem to offer a level of scrutiny of how the venue is run, which would be advantageous to both community and employees. We, as a leadership, would therefore encourage Inverclyde Council to introduce a licensing scheme under the flexibility offered by the Scottish Government.

If such a venue was planned for the area, would such an application be publicised by the council so that interested parties in the area could submit objections prior to final permission being given?

With regards

Ian A. Blair
Secretary of Greenock Baptist Church.

Lindsay Carrick

From: Licensing Section
Sent: 21 January 2021 14:01
To: Lindsay Carrick
Subject: FW: S E Vs.

From: Morag Wilson [REDACTED]
Sent: 21 January 2021 13:45
To: Licensing Section <licensing.section@inverclyde.gov.uk>
Subject: S E Vs.

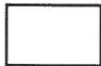
Dear Lindsay.

In response to your letter dated 21-12-2020. Hamilton Bardrainney Church met as a Board/Session on Wednesday evening on Zoom, 20-01-2021. Your letter on S E Vs. was discussed. It was agreed, we didn't approve of such Venues, and would not want one in our Area in Port Glasgow. If there are such places locally, then they should be Licensed.

Yours Sincerely

Morag Wilson Session Clerk.

Hamilton Bardrainney Church port Glasgow.



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Alan Stevenson

Lindsay Carrick

From: Alan Stevenson
Sent: 19 February 2021 15:52
To: Lindsay Carrick
Subject: (Official) Air Weapons and Licensing (Scotland) Act 2015 - Consultation on the Licensing of Sexual Entertainment Venues (SEVs)
Attachments: Consultation SEVs for Licensing Feb 2021.docx

Classification: Official

Hi Lindsay

Air Weapons and Licensing (Scotland) Act 2015 - Consultation on the Licensing of Sexual Entertainment Venues (SEVs)

I am forwarding the completed response from Inverclyde Violence Against Women Multi Agency Partnership relating to the above consultation. This response is supported and endorsed by the Inverclyde Child Protection Committee, Inverclyde Adult Protection Committee and Inverclyde Community Safety Partnership. The response has also been shared with the Council's Equalities Group and Women's Forum.

Please just let me know if you need any further information

Alan Stevenson
Acting Service Manager – Children's Services
Health and Social Care Partnership
Inverclyde Council
Princes Street House
19-29 Princes Street
Port Glasgow
Inverclyde
PA14 5JH

Inverclyde Council website – www.inverclyde.gov.uk
Inverclyde on Twitter – twitter.com/inverclyde

Inverclyde Council - Best Government Services Employer in the UK 2016 – Bloomberg Business Best Employer Awards 2016

Written Submission from Inverclyde Violence Against Women Partnership

Civic Government (Scotland) Act 1982: Consultation on the future policy development of Sexual Entertainment Venues (SEV's)

Inverclyde Violence Against Women Partnership (VAWMAP) welcomes the opportunity to respond with views relating to this Consultation exercise carried out by Inverclyde Council.

The vision of Inverclyde Violence against Women Multi Agency Partnership is to live in an area where all individuals are equally safe and respected, where women live free from all forms of violence and abuse and no child or young person should have to experience gender based violence or live with its impact. Our aim is to work in partnership with all services to prevent and eradicate all forms of violence against women. We recognise the insidious and deep rooted nature of the problem and the need to invest in significant economic, social and cultural change over a long term period. This requires ongoing commitment from partners and the community to effect cultural change.

The VAWMAP is working together to try to dismantle all aspects of violence against women including (but not limited to) domestic abuse, rape, sexual assault, sexual harassment, child sexual abuse, stalking, honour based abuse, and commercial sexual exploitation including (but not limited to) prostitution, trafficking, pornography, lap and pole dancing.

The VAWMAP is made up of representatives from agencies working with women and children in Inverclyde including: Police Scotland, Inverclyde Women's Aid, NHS Greater Glasgow & Clyde, Homelessness Service, Alcohol & Drugs Service, HSCP - Social Work Criminal Justice and Children's Services, Child Protection, Education, Community Safety & Resilience, RSLs, ASSIST, SPS Greenock and CLD. The VAWMAP is coordinated by the Community Safety & Resilience, Inverclyde Council and meetings are currently being held monthly.

It is the view of the VAWMAP that all forms of commercial sexual exploitation contribute to creating and sustaining gender inequality and objectify women. In our view activities such as lap dancing, stripping, prostitution and pornography are inextricably linked to the sexual commodification of all women and girls, this is both harmful and damaging not only to women and girls, but to our society and our culture.

The VAWMAP accepts that regulation is necessary in order that women and girls are afforded the same rights and protections that any other human being would reasonably expect.

'A licensing regime should be adopted to licence and regulate SEV's. However we consider the form of "entertainment" to be degrading and often exploitive to, in most cases, the women involved as well as fostering a culture where women are objectified. We do not consider these venues to have any positive value to Inverclyde.'

Please find below our Inverclyde VAWMAP responses as per the Consultation:

Do we think that SEV's in Inverclyde should be licensed?

The VAWMAP supports the right of Inverclyde Council (IC) to regulate SEV's across the local authority area. Should IC fail to adopt the discretionary powers now available to them under the 1982 Act, then SEV's could continue to operate without regulation or any additional conditions attached and the local authority would have no control or regulation over the provision of sexual entertainment within any SEV's. We believe that it is fundamentally important that IC asserts its right to regulate.

Equally Safe is the Scottish Government and COSLA's strategy to prevent and eradicate violence against women and girls. Underpinning the strategy is a gendered analysis of its understanding of violence against women and girls and this includes commercial sexual exploitation within its definition. The strategy recognises that this violence stems from deep rooted and systemic gender inequality and the subordinate position women occupy in society in relation to men.

Commercial sexual exploitation is broken down to include prostitution, trafficking, pornography, lap and pole dancing, stripping, peep shows, internet and phone sex, internet brides, this list is not exhaustive. Failing to adopt a regulatory role in respect of SEVs is to risk contributing to commercial sexual exploitation in Inverclyde.

What impact, if any do we think SEVs currently have on the community?

All of us who live and work in Inverclyde feel proud of the area and are anxious to make sure that we continue to have good employment prospects, low crime rates and an attractive environment. The Inverclyde Alliance shares these hopes and is determined to make sure that the area is seen as one of the best places to live and work in Scotland. There is a commitment to develop and deliver co-ordinated, effective, efficient services together, meeting the needs of our communities and delivering better outcomes for all.

The Community Safety & Resilience Team, Inverclyde Council, coordinates VAWMAP. Community Safety' means different things to different individuals and communities across Inverclyde but ultimately it is about communities being resilient and able to feel and be safe. Within The Community Safety (CS) Strategy the CS Partnership focuses on three outcomes that aim to help communities feel safe and be safe; reducing violence, crime and disorder, reducing unintentional harm and injury and building resilient communities.

IC has a Public Sector Equality Duty. Having SEVs in our communities across Inverclyde will not advance the equality of opportunity of women workers or residents. The VAWMAP is of the view that SEVs contribute to the sexual objectification of women and therefore not in keeping with the principles of equality. The presence of SEVs close to transport hubs, shopping areas, clubs and bars can create a sexually aggressive environment in which women and girls can feel fear and intimidation or could be in danger of being sexually harassed.

Impacts on SEV operators or workers if they were licensed?

Inverclyde Council and its partners have ensured that disadvantaged people, minority groups and people at risk are at the centre of community plans and strategies. Addressing inequalities, improving public protection and mental health & wellbeing all contribute to making Inverclyde a better place to live. A workforce that has an awareness of the Equalities agenda ensures that our practices are person centred and developed with full awareness of related issues. The VAWMAP considers that the existence of SEVs, licensed or otherwise, conflicts directly with our plans, strategies, policies and our people centred approach at both a corporate and a community level. However, if they were to exist they should be licensed in order to provide protections relating to the women working in an environment where sexual harassment is normalised to address the impacts on their mental health and wellbeing, self-esteem and self-worth.

Do we think there would be positive/negative impacts on the communities and surrounding vicinity to SEV's if they were licensed?

Inverclyde Alliance recognises that whilst challenges will undoubtedly lie ahead, Inverclyde also has a number of substantial strengths that we can build upon. All partners are focussed on ensuring that all our children, citizens and communities are safe, healthy, achieving, nurtured, active, respected, responsible and included through the delivery of the three strategic priorities contained within the Local Outcomes Improvement Plan 2017-2022. The Alliance is committed to continuing to develop co-ordinated, effective, efficient services together, that meet the needs of our communities and deliver better outcomes for all. The Plan should improve the wellbeing and quality of life of the residents of Inverclyde, with a particular focus on reducing inequality and poverty.

Inverclyde is one of the most attractive places in Scotland to live, work and visit, with breath-taking scenery, excellent transport links to Glasgow and Edinburgh, some of the best walking and sporting activities in Europe and the best school estate in Scotland. The main towns of Greenock, Port Glasgow and Gourock sitting on the Firth of the Clyde provide a marked contrast to the coastal settlements of Inverkip and Wemyss Bay and the picturesque villages of Kilmacolm and Quarriers Village which are located further inland, and offer a further dimension to the area's diversity, particularly in social, economic and physical terms. A strong sense of community identity exists within Inverclyde and to local neighbourhoods in particular. Local citizens are rightly proud of their area, and its history which is steeped in centuries of maritime and industrial endeavour. IC should take into account these attributes when considering the provision of a SEV in the area. It would not be an attractive asset for a family friendly area for local residents and tourists. It would be detrimental to Inverclyde's efforts to promote the local areas and tourist attractions and also the night time economy, while having the presence of any SEVs in the area.

IC is striving to follow neighbouring authorities to achieve White Ribbon status. The White Ribbon Campaign in Scotland (WRS) supports Council areas to work towards ending Violence Against Women (VAW) by engaging men and boys to take action and achieving White Ribbon status. White Ribbon Scotland uses the skills and experience of men in communities to educate and inspire other men to change attitudes in society, address gender inequalities and challenge violent and abusive perceptions of masculinity. The award requires local areas to commit to developing projects, supported by WRS staff, resulting in them taking ownership and receiving recognition for their commitment to involving men in addressing VAW. The intention is that after a successful first year the involvement of men would become an integral, but not dominating, part of the local VAW

delivery plan, thereby ensuring that the ongoing involvement of men becomes the legacy of achieving White Ribbon Status. This sends out a clear signal to the general public that if everyone plays their part in changing attitudes and behaviour there can be a real positive difference in levels of VAW. On successful conclusion of the project, the Council is presented with an award that recognises the work carried out and confirms the attainment of White Ribbon Status in Inverclyde. The existence of SEVs in Inverclyde is likely to affect our success as an area of achieving White Ribbon Status.

If SEV's were to be licensed, do we think the location of SEV's is an important consideration?

It is important that others are considered with any decision to license a SEV including where in Inverclyde the venue is located. IC would need to consider the impact it would have on residents, businesses, visitors and tourists and workers. All of these people should have the right and ability to access all areas of the local authority equally and safely. The location of SEVs is an important consideration and existing areas, facilities and services such as, schools; places of worship; residential areas; women's refuges and shelters; homelessness services; support services for women, children & young people; third sector organisations; charitable services; known issues or areas of anti-social behaviour; concerns over human trafficking or exploitation and areas where there are already concerns about the safety of women and girls are important factors which must be given consideration. The VAWMAP considers that there is no location in Inverclyde which is appropriate for a sexual entertainment venue.

If SEV's are to be licensed, what should the appropriate number be?

The VAWMAP strongly requests that Inverclyde Council should adopt a '**NIL**' policy for SEV's as per a number of reasons stated above. **However if this was not adopted by the local authority, we would recommend** additional conditions to the standard licencing conditions as per the following:

- Licensing Officers should have access to Risk Assessments and regular inspections of the SEV's, including unannounced inspections
- License holders, bar staff and door security staff should attend mandatory equalities training as determined by the Inverclyde Equalities Group.
- Performers working in the SEV's should have access to safe working facilities and separate from the opposite sex and meet with health and safety regulations
- There should be a maximum number of performers on stage at any one time and performers should not be fully naked
- Prohibition of Private Booths
- Controls on exterior advertising, signage including in public spaces e.g. public transport, taxis

Standard licence conditions that we think would be relevant?

- Performers should be provided safe transport home and paid by the SEV license holder
- SEV's should not be licensed for late night (terminating at 4am) alcohol licenses
- Any performers who provide passport and visa documents to the licensee must have these returned to them to prevent any form of exploitation and coercion

- SEV's must be able to ensure there visible codes of conduct for staff and customers and that all health and safety regulations are adopted
- Licensing of SEVs should be on a different scale from the arrangements for a local authority alcohol license. In England and Wales the charging arrangements are very different
- Ensure an Equality Impact Assessment is part of the licensing process and decision

How could the Council adequately address the licensing objectives within an SEV policy statement in relation to:

- **Preventing public nuisance, crime and disorder**
- **Securing public safety**
- **Protecting children and young people from harm**
- **Reducing violence against women**

If Inverclyde Council fails to adopt a 'NIL' policy on licensing SEV's, it is sending a message that the sexual entitlement of men takes precedence over the equality, safety and wellbeing of women and girls in our area. The local authority could be exposing vulnerable women and girls to exploitation with an impact on local policing dealing with possible subsequent criminal activities.

As mentioned previously, the local authority have to ensure the public safety of all residents, workers, visitors and tourists across Inverclyde. The VAWMAP along with the Child Protection Committee, Adult Protection Committee and Community Safety Partnership, has developed local strategies to ensure protection of children and young people from harm. By failing to regulate SEV's locally, the local authority could be exposing children and young people to come into contact with activities which are for 'adult entertainment' only. The normalisation of such venues in society makes the sex industry a viable option for women who may find themselves under pressure to get involved in selling sex, leading to many issues in relation to long term wellbeing. This climate also makes it easy for young people to be groomed for involvement in the sex industry and this goes against the wellbeing indicators outlined in **Getting It Right For Every Child**.

The VAWMAP has, in line with the national Equally Safe Strategy (preventing and eradicating violence against women and girls), adopted a local Violence Against Women Strategy, the outcomes for which are monitored through the Community Safety Strategy Group and ultimately Inverclyde Alliance. VAWMAP also has to report yearly to the Improvement Service on the Equally Safe Quality Standards and Performance Framework. This annual exercise ensures that Violence Against Women Partnerships have a key important role to play in providing quality assurance for local services, policies and processes to ensure that they are evidence-informed and contribute to positive outcomes for women and children.

The role of the Inverclyde Violence Against Women Partnership works towards ensuring that women and girls and vulnerable people, are not exposed to physical, emotional and psychological harm which could occur in the event of SEV's established or not appropriately regulated in our area.

Inverclyde Violence Against Women Multi Agency Partnership

23/02/2021

Your Ref: AS/LC

Our Ref: DCU/K/AS/LC-AH



Lindsay Carrick
Legal and Property Services
Inverclyde Council
Clyde Square,
Greenock
PA15 1LX

Police Scotland
Paisley Police Office
Mill street
Paisley
PA1 1JU
Tel: 01415325900

Dear Madam,

In regards to your letter dated 21st December 2020.

If the Board decides to permit the operating of Sexual Entertainment Venues within the local authority area then it would be the view of Police Scotland's Licensing Department that such venues be licensed by Inverclyde Council. I appreciate that Sexual Entertainment Venues within Scotland are not required to be licensed at this time, however are licensed in terms of the Licensing (Scotland) Act 2005 where alcohol is sold on premises.

If premises were licensed this would enable officers from Police Scotland to conduct inspections of the premises, including premises plans and documentation. It would also be requested that all staff at such venues be trained accordingly with all security/door staff being SIA trained and accredited.

If the Council adequately addresses the licensing objectives within a Sexual Entertainment Venue policy statement, this would assist in securing the following objectives

- Preventing crime and disorder
- Securing public safety
- Preventing public nuisance
- Protecting and improving public health
- Protecting children and young people from harm

Yours faithfully



David Duncan
Chief Superintendent
Divisional Commander



The Church of Scotland
Old Gourock & Ashton Parish Church

41 Royal St, GOUROCK PA19 1PW
www.ogachurch.org.uk



APPENDIX 2

Anne Sinclair

19 January 2021

Legal Services Manager

Litigation, Licensing & Committee Services

Inverclyde Council

Municipal Buildings

Greenock PA15 1LY

Dear Ms Sinclair,

Air Weapons and Licensing (Scotland) Act 2015

Consultation on the Licensing of Sexual Entertainment Venues (SEVs)

I refer to your letter of 21 December 2020 in the above connection and I reply on behalf of the Minister and Kirk Session of Old Gourock and Ashton Parish Church.

We note that the Scottish Government legislation gives the Council a discretionary power to license SEVs in its area. We also note that the Council intends to carry out a second consultation in connection with a draft SEV Policy Statement and that such a policy could potentially include a provision that there will be no Sexual Entertainment Venues permitted within the area.

With respect to your department, we consider that the content of your letter implies that SEVs will be allowed in the Inverclyde area, otherwise why would the first consultation be on whether or not to license such establishments rather than whether to permit them in the first place? It seems to us that your consultations are, therefore, the wrong way round.

However, since your letter is a consultation on licensing such premises, **following consideration of your letter, we urge the Council's General Purposes Board to decide in favour of licensing SEVs throughout Inverclyde.**

Please ensure that we are included in the second consultation.

Yours sincerely,

James K Hempsey, Session Clerk.

Minister: Rev David WG Burt BD DipMin MTh - [REDACTED]

Session Clerk: James K Hempsey - [REDACTED]

Secretary: [REDACTED]

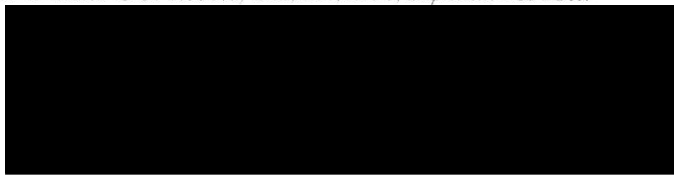
Safeguarding Officer: Diane Gillan - [REDACTED]

Old Gourock and Ashton Parish Church of Scotland No: 150798 Scottish Registered Charity No: SCO 07324



Wellpark Mid Kirk

Rev Alan Sorensen, DL, BD, MTb, Dip Min, FSA Scot



Anne Sinclair
Legal Services Manager
Litigation, Licensing Committee
Inverclyde Council

12th February 2021

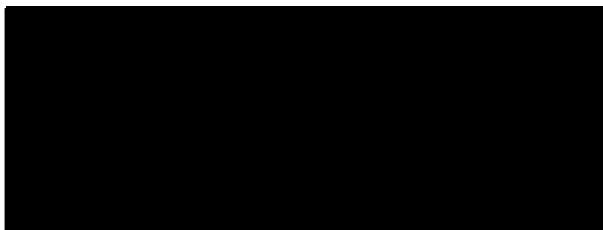
Dear Anne Sinclair

Consultation on Licensing of Sexual Entertainment Venues

Thank you for your correspondence on the above. The Kirk Session of Wellpark Mid Kirk has considered this and is of the unanimous opinion that such venues should require licensing.

We look forward to the publication of the draft policy and will make a submission in response to that. I'm sure it will not come as any surprise that we are most likely to be minded to support a policy that curtails such events as much as possible.

Yours sincerely,



Alan Sorensen
Minister