

jobcentreplus

Adult Entertainment Industry Consultation – responses received against the policy

DWP Department for
Work and Pensions

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Q1 - The Gender Equality Duty came into force in April 2007. Do you consider that this policy and associated processes pays due regard to the duties to promote gender equality; eliminate harassment; eliminate sex discrimination?	
Consultee	Response
<p>Leeds Inter-Agency Project (LIAP) Women & Violence Trust</p>	<p>Promote gender equality. The sex industry, from pornography through strip clubs to prostitution encourages violence against women and is violence against women. It normalises harmful attitudes about women such as the idea that women are objects to be used for sexual gratification. Any normalising of this – e.g. by advertising jobs in the sex industry in Job Centres, is reinforcing the idea that this view of women is acceptable. This is undermining gender equality.</p> <p>Eliminate harassment. Those who live in or near red light areas have always complained about the harassment of women and girls by men/punters in the area. The buying and selling of women and paying to have women perform sex acts can lead to a view of all women as prey. It encourages harassment. Strip and Lap Dancing Clubs specifically encourage harassment of women in the club. That is what men pay to do in such sex encounter establishments. Having paid to harass women in a club, they are then more likely to harass women in the street. So any endorsing of this – by advertising the posts in Job Centres actually encourages harassment.</p> <p>Eliminate sex discrimination. Sexual harassment is part of sex discrimination. These establishments are devoted to encouraging sex discrimination against women. The process of advertising jobs in the sex industry in Job Centres encourages sex discrimination against women as they promote the idea that this discrimination is not only acceptable but desirable.</p>
<p>Justice for Women</p>	<p>One of Justice for Women’s main concerns is violence against women – which is a result of women’s inequality and perpetuates women’s inequality.</p> <p>The Gender Equality Duty came into force in April 2007. It is binding on all public bodies. We are asked to consider how the policy of carrying adverts for the sex industry pays due regard to</p>

	<ul style="list-style-type: none"> • Promote gender equality. The sex industry, from pornography through strip clubs to prostitution encourages violence against women and is violence against women. It normalises harmful attitudes about women – that we are just pieces of meat and can be treated as pieces of meat. So any normalising of this – eg by advertising jobs in the sex industry in Job Centres is reinforcing the idea that this view of women is acceptable. This is undermining gender equality. • Eliminate harassment. Those who live in or near red light areas have always complained about the harassment of women and girls by men/punters in the area. The buying and selling of women and paying to have women perform sex acts leads to a view of all women as prey. It encourages harassment. Strip and Lap Dancing Clubs specifically encourage harassment of women in the club. That is what men pay to do in these sex encounter establishments. So having paid to harass women they leave the club. They are then more likely to harass women in the street. So any endorsing of this – by advertising the posts in Job Centres far from eliminating harassment, encourages it. • Eliminate sex discrimination. Sexual harassment is part of sex discrimination. So these establishments are devoted to encouragement of sex discrimination – against women. By advertising jobs in the sex industry in Job Centres you are encouraging sex discrimination against women, as they promote the idea that this discrimination is not only right, it is sexy.
Eaves	<ul style="list-style-type: none"> • The policy of advertising jobs in the sex industry does not, in Eaves opinion, meet the DWP's duties under the Gender Equality Duty. The GED is intended to address the fact that, despite 30 years of individual legal rights to sex equality, there is still widespread discrimination, and persistent gender inequality. Policies and practices that seem neutral can have a significantly different effect on women and on men, often contributing to greater gender inequality and poor policy outcomes. Individual legal rights have not been enough by themselves to change this (EHRC Code of Practice 1.19). • In the GED Code of Practice the Equality and Human Rights Commission (EHRC) states that public authorities have to be proactive in eliminating discrimination and harassment and be proactive in promoting equality of opportunity and not just avoiding discrimination. In order to meet

the general duty under the Equality Act 2006, public authorities are expected to have **due regard** to the need to eliminate unlawful discrimination and harassment and promote equality of opportunity between men and women in all of their functions. Due regard comprises two linked elements: proportionality and relevance. **The weight which public authorities give to gender equality should therefore be proportionate to its relevance to a particular function.** In practice this principle means that public authorities should prioritise action to address the most significant gender inequalities within their remit.

- The requirement for proportionality and relevance should not be interpreted as a simple question of the numbers of people affected. Public authorities should also take into account the seriousness or extent of the discrimination, harassment or gender inequality, even if the number of people affected is small (EHRC Code of practice 2.22). **The fact that only 0.015% of vacancies advertised by JC+ in the preceding year are in the ‘adult entertainment’ industry is not relevant because of the excessively harmful nature of this policy in terms of discrimination, harassment and gender inequality.**
- Harassment and sexual harassment are unlawful under the Sex Discrimination Act and the duty requires public authorities to have due regard to the need to eliminate them. The duty to have due regard to the need to promote equality of opportunity between men and women is also relevant to ensuring that harassment is prevented before it occurs.
- The DWP as a public body must take a broad view of its responsibilities under the GED, looking at not only the affect on those who actually apply for jobs through JC+, but the wider need to achieve gender equality in society. Where changing a function or proposed policy would lead to significant benefits to the gender equality of men and women public authorities should give greater weight to the case for change and take steps accordingly. (EOC Code of Practice 2.26). Despite the apparent gender equality demonstrated by your statistics in regard to the numbers of male/female applicants to the ‘adult entertainment industry’, it is clear that this industry is one in the main set up to provide services for male clients by female ‘workers’, and that in reality the number of men

^{1,2}. Indeed, not only is the 'adult entertainment industry' not a gender neutral employer, the function it fulfils in society is to perpetuate the inequality women continue to suffer by treating them merely as sexual objects.

- **The DWP's policy of advertising jobs in the 'adult entertainment' or sex industry fails to pay due regard to the need to eliminate sexual harassment against women.** Although the consultation document gives evidence that only two complaints about direct sexual harassment had been received by JC+ by those who had taken jobs in the sex industry through JC+, this does not accurately represent the level of sexual harassment caused by the continuation of this policy. Those who work in the 'adult entertainment' industry routinely suffer high levels of sexual harassment in the work place both by management and by clients³, indeed Eaves would argue that sexual harassment is inherent in the very nature of this 'work'. There is also strong evidence to suggest that women who work in the 'legitimate adult entertainment' industry are often coerced into prostitution. Kelly Holsopple's study of strip clubs in the USA found that 100% of dancers were asked to perform sexual acts on men for money, 78% every day they worked⁴. This is particularly relevant in the current economic climate as other research indicates that coercion of dancers to

¹ Bindel J, and Atkins H, (2008). *Big Brothel: A Survey of the Off-Street Sex Industry in London*. The POPPY Project. London: Eaves Housing for Women.

² Dickson (2004). *Sex in the City: Mapping Commercial Sex Across London*. London: Eaves Housing for Women.

³ Bindel, J. (2004) *Profitable Exploits: Lap Dancing in the UK*, London: CWASU, and Holsopple, K. (1998) *Stripclubs According to Strippers*, Minnesota: Metropolitan Coalition Against Prostitution.

⁴ Holsopple, *ibid*.

perform sexual acts on customers by club management intensifies when market pressure increases⁵. Furthermore, in areas where 'adult entertainment' venues are situated, female residents complain of increased levels of sexual harassment and are discriminated against because their freedom of movement is restricted in order to avoid these locations. Research suggests that in areas where strip clubs have opened reports of rape and sexual assault have increased by up to fifty percent⁶. There is also growing recognition about the links between the adult entertainment industry and the sexual harassment of the wider population of women as a whole. The increasing normalisation and glamorisation of pornography and the sex industry which disproportionately objectifies women, increasingly normalises the unacceptable levels of sexual harassment women in the general population and those working in the 'adult entertainment industry' receive on a day to day basis. This normalisation is undoubtedly further encouraged by the DWP's decision to advertise jobs within the sex industry, thus further perpetuating gender inequality throughout British society.

- The vast majority of women who work within the adult entertainment industry are self employed

⁵ Bott, E. (2006) Pole Position: Migrant British Women producing 'selves' through lap dancing work. *Feminist Review*, 83, 23-41.

⁶ Eden, I. (2007) *Inappropriate Behaviour*. London: Lilith.

⁷ Bindel, *ibid*.

⁸ www.dwp.gov.uk

⁹ Bindel & Atkins, *ibid*.

¹⁰ www.punternet.com

¹¹ [Women's Resource Centre](#).

¹² *ibid*.

¹³ Home Office, 2006. *A coordinated prostitution strategy and a summary of responses to 'Paying the price'*. London: Home Office.

¹⁴ Home Office (2004b). *Paying the Price: a consultation paper on prostitution*. London: UK Government.

¹⁵ Home Office, 2004a. *Solutions and strategies: Drug problems and street sex markets*. London: Home Office.

¹⁶ Ramsay, R. *et al* (1993). *Psychiatric Morbidity in Survivors of Organized State Violence Including Torture*. 162:55-59, *British Journal of Psychiatry*.

¹⁷ Home Office (2004a), *op cit*.

¹⁸ Home Office (2006). *A Coordinated Prostitution Strategy & Summary of Responses to 'Paying the Price'*, London.

¹⁹ Stephen-Smith, S. (2008) *Routes in, Routes Out: Quantifying the Gendered Experience of Trafficking to the UK*. London: POPPY.

and it is incredibly difficult to earn a living wage through this type of employment. There is research and anecdotal evidence to suggest that, for instance, within the lap dancing industry women are in fact expected to pay clubs fees to dance and will often receive punitive fines if they do not conform to club rules. Evidence also demonstrates that clubs often retain an excess of dancers who are forced to compete with each other to make money. Not only does this mean that often women are actually in debt to the clubs rather than making any kind of living for themselves, but that in order to make a living they are pushed into activities which they would not otherwise have done such as performing sexual acts with clients⁷. Driving women who are recognised as being heavily discriminated against within the labour market into work which may lead them into further poverty or exploitation cannot conform with JC+' stated key objective 'to help people facing the greatest barriers to employment to compete effectively in the labour market and move into and remain in work'. The DWP states it is *here to promote opportunity and independence for all, help individuals achieve their potential through employment [and] work to end poverty in all its forms*⁸. Encouraging women to enter a life of exploitation in the sex industry does not and cannot fulfil any of these aims. JC+ and the DWP have a responsibility to promote gender equality by proactively assisting women to engage in employment which does not compromise their dignity and human rights. The DWP must recognise the reality that women who have low educational achievement, lack employment history or need flexible work hours due to child care obligations may be driven into the 'adult entertainment industry' falsely believing that because it is sanctioned and promoted by the DWP it will provide better 'opportunity' than other types of employment. One of the outcomes that the EHRC suggests the GED should achieve is that girls have higher aspirations for their future careers. Eaves would argue that very few parents would wish involvement in the sex industry as a viable 'career opportunity' for their daughters, or sons for that matter. Undoubtedly the DWP and its subsidiaries are key players in the promotion of this outcome and must be able to see the detrimental impact that its current policies in this respect will have on its ability to achieve this outcome.

- It is well established that the lap dancing industry has strong links with prostitution. Furthermore, there is little doubt that 'working' in the 'adult entertainment industry' in a sauna, massage parlour or for an escort agency is merely a euphemism for being exploited as a prostitute. In recent

research undertaken by Eaves POPPY project, more than 10% of brothels in London identified themselves as massage parlours, 2% as saunas⁹. Log on to the website Punternet, which is a resource for men who wish to buy sex in the UK, and you will find a 'useful' guide to using prostitutes in such venues¹⁰. Punternet also has links to many 'escort' agencies. These sites show women naked or semi naked on the front pages clearly giving the implication that the women who work in such venues are available sexually. Eaves does not view prostitution as a career choice for women but as a situation women who have no other choice are forced into by poverty, marginalisation and other vulnerabilities. Indeed, the facts about women exploited in prostitution really speak for themselves:

- 75% of women involved in prostitution were drawn into prostitution when they were children¹¹. 74% of women cite poverty and the need to pay household expenses and support their children as a primary motivator for entering prostitution¹².
- Up to 70% of women in prostitution spent time in care, 45% report sexual abuse and 85% physical abuse within their families¹³.
- Up to 95% of women in prostitution are problematic drug users, including around 78% heroin users and rising numbers of crack cocaine addicts¹⁴.
- More than half of UK women in prostitution have been raped and/or seriously sexually assaulted. At least three quarters have been physically assaulted¹⁵.
- 68% of women in prostitution meet the criteria for Post Traumatic Stress Disorder in the same range as torture victims and combat veterans undergoing treatment¹⁶.
- Women in prostitution in London suffer from a mortality rate that is 12 times the national average¹⁷.

Based on this evidence the current government has recognised prostitution as a form of violence against women since 2006 when it released its coordinated strategy to combat the problem¹⁸. It therefore seems astonishing that another government department would condone 'work' in prostitution as a viable career choice for vulnerable women, as the DWP is doing in line with its current policy.

	<p>In advertising jobs within the sauna, massage or escort industry the DWP and JC+ are demonstrating that they are complicit with brothel keeping and the pimping of women. In addition, the connection between brothels masquerading as another type of business and the trafficking of women and girls for sexual exploitation has also been well evidenced. 23% of the trafficking victims Eaves POPPY Project has worked with were forced to work in saunas or massage parlours in the UK after being trafficked¹⁹. It is clearly not sufficient to write a letter to those who recruit women for such ‘jobs’ asking them whether something illegal is involved and when they say no taking their word for it – particularly given that a significant proportion of the activity that takes place under the auspices of the sex industry is illegal anyway. Instead JC+ must work from the standpoint that every sauna, massage parlour or escort agency is a front for prostitution unless it can categorically prove otherwise.</p> <p>In order to meet your obligations under the Equality Act you must look at the broad need to achieve gender equality within society as a whole. The DWP cannot continue to offer support to this type of business and meet its duties under the Equality Act.</p>
<p>Glasgow Community and Safety Services</p>	<p>A further objection to the Jobcentre Plus policy of advertising adult entertainment vacancies relates to the newly established Gender Equality Duty – a law that came into force in April 2007 requiring all public bodies in England, Wales and Scotland to take steps to promote equality of opportunity between women and men and eliminate unlawful discrimination and harassment in all their functions. It must be contended that the gender inequality inherent in the nature of adult entertainment work serves to promote sexual harassment and discrimination. Arguably, the licensing process should be scrutinised and a license for clubs where adult entertainment activities occur should not be granted until an assessment of this kind has been carried out, to deduce whether it unfairly impacts on either sex.</p> <p>The Equality and Human Rights Commission has made it clear that it views violence against women as gender inequality and expects to see this reflected in gender equality schemes. The Department for Work and Pensions, if it purports to being fully committed to the Gender Equality Duty is acting in contradiction to this duty by promoting opportunities for women to work in a potentially discriminatory and sexually intimidating environment. Indeed the Consultation paper highlights two recorded</p>

	<p>complaints of harassment from jobseekers who alleged that they were asked to perform sexual services in the course of employment, which they had obtained through use of the JCP.</p>
<p>Wales Women's National Coalition (WWNC)</p>	<p>No, we do not feel that this policy and associated processes pay due regard to the Gender Equality Duty (GED). The GED was introduced on 6th April 2007 to ensure that public bodies take steps not only to eliminate harassment but also to proactively promote equality between women and men. The 'adult entertainment' industry – massage parlours, escort agencies, topless TV channels, lapdancing, pole-dancing and so on (as listed in 17) – is based on a system of predominantly male business owners employing predominately female staff to sexually titillate predominately male customers. It is difficult to see how advertising jobs within this system of men profiting from or paying to view women's bodies could be construed as proactively promoting equality between men and women.</p> <p>WWNC feels that, rather than offering jobs within the 'adult entertainment' industry, the Jobcentre would benefit more from following the examples of other public sector organizations in order to conform to the GED within the employment field:</p> <ul style="list-style-type: none"> • Advertising jobs that offer flexible working practices to account for women's caring responsibilities; • Encouraging employers to proactively recruit more women by explicitly mentioning their work-life balance policies in recruitment adverts; • Taking into account childcare needs in skills training for mothers who wish to retrain to improve their ability to compete in the workplace. <p>WWNC does not feel that the policy of advertising for jobs within the 'adult entertainment' industry compares well with other examples of public sector organisations' efforts to comply with the GED. By advertising for vacancies within an industry that is inherently based upon the commodification of women's bodies for male profit and pleasure, the Jobcentre is in danger of failing to comply with the GED by exacerbating gender inequalities within society.</p>

There are several barriers for women within the employment market that needs to be addressed in order for the Jobcentre Plus and DWP to be fulfilling requirements under the GED. Rather than prioritizing the needs of 'adult entertainment' industry employers, we would recommend the Jobcentre acted on the following key areas to promote gender equality and eliminate gendered discrimination:

- **Closing the gender pay gap** (which is currently 12.7% in Wales – up from 10.3% in 2007; the Jobcentre could work towards closing this by training staff to encourage women into better-paid work and ensuring that employers advertising within the Jobcentre offer equal pay for equal work)
- **Addressing the disproportionate amount of women in low-paid jobs** (by ensuring that Jobcentre advisers receive training to avoid the current situation of jobseekers routinely being offered stereotypical jobs such as cleaning and clerical work to women – such 'feminised' jobs are notoriously poorly paid. This would also go some way towards closing the gender pay gap)
- **Equal pay for apprenticeships** (traditional female apprenticeships, such as hairdressing, are among the worst paid – see our member organization YWCA's 'More than One Rung' campaign, which helps disadvantaged young women into better skills and training)
- **Encouraging women and girls to develop their skills for long-term employment**
- **Addressing inadequate childcare provision** (lack of good quality, affordable childcare prevents mothers from fully participating in the labour market)
- **Investing in lifelong learning to enable women to re-skill and progress within their careers**

	<ul style="list-style-type: none"> • Addressing discriminatory employment practises regarding maternity and pregnancy within the workplace (women are still being dismissed for getting pregnant, questioned at interview stage on their intentions to having children and facing difficulties when returning to work) <p>Addressing these core issues would be far more effective in promoting gender equality than encouraging women to enter into a job sector which ultimately serves to normalize, exacerbate and reproduce unequal power relations between men and women. In order to truly promote gender equality and fulfil its duties under the GED, Jobcentre Plus would benefit from reconsidering its priorities.</p> <p>From the consultation document, it appears that slightly more men than women are applying for these jobs. It also appears that the Jobcentre therefore thinks that this policy is not discriminatory towards either men or women. However, the lack of gender-disaggregated data relating to who is actually chosen for the job by ‘adult entertainment’ industry employers is a concern. We would guess that an overwhelming majority of lapdancing and topless TV presenting jobs are offered to women rather than men, and that this would be the case even if 90% of applicants were men, due to the extremely gendered nature of this work.</p> <p>While the Jobcentre may think it is offering equality of opportunity due to approximately equal numbers of men and women applying, the DWP seriously needs to consider equality of outcomes in terms of who is actually being appointed, and produce gender-disaggregated statistics on outcomes for jobseekers.</p>
Women’s Support Project (WSP)	<p>Promote gender equality - The WSP fails to see how JobCentre Plus is promoting gender equality when it endorses the Adult entertainment industry by accepting its advertisements. This industry is based on gender inequality and the exploitation of women.</p> <p>The statistics provided are not reflective of any gender equality and the interpretation of them as such, displays gender blindness. The WSP would challenge the assertion that the current policy has “No disproportionate impact in terms of gender”</p>

	<p>Women are proportionately over represented in activities with sexual element. They are the ones employed in escort agencies, lap dancing clubs and saunas. These settings are directly linked to women's exploitation and so any comparison with employment in warehouse work, retail or manufacturing is redundant.</p> <p>Eliminate harassment - The current policy will not eliminate harassment but endorse jobs where women are viewed as commodity and objectified. Research carried out on behalf of Glasgow City Council, found that women in lap dancing experienced harassment from customers and were approached for sexual activity. As such, the current policy risks placing women in situations where harassment is the norm.</p> <p>Eliminate sex discrimination - The proportion of women to men is much higher in sex industry and the adult entertainment industry is based on the demands of the customers, of which the majority are men. Women may be offered work where they are self employed and do not have the same contractual arrangements or rights as others.</p>
Fawcett Society	<p>Scope This response relates to Question 1 of the consultation:</p> <p><i>The Gender Equality Duty came into force in April 2007. Do you consider that this policy and associated processes pays due regard to the duties to:</i></p> <ul style="list-style-type: none"> • <i>promote gender equality?</i> • <i>eliminate harassment?</i> • <i>eliminate sex discrimination?</i> <p>About the Fawcett Society The Fawcett Society is the UK's leading campaign for gender equality. When individual women are able to realise their potential, the benefits will be felt across society. The Fawcett Society makes a difference by campaigning for legislative change, influencing practice, and empowering women and men to effect change at a grassroots level. The Fawcett Society campaigns for:</p>

- **Economic rights:** women's right to fair pay and fair treatment in the workplace
- **Political rights:** women's right to a powerful voice in decision making
- **Social rights:** women and men to break free from stereotypes
- **Bodily rights:** women's freedom from violence, harassment and objectification

Terminology

The DWP consultation document has used the term 'adult entertainment industry' to refer to jobs that include working in lap dancing clubs, pornography and prostitution. This is a term commonly used by representatives of the industry. We believe it works to mask and normalise the reality of the industry. Therefore, we shall use the term 'sex industry' in this document to refer to such jobs as this is a more accurate reflection of the nature of the work.

Summary

The DWP should reverse its policy of advertising vacancies in the sex industry because it is in direct contravention of its duties as set out in the Gender Equality Duty 2007 and the duties implied by the UN Committee to End All Forms of Discrimination Against Women (CEDAW). Both Government and academic research evidences the extensive harm of the sex industry both on the individuals who are directly employed in it (predominantly women) and gender relations in society more broadly. The policy and associated processes are based upon an inappropriate generalisation from a ruling on a chain of lingerie and sex toy retail outlets to the sex industry as a whole. Further, this generalisation was made prior to the introduction of the Gender Equality Duty 2007.

Inappropriate application of the High Court ruling – Ann Summers Ltd v Jobcentre Plus

- In 2003 Jobcentre Plus set a policy of accepting and advertising vacancies from the sex industry. No distinction is made between different parts of the industry. The only exemption to this policy is jobs that fail to comply with civil and criminal law. This policy is based on a High Court ruling (Ann Summers Ltd v Jobcentre Plus) that challenged the refusal of Jobcentre Plus to advertise jobs in Ann Summers stores.
- The High Court ruling upon which the DWP policy is based related to a chain of lingerie and

sex toy retail outlets. These retail outlets are not licensed as sex shops under the Local Government (Miscellaneous Provisions) Act 1982. The individuals working in them do not directly provide services to customers for the purpose of sexual stimulation. The nature of the transaction that takes place between employee and customer is the exchange of an inanimate object for money. That inanimate object is then used by the customer for sexual purposes in a personal setting - separate from that workplace.

- Individuals working in venues such as lap dancing clubs, topless bars, and massage parlours, do directly provide services for the purpose of sexual stimulation. No intermediary inanimate object providing for sexual stimulation in a separate context is exchanged. The individual (female) employee becomes that 'object' and the sexual stimulation takes place directly within the context of her workplace. The implications for employees working in these two separate contexts are therefore hugely disparate.
- Generalising from the High Court ruling of retail outlets (not classified as sex shops) to venues such as lap dancing clubs and massage parlours is therefore unjustified and inappropriate.

The sex industry as commercial sexual exploitation

- Extensive academic research evidences the inherent harm of commodifying women's bodies and treating these individuals as 'objects' for the purpose of sexual gratification of paying customers. It is intrinsically linked to gender-based discrimination and violence against women. CEDAW has repeatedly called on states – including the British Government - to take action against the objectification of women. Similarly the UK-based End Violence Against Women coalition has called on the UK Government to tackle the sexualisation of women and girls because it provides a 'conducive context' for violence against women. The Gender Equality Duty 2007 requires all Government departments to promote gender equality. The sexual objectification of women's bodies is in direct contradiction to this aim. Therefore, the DWP policy of advertising vacancies in the sex industry is in contradiction to its duties as set out in the Gender Equality Duty 2007.
- The sex industry not only harms those directly involved in it, but also has an impact on wider societal gender relations. For example, areas surrounding lap dancing clubs can become 'no-

	<p>For further information about this response please contact Kat Banyard, Campaigns Officer: kat.banyard@fawcettsociety.org.uk; 020 7253 2598.</p>
<p>Women's Aid</p>	<p>Women's Aid welcomes the opportunity to respond to this consultation.</p> <p>Women's Aid welcomes the Gender Equality Duty and considers that it does pay due regard to promotion of gender equality and the elimination of sexual harassment and discrimination.</p> <p>Women's Aid recommends that: The decision to advertise employer vacancies should be subject to an Equality Impact Assessment in line with the requirement of the Gender Equality Duty (GED). This is based on concerns of gender equality and not religious morality as suggested in page 17 of the consultation document. The GED requires all public bodies to proactively promote gender equality and counter gender stereotyping.</p> <p>Women's Aid is concerned that:</p> <ul style="list-style-type: none"> • The consultation document states that the 'AE industry' policy is gender neutral because an equal number of women and men have applied for 'AE jobs' through Jobcentre Plus (JC+). • Combining 'front of house' and 'back of house' staff i.e. lap dancers / warehouse staff/ escorts and bar staff monitoring data all together obscures the gendered nature of the AE industry. Experiences of front line services working with women confirm that positions advertised in JC+ since 2003, for lap dancers /escorts' / 'masseuses'/ strip webcam performers / chat line operators etc are gendered and subject to occupational segregation and that the industry is not 'gender

neutral'.

Women's Aid is further concerned that:

- The DWP's decision to carry advertisements for an industry that perpetuates and normalises the sexual objectification of women is counter to the GED obligation to promote gender equality and eliminate sex discrimination.
- By promoting adverts for work in the 'AE industry' supports sexual harassment - by legitimising an 'industry' in which sexual harassment is not only prevalent but tolerated and normalised. It is well known by those both in and out of the AE industry that in many cases 'escort' and 'massage parlour' are euphemisms for prostitution. Physical assault, sexual violence and psychological abuse are regular occurrences for the vast majority of women in prostitution. Similarly, lap dancing is frequently portrayed as a 'just a harmless bit of fun' yet both research and a large number of ex-performers confirm that sexual harassment is a structural part of the industry. In addition, women outside of lap dancing clubs are subject to sexual harassment and intimidation - leading to the creation of no-go areas, as recognised by the Royal Institute of Town Planning.

Women's Aid recommends that:

The DWP reverse the policy of accepting and advertising positions from within the AE industry because of the negative impact on gender equality and in doing so no longer promoting work that for many women involves abuse, violence and harm and reinforces occupational segregation to the detriment of women.

Women's Aid welcomes the HM Government consultation paper "Together we can end violence against women and girls" it states that Jobcentre Plus offers opportunities for earlier detection and action for women who have left abusive relationships and that Jobcentre Plus will continue to provide staff training in respect of violence against women and that this training will be refreshed as appropriate. We recommend that this takes into account the needs of all women including those working in the AE industry.

	<p>For further information, contact: Deborah McIlveen, Policy Manager Women's Aid, PO Box 391, Bristol BS99 7WS Telephone: 0117 944 4411 E-mail: d.mcilveen@womensaid.org.uk</p>
Individual 1	<p>Encouraging the normalisation of sexual exploitation of women promotes the concept of women as masturbation/fantasy aids for men so promotes the degradation of both genders.</p> <p>Such encouragement of objectifying women and promoting the concept they're purchasable commodities naturally reduces understanding of the idea that harassment is unwanted or criminal.</p>
Individual 3	<p>I feel strongly that the policy of advertising vacancies for the adult entertainment industry does not promote gender equality, and could well contribute to harassment and sex discrimination.</p> <p>It is claimed in the document that more men apply for these vacancies than women, but from the table on page 10, it is clear that men apply mainly for the non-sexual support roles. For example they dominate applications for warehouse staff and chat line operators and supervisors. Men also dominate applications to work as escorts or at a topless TV channel, but of course such work gives men the opportunity to meet women and gawp at naked ones, whereas the women working in such areas would be sexual targets and much more likely to be demeaned. In the table also, webcam operators and performers are lumped together, but it is easy to guess which gender is most likely to be the performer, and which the operator (getting a good view).</p> <p>The adult entertainment industry is by nature extremely sexist, because it is almost always men who purchase sexual entertainment from women, rather than the other way round. The women are placed at risk, and are turned into sexual commodities to be bought. Recent research has shown that establishments such as lap dancing clubs, which are not supposed to allow physical contact, frequently flout the rules and exploit the dancers by deliberately placing them in fierce competition with each other. In order to simply get back the money they have paid to dance at the clubs, the women must often be more sexual and physical than they would like, and many end up prostituting themselves. A government-run job centre should pay higher regard to protecting women from this kind of exploitation, especially as many may accept the jobs without fully realising what they are</p>

	getting themselves into.
Individual 4	<p>No I don't. The 'sex industry' is based on the gender equality between men and women, whereby it is seen as acceptable and men's presumed 'right' to purchase women's bodies for sexual stimulation. The Job Centre, by promoting these jobs, is perpetuating the view that this attitude is acceptable, and is normalising the inherent gender inequality.</p> <p>It has been widely shown that sexual and other harassment of women are commonplace in the sex industry, therefore the Job Centre is colluding with this form of work which contains a high level of gender-based harassment. As detailed above, the sex industry is built on sex discrimination, so the Job Centre is certainly not fulfilling its duty to eliminate sex discrimination, by supporting this industry.</p>
Individual 5	<p>The consultation would appear to be arguing that advertising adult entertainment vacancies through Job Centre Plus centres is lawful, and in line with the Gender Equality Duty 2007. I would like to disagree.</p> <p>The Gender Equality Duty of 2007 clearly stipulates, as its central tenet, that public services should "eliminate unlawful discrimination and harassment". In your report, you have suggested that because almost equal numbers of men and women have expressed interest in adult entertainment industries, then the advertisement of such vacancies does not encourage discrimination or harassment.</p> <p>However, gender discrimination and harassment is about much more than simple numbers of men and women in employment. Gender is about roles, relationships and attitudes of people within society.</p> <p>In the case of adult entertainment industries there is overwhelming empirical scientific evidence that such industries encourage discriminatory and sexist stereotypes of men and women (of women as inferior, sex objects and readily available to service men, and of men as being dominant, powerful, obsessed with sex and unable to control their urges).</p> <p>The propagation of such stereotypes encourages sexist behaviour, and there is also strong scientific evidence showing correlations between using or viewing sexist materials (as provided by the</p>

	<p>mainstream adult entertainment industry), and having sexist attitudes, and engaging in sexist behaviour such as harassment and even violence. This harassment is directed not only towards women, but towards men who refuse to conform to hegemonic masculine stereotypes (for instance homosexual men).</p> <p>Therefore, it logically follows that if the adult entertainment industry contributes to sexist harassment and discrimination in society, then by advertising jobs within this industry, the Job Centre Plus centres are also contributing to sexist harassment and discrimination, which is a violation of the Gender Equality Duty 2007.</p> <p>An example for the sake of comparison would be a television station that broadcasts racist propaganda. Even if equal numbers of ethnic groups were represented among its workforce, the fact that the content of the station is racist and contributes to racist harassment and discrimination in the society at large would mean that the advertising of vacancies of this employer by a public institution would be inappropriate and unlawful.</p>
Individual 6	<p>I am pleased that this consultation is being made because the very existence of jobs in the adult entertainment sector works to normalise and legitimise a cultural attitude which constructs women as sexual commodities. If the resources of the state are being used to tacitly endorse and promote this type of work then it sends a message that the government is effectively acting as an institutional 'pimp,' encouraging predominantly women to undertake work of a sexual nature for male titillation. Is this really a way forward to support gender equality?</p> <p>This type of work blatantly constructs women as sexual objects, disposable commodities to be used and discarded by men for sexual purposes. Massage parlours effectively function as brothels, strip club work is a form of prostitution - defined as a sexual service being sold for money; all of these point to a type of work which carries a human cost to those who are unwittingly exploited, as well as a societal cost to the detriment of equal gender relations. Will people - and in this case almost 100% women - be told that their benefits will be cut unless they take work of a sexual nature which they do not want to do? The government should not be advertising these posts whatsoever unless it thinks that it is acceptable to introduce under privileged women into the sex industry. Frankly I am appalled</p>

	<p>that Job Centres are hosting these adverts at all. What message does it send about the value and status of women in society when a state funded body posts jobs that serve as an introduction to prostitution?</p> <p>These adverts are of a special nature which hold highly damaging implications for gender equality, given that they are intended for economically disadvantaged young and often vulnerable women, and they should be treated as such. I would hate for my daughter to visit the job centre as a teenager and come back with an advert for a massage parlour or strip club, having been told that a civil servant thought it was suitable work for a woman. Action needs to be taken to remove these adverts because of their special nature and implications.</p> <p>Consider if you had a type of advert which involved the exploitation of black people or homosexuals - would this be acceptable? I doubt it. So what makes it acceptable to use state funds to introduce women into prostitution which is basically what the majority of these jobs are?</p>
Individual 8	<p>Your own consultation states the following from the Gender Equality Duty:</p> <p>29. Within the gender equality duty, public authorities are required to carry out their duties having due regard to the need to:</p> <ul style="list-style-type: none"> • eliminate unlawful discrimination and harassment, and • promote equality of opportunity between men and women. <p>I do not believe that the majority of jobs in the adult industry comply with these recommendations, most certainly not those of pole/lap/erotic dancer. I suspect you would point to the fact that you have employed more men in the escort industry than women, but this is due to this being the main avenue men have into prostitution. A woman dancing at a pole first has to pay for the use of the pole that night is regarded solely as a sexual object to be bought and sold by those assembled at the club. I do not regard this as being in any way conducive to eliminating discrimination ('women are only sex objects') or harassment, nor does it promote equality when it is, 99% of the time, the woman who is made to strip naked, and the male onlookers who pay to watch whilst still fully clothed.</p>

Furthermore, the only way to earn any money as a pole/lap/erotic dancer is to ensure 'private' dances, where touching does take place and is indeed actively encouraged by the fact that male customers will pay more for this privilege whilst the female dancer is already out of pocket simply by having to pay to use the club in the first place. This does not promote equality of opportunity at all, indeed it actively promotes discrimination, harassment and inequality, all of which most certainly do not help to make women's lives in any way safer or equal.

Again, cases of legal recourse are few and far between because again, many employees in the adult industry expect this to be 'just part of the job', and believe there is little that can be done if they are dismissed for complaints about it. I am concerned that this lack of legal evidence may be used by yourselves and those who represent the adult industries as 'proof' that the industry is problem- and discrimination-free, when it quite patently is not the case. May I remind you again that sexual coercion and violence in the UK is endemic and chronically under-reported, and we live in a culture that supports a dismissive attitude towards it (or further information you may wish to ask such agencies as the Rape Crisis Centre and T.A.R). It worries me greatly that the DWP is seeking to allow industries that perpetuate inequality and discrimination a platform to advertise and expand.

May I also add that, with regards to the Disability Equality Duty and in relation to the Gender Equality Duty, I have never seen or heard of a pole/lap/erotic dancer, masseur or lingerie/nude model who didn't conform to a rigid visual stereotype - aged between 18-35, 'slim', 'attractive'. I have never seen an overweight man dancing at a pole, I have never seen a masseur in a wheelchair, and I have rarely seen nude models with obvious disabilities or who are overweight. Whilst this is perhaps not stated obviously, such discrimination in favour of the rigid visual stereotype stated earlier quite patently exists in the adult industries because that is 'what sells', and I find it worrying that the adult industry should be allowed to employ only such stereotypes where other industries would be censured for doing so.

In short, no, I do not believe that the DWP, and by extension the government, should be seen to be tolerant or supportive of an industry that promotes discrimination and harassment, that actively damages the struggle for equality between genders, and that may put employees at serious risk of

	<p>harm. Allowing these jobs to be advertised would be tantamount to doing so, and would, I believe, be a grave mistake.</p>
Individual 11	<p>I do not believe that this policy and its associated processes pay due regard to the duties to promote gender equality and to eliminate harassment and sex discrimination. "Adult entertainment" overwhelmingly caters to adult men and encourages, legitimises and institutionalises the viewing and using of women and children as sexual objects and therefore as second-class or subhuman. It therefore encourages and promotes gender inequality in the wider society with innumerable ramifications. For example, it contributes to apathy on the pay gap, the lack of will to address the appalling rape conviction rate in this country, the prevalence of harassment of women at work, of women not being taken seriously, women not having a voice in government and setting the agenda in education and the media, etc.</p> <p>Individual women who start work in the adult entertainment industry are statistically more likely to end up in prostitution, with all its risks of major physical, mental and emotional trauma and risks of extreme violence and murder.</p>
Individual 15	<p>Despite The Gender Equality Duty which came into force in April, 2007, Jobcentreplus branches continue to accept job vacancies from The Sex Industry. Commercial sexual exploitation which is central to The Sex Industry eroticises and promotes women's inequality and this includes black and minority women. (See http://www.prostitutionresearch.com/ See also http://www.fawcettsociety.org.uk/documents/SATC%20manifesto%20public.pdf)</p> <p>The Fawcett Society have produced research entitled 'Sexism and The City which provides evidence of female sexual exploitation directed against women working as lap dancers. Lap dancing clubs normalise the sexual exploitation of women and directly counter efforts to promote gender equality. Therefore Sex Industry job vacancies placed within Jobcentreplus offices normalise the systematic male sexual exploitation and commercial commodification of women.</p> <p>The Consultation document whilst providing a detailed breakdown of vacancies within The Sex Industry does not separate out lap dancing vacancies from non-lap dancing vacancies. Collapsing lap dancing vacancies and non-lap dancing vacancies into the same category hides the reality lap</p>

	<p>dancing vacancies are female ones not male. Would male jobseekers seeking work be eligible to apply for work as naked erotic dancers, given lap dancing is one wherein only females are performing totally naked for fully clothed male customers.</p> <p>Hiding the fact lap dancers are female not male this distorts the statistics and appears to show equal numbers of women and men applying and working as naked lap dancers within The Sex Industry. Research and anecdotal evidence confirms female lap dancers are commonly subjected to unwanted male customers sexually touching their bodies, sexually assaulting them and/or coercing them into unwanted sexual activity.</p> <p>(See http://www.object.org.uk/LapDancingFaqs.html). This is far removed from the Sex Industry employers signing a statement saying 'there is no unwanted sexual activity.'</p>
Individual 17	<p>I wish to state that I reject the term 'adult entertainment industry' because of the well-known risks, harms and abuse associated with the sex industry. The term 'adult entertainment industry' (AE industry) legitimises these harms so I will therefore use it in inverted commas.</p> <p>The DWP decision to carry adverts for the 'AE industry' was taken before the introduction of the GED. I strongly believe that in light of the GED this decision should be subject to an Equality Impact Assessment and reversed. This belief and the following arguments are based on concerns of gender equality, not religious morality as suggested in page 17 of the consultation document.</p> <p>The GED requires all public bodies to proactively promote gender equality and counter gender stereotyping. The consultation document states that the 'AE industry' policy is gender neutral because an equal number of women and men have applied for 'AE jobs' through Jobcentre Plus (JC+). However, I dispute this claim – given that your data collection is seriously flawed. By lumping together 'front of house' and 'back of house' staff i.e. lumping together lap dancers / warehouse staff/ escorts and bar staff all together , the gendered nature of the 'AE industry' is heavily obscured by your figures.</p> <p>A substantial body of research as well as the experiences of front line services confirm that positions</p>

advertised in JC+ since 2003, for lap dancers /'escorts' / `masseuses'/ strip webcam performers / chat line operators etc are extremely gendered. Arguing that the industry is `gender neutral' is therefore clearly an erroneous argument.

Moreover, the fact that the industry is as gendered as it is raises important questions about its gender impact. The core function of the `AE industry' revolves around the sexual objectification of women and girls. It is well recognised that the disproportionate sexual objectification of women in society is linked to the endemic levels of gender-based discrimination and violence running through our society.

These links are recognised by a growing body of research and by both international and UK bodies working for women's rights such as the UN Committee to End All Forms of Discrimination Against Women (CEDAW Committee), which since 1979 has called on States to take action on the objectification of women. It has since repeatedly identified the links between the portrayal of women as sex objects by the media and sex industry with attitudes underpinning gender-based discrimination.

Likewise the End Violence Against Women Coalition – the largest coalition of women's organisations in the UK – has called on the UK Government to tackle the growing sexualisation of women and girls in the media and popular culture, highlighting its role as a `conducive context' for violence against women. The continued mainstreaming of the sex industry / `AE industry' in which women are portrayed and marketed as sex object commodities is clearly implicated in these issues.

The DWP's decision to carry advertisements for an industry which perpetuates and normalises the sexual objectification of women therefore runs counter to its GED obligation to promote gender equality and eliminate sex discrimination.

Moreover, carrying adverts for the `AE industry' actually normalises sexual harassment – by legitimising an `industry' in which sexual harassment is not only rife but tolerated and normalised. It is well known by those both in and out of the `AE industry' that `escort' and `massage parlour' are euphemisms for prostitution. Physical assault, sexual violence and psychological abuse are regular

	<p>occurrences for the vast majority of women in prostitution.</p> <p>Similarly, lap dancing is frequently portrayed as a `just a harmless bit of fun' yet both research and a large number of ex performers confirm that sexual harassment is a structural part of the industry. In addition, women outside of lap dancing clubs are subject to sexual harassment and intimidation leading to the creation of no-go areas, as recognised by the Royal Institute of Town Planning.</p> <p>The DWP should not be legitimising the normalisation of sexual harassment in a context in which at least 1 in 3 UK women experiences sexual harassment or stalking in the course of her lifetime.</p>
Individual 18	<p>No, I do not believe this policy pays due regard to the Gender Equality Duty. It is clear from this consultation's own figures that the majority (nearly 60%) of applicants for these jobs are men, meaning that, for the most part, women find these types of jobs at best distasteful and, at worst, thoroughly demeaning and offensive. As a female who is jobseeking at present, I would be horrified to find sex industry jobs appearing on my searches.</p> <p>Clearly for many of the frontline jobs – lapdancers and sex chat lines for instance – men would be discriminated against since the adult entertainment industries are principally for the sexual stimulation of heterosexual men.</p> <p>The sex industries (or adult entertainment as the consultation coyly refers to them) are oppressive and demeaning to women, often leading – as a recent Channel 4 documentary on lapdancing clubs proved – to illegal acts such as sexual contact and prostitution. As the Channel 4 documentary also highlighted, it is next to impossible for employees to either complain or to refuse increasing sexual demands as they will simply lose their jobs.</p> <p>Webcam based jobs are clearly going to be pornographic and escorting and massage parlours generally involve their staff in prostitution – which is illegal in this country. Jobcentre Plus's safeguards cannot possibly prevent women being abused in these jobs.</p> <p>The presence of sex establishments has been linked to increases in violent and gender hate crimes</p>

	<p>(sexual assault and rape), in some areas by over 50%. The wider implications of the sex industries for women's place in society means that by allowing adult entertainment industry jobs to be advertised, Jobcentre Plus is indirectly responsible for increases in harassment and sexual violence against women, as well as more directly for encouraging discrimination and disrespect of women in society generally.</p> <p>Advertising jobs where sexual harassment is virtually guaranteed is in direct contravention of the Gender Equality Duty and this practice should cease.</p>
Individual 19	<p>I wish to state that I reject the term 'adult entertainment industry' because of the well-known risks, harms and abuse associated with the sex industry. The term 'adult entertainment industry' (AE industry) legitimises these harms so I will therefore use it in inverted commas.</p> <p>The DWP decision to carry adverts for the 'AE industry' was taken before the introduction of the GED. I strongly believe that in light of the GED this decision should be subject to an Equality Impact Assessment and reversed. This belief and the following arguments are based on concerns of gender equality, not religious morality as suggested in page 17 of the consultation document.</p> <p>The GED requires all public bodies to proactively promote gender equality and counter gender stereotyping. The consultation document states that the 'AE industry' policy is gender neutral because an equal number of women and men have applied for 'AE jobs' through Jobcentre Plus (JC+). However, I dispute this claim – given that your data collection is seriously flawed. By lumping together 'front of house' and 'back of house' staff i.e. lumping together lap dancers / warehouse staff/ escorts and bar staff all together, the gendered nature of the 'AE industry' is heavily obscured by your figures.</p> <p>A substantial body of research as well as the experiences of front line services confirm that positions advertised in JC+ since 2003, for lap dancers /escorts' / 'masseuses'/ strip webcam performers / chat line operators etc are extremely gendered. Arguing that the industry is 'gender neutral' is therefore clearly an erroneous argument.</p>

Moreover, the fact that the industry is as gendered as it is raises important questions about its gender impact. The core function of the 'AE industry' revolves around the sexual objectification of women and girls. It is well recognised that the disproportionate sexual objectification of women in society is linked to the endemic levels of gender-based discrimination and violence running through our society.

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Likewise the End Violence Against Women Coalition – the largest coalition of women's organisations in the UK – has called on the UK Government to tackle the growing sexualisation of women and girls in the media and popular culture, highlighting its role as a 'conducive context' for violence against women. The continued mainstreaming of the sex industry / 'AE industry' in which women are portrayed and marketed as sex object commodities is clearly implicated in these issues.

The DWP's decision to carry advertisements for an industry which perpetuates and normalises the sexual objectification of women therefore runs counter to its GED obligation to promote gender equality and eliminate sex discrimination.

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	<p>addition, women outside of lap dancing clubs are subject to sexual harassment and intimidation – leading to the creation of no-go areas, as recognised by the Royal Institute of Town Planning.</p> <p>The DWP should not be legitimising the normalisation of sexual harassment in a context in which at least 1 in 3 UK women experiences sexual harassment or stalking in the course of her lifetime.</p>
Individual 20	<p>I wish to state that I reject the term `adult entertainment industry' because of the well-known risks, harms and abuse associated with the sex industry. The term `adult entertainment industry' (AE industry) legitimises these harms so I will therefore use it in inverted commas.</p> <p>The DWP decision to carry adverts for the `AE industry' was taken before the introduction of the GED. I strongly believe that in light of the GED this decision should be subject to an Equality Impact Assessment and reversed. This belief and the following arguments are based on concerns of gender equality, not religious morality as suggested in page 17 of the consultation document.</p> <p>The GED requires all public bodies to proactively promote gender equality and counter gender stereotyping. The consultation document states that the `AE industry' policy is gender neutral because an equal number of women and men have applied for `AE jobs' through Jobcentre Plus (JC+). However, I dispute this claim – given that your data collection is seriously flawed. By lumping together `front of house' and `back of house' staff i.e. lumping together lap dancers / warehouse staff/ escorts and bar staff all together , the gendered nature of the `AE industry' is heavily obscured by your figures.</p> <p>A substantial body of research as well as the experiences of front line services confirm that positions advertised in JC+ since 2003, for lap dancers /escorts' / `masseuses'/ strip webcam performers / chat line operators etc are extremely gendered. Arguing that the industry is `gender neutral' is therefore clearly an erroneous argument.</p> <p>Moreover, the fact that the industry is as gendered as it is raises important questions about its gender impact. The core function of the `AE industry' revolves around the sexual objectification of women and girls. It is well recognised that the disproportionate sexual objectification of women in society is linked</p>

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	<p>The DWP should not be legitimising the normalisation of sexual harassment in a context in which at least 1 in 3 UK women experiences sexual harassment or stalking in the course of her lifetime.</p>
<p>Individual 24</p>	<p>I consider very strongly that the policy does not pay due regard to the duty to promote gender equality, eliminate harassment and eliminate discrimination.</p> <p>First I must comment that I am surprised to see that the consultation document carefully records the numbers of applicants for each vacancy (they seem well balanced for age and gender) but not the numbers of successful applicants, i.e. those who were appointed! It simply says "No data is available on the outcome of jobseekers who applied for these vacancies". I see that this is based on your Diversity Impact Assessment from December 2008 which similarly fails to actually assess impact by gender of the policy. I am unaware of any other equal opportunities monitoring process that fails to compare numbers of applicants with numbers of successful candidates - this is the whole point of equal opportunities monitoring and the figures are a nonsense without it. Similarly, we do not look at numbers of people employed in Universities (where most cleaners are women and most professors are men) and say that the sector is gender neutral! There is another very basic issue indeed here, of gender segregation within the sector.</p> <p>The term 'adult entertainment industry' does not capture the fact that many of these organisations are sex encounter establishments and people are being asked to sell sex encounters. I need not go into detail here about the fact that most thinkers in the field who do not have personal investment in saying otherwise are agreed that to conflate 'sex' with 'work' is deeply problematic and it perpetuates gender inequality. A man employed to work in a warehouse where 'adult entertainment' products are packaged is selling his labour. A woman employed to perform lap dances is selling sexual acts. These are two very different things and I am at a loss to understand why they have been conflated in the consultation document. The answer must be that there is an underlying assumption that any people, men or women, might find being asked to work for an 'adult entertainment establishment' in some way distasteful or offensive on a moral basis. The gender equality perspective is not about personal or religious morality - it is about the very real harm done to women who work in the 'industry' and, crucially, to all women who suffer as a result of the commodification of sexuality and the assumption that women's bodies can be bought.</p>

	<p>You will know that the commodification of women's bodies is linked by authoritative sources to violence against women and to gender discrimination. However much people with vested interests might want to lobby and claim otherwise, the UN and the UK's EAW coalition along with many other statutory organisations have very clearly made these links. Therefore to promote the activities of individuals or organisations who seek to add to the number of opportunities for society to objectify women's bodies and identify sex with paid work runs counter to duties under the Equality Act.</p> <p>I am in no doubt that Jobcentre Plus needs to rethink its attitude towards gender equality in this regard. It must also stop lumping together diverse organisations under the catch-all 'Adult Entertainment' description. The law recognises the separate existence of 'sex encounter establishments' which sell sex encounters and sexual stimulation, which are distinct from 'sex shops', and so should Jobcentre Plus.</p>
Individual 25	<p>I wish to state that I reject the term `adult entertainment industry' because of the well-known risks, harms and abuse associated with the sex industry. The term `adult entertainment industry' (AE industry) legitimises these harms so I will therefore use it in inverted commas.</p> <p>The DWP decision to carry adverts for the `AE industry' was taken before the introduction of the GED. I strongly believe that in light of the GED this decision should be subject to an Equality Impact Assessment and reversed. This belief and the following arguments are based on concerns of gender equality, not religious morality as suggested in page 17 of the consultation document.</p> <p>The GED requires all public bodies to proactively promote gender equality and counter gender stereotyping. The consultation document states that the `AE industry' policy is gender neutral because an equal number of women and men have applied for `AE jobs' through Jobcentre Plus (JC+). However, I dispute this claim – given that your data collection is seriously flawed. By lumping together `front of house' and `back of house' staff i.e. lumping together lap dancers / warehouse staff/ escorts and bar staff all together , the gendered nature of the `AE industry' is heavily obscured by your figures.</p>

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The DWP's decision to carry advertisements for an industry which perpetuates and normalises the sexual objectification of women therefore runs counter to its GED obligation to promote gender equality and eliminate sex discrimination.

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	<p>euphemisms for prostitution. Physical assault, sexual violence and psychological abuse are regular occurrences for the vast majority of women in prostitution.</p> <p>Similarly, lap dancing is frequently portrayed as a 'just a harmless bit of fun' yet both research and a large number of ex performers confirm that sexual harassment is a structural part of the industry. In addition, women outside of lap dancing clubs are subject to sexual harassment and intimidation – leading to the creation of no-go areas, as recognised by the Royal Institute of Town Planning.</p> <p>The DWP should not be legitimising the normalisation of sexual harassment in a context in which at least 1 in 3 UK women experiences sexual harassment or stalking in the course of her lifetime.</p>
Individual 22	<p>I wish to state that I reject the term 'adult entertainment industry' because of the well-known risks, harms and abuse associated with the sex industry. The term 'adult entertainment industry' (AE industry) legitimises these harms so I will therefore use it in inverted commas.</p> <p>The DWP decision to carry adverts for the 'AE industry' was taken before the introduction of the GED. I strongly believe that in light of the GED this decision should be subject to an Equality Impact Assessment and reversed. This belief and the following arguments are based on concerns of gender equality, not religious morality as suggested in page 17 of the consultation document.</p> <p>The GED requires all public bodies to proactively promote gender equality and counter gender stereotyping. The consultation document states that the 'AE industry' policy is gender neutral because an equal number of women and men have applied for 'AE jobs' through Jobcentre Plus (JC+). However, I dispute this claim – given that your data collection is seriously flawed. By lumping together 'front of house' and 'back of house' staff i.e. lumping together lap dancers / warehouse staff/ escorts and bar staff all together , the gendered nature of the 'AE industry' is heavily obscured by your figures.</p> <p>A substantial body of research as well as the experiences of front line services confirm that positions advertised in JC+ since 2003, for lap dancers /escorts' / 'masseuses'/ strip webcam performers / chat line operators etc are extremely gendered. The argument that the industry is 'gender neutral' is</p>

therefore clearly an erroneous argument.

Moreover, the fact that the industry is as gendered as it is raises important questions about its gender impact. The core function of the 'AE industry' revolves around the sexual objectification of women and girls. It is well recognised that the disproportionate sexual objectification of women in society is linked to the endemic levels of gender-based discrimination and violence running through our society.

These links are recognised by a growing body of research and by both international and UK bodies working for women's rights such as the UN Committee to End All Forms of Discrimination Against Women (CEDAW Committee), which since 1979 has called on States to take action on the objectification of women. It has since repeatedly identified the links between the portrayal of women as sex objects by the media and sex industry with attitudes underpinning gender-based discrimination.

Likewise the End Violence Against Women Coalition – the largest coalition of women's organisations in the UK – has called on the UK Government to tackle the growing sexualisation of women and girls in the media and popular culture, highlighting its role as a 'conducive context' for violence against women. The continued mainstreaming of the sex industry / 'AE industry' in which women are portrayed and marketed as sex object commodities is clearly implicated in these issues.

The DWP's decision to carry advertisements for an industry which perpetuates and normalises the sexual objectification of women therefore runs counter to its GED obligation to promote gender equality and eliminate sex discrimination.

Also, carrying adverts for the 'AE industry' actually normalises sexual harassment – by legitimising an 'industry' in which sexual harassment is not only rife but tolerated and normalised. It is well known by those both in and out of the 'AE industry' that 'escort' and 'massage parlour' are euphemisms for prostitution. Physical assault, sexual violence and psychological abuse are regular occurrences for the vast majority of women in prostitution.

	<p>Similarly, lap dancing is frequently portrayed as a `just a harmless bit of fun' yet both research and a large number of ex performers confirm that sexual harassment is a structural part of the industry. In addition, women outside of lap dancing clubs are subject to sexual harassment and intimidation leading to the creation of no-go areas, as recognised by the Royal Institute of Town Planning.</p> <p>The DWP should not be legitimising the normalisation of sexual harassment in a context in which at least 1 in 3 UK women experiences sexual harassment or stalking in the course of her lifetime.</p>
Individual 21	<p>I am writing to you regarding the above consultation, and will respond as an individual to the questions that allow for scrutiny based on gender. Firstly I should explain that I reject the expression 'adult entertainment industry' as it refers to the sex industry, which is a growing global industry based on the degradation, humiliation, objectification and abuse of mainly women (though men and children are also affected), and cannot be considered without taking into account the gendered nature of its most harmful aspects.</p> <p>I must also mention that I am mostly concerned with the adverts for escorts, lap dancers, web cam performers, and masseurs, which relate to the sale of sexual services/acts being carried out on the body of the individual. It is extremely important to consider these adverts separately to adverts for adult shop assistants, and your heavily flawed statistics included in the consultation fail to do this to such an extreme that the result is almost comical. I do not accept any claim that escorting or similar does not inevitably lead to sexual services being provided, as in the majority of cases it does.</p> <p>The decision to advertise the sex industry in Jobcentres is completely misaligned with the more recently implemented Gender Equality Duty (GED). This decision is quite rightly being reviewed, and should take now be subject to an Equality Impact Assessment (EIA) which would inevitably lead to it being withdrawn.</p> <p>Gender equality cannot be reached while women and girls are being increasingly sexualised and objectified. I would like to outline some of my own experiences. Friends, colleagues and I frequently experience increased sexual harassment, sexual comments and expectations of sexual performance following male friends and colleagues visits to lap dancing clubs and prostitutes, and on a daily basis</p>

based upon widely discussed porn consumption.

It is seen by men as 'harmless fun' to shout at and sexually harass a women, and to discuss in graphic detail acts that they have seen being performed and believe female colleagues should be willing to perform. It is becoming more and more uncomfortable to socialise and work in a society where buying a women to perform sexual services is considered normal, and often an obligatory part of a night out, for example. Women friends and colleagues have reported harassment outside lap dancing clubs, on public transport by groups of men where the theme has been a sex industry night out, groping, increased comments about our physical appearance, often derogatory, sexual violence, domestic violence and rape.

Offering sex industry jobs to women only, usually women of a certain physique in some cases, as has been reported when men entered into a Scottish Jobcentre to apply for a lap dancing position, is direct sexual discrimination/stereotyping. Would a woman weighing 18 stone be considered for a lap dancing position? Marketing women's bodies as sexual commodities to be bought and sold is a huge factor in the high levels of sexual violence in society underpinned by attitudes that think that this is acceptable, normal and obligatory behaviour for women and girls.

Q2 - The Race Equality Duty came into force in April 2001. Do you consider that this policy and associated processes pays due regard to the duties to promote equality of opportunity; promote good relations between people of different racial groups; eliminate unlawful discrimination?	
Consultee	Response
Women's Support Project (WSP)	<p>Promote good relations between people of different racial groups - Racism is inherent in commercial sexual exploitation – especially in forms like pornography where women are promoted as a commodity on basis of not only gender but also race. See below for examples from escort agency sites advertising online:</p> <ul style="list-style-type: none"> • Tammy - Stunning Babe, Scotland - A sensuous cocktail of Scottish and Persian ancestry - 32C-24-32. With exotic looks and erotic by nature! Sweet, polite, discreet and can adapt to any social situation. Our time together can include a true gift offering kissing cuddling and owo. • Delta is Blonde & Beautiful, Scotland, 21, 32C-24-32 - European babe and model just for you! She is sweet but seductive and takes great delight in her ability to thrill you with her sensuality, No matter what you do with Delta, she'll make sure you're eagerly anticipating the next visit, even before you walk out the door! • Oriental Escorts, Scotland - A Scottish based oriental escort service, the home of sweet, sexy oriental escorts in Scotland. We treat our oriental escort girls with kindness, courtesy & respect & welcome clients who do the same. For info of any sort about our beautiful oriental escort girls please ring for prompt, personal attention.
Individual 1	Black and Minority Ethnic (BME) women are amongst the poorest members of society and have the highest proportion of unsupported lone parenthood. They are thus most vulnerable to exploitation through the sex industry.
Individual 3	As I am not a member of an ethnic minority I do not feel qualified to answer this question. However, since it is well known that much pornography is racist, it would not surprise me if the adult entertainment industry were too. Your document only provides figures for the ethnicity of applicants rather than the ethnicity of those that were actually given the job, but it would not surprise me if ethnic

	minorities were disproportionately represented amongst the women working in this industry.
Individual 4	No. The sex industry mainly employs white women. Where women of other ethnic/racial backgrounds are employed, they are invariably promoted as 'exotic' or some other racial stereotype, therefore this line of work has racist connotations, and the Job Centre is indirectly condoning this. This is particularly pertinent where a white man (and most customers to the sex industry are white men) can 'purchase' a non-white woman, to perform sexual services for him, with all the racist connotations implied within that. Since most women employed in the sex industry are white, there will be unlawful discrimination involved.
Individual 11	I do not believe this policy and its associated processes pay due regard to the duties under the Race Equality Duty, because the jobs are aimed at the most vulnerable people in our society who disproportionately include people of colour and minority ethnic groups. It therefore is likely to exacerbate the combination of racism and sexism to which women from these groups are exposed.
Individual 12	<p>While the statistical information in the Consultation Document may be of interest, it is slightly misleading. I am of the opinion that the details referring to ethnicity (Page 10, 2.1) should read that people stated what their ethnicity was. The Consultation Document gives the impression that Jobcentre Plus knows for certain that the 351 people who applied for jobs in the adult entertainment industry are indeed of the ethnic origin that they claim. The fact that 24% preferred not to say is an indication that these applicants may feel that confirming their ethnic origin, could be detrimental to their application.</p> <p>Whilst giving a general picture over a specific period, statistical information of this type is not an accurate measure of success or failure in the application of the Race Equality Duty or a public body's race equality scheme.</p> <p>Similar statistical information is recorded and used by all public bodies in recruitment selection but has little basis if an applicant does not complete the Equal Opportunities data which is voluntary.</p> <p>I do not regard the RED as having a major effect of promoting good relations between people of different racial groups. Many people are probably unaware of a public body's Duty and in my</p>

	<p>experience, even those employed by a public body who may be aware of the 'Race Equality Duty' title, will have little knowledge as to what the Duty actually entails.</p> <p>Certainly, publishing race equality schemes and reviewing their list of functions and policies, have helped public bodies to introduce procedures and initiatives that have aided not only employees but the communities that they serve. Publishing a scheme and reviewing it is one thing but only good practice and constant monitoring can ensure that the Duty is effective.</p> <p>The Race Equality Duty in my opinion adds a little to the legal powers afforded under the Race Relations Act (1976), reference to which has led to numerous legal cases of discrimination but the Race Equality Duty cannot in itself eliminate unlawful discrimination.</p>
Individual 18	<p>I do not believe this policy deals with Race Equality Duty issues at all. For people of certain cultures the sex industries go completely against their beliefs and would be found thoroughly offensive. I find this divisive and contrary to the duty to 'promote good relations between people of different racial groups'.</p>

Q3 - The Disability Equality Duty came in to force in December 2006. Do you consider that this policy and associated processes pays due regard to the duties to promote equality of opportunity; promote positive attitudes; promote participation in public life; eliminate unlawful discrimination; eliminate disability related harassment; take steps to meet disabled peoples' needs?	
Consultee	Response
Individual 1	If they need to be seen as sex objects paid to pretend to sexual arousal for the benefit of exploitative punters and owners of sex clubs, it meets them. Otherwise, not.
Individual 4	No. There will be very few disabled people employed in the sex industry, and where they are employed it will be as a 'special interest' purchase, implying inferiority and encouraging harassment. Indeed, the whole atmosphere of the sex industry is one which encourages harassment of anyone who does not fit the mould of white able-bodied heterosexual male.
Individual 11	The adult entertainment industry requires a continuous stream of young women (and to a lesser extent of young men) to act as fodder for rapacious and leery men. Since when did lap dancing clubs hire older men and women or young women in wheel chairs as lap dancers? So how can this be justified under age discrimination and disability legislation? If the jobs are not good enough for healthy 35-year old men, they are not good enough for anyone.
Individual 18	I cannot see that the policy affects Jobcentre Plus's Disability Equality Duty, although I am certain that people with disfigurements for instance, would not be welcomed as lapdancers or webcam 'performers'. How, therefore, can the policy be considered conducive to disability equality? In my view, it cannot.

Q4 - To what extent do you think that this policy and associated process reflects consideration of good practice in terms of equality for other diversity strands such as Age; Religion or belief; Sexual orientation?	
Consultee	Response
Eaves	<p>Age? Eaves has gathered evidence (detailed below) to demonstrate that JC+ does not provide accurate information about the ages of those who apply for or are employed within positions in the 'adult entertainment industry' due to inefficient safeguarding and recording procedures. You also state that you are unable to provide statistics about those who are successful in obtaining positions you advertise within this industry. This makes it very difficult to respond to this question.</p> <p>However, it is our experience and we would argue general knowledge that those who work and are attracted to work within the 'adult entertainment industry' are disproportionately vulnerable young women who are drawn to this type of work because of the populist media myths that it is glamorous and well paid. We also believe that this industry inherently glamorises the hyper-sexualisation of young women because it caters to the fantasies of hetero-normal masculinity as represented in mainstream pornography such as 'page three' and 'lads' mags'.</p>
Women's Support Project (WSP)	Age - The statistics provided by JobCentre Plus do not provide enough detail of breakdown by age bracket according to the type of posts advertised to highlight
Individual 1	I think that question is beyond belief in its Kafkaesque lack of relevance to reality. It's like saying "does everyone have an equal right to be raped, or an equal right to be homeless or drug addicted." It is not the point - the point is how to enable women who have no access to careers, emotional or practical support, childcare or decent incomes to get these things. Diversity and equality policies are intended to empower people and give equal access to opportunities, not equal access to exploitation.
Individual 3	I am not sure about religion or sexual orientation, but you can be sure that few middle-aged women or old men will be employed as lap dancers or web cam performers.
Individual 4	See above. The sex industry most often employs white, young, thin, able-bodied women who fit a very narrow stereotype. Therefore discrimination in the job selection process is inevitable.
Individual 11	The adult entertainment industry requires a continuous stream of young women (and to a lesser extent of young men) to act as fodder for rapacious and leery men. Since when did lap dancing clubs hire older men and women or young women in wheel chairs as lap dancers? So how can this be

	justified under age discrimination and disability legislation? If the jobs are not good enough for healthy 35-year old men, they are not good enough for anyone.
Individual 12	Age - By agreeing to advertise any vacancy, Jobcentre Plus is responsible for ensuring that those applying for particular vacancies are eligible to do so, e.g. bar staff, etc. must be 18 years of age and that Age Discrimination legislation is complied with. One has to ask why vacancies in the manufacturing and retail areas in the adult entertainment industry are exempt from going through a Jobcentre Plus adviser as persons under the age of 18 can therefore apply direct to organisations.
Individual 18	<p>As with the Disability Equality Duty, I cannot see that older applicants would be welcomed for certain jobs within the sex industries. A 50 year old dancer would be highly unlikely to be given a job as a pole dancer no matter how good she was and her being turned down for this reason would be in contravention of age discrimination legislation.</p> <p>Religious people are likely to find the sex industries thoroughly offensive – as indeed do many atheists and agnostics. I am an atheist and find any industry which promotes gender discrimination, disrespect, harassment and other gender based violence totally abhorrent.</p> <p>This is not the same as being against sex or taking a moral stance, it is about the harm caused, principally to women and children, by the sex industries.</p>

Q5 - Can more be done by Jobcentre Plus to strengthen the safeguards in place for the safety of jobseekers and if so, please provide details?	
Consultee	Response
Leeds Inter-Agency Project (LIAP) Women & Violence Trust	We note that you yourselves recognise the need for safeguards – you are aware these are not “jobs like any other”. The harm to women who enter the sex industry has been well documented. Why when the government is promoting routes out are you providing routes in?
Justice for Women	We note that you yourselves recognise the need for safeguards – you are aware these are not “jobs like any other”. The harm to women who enter the sex industry has been well documented. Why when the government is promoting routes out are you providing routes in?
Eaves	<ul style="list-style-type: none"> • The safeguards you currently employ are not effective and do not appear to be based on any logical reasoning. If your position is that employment within the ‘adult entertainment industry is safe’, then there does not appear to be any reason why those who are under eighteen should be excluded from applying for such jobs. We feel that it is important to state explicitly that by recognising the need to employ safeguards in relation to positions within the ‘adult entertainment industry’ you are in effect openly acknowledging that these jobs are not like other positions you advertise, that they are not in fact inherently safe. It is therefore even more surprising that you have not within this consultation suggested any possibility of employing the ultimate safeguard of reversing your current policy position. This is the only safeguard that we feel is strong enough to protect vulnerable women from exploitation within the ‘adult entertainment industry’. • You state that each vacancy contains a detailed description of the job requirements. We would contest the truth of the statement. For instance we do not believe it goes far enough merely to state that if a woman works in a lap dancing club then she will be required to be naked. The description must reflect the true nature of the work. It must also go further to explain the implications of being self employed as described above. You state in your adverts for self employed positions that <i>“The company [who will be employing the woman] has given an assurance that this vacancy enables workers to achieve a wage equivalent to the National</i>

Minimum Wage rate”, however as discussed above this does not reflect research findings into the earnings of those self employed in the sex industry. Our own and others’ experiences as ‘mystery shoppers’ when requesting information from JC+ employees about how employers will guarantee these earnings has demonstrated that they cannot give accurate information about being self employed. An Eaves staff member called the Jobseeker phone line to enquire about a position as a lap dancer on 10th February 2009. During this phone call the employee requested information about how the assurance of earning scheme for self employed people would work. She was informed that the JC+ employee ‘was not sure but thought that the club owner would make up earnings to National Minimum Wage’. This is highly unlikely to be the case and it is not acceptable that JC+ employees who are the first point of contact for these positions are unable to provide accurate information to jobseekers.

- Leading on from this point, we have serious concerns about the level of training received by frontline JC+ staff with regard to your stated safety mechanisms related to jobs in the ‘adult entertainment industry’. You state that if a customer contacts JC+ through your phone line or via the internet and enquires about a job in the ‘adult entertainment industry’, they will be required to contact their local JC+ office and arrange to see a personal adviser. However, on a number of occasions Eaves staff have phoned the jobseeker line to enquire about positions in the ‘adult entertainment industry’ and have been given instructions to contact the employer directly with a phone number or told to go directly to see the employer at a work venue. In [Appendix 2](#) to this document there is a statement by a staff member relating to a call she made in regard to a position on the 17th December 2008, where she was freely given employers’ information with no regard to your ‘safeguarding’ policy. On the occasions when we were told we needed to see a personal adviser, when we contacted the local JC they were unaware as to why we would need to do that and re-referred us back to the main phone line. On one occasion when a staff member made enquiries about a vacancy the male JC+ employee laughed out loud at her because the post in question was a position as a lap dancer. This is clearly an inappropriate and wholly unprofessional response. When asked why a JC+ call centre operator could not give out the information regarding the position, the operator was unable to give any reason. All of these incidents suggest that JC+ staff are currently unaware of the safeguarding policy and we are

	<p>therefore very sceptical about JC+ abilities to offer the level of 'safe' service you suggest is provided.</p> <ul style="list-style-type: none">• Most seriously, we include a number of your own adverts from last year in Appendix 1 to this document which demonstrate that you have not been following your own stated policy in regard to adverts in the 'adult entertainment industry'. These adverts obtained from your website all clearly give out contact details for employers on the adverts, meaning that you have no ability to monitor who is applying for these positions. This means that not only are you unable to control the number of vulnerable under eighteen year olds who are applying for these jobs, and that you cannot contact any applicants to check whether any illegal activities are taking place, but that the statistics you include with regard to enquiries about positions in the 'adult entertainment industry' within this consultation document cannot possibly be accurate.• The seeming lack of staff training with regard to positions within the 'adult entertainment industry' raises a further serious concern – namely that JC+ employees may not be aware that those claiming benefits cannot be compelled to apply for or accept these jobs after expressing an interest. We understand that those who claim benefits such as job seekers allowance may be compelled to accept other jobs or at least attend interviews for positions in order to stay in receipt of benefits. If staff members are not aware of the safeguards policy in place for 'adult industry' jobs then it seems clear that those who refuse to accept them may be penalised and therefore feel pushed into taking such positions. The Gender Equality Duty Code of Practice section 2 discusses the need for staff training to mainstream the duty and integrate it into working practices – we believe that by failing to adequately train staff as to your stated safeguards and the purpose of them means that you are not meeting your duties under the GED.• Furthermore, we are deeply concerned about your stated policy of only offering these jobs to those “who enquire about them or those who have already worked in the industry”²⁰. Women who have exited the sex industry should not be encouraged to re-enter exploitative employment merely
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²⁰ Private correspondence between Eaves' Chief Executive and Stephen Timms, 14/04/08.

because they have had the experience previously. As we have stated before, one of the outcomes of the Gender Equality Duty is that girls [and women] should be encouraged to have higher aspirations for their careers, we do not believe that this policy fulfils this aim or the stated aims of JC+ or the DWP as previously discussed. Eaves views prostitution and associated exploitative 'work' such as lap dancing and being filmed for pornographic purposes as a form of gender-based violence. We therefore believe that encouraging women to re-enter this field of employment is a form of state sponsored re-victimisation. There is evidence that those who work in the 'adult entertainment industry' can develop substance misuse issues due to the cognitive dissonance needed in order to perform acts which they find humiliating and difficult²¹. There is also research which discusses the link between entry to the 'adult entertainment industry' and a history of sexual abuse²². It is therefore deeply inappropriate and negligent to encourage those who have managed to leave this 'work' to return. You should in fact be developing schemes which actively encourage those who have been exploited through this type of 'work' to feel confident to enter new types of employment which will offer a supportive and safe environment to develop a meaningful career path and positive future life.

- You state that if a JC+ customer is expected to undertake activities not previously specified *and* of an illegal nature in the course of a job they have gained through JC+, then service to the employer will be withdrawn. However, as previously discussed this relies on frontline staff being aware of this policy and informing the customer. This is impossible if they are unaware that the customer has actually received the job. Additionally we question how likely it is that a customer will return to JC+ to make these complaints unless they feel sure that their welfare benefits will be reinstated immediately when they cease the job. This is not standard practice when a person leaves another type of employment voluntarily and wishes to claim benefits, and even for those who are deemed to have ceased employment involuntarily there is generally a long waiting period before receipt of benefits. We are also concerned about the proviso that the activities must be of an illegal nature in

²¹ Scottish Executive (2006) *Adult Entertainment Working Group, Report and Recommendations*, Edinburgh: Scottish Executive.

²² Wesley, J. (2002) Growing Up Sexualised, Issues of Power and Violence in the Lives of Female Erotic Dancers, *Violence Against Women*, 8, 1182-1207

	<p>order to be recognised as unacceptable. As you may be aware the act of prostitution itself is not currently illegal in the UK (although many of the activities related to it are), but we would hope that JC+ is not suggesting that people should continue with their employment if it becomes apparent that this is what their employer fundamentally requires of them, whether it is legal or illegal.</p> <ul style="list-style-type: none"> • We are also concerned that the safeguard of writing a letter to a prospective employer asking them to state that they are not engaged in illegal activity is verging on the ridiculous as a safety measure. It is hard to believe that any ‘adult entertainment’ provider will write back admitting that indeed they are undertaking illegal activities. This then is merely a disclaimer for JC+ in order to allow you to continue to advertise jobs which while they may not be illegal are clearly exploitative and damaging to many of those who end up working in them. <p>You state in the consultation document that <i>“in terms of equality of opportunity, the data... suggests no disproportionate impact in terms of gender”</i>. Eaves maintain this it is very difficult for you to support this claim given the range of weaknesses and limitations in your data that we have identified and outlined above. Furthermore, we would suggest that jobs within the ‘adult entertainment industry’ inherently cannot offer any meaningful opportunity given their typically exploitative nature. We have shown, however, that this type of employment offers significant disadvantages for women, particularly young and vulnerable women who are the most likely to be using JC+ services.</p> <p>We look forward to the outcome of your consultation exercise and hope that you will use the information that you receive to reach a rational decision that in order to meet your obligations under the Gender Equality Duty you must cease to advertise positions in the ‘adult entertainment industry’.</p>
Glasgow Community and Safety Services	<p>Although we are aware of the safeguards that are implemented when advertising for a job of the adult entertainment nature, we do not believe these measures go far enough. For example it would appear that the Jobcentre Plus offers a screening process for adult entertainment vacancies in so far as women who express an interest in the post have to meet with an Advisor to discuss their suitability and ensure their full awareness of the nature of the job. While you may argue that this offers an opportunity for JCP to screen out vulnerable women, Advisors have neither the skills or the</p>

	<p>knowledge to identify vulnerable women and it is arguable that all women are vulnerable in the predatory environment of lap/pole dancing clubs.</p> <p>Furthermore, again focusing on lap dancing club we understand that although dancers are technically self employed, it is common practice for dancers to pay a fee to dance in a club. We know of no other job where an employee has to pay a fee to hold the post. The lack of protection afforded to women in this environment is such that they remain vulnerable to rape and sexual assault.</p> <p>Additionally, GCSS feels it necessary to comment on the purported safeguard for vacancies which involve physical contact e.g. escort work or working in a massage parlour or sauna. We are aware that before the JCP will advertise such vacancies, the employer will be sent a letter informing them that they must complete and return a statement to confirm that they are not involved in illegal activities and the vacancy does not involve contact of a sexual nature. This, undoubtedly, must be considered a naïve approach as it is wholly unlikely that the organised gangs/criminals who run brothels across the UK under the guise of a “massage parlour” or “sauna” are going to openly admit that they allow illegal activities to go on. For this reason, this particular measure cannot be considered a credible safeguard.</p>
<p>Wales Women’s National Coalition (WWNC)</p>	<p>Organisations and individuals with whom we have consulted on this issue unanimously feel that the Jobcentre Plus should be doing more to protect the safety of jobseekers, and that current safeguards within the Jobcentre’s policy are insufficient.</p> <p>Our first recommendation to ensure jobseekers’ safety would simply be to stop advertising jobs within the ‘adult entertainment’ industry. The very fact that Jobcentre policy includes stronger safeguards for this industry than for others implies that employees within this industry are at greater risk of harm. Furthermore, it shows that the Jobcentre acknowledges that there are greater risks within this industry.</p> <p>Why, then, is the Jobcentre advertising jobs that it accepts pose greater risks to employees’ safety than other jobs? Surely not advertising them in the first place would be the greatest safeguard? This would also free up time for Jobcentre employees to spend dealing with the dramatic increase in</p>

jobseekers during the current recession, rather than having to spend time phoning employers and employees and sending out letters for prospective employers to sign and return in an attempt to ensure that no laws are being broken and no employee is expected to perform sexual acts? Consultation with individuals who are currently unemployed and have been for some time has shown that Jobcentre staff in south Wales have recently cut their time with jobseekers from fifteen minutes to five. This calls into question the quality of service that all employees are currently receiving, regardless of industry (or gender).

Our comments on other safeguards are as follows (all taken from paragraph 10 of the consultation document).

‘Each vacancy contains a detailed description of the job requirements’ – This is assuming that the employer is being completely honest about the nature of the work. Given that owners of massage parlours and escort agencies that offer sexual services are aware that prostitution is essentially illegal (although advertising vacancies for industries whose barriers blur with the sex industry could cause some confusion over the legality issue), it is very unlikely that they would include sex as part of the job description. They are probably relying on the fact that the vast majority of people correctly conflate ‘massage parlour’, ‘escort agency’ and so on with ‘prostitution’, and the DWP must surely also be aware of the links here.

‘Adult entertainment industry vacancies are only discussed with people who enquire about them’ - This is a small reassurance, but we remain concerned at the way in which Jobcentre Plus staff might discuss these vacancies due to the ‘sensitivities associated with employment in the adult entertainment industry’ (10).

Several of our members have had negative experiences with Jobcentre staff members; for example, one woman who works in the field of gender equality and particularly in support services for female victims of violence experienced ongoing lack of understanding about her area of work from several Jobcentre employees when she was job hunting. Given these misunderstandings, and others that we have been informed of such as Jobcentre staff routinely offering inappropriate work (often along

gendered lines e.g. construction for men, cleaning for women, which exacerbates existing expectations of men and women, contributes to women's concentration in lowly-paid sectors, and leaves the pay gap unchallenged), we are concerned about advisors' likelihood to sensitively and appropriately discuss adult entertainment vacancies with jobseekers. One of our members stated her concerns on this:

- Having signed on three times in my life, and on every occasion the Jobcentre advisor did not have an understanding of the field of employment I work in, I do not have a great deal of faith in them having sufficient understanding of the sensitivity of this field to effectively take this commitment forward.

'Nobody is obliged to enquire about or apply for adult entertainment industry vacancies and we do not penalize any customer claiming benefits' - We are pleased with this, particularly as due to recent welfare reforms we were initially concerned that women could effectively be forced into the sex industry or have their benefits stopped if they refuse to apply for 'adult entertainment' vacancies. However, we are extremely concerned as to whether this policy is understood by all staff members, at all levels, in all Jobcentres.

Given the concerns briefly stated above, the fact that there is a lot of scope for misinterpretation of the policy due to the vast numbers of staff that the Jobcentre employs (including all employees at the eight Employer Direct contact centres, staff responsible for Employer Direct online, all Jobcentre Plus LRMAs and all other employees within Jobcentres), and the usual routine of Jobcentre staff informing jobseekers that they must actively seek any work or get their benefits reduced or stopped, we are very concerned that this safeguard will not be enough. Jobseekers also need to be made explicitly aware that they do not need to apply for these jobs, at the first point of contact (probably on the advertisement for the job), so that it is abundantly clear to all jobseekers that an objection to applying for such a job would not lead to any penalties such as loss of benefits.

Furthermore, while jobseekers may not be obliged by the actual policy to apply for these jobs, the Jobcentre and DWP need to situate this within a wider context of jobseekers' vulnerable financial

situations. If a mother needs money to feed and clothe her children (which affects women disproportionately, as women make up 90% of lone parents and half of all lone parents are living in poverty), she is likely to feel obliged to take any job offered, whether this is entrenched in Jobcentre policy or not. Furthermore, this affects BME women even more adversely, as BME women are more likely to live in poverty, so the Jobcentre may also be falling short of obligations under the Race Equality Duty.

By advertising and drawing attention to jobs within the 'adult entertainment' industry, the Jobcentre is putting vulnerable single mothers in an impossible position of choosing between their dignity and their children's welfare. Bringing up a family on benefits is difficult enough without the Jobcentre making it more difficult. Another of our members shared her daughter's recent experience:

- I have personal experience of these adverts and was appalled... my daughter is unemployed and despite marking local counties for job search, jobs in adult industries in Manchester came up. It did warn you the job involved filming and would cause embarrassment to your family!!! It was night work, £300 a night. Very tempting if you are broke, rent/bills to pay etc, pressure from Jobcentre to get job, and no one to support you.
- My daughter had me but other girls there didn't have anyone and some were extremely vulnerable, I felt such job adverts should not be paid for by me/taxpayer and we should NEVER risk putting vulnerable people in this position (whatever their gender, disability, ethnicity etc). I will support any move made by WWNC to oppose such advertising.

There is also a complex issue here regarding the concept of 'choice' – that is, the idea that if jobseekers don't want these jobs, they don't have to take them or can simply skip over them. Considering that Jobseekers' Allowance currently stands at £47.95 (age 16-24) or £60.50 (age 25+) per week, whereas jobs in the 'adult entertainment' industry routinely offer hundreds of pounds per night, the concept of 'choice' becomes much more problematic and women may feel pressured into taking such jobs despite Jobcentre policy due to financial difficulties.

It is also important to point out here that, due to the economics involved, jobseekers who may not have dreamed of going into the adult industry could quite understandably feel tempted to enter it due to being made aware of the availability of work and high rates of pay by browsing in the Jobcentre. Once inside the industry, it is easy to see how this could lead to prostitution, particularly when looking at escort agencies and 'massage parlours'. There is a much finer line between working in a 'massage parlour' and prostitution than there is between working in a non-adult industry job and prostitution (in terms of both the way in which the employee would normalize sexualized jobs, and increased knowledge of and access to such jobs). Good money, pimping, links between the sex industry and drug addiction, and a perceived or actual inability to move into other future work could trap vulnerable women into the sex industry. This is an extremely serious issue when considering Government endorsement of this industry, hence the concerns voiced by the Fawcett Society and Object that the Government is 'acting as a pimp in the huge prostitution industry'.

Safeguards offered in paragraph 11 for 'vacancies involving physical contact' - It is difficult to see where the Jobcentre is drawing the line between 'physical contact' and 'contact of a sexual nature'. This is not clearly outlined in the letters included as Annexes which are sent to prospective employers. How could physical contact between an escort and her client be construed as not sexual, for example? Technically it could be argued that a masseuse is not touching her client sexually (although we are concerned that the Jobcentre appears to be denying the widespread knowledge that most 'massage parlours' are guises for brothels), but the argument that touching between an escort and her customer is not sexual requires a lot more explanation, which is not provided in this consultation document. Given the current appalling 6% conviction rate for rape, it is extremely worrying that Jobcentre policy is so vague regarding what constitutes 'contact of a sexual nature'.

Furthermore, WWNC strongly feels that the letter and statement (Annexes 3 and 4) sent to employers are insufficient to ensure the safety of jobseekers. It would be interesting to see how many employers who initially expressed a desire to advertise in the Jobcentre decided against it after receiving these letters. It would surely be extremely easy to sign and send back these forms and seems somewhat naïve to think that ensuring employers do this, or deny over the phone that a job involves sexual

contact, is a real safeguard for applicants.

Again, the lack of data on outcomes of jobseekers here is worrying and might be interpreted as a lack of concern on the part of the Jobcentre. **This is the ultimate risk to women's safety and our gravest concern regarding this policy.** We would strongly urge the Jobcentre to collate and disaggregate by gender the outcomes of applicants to these posts. How does the Jobcentre truly know that these are suitable employers? The policy implies that work in massage parlours and escort agencies is not dissimilar to any other kind of work. With this in mind, presumably the Jobcentre would not expect a woman to enter a building site without a hard hat – so why expect a woman to enter into this kind of work which offers neither adequate safety measures nor data on health and safety records?

The concern regarding outcomes extends to (13) – that staff members who do not wish to deal with such vacancies do not have to, 'but we do not gather information about if and how often this happens in practice.' Arguing the case without clear outcomes would not be acceptable for any other policy, and given the particularly sensitive nature of this policy and serious allegations that the Government is effectively providing a pimping role, the lack of data on outcomes is very worrying. Evidenced outcomes on a policy should be necessary to support the policy being taken forward, and WWNC is extremely concerned that the likelihood of this policy to put women's human rights and personal safety at risk far outweighs its likelihood in removing barriers to employment.

We are also not entirely reassured by the safeguard in (12) regarding reporting employers who provide illegal services to the police. It is widely known that many 'massage parlours' are guises for brothels, and extremely difficult to see how the Police could possibly not know this too. However, 'massage parlours' are neither routinely raided nor closed down by the Police. As such, the safeguard of informing the Police that the Jobcentre knows of a brothel is not much of a guarantee of women's safety.

If the Jobcentre decides to continue to advertise these vacancies (which is certainly not something that we would endorse as an organisation), there are several recommendations that our members

	<p>have made to strengthen current safeguards. For example, Chwarae Teg, the leading professional agency for the economic development of women in Wales, suggest that vacancies in the adult entertainment industry could be made available 'on request' only, so that the DWP could control and monitor enquiries to ensure that, for example, jobseekers under the age of 18 do not access adverts.</p> <p>However, given the majority of our members' views stated above – the pressures of poverty leading to increased likelihood in accepting any work, particularly well-paid work; concern over whether the policy will be properly understood and taken forward by Jobcentre staff at all levels; the fine line between escort work and illegal sex work; concern over Government acting inadvertently in a pimping role; lack of data on the outcomes of applicants and especially their safety; additional pressures for poor single mothers; the greater risks associated with the 'adult entertainment' industry and implicitly acknowledged by the Jobcentre – our recommendation is essentially that Jobcentre Plus should stop advertising such vacancies as a matter of urgency and concentrate its efforts instead on fulfilling the Gender Equality Duty through measures recommended in paragraph 11 of our response.</p>
Women's Support Project (WSP)	<p>The WSP believes that the only way to ensure safety for women is not to accept them. Job Centre Plus could be considered to condone exploitation of women by continuing with its current policy and collude with an industry that is based on differential harm between genders. JobCentre Plus should not support or normalise these employers and remain outside of the industry.</p> <p>The policy of relying on the assurance statement from employers could suggest more concern with minimum requirements and this self reporting is not part of a robust system of safeguards.</p>
Individual 1	<p>Enable women who have no income, qualifications, access to counselling or self confidence in any area apart from their temporary ability to evoke sexual arousal, to get access to long term meaningful support and not advertise jobs which keep them trapped in cycles of exploitation and self contempt.</p>
Individual 3	<p>I do not think that adverts for the adult entertainment industry should be held at job centres. This is because the industry is sexist and exploitative, and carrying such adverts could encourage naive women into the sex industry where they will be at risk.</p>
Individual 4	<p>I would suggest not advertising this type of work at all. Although the Job Centre is trying to eliminate and monitor potential for exploitation into offering sexual services, I think it is rather naive to think that</p>

	<p>the sex industry is not based largely on the offer of these services. It is inevitable that these services will be required of staff in a large number of cases.</p> <p>Also, it is irresponsible of the Job Centre to advertise this type of work, as it creates and adds to a social climate in which it is acceptable to treat women as sex objects and aspirational for women to want this type of work in which they are treated as sex objects. It legitimises and 'respectalises' this type of work which is based on the disrespect and sexual objectification of women. It therefore furthers women's inequality in all spheres of life.</p>
Individual 11	<p>I have heard that very young women have been given only a mobile phone number as the point of contact for a job in the adult entertainment industry. This is a total travesty of all safety rules and I would hope and expect that job centres would never expect anyone to follow up a job lead of any kind on the basis of a mobile phone number only. At the very minimum there should be a verifiable postal address and land line phone number.</p>
Individual 12	<p>In my opinion, additional safeguards can be added to those already put in place by Jobcentre Plus either by the Government challenging the Ann Summers judgement made by Mr Justice Newman in 2003 or by insisting that applicants for all vacancies in the adult entertainment industry are interviewed by a Jobcentre Plus adviser. As far as I can see, there is nothing in Mr Justice Newman's judgement stating that vacancies in the manufacturing and retail areas in the adult entertainment industry should be exempt from this though I understand that there may be no physical contact between persons in this part of the industry.</p> <p>Jobcentre Plus advertises vacancies like all other recruitment agencies but I have as yet been unable to find jobs such as adult chat hosts, lap dancers, pole dancers, strippers, etc. in any private recruitment agency websites. One has to ask why Jobcentre Plus is perhaps the only one to advertise such jobs in this industry.</p> <p>If the applicant is appointed, the limited internal procedures currently employed by Jobcentre Plus will have no affect. If a successful candidate feels aggrieved in some way if asked to carry out 'additional duties', then the person has the choice of carrying out the requirements made by the employer, taking legal advice, or leaving the job. Advising Jobcentre Plus of their concerns does nothing for the worker,</p>

	<p>merely permitting Jobcentre Plus to stop advertng further vacancies for that particular company.</p> <p>The statistical data provided in the document show that Jobcentre Plus received complaints between 01/08/07 – 31/07/08 from two applicants who were successful in gaining employment in the adult entertainment industry and then found out that they were being asked to provide ‘sexual services’, is in my opinion irrelevant.</p> <p>There is no data detailing the number who applied for vacancies in the adult entertainment industry via Jobcentre Plus and who subsequently did get involved in providing sexual services but did not complain to Jobcentre Plus.</p> <p>The pro forma shown in appendix 4 may indeed be completed by the company and returned to Jobcentre Plus but in reality provides no assurance that the company in question has completed the form truthfully and if no applicant who is appointed does not complain when asked to carry out acts where physical contact is required, the form is worthless.</p> <p>Adult sex sites (both legal and illegal) are available to everybody who has access to a computer, including adult chat web sites. Indeed, unless the computer has parental controls, many of those accessing such sites may be under 18 years of age.</p> <p>Young people having experienced such web sites may, when turning 18 and seeing jobs of this nature advertised by Jobcentre Plus, might feel compelled to apply for and take up employment in the adult entertainment industry.</p>
Individual 15	<p>Jobcentreplus branches by accepting vacancies from The Sex Industry are effectively condoning and accepting female sexual exploitation as ‘just work.’ The term ‘Adult Entertainment’ is used to hide the commercial sexual exploitation of women for men’s sexual entertainment and usage. (See The Idea of Prostitution 1997 by Sheila Jeffreys and also The Industrial Vagina 2009 by Sheila Jeffreys. Both books dissect common claims that The Sex Industry is just ‘harmless male entertainment’ not specific and commercially driven male sexual exploitation and degradation of women.)</p>

Jobcentreplus by accepting such vacancies does not provide any safeguards whatsoever to safeguard female Jobseekers' rights to be protected from unwittingly becoming involved in prostitution which is rife within the Sex Industry. The claim Sex Industry employers all receive a letter informing them they must complete and return a signed statement confirming they are not involved in illegal activities and that the vacancy does not involve contact of a sexual nature, is totally unacceptable.

Furthermore, Jobcentreplus staff ringing the Sex Industry employer after the vacancy has been filled and seeking confirmation 'no sexual activity is taking place' is also unacceptable. It is ludicrously easy for The Sex Industry employers to sign a document and answer a few questions via the telephone with the full knowledge their sexually exploitative businesses will not be subjected to unsolicited spot checks by Jobcentreplus staff.

Furthermore, apart from a signed document and telephone call, Sex Industry Employers know the likelihood of their being prosecuted for engaging in illegal sexual activities is 99% unlikely. Stating a signed document and quick telephone call supposedly ensures 'jobseekers' which in itself presumes male and female jobseekers will willingly seek vacancies wherein they will be expected to work totally naked for the sexual entertainment of male customers, totally ignores the fact many women working in Sex Industry as lap dancers, exotic dancers or web cam operators are routinely subjected to coercive, threatening or force by male employers in order to ensure they submit to sexual demands from male customers, including prostitution. See <http://www.glasgow.gov.uk> and also Violence and Stress At work and In The Performing Arts by Giga, Hoel and Cooper, University of Manchester, published by The International Labour Office, Geneva, 2004.

This report states 'some lap dancers particularly those employed in 'exotic dancing' such as stage dancing, table dancing and lap dancing report social disillusionment and increased health problems due to costume and appearance restrictions, dirty work environments, coercion by management and (male) customers to perform particular types of dance, sexual harassment, physical assault, forced sex (meaning rape by male customer) and the effects of stigmatisation.

Research proves many businesses claiming to be respectable Massage Parlours or Saunas are in

	<p>fact covers for prostitution activities. Women working in these places are involved in prostitution and the clients are all male seeking to buy women's bodies. See http://www.eaves4women.co.uk/POPPY_Project/Documents/Recent_Reports/Sex%20in%20the%20City.pdf</p> <p>The Home Office's Consultation Paper 'Paying The Price, July, 2004 itself acknowledges the fact pimps operating from Massage Parlours and 'Saunas' are at the more profitable end of the market in prostitution. (Paying The Price 2004: page 16). On page 6 of 'Paying The Price' it states 'There is a growing trade in selling sexual services in premises licensed for other activity, including massage and also video and film. Prostitution must not be concealed behind the façade of legitimate businesses.' Yet whilst The Home Office admits businesses such as 'Massage Parlours, Saunas and Web-cam companies' are commonly engaged in providing male customers with prostituted women, the DWP believes such businesses are conducting 'legitimate and legal business practices.'</p>
Individual 18	<p>The only thing that will really safeguard Jobcentre Plus clients from harassment, abuse and discrimination is to not advertise adult entertainment industry jobs at all and this is the course I would advocate.</p>

Q6 - Do the safeguards go too far and ignore the needs of the employer in favour of the safety of jobseekers. If yes, please explain why?	
Consultee	Response
Glasgow Community and Safety Services	As previously outlined we do not believe the safeguards go far enough, and in certain cases they are unlikely to provide credible protection to vulnerable jobseekers. By creating routes into the sex industry through the JCP, the Government is essentially condoning the sex industry and sanctioning state-sponsored prostitution. Thus, the only safeguard that we would support is an end to the JCP's policy of advertising adult entertainment vacancies.
Wales Women's National Coalition (WWNC)	No. Given the points stated above, we believe employers' needs are being afforded much greater priority than jobseekers' safety.
Women's Support Project (WSP)	The employers such as Escort Agencies, Lap Dancing Agencies, are involved in a very profitable industry and are skilled in how to advertise and promote services and employment. Safeguards need to be increased to ensure the safety of workers should be the priority.
Individual 1	Safeguards guard people and make them safe. These are therefore not safeguards. Does asking men why they ignore the abusive and trafficking elements of prostitution ignore the safety of women in favour of the needs of pimps to have money?
Individual 3	No. Such employers have scant regard for the welfare and dignity of their employees. It is the duty of government to protect people from them.
Individual 4	No, certainly not.
Individual 11	No, the safeguards do not go far enough. In fact I do not believe that it is possible to put into place adequate safeguards when the very industry is such a corrosive and corrupting force in society.
Individual 12	No. Not far enough.
Individual 18	No. As per my previous answer, there never can be enough safeguards for jobseekers (or the public generally) from these abusive industries.

Q7 - Please provide any other comments you have on the Jobcentre Plus policy of accepting vacancies from within the adult entertainment industry.	
Consultee	Response
Leeds Inter-Agency Project (LIAP) Women & Violence Trust	You give a detailed history of this, featuring the court case brought by the Ann Summers sex shop chain. It could be argued that your interpretation – that now you must advertise all jobs in the sex industry – is too wide. Nude or semi nude dancing or serving is closer to prostitution than selling pornography and so called sex aids. Escort or masseuse is, as everyone knows, prostitution. Prostitution is not illegal but soliciting is. If you feel the law means you must advertise Retail (adult products), that does not mean you must advertise all vacancies in the sex industry because by doing so you can be said to be promoting prostitution – soliciting.
Justice for Women	You give a detailed history of this, featuring the court case brought by the Ann Summers sex shop chain. It could be argued that your interpretation – that now you must advertise all jobs in the sex industry – is too wide. Nude or semi nude dancing or serving is closer to prostitution than selling pornography and so called sex aids. Escort or masseuse is, as everyone knows, prostitution. Prostitution is not illegal but soliciting is. If you feel the law means you must advertise “Retail (adult Products)”that does not mean you must advertise all vacancies in the sex industry. Because by doing so you can be said to be promoting prostitution – soliciting. Please stop.
Joint Forum Women's Group	<p>I am responding to the above consultation on behalf of the Joint Forum Women's group, a group that campaigns for better mental health services for women, and which raises awareness of the social causes of women's mental health problems.</p> <p>The group strongly objects to the policy to advertise jobs in the 'adult entertainment' industry in Job Centres. We believe such jobs are highly exploitative of women, and add to the sexual objectification of women. We believe that the sex industry encourages men to see women as sexual commodities and increases the risk of rape and sexual assault. We do not believe the availability of such jobs represents a free choice, as many of the women who may enter this industry may do so out of poverty, or have low confidence and self esteem, perhaps with histories of mental health issues or sexual abuse.</p>

	<p>As women, we feel vulnerable and frightened by the setting up of venues such as lap dancing clubs in city centres, which adds to the fear felt by many women of travelling alone at night. Furthermore, as most of these jobs are targeted at young women, we also question whether the displaying of such job adverts in Job Centres contravenes the Gender Equality Duty on public bodies, to promote equality between men and women.</p> <p>On behalf of the Joint Forum women's group I would appreciate a response to this response to the above consultation.</p>
<p>Dumbarton District Women's Aid</p>	<p>We at Dumbarton District Women's Aid have been campaigning locally with support from the local churches about these jobs being advertised in the jobcentres. Whoever we talk to can hardly believe us when we tell them the nature of some of the jobs being advertised.</p> <p>Women's Aids philosophy has always been that women are abused in their homes because of the unequal distribution of power in society generally. We have campaigned long and hard on this and it is now accepted by many agencies working in this area that in order to tackle domestic abuse at its root we must tackle these inequalities.</p> <p>Our Scottish Parliament states that "Gender based violence is a function of gender inequality." It then goes on to state that violence against women encompasses the sexual exploitation of women.</p> <p>Some of the jobs advertised state that "you will be required to dance at functions and undertake visiting escort duties" or that " your duties involve working nude/semi nude and involve explicit sexual dialogue"</p> <p>We believe this is not adult entertainment but a route into prostitution. One young woman who worked in prostitution and had started as a pole dancer said" there is a system in place which is older and stronger than I could begin to imagine. What could I do about it? If I had any power I would make it so that nobody was ever bought, sold or rented again.</p> <p>There is another job for a cleaner, being paid a higher hourly rate if she is prepared to do the work</p>

	<p>naked. This is not part of the adult entertainment industry, but part of the dehumanising of women.</p> <p>Many of the young women in our area who are looking for work are faced with the prospect of low paid work in the tourist industry or equally low paid minimum wage work in the care sector. They may be “seduced” by the higher wages paid in these escort type jobs as a way out of deprivation and poverty.</p> <p>However the experience of having to acquiesce to unwanted sex in order to survive economically results in psychological damage.</p> <p>We have read the consultation document and all the safeguards put in place. We would argue that these safeguards have been put in place because it is understood that these jobs are damaging to young vulnerable people and would urge that instead of looking for safeguards to allow these jobs to continue to be advertised the governments time would be better spent in finding ways to ensure that there is no legal way for these jobs to be advertised in one of their agencies.</p> <p>We hear women in our refuge talking about the experience of all forms of abuse including sexual abuse on a daily basis. We believe that sexual abuse is trivialised in the media and conveyed as entertainment in the film industry. We are greatly concerned at the sexualised nature of childrens clothing and in particular the playboy tendency to target young primary school age girls as consumers of their products.</p> <p>We see the Job Centre adverts as a continuation of this exploitation and are glad to have the opportunity to participate in this consultation document.</p>
Eaves	<p>Eaves has significant experience of working with women who are currently or have previously worked within the ‘adult entertainment industry’ and have undertaken a number of research projects in this area. We therefore feel that we are very well placed to offer an expert opinion in response to this consultation exercise.</p> <p>After a considerable period of lobbying and correspondence with the DWP and Jobcentre Plus with</p>

regard to your policy of accepting and advertising jobs in the 'adult entertainment industry', Eaves welcomes this consultation. We assume that the consultation will form part of an equality impact assessment on this policy in line with your obligations under the Gender Equality Duty (GED). In our view it is imperative that a full gender impact assessment is carried out on this policy, because although relatively few of the vacancies advertised by Jobcentre Plus (JC+) are within the 'adult entertainment industry', there is clear evidence (presented below) that reversing this policy will have a major impact on gender equality (Equality and Human Rights Commission Code of Practice 3.67). We look forward to viewing the completed impact assessment and being informed of any policy decision you reach.

Please note that we will only be answering the specific consultation questions that relate directly to our areas of expertise. Before we respond to your specific questions, there are a number of broader issues we wish to address as follows:

- We do not believe that our views on this policy relate to 'moral' issues, as suggested in your consultation document in paragraph 57, but rather an issue of meeting your responsibilities under the Gender Equality Duty.
- In your consultation you have used the terminology 'adult entertainment industry'. Eaves does not recognise this as a legitimate form of industry, particularly given that a significant proportion of this industry operates outside the law. We prefer to use the term 'sex industry' or the language of 'sexual exploitation'. However, for the sake of consistency and clarity for all those who read this document we have used the same terminology as the DWP. We have placed the term 'adult entertainment industry' in inverted commas to represent the fact that we do not recognise the related activities as a form of adult entertainment or indeed a legitimate or viable form of work.
- With regard to your statement regarding your obligations after the *'Ann Summers ruling'*, Eaves and our legal advisers assert that you have interpreted the ruling in an overly risk-averse fashion. In fact the judicial review found that your decision making had been in error, not the decision itself.

	<p>This decision was also made prior to your obligations under the Equality Act, to which you must now give due regard. This decision was also only in regard to employment within the particular employer Ann Summers, which is predominantly a retail outlet albeit one that sells items of a sexual nature. We feel strongly that a job within Ann Summers cannot be equated with employment within a lap-dancing club or a massage parlour. We would argue that reconsidering your policy to advertise jobs in the wider sex industry will <i>not</i> leave you open to further significant legal challenge, but in fact <i>assist you</i> to avoid receiving challenges about your failure to meet your responsibilities under the GED.</p> <ul style="list-style-type: none"> In addition, we note that the data you have provided in the consultation document fails to provide an accurate picture of those who have applied for and received jobs in the ‘adult entertainment industry’ for several reasons. Firstly, we believe that by including figures for work within warehouses and retail outlets which distribute items of a sexual nature, alongside positions which involve sexually stimulating behaviour by those who work in them you have deliberately obscured the figures to make them appear more gender neutral. We do not accept that these types of jobs can be considered equivalent. Secondly; you have not provided information about the demographics of those who actually <i>gained</i> employment within the ‘adult entertainment industry’; we feel that this information would provide a far more accurate picture of the gendered nature of this work. Thirdly; we question why you have only included statistics from the last financial year. You began to advertise positions in the ‘adult entertainment industry’ in 2003 and we consider that it would have been more transparent to include statistics from then up until the present time.
<p>Glasgow Community and Safety Services</p>	<p>Routes Out of Prostitution and the Trafficking Awareness Raising Alliance (TARA) are based in Glasgow Community and Safety Services, a joint partnership between Glasgow City Council and Strathclyde Police which was set up to prevent crime, tackle anti-social behaviour and promote community safety in the city. Commercial sexual exploitation is recognised as being widespread in our society and takes many forms including prostitution, trafficking, lap dancing and pornography. It disproportionately involves men using vulnerable women and children for their own sexual gratification or financial gain. We hold the view that exploitation in this way is a clear form of violence against women and a barrier to gender equality.</p>

GCSS are choosing to respond to this Consultation paper in order to vehemently oppose Jobcentre Plus's current policy of accepting and advertising jobs from within the adult entertainment industry, due to the growing body of evidence that would support the view that lap dancing and other forms of adult entertainment are linked to the sex industry. We believe the term adult "entertainment" to be misleading in the context of activities which so clearly sexually denigrate women in an environment of male power and control. Portraying women as sexual objects plays a part in normalising sexual violence and contributes to the male abuse of women being acceptable, tolerated, condoned and excused.

We are concerned that the sex industry is further attempting to mainstream and normalise its activities by advertising through Jobcentre Plus (JCP) and that JCP by agreeing to promote these adverts are offering an expedient pathway for vulnerable women to become part of the sex industry.

In terms of the 351 adult entertainment vacancies advertised with JCP last year it is crucial that we voice our concern over the advertising of, in particular, lap dancing club staff, dancers (lap, pole, table, erotic), adult chat line operators, lingerie and nude models, escorts, masseuse, topless TV show, web cam performers, topless/semi nude bar staff, kissogram etc. The selling of adult products would not be considered exploitative so our criticism is not levelled specifically at stores like Ann Summers, although we would oppose the Ann Summers Ltd v Jobcentre Plus ruling in 2003.

The main reason for our opposition to advertising for vacancies in lap dancing clubs is:

- They overlap with/are a front for prostitution
- Many dancers begin work in lap dancing clubs through lack of real choice
- They encourage men to sexually objectify women
- Activities within the club can be seen as detrimental to gender equality
- Working conditions and terms of employment of lap dancers are inadequate and problematic. For example, there is strong evidence that dancers can suffer humiliation and sexual harassment on a regular basis from customers and staff/management.
- People/other businesses do not want the clubs in their community

	<p>In light of the Home Office’s announcement last year of its intention to tackle and reduce the demand for prostitution by prosecuting those who seek to pay for sex and to develop routes out for women still engaged in prostitution, it would seem that there is an overwhelming contradiction in the Department for Work and Pensions effectively promoting engagement with and a pathway into the sex industry whilst the Government is trying to promote human rights and equality for all.</p> <p>It is clear that Jobcentre Plus’s policy of advertising adult entertainment vacancies contributes to the normalisation of the sex industry in our society today and fails to acknowledge the long term harm and trauma experienced by the victims of commercial sexual exploitation. Research shows that the buying and selling of sexual services does occur in some clubs and that women performers face poor working conditions and high levels of harassment. This must be in stark contrast to the JCP’s purported aim of supporting people from welfare into “work”. GCSS recognises that engagement in the adult entertainment industry is harmful, survival behaviour, resulting from a lack of real choices for women and the demand for sexual services by men.</p> <p>We would reject the argument that involvement in the sex industry is a civil right – no woman wants the right to be sexually exploited, abused and demeaned. At a local level, adult entertainment venues have a negative impact on the safety and well being of women living and working near them. On a wider level, by creating a convenient route in to the sex industry the Government is essentially facilitating the supply of vulnerable women to meet this demand. Thus the current policy is creating an obstacle to gender equality as well as acting in blatant disregard of the Government’s obligations under the Gender Equality Duty 2007. For the above reasons, GCSS must wholly oppose JCP’s policy and support an end to the advertising of such vacancies.</p>
<p>Wales Women’s National Coalition (WWNC)</p>	<p>WWNC welcomes the opportunity to respond to this consultation, for which we have assembled members’ views through email questionnaires, meetings and telephone interviews, and are also drawing on our recognized expertise in gender issues in Wales and current equalities legislation with a gender-specific focus.</p> <p>We appreciate that safeguards have been tightened considerably with respect to the Jobcentre</p>

advertising 'adult entertainment' industry vacancies due to the Jobcentre taking heed of groups who have objected to such advertisements. While we welcome the improved safeguards, we remain concerned at the message that current policy sends out regarding what constitutes meaningful employment, that women's personal safety and human rights are at risk, and that the Jobcentre would benefit more from reconsidering its priorities in light of obligations under the Gender Equality Duty.

If you would like to further discuss any of the issues raised in this consultation response, please contact WWNC's Policy Officer, Hannah Austin, on 029 2047 8919 / 07872 601515 / hannah-austin@wwnc.org.uk.

Main issues

The Jobcentre Plus seems to think that people opposing the advertising of adult entertainment industry jobs are doing so because they find the industry 'morally repugnant' (56). However, it is important to point out that this is not the main issue here. The main issues are regarding the exploitation of vulnerable groups of people, Government-endorsed normalizing of the commodification of women and the message that this sends out to society in general, endangering women's lives and providing a pimping role for the huge sex industry.

Jobseekers' safety

We are concerned at the Jobcentre's insistence that that the adult entertainment industry is 'like any other vacancy' (9). Does any other vacancy require routine phone calls to jobseekers to ensure that they are safe and well? The very fact that this is part of Jobcentre Plus policy clearly implies that the Jobcentre perceives there to be greater risks to applicants of these jobs than in other advertised vacancies. As such, would it not be better to simply not advertise jobs which pose increased risks to jobseekers' safety? If there is even a small risk that people are being led into exploitation via the promotion of jobs with inadequate conditions wider than that of the adult industry, why is the Jobcentre continuing to advertise these jobs?

Terminology

The terminology of 'adult entertainment' is also misleading, in our view. What we are essentially talking about here, as mentioned in (8) above, is a system of predominantly male business owners employing predominately female staff to sexually titillate predominately male punters. If we applied the Gender Equality Duty to the 'adult entertainment' industry, apart from the fact that the industry as a whole would be shut down by the Equality and Human Rights Commission, we clearly would find that lap dancing clubs, strip bars, topless TV channels and massage parlours are forms of 'entertainment' for men. To truly demonstrate a commitment to equality and human rights (of which women's rights are obviously a part of – and the fact that there is still a need to point this out in the 21st century is extremely disheartening), Government should consider the equalities policies of the jobs it is promoting through the Jobcentre.

Recession

We are also concerned that during this recession, women will feel even more pressurized into taking up these jobs due to a lack of viable alternatives. Women are feeling the effects of the credit crunch and recession more keenly than men, and this will get worse before it gets better. As such it is more important now than ever to pull advertising of demeaning industries, as it could easily be misconstrued that the Government is endorsing these industries.

Ann Summers ruling

Regarding the Ann Summers ruling, there is a huge and clear distinction between employment within an Ann Summers store – which is essentially retail – and working in a massage parlour or strip bar. The Jobcentre needs to address this as a matter of urgency. Given that 42% of applicants to this industry are to jobs within retail or warehouses (calculation based on figures from the table in paragraph 18), this would still be catering to many employees' jobseeking needs, but – crucially – abandoning advertising more sexualized jobs. Jobseekers should still be allowed to reject jobs at Ann Summers stores on the grounds of faith, but there is a massive distinction between the kind of work

available in such stores, which is essentially the same as that involved in other retail outlets, and the kind of work on offer on a topless TV channel. As such, it would be entirely possible for the Jobcentre to change its policy to allow for advertising from Ann Summers (taking into consideration the 2003 High Court ruling) but to ban advertising for vacancies that walk a fine line between entertainment and the sex industry. We would recommend that the Ann Summers issue is removed from the debate to avoid confusing issues.

Conclusion

In conclusion, **our main concern is for the safety of women, followed by our core aim to promote equality between men and women.**

The current policy is pressurizing the most vulnerable groups of women into considering jobs in employment areas which tread a fine line with the sex industry. This pressure is likely to increase given the current economic climate. Continued advertising sends out the wrong message to society by normalising the commodification of women's bodies for men's pleasure and profit. We are particularly concerned at the lack of evidence on outcomes, which shows insufficient respect for women's human rights and personal safety.

We feel that current Jobcentre policy does not adhere to obligations under the Gender Equality Duty and that the Jobcentre should reconsider its priorities under current equalities legislation (see 8 above for our recommendations on priorities in promoting gender inequality that we feel the Jobcentre should be concentrating on, rather than promoting 'adult entertainment'). The Jobcentre could continue to advertise retail jobs within lingerie shops that sell sex toys such as Ann Summers – as long as religion and belief equalities issues are taken into account when recruiting jobseekers. There is a clear distinction to be made between retail work and stripping, lapdancing or working as an escort. The Government should be incredibly wary that it is not inadvertently acting as a pimp in the huge prostitution industry.

Our ultimate recommendation is that the Jobcentre changes its policy and refrains from

	<p>advertising jobs in the ‘adult entertainment’ industry as a matter of urgency.</p> <p>We look forward to receiving your response on this consultation, and would welcome being contacted to contribute to future consultations.</p>
<p>Women’s Support Project (WSP)</p>	<p>The Women’s Support Project (WSP) welcomes the opportunity to provide feedback on the Job Centre Plus policy of accepting and advertising vacancies from the adult entertainment industry. This submission comes on behalf of the organisation.</p> <p>Definition of the Adult Entertainment industry</p> <p>The WSP would firstly seek clarification on the definition used by Jobcentre Plus for Adult Entertainment. The WSP believes Adult Entertainment should be understood as a form of sexual exploitation and not as legitimated as a form of work. Adult entertainment is a euphemism and as such, could include any entertainment deemed suitable only for adults. It has also been used to denote live, sexualised performance or activity. The WSP, along with many other women’s organisations, believes it should also include pornographic material bought in shops, material viewed, or services bought.</p> <p>Definition from Adult Entertainment Working Group (AEWG) The Scottish Executive to brought the Adult Entertainment Working Group together to investigate all forms of adult entertainment including:</p> <ul style="list-style-type: none"> • research into the activities and associated impacts • identify and assess relevant types of controls, including their impact • recognise the need to balance local and national interests. <p>This group defined Adult Entertainment as:</p> <p>“The performance in a public place of any activity that a reasonable person would, in all the circumstances, consider to be for the purpose of providing sexual gratification and/or titillation.”</p>

	<p>There was a clear understanding by the group that there was a sexual element to the work. The WSP believes that such work should not be advertised or promoted in any way through JobCentre Plus.</p> <p>Their report noted concerns that jobs and activities within the adult entertainment Industry could be “regarded as sexually exploitative and so, are incompatible with the Scottish Executive's work on gender equality and violence against women.” The AEWG felt that sanctioning such activities (and therefore employment) which reinforce gender inequality acts contradicts any support for the principles of equality and human rights. By accepting the range of advertisements for employment in the adult entertainment, JobCentre Plus is acting in contradiction to the Scottish Government’s strategy on Violence Against Women.</p> <p>The current policy to accept and advertise vacancies from the adult entertainment industry serves to normalise and adds to the mainstreaming of sexual exploitation. It is on this basis that we feel JobCentre Plus should not accept any adverts from employers who are involved in this exploitation in the name of adult entertainment.</p> <p>The current policy is unacceptable and conflicts with other approaches and strategies to commercial sexual exploitation. Objections expressed here are not based on “moral repugnance” but on evidence of wider negative impacts of normalising exploitation</p> <p>The current policy of not promoting advertisements or directing people towards them has been an important consideration and there be no compulsion for people to have to apply for such posts or have any impact on benefits.</p> <p>JobCentre Plus staff should have full information on the adult entertainment industry as part of training to ensure they are then able to make an informed decision as to whether they want to be involved in the advertisement and recruitment process.</p>
OBJECT	<p>About OBJECT and Relevant Information OBJECT is a human rights organisation which challenges the sexual objectification of women in the</p>

media and popular culture because of its links to discrimination and violence against women. These links are recognised by a growing body of research and by both international and UK bodies working for women's rights such as the UN Committee to End All Forms of Discrimination Against Women (CEDAW), which since 1979 has called on States to take action on the objectification of women. It has since repeatedly identified the links between the portrayal of women as sex objects by the media and sex industry with attitudes underpinning gender-based discrimination. Likewise the End Violence Against Women Coalition – the largest coalition of women's organisations in the UK – has called on the UK Government to tackle the growing sexualisation of women in the media and popular culture, highlighting its role as a 'conducive context' for violence against women.

OBJECT has seen a copy of the consultation response submitted by Eaves Housing for Women and we would like to state that we fully support all points made in their response. Please note that the main body of our own response draws on legal advice from a gender discrimination expert. A legal note from a public law specialist is also attached (see [Appendix 3](#)).

Our interest in this consultation is concentrated in three main areas:

1. The lack of legal basis for DWP's policy
2. The exploitative nature of the 'adult entertainment' industry
3. The incompatibility of DWP's policy with the Gender Equality Duty 2007

1. Lack of legal basis for DWP's policy

- We do not believe there is a legal basis for extending a decision relating to a chain of retail lingerie and sex toy shops to virtually the entire sex industry. Ann Summers shops hold retail licences and are not licensed as sex shops under the Local Government (Misc. Provisions) Act 1982.
- The core function of an Ann Summers shop is to sell articles to customers for their use, not to actually provide services of a sexual nature. Employment within an Ann Summers shop is therefore entirely different from selling sexual stimulation (and sexual 'services' in many cases)

in a lap dancing club, 'escort' agency, 'massage parlour', strip web cam, chat line etc.

- This distinction was even drawn by the Judge involved in the Ann Summers Ruling (see enclosed legal note), who stated that jobseekers enquiring about work in an Ann Summers store should not be expected to consider 'work' in an escort agency or massage parlour.
- For this reason we wholly dispute DWP's 2003 decision to accept advertisements for all 'adult entertainment employers' on the basis of the Ann Summers ruling.

2. The exploitative nature of the 'adult entertainment' industry ('AE industry')

- A great deal of OBJECT's work focuses on challenging the continued mainstreaming and glamorising of the sex industry – in particular prostitution and lap dancing. We firmly believe that prostitution is a key social justice and equality issue – its violent nature reflecting both structural socio-economic and gender imbalances in British society. Physical assault, sexual violence and psychological abuse are regular occurrences for the vast majority of women in prostitution. The links between young women spending time in local authority care and entry into prostitution are well-established. And, as many women are drawn into prostitution at a young age, the chaotic life style, substance dependency and their abusive relationships make it difficult to exit without considerable support. It is well known by those both in and out of the 'AE industry' that 'escort' and 'massage parlour' are euphemisms for prostitution (for example see [Appendix 4](#)). By carrying advertisements for these 'jobs' the DWP is essentially acting as a recruitment outlet for pimps and legitimising 'jobs' which are fronts for prostitution.
- Similarly, lap dancing is frequently portrayed as a 'just a harmless bit of fun' yet both research and a large number of women who are involved with OBJECT's 'Stripping the Illusion' lap dancing campaign confirm that both financial and sexual exploitation are rife across the industry. Women pay fees to work, pay fees to staff such as security and DJs, pay for club uniforms, pay fines for being late or missing shifts, pay commission on their earnings and face intense competition to make these earnings due to the industry wide practice of disproportionately high performer to customer ratios. On top of this women face an environment in which sexual harassment is normalised and tolerated (this is backed up by research).

- For all of these reasons we reject the DWP's term 'adult entertainment industry' as this further legitimises the sex industry as 'harmless work'.
- Moreover, the serious contradiction between legitimising an industry by carrying its advertisements and then stating that 'safeguards' are in place / employers offering illegal services will be removed – are not addressed by the DWP consultation document.

3. The incompatibility of DWP's policy with the Gender Equality Duty 2007 (GED 2007)

- The decision to carry advertisements for the 'AE industry' was taken before the introduction of the GED 2007. The legal landscape has therefore considerably changed and as a public body the DWP now has a responsibility to actively promote gender equality and to counter gender stereotyping.
- We again underline the central point that the Ann Summers ruling related to shops which retail materials of a sexual nature – some of which might promote the sexual objectification of women and some which do not. However lap dancing /strip webcam performing/ 'escorting' etc clearly objectifies women and has wider implications for women in society as a whole. Each 'employment' should therefore be considered distinctly. We dispute the DWP's view that the industry is 'gender neutral' and find that the data methods used in the consultation obscure the gendered nature of the industry, by lumping 'front of house' (usually women) with 'back of house' staff . It is well confirmed that the 'AE industry' is heavily gendered, with the vast majority of the industry catering for male customers.
- Carrying adverts for a gendered industry whose core function revolves around the sexual objectification of women and gender stereotyping clearly runs counter to DWP's responsibility under the GED 2007.
- Moreover the 'AE industry' increasingly normalises unacceptable levels of sexual harassment of women in the general population as well as towards women involved in the industry.
- According to Equality and Human Rights Commission GED guidelines all Government departments should raise aspirations for young women. By promoting 'AE industry jobs' as normal career choices the DWP contradicts this policy.
- The above factors render the DWP policy an equality and social justice issue – contrary to the

	<p>consultation document suggestion that objectors to the policy find it 'morally repugnant'.</p> <ul style="list-style-type: none"> • A Gender Equality Impact Assessment must be therefore be undertaken. Presently the emphasis of any assessment is on female vs. male application comparisons (eg. paragraph 37 of the consultation). However, this clearly misses the point. The risk of discrimination and harassment of women via such 'jobs' and the undermining of the promotion of equality for women by carrying these advertisements, plainly adversely affects women as compared to male jobseekers. <p>Conclusion</p> <ul style="list-style-type: none"> • OBJECT believes that no advertisements for 'adult entertainment jobs' should be carried, whether front line (eg lap dancing, 'escorts' etc) or back of house (DJs, supervisors etc). The current policy is incompatible with the GED 2007, legitimises an exploitative and harmful industry and is based on a flawed legal decision to extend the 2003 Ann Summers ruling.
Individual 1	As the credit crunch bites in more people will be desperate for money or for masturbatory distractions to help them feel powerful. I think it is extraordinary that the jobcentre advertises these jobs or thinks this an acceptable approach to supporting the most disadvantaged people in our society.
Individual 2	<p>Unfortunately jobs of all types are advertised in jobcentres. Many are simply lousy jobs with awful employers who pay the minimum allowed by law. As far as I know the DWP does not inspect advertisers to see if they are complying with health and safety standards, cleanliness and conditions of work. There are no local league tables for good and bad employers. You simply accept all and any adverts. No job advert of any type should be accepted by jobcentres until the place of work has been fully scrutinised. Any job without a trade union should never be accepted.</p> <p>Currently a person wishing to buy a tin of beans gets more info about it than job centres give to the unemployed about jobs. I was on the dole two years ago and my local jobcentre advertised a prostitute's position. I am not opposed to the sex trade but I complained because a vulnerable young woman could easily have been pushed into a life she did not really want by an eager clerk wanting to make the figures look good.</p>
Individual 3	As my previous responses indicate, I do not think that Jobcentre Plus should advertise vacancies in

	the adult entertainment industry.
Individual 5	This consultation is strong in its rigour and efforts to evaluate the issues. However, I would suggest that it could be informed by some insights from gender theory, and ideally its application to legal studies, in order to strengthen the arguments. I thank you very much for your time, and for reading these comments. If there is any way I can be of service, for instance in clarifying any of my arguments, or for details on the scientific studies I have mentioned, please do not hesitate to contact me.
Individual 7	<p>I find the Appendix Questionnaire Part of the Consultation problematic not least because it presents the advertisement of vacancies available in the Adult Entertainment Industry in Job Centres as a fait accompli. I understand completely the legal ruling obtained by the Ann Summers group but would wish that you would appeal that ruling in the High Court rather than sanitise the advertisement of such vacancies with mealy mouthed provisos such as are referred to in the Consultation Document.</p> <p>The legitimisation of such vacancies by their being offered (with provisos for both staff and applicants) is exasperating as we are forced daily to listen to a litany of crimes of violence committed by men against women. Once one becomes aware of gender as a factor in all strata of society, the second class status of women becomes apparent. Despite Equality legislation on the books for over 30 years women remain discriminated against overtly and covertly. They cannot enjoy the freedom to feel safe on the streets and are likely to be the victims of domestic abuse in their homes. Women on the whole do not commit crime, men do. Many of the women working in the Adult Entertainment Industry are working to feed a drug habit and/ or often to support children in their role as single parents.</p> <p>To take a stand against the Ann Summers ruling would have sent out a strong message that the State does not sanction the use and abuse of women by organisations purporting to be offering them the opportunity to earn an honest living. The majority of the population I'm sure would not want any women young or old known them to work in such positions - why is this Mr Habershon?</p> <p>I know why I wouldn't want my daughters to work in the 'Adult Entertainment' Industry as I am perhaps more informed than many as to exactly who the 'Adults' are being entertained and what these men regard as appropriate entertainment. Many people - men and women- despite lack of</p>

	<p>knowledge as to exactly what goes on within these industries still possess a natural reticence to such a proposition arrived at via many routes. Such reticence is born of old age wisdom and should be valid even if it cannot be mobilised in the form of legal representation - that is what we elect our politicians for.</p> <p>I would like to register my strong disappointment that such positions are being advertised in any shape or form in the Job Centre network The fact that such positions must be sanitised, restricted in terms of carrying an assurance that refusal to consider such vacancies will not carry financial penalty in the withdrawal of benefits or indeed from a staff member's point of view, the offering of options not to participate in the promotion of such 'opportunities' should the staff member feel uncomfortable with such a relationship.</p> <p>The very nature of the need for such arrangements indicates why the decision to offer such employment is frankly unacceptable. I look forward to your comments - even more so I look forward to hearing that an Appeal is being lodged against the Ann Summers ruling!</p>
Individual 8	<p>I am most concerned to see that the government is considering allowing the adult industry back into Job Centres. Granted, this industry is increasingly normalised, but I am not convinced that the jobs offered or your assurances that they will not entail physical sexual contact are in any way safe.</p> <p>As a former worker in the adult industry, may I point out that my arguments are based on my own experiences, and the experiences of others I have come into contact with who have also worked within the industry in one form or another. May I also point out that I do not regard objections to the sex industry as 'moral' objections, but rather as tangible, legitimate objections on the grounds of personal safety. Many jobs you may be asked to advertise in the adult industry will be innocuous - receptionists, security staff, even cleaners. However, many are not, and it is the advertising of these jobs that I have grave concerns about.</p> <p>You state that employers will have to sign an assurance that no employee will be expected to perform sexual services that involve physical contact with clients. You also cite two cases (already) where this has caused problems. I feel you are either unaware or unwilling to recognise that many of the jobs</p>

	<p>listed quite obviously do involve physical sexual contact with clients, and I cannot understand why you are attempting to pretend this is not the case by hiding behind a useless scrap of signed paper that essentially says 'I promise I'll be good'. As you have already discovered in one case, employees that do face expectations to perform physical sexual contact are unwilling to press their case (one only has to look at the current 5% conviction rates for rape to see how few people wish to face the added harassment and questioning that a legal wrangle involves), and you then merrily allowed the employer to carry on advertising. This does not bode well.</p> <p>Further to that, are you so naive as to believe that escort agencies and 'adult' masseurs do not offer physical sexual contact? Even a cursory internet search will list thousands of pages of escort services that make it very clear that escort agencies are a thin legalised veneer for prostitution. Indeed, of the 20+ people I know who have worked for escort agencies specifically, every single one has had paid sexual contact with clients and indeed this was simply expected as part of the job. Those that refused on occasion were fired. Again, no complaints were formally made about this very obvious employment discrimination because it is difficult to prove and is not taken seriously. May I also remind you that a job in the adult industry is NOT a job like any other, in that the demand to undertake work you have not agreed to do is not merely insubordination, but sexual harassment, sexual assault and/or rape.</p>
Individual 9	<p>Since the consultation fails to include any question that provides the opportunity to express my particular concerns I have to express them under Item 7, for further general comments.</p> <p>I object to Job Centre Plus handling vacancies for the Lap/Pole Dancing industry, for two main reasons:</p> <ol style="list-style-type: none"> 1. I understand that Lap Dancing establishments commonly do not offer remunerative employment at all, and indeed workers are required to pay the "employer" for the right to work, after which their earnings are paid by punters at the club. This is on a par with pimping in the prostitution industry. 2. I don't believe Job Centre Plus should involve itself with exploitive business to which an arguable majority of people take moral exception.

Individual 10	<p>I feel that this is an industry that introduces vulnerable women and girls into prostitution and, therefore, should not be supported by a state funded institution.</p> <p>I understand that one of your key objectives is to promote work as the best form of welfare but this objective is clearly undermined by your willingness to advertise jobs that so clearly lead to anything but the welfare, physical or mental, of individuals. This industry also directly leads to the harassment and objectification of women and I think this has been ignored in the decision to allow these ads to be featured by you.</p>
Individual 11	<p>These jobs are aimed at the most vulnerable people in our society, who should be protected from such exploitation. It is totally abhorrent to me that the government would facilitate this vile industry in any way and I believe that in doing so, it could be considered to be acting as a pimp. Simply stated, the government should not be doing anything to facilitate this industry.</p> <p>I am outraged that the government would participate and facilitate an industry that does such enormous damage to society and which contributes to the inability of so many men to form and sustain loving and caring sexual and family relationships.</p>
Individual 12	<p>Firstly, I find it objectionable that a Government database is being used to advertise jobs in the adult entertainment industry and that all taxpayers are effectively contributing to the filling of such vacancies.</p> <p>Also, by specifying that jobs are for self employed persons, companies are intentionally distancing themselves from those persons and makes the employer / employee relationship rather tenuous. If the successful candidate is genuinely self employed, how can the company make statements specifying wage details in advertisements?</p> <p>Given the current economic climate, people of age eighteen plus may be prepared or feel obliged to carry out 'additional acts' in this industry for the sake of having a job and having some form of income, without complaining to Jobcentre Plus about the work they are asked to undertake, even if Jobcentre Plus contacts them after their appointment.</p>

I am sure that you are also aware of the report prepared by Harriet Harman, Minister for Women and Equality, on the type of vacancies advertised in her local press and her views on this subject.

It is my opinion that Jobcentre Plus has little or no control over employers in the legal adult entertainment industry or indeed those workers who decide to carry out work for such companies. In addition, there is no control over who is contacting these workers either by telephone or over the internet. The worker without even knowing it may in fact be being stalked online.

Once in the legal adult entertainment industry, it may be little more than a short step into the illegal sex industry where there will be no safeguards whatsoever. Young women not only in the UK but throughout Europe may be distressed about how they are going to manage financially.

As such, they might move from the legal adult entertainment industry into the illegal sex industry, exposing themselves to physical and psychological danger. One only has to recall the deaths of five women in Ipswich who were attacked and murdered by one man and who was convicted last year.

As with all public bodies, Jobcentre Plus must have a duty of care to ensure that the work that it carries out does not place members of the public at risk and should, if it intends to continue advertising jobs in the legal adult entertainment industry must, I feel, carry out risk assessments for all workers that it places in each establishment.

Given that a number of vacancies are advertised as being available nationwide by individual companies, I don't think this is possible and if not, then the Department for Work and Pensions should not, in my opinion, be advertising such jobs in any circumstances.

In relation to lap dancing clubs, I believe they promote gender stereotypes and attitudes that say it is acceptable to treat women as sexual objects, rather than real people. Accordingly, they are linked to gender discrimination and sexual harassment in the workplace.

The matter of Jobcentre Plus advertising these vacancies has been highlighted in the press several

times, the most recent of which I read in the Scotland on Sunday newspaper, 4 .1.09 and the Daily Express, 10.2. 09.

The subject has also been raised by Denise Marshall, of the Poppy Project, when she advised the Commons Home Affairs Select Committee that women as young as 17 were being offered jobs in the sex industry (BBC News 29 April 2008).

According to The Guardian on 29.4.08, a rapid expansion of lap-dancing clubs across the UK has been allowed by the government despite concerns about links with prostitution and human trafficking.

Members of the home affairs committee have also criticised the practice. "I am not happy at the government promoting this sort of inappropriate work for women," said Labour MP Ann Cryer. "I did not know this was happening and I hope the jobcentres will rethink it." (The Guardian, 30.4.08).

A coalition of MPs, peers, government advisers and think-tanks says that lap dancing has exploited the 2005 Licensing Act - a flagship piece of government legislation - allowing hundreds of new clubs to open in the face of opposition from councils, residents and police'.

Even Amnesty International considers lap dancing clubs in the UK are dangerous places for women to be working.

Though lap-dancing clubs are currently licensed in the same way as bars and pubs, I understand that under new legislation they will be classified in the same way as sex establishments and the proposed changes in the Policing and Crime Bill and are welcomed.

Mr Purnell, DWP Secretary, defended Jobcentre Plus in March 2008, claiming the adverts were legal and that Jobcentre Plus has the duty to comply with anything that is legal.

After the Ann Summers judgement, several politicians of all parties have, over a period of time, raised the matter of adult entertainment industry vacancies being advertised through Jobcentre Plus and in

	light of this Consultation, the Government should take the appropriate steps to ensure that these jobs are removed from the Jobcentre Plus Job Search database.
Individual 13	<p>On reading this consultation document, my instant reaction is that this is a surreal exercise. I am shocked and dismayed that a government department would engage in the processes of exploitation of individuals as outlined in this document. It beggars belief that a government department would seek to engage in the dehumanisation processes of the so called "Adult Entertainment" industry by assisting their recruitment procedures.</p> <p>Research show that a significant number of individuals who are exploited in this way have a background of poverty, addiction, abuse and violence. In Britain to-day we can surely offer more help and support to ensure positive developments offering life sustaining employment and training. Do not let us delude ourselves that this employment is harm free. We know this is not the case. There is a high risk of physical injury. Physiological break-down and distress goes with the territory.</p> <p>The adult entertainment (sic) industry has long promoted a strategy of normalisation of their exploitation. This is yet another attempt to confuse the issue. This road leads to a brutalisation of the unemployed, and is against any humane, civilised principals Individuals drawn to this so called employment, due to need, rather than choice.</p> <p>I am shocked at the resources that have been already utilised in this consultation, which is totally at odds with all government equality policies.</p> <p>I am a retired senior addiction worker, previously being employed in Social Work Service, Glasgow for twenty five years. I also have a Diploma in Cognitive Behaviour Therapy, and am currently pursuing a degree in Social Sciences at Strathclyde University.</p> <p>I have a professional experience of engaging with individuals engaged in this crushing exploitation, and have witnessed the trauma they experience.</p>
Individual 14	I believe that Jobcentre Plus has no right advertising jobs in the adult entertainment industry. I also believe that there is a big difference between working in a shop such as Ann Summers and working

	<p>as a lap dancer or escort, even though both jobs would be considered under the same remit.</p> <p>The adult entertainment industry is heavily biased towards men, creating a culture of sexual inequality. It is all about young women being available to sexually stimulate men for money, whether touching is involved or not. The implications for abuse and inequality are far reaching.</p> <p>By advertising these jobs in job centres it is saying that sexual inequality is perfectly OK and is a career route for young women, therefore my objections are chiefly on the grounds of equality and human rights, and my answers to the question below (from the consultation document) are:</p> <p>The Gender Equality Duty came into force in April 2007. Do you consider that this policy and associated processes pays due regard to the duties to:</p> <ul style="list-style-type: none"> • promote gender equality? No • eliminate harassment? No • eliminate sex discrimination? No
Individual 15	<p>I am an independent Professional Researcher, specialising in male violence against women.</p> <p>I do not accept the term 'Adult Entertainment Industry' since it is not only offensive but also serves to invisibilise the deliberate commercial male sexual exploitation and widespread male sexual abuse of women working within the Sex Industry. The correct terminology is 'The Sex Industry' because this describes Lap Dancing, Pole Dancing, Web Cam Performers and Topless Bar Staff.</p> <p>All these types of employment are carried out by women not men and their sole purpose is to sexually titillate and cater to men's sexual entertainment. (J. Bindel: Profitable Exploits: Lap Dancing in the UK, Child and Women Abuse Studies Unit, London Metropolitan University for Glasgow City Council, 2004).</p> <p>One question omitted from this consultation is whether or not The Sex Industry should be permitted to advertise in Jobcentreplus given the Sex Industry itself readily acknowledges their speciality is</p>

providing naked female women as sexual commodities for male entertainment and even sexual access in the form of prostitution. (See The Industrial Vagina by Sheila Jeffreys, 2009: 95).
http://www.stripmagazine.com/mmagazine/new_welcome.php?subaction=showfull&id=1188506362&archive=&start_from=&ucat=2&category=2)

Whilst this Consultation focuses on Jobcentreplus advertising Sex Industry vacancies which effectively normalises the commercial sexual exploitation of women and enforces gender inequality, the Police and Crime Bill currently going through parliament will criminalise men who buy prostituted women if these women are 'controlled.'

The government is sending a confusing message wherein there are ongoing measures to reduce gender inequality and male commercial sexual exploitation of women, whilst simultaneously the Sex Industry is being allowed to advertise vacancies which promote and normalise the sexual exploitation and commodification of women as men's sexualised dehumanised playthings.

The High court ruling – Ann Summers Ltd. V Jobcentreplus which resulted in Jobcentreplus having to accept vacancies from Ann Summers takes no account of the fact these vacancies did not and still do not involve female staff removing all their clothes; performing sexualised dances for male customers or engaging in sexual acts. Ann Summers employee's sole role is to sell sex products to customers and this is totally different from The Sex Industry wherein women working as lap dancers reinforce gender inequality and ensure male sexual dominance and pseudo belief men as a group are entitled to have naked women sexually service them. In other words the Sex Industry cannot be separated out from commercial prostitution because the Sex Industry's sole role is in providing women's bodies for men to sexually consume and abuse.

<http://www.guardian.co.uk/lifeandstyle/2008/feb/29/women.ukcrime> and also
<http://www.fawcettsociety.org.uk/documents/SATC%20manifesto%20public.pdf>

If the Sex Industry is allowed to continue to advertise vacancies at Jobcentreplus branches this effectively means the Government has become a state authorised Pimp by colluding with prostitutes

(males who buy women's bodies for the purpose of sexual exploitation and sexual violence). Yet the Gender Equality Duty Act supposedly promotes gender equality. I see no gender equality when The Sex Industry is allowed to advertise vacancies which normalise the continuing male sexual commercial exploitation and dehumanisation of all women.

Activities such as lap dancing are harmful to the individual women involved and also have a negative effect on the position of all women through the male objectification and dehumanisation of women's bodies. This occurs irrespective of whether not individual women claim lap dancing etc. is 'empowering.' Jobseekers are not a gender neutral group because we cannot ignore the fact The Sex Industry is targeting women to work as lap dancers, pole dancers, web cam performers or 'masseurs.' All of these industries are gateways into prostitution and as such are illegal activities. See Adult Entertainment (sic) Working Group Report by The Scottish Executive, 2006. http://www.object.org.uk/downloads/Scottish_Executive2006.pdf

The difference between the term 'adult entertainment' and 'The Sex Industry' is that the latter is solely concerned with the sexual exploitation of women. Sexual exploitation occurs when it breaches a person's human right to dignity, equality, respect and physical and mental wellbeing. It becomes commercial sexual exploitation when another person or group of people, achieves gain or advancement through the activity.

Commercial sexual exploitation is a multi-billion dollar business which encompasses pornography, internet chat rooms, sex phone lines, escort services, prostitution, trafficking into prostitution, peep shows, lap dancing, table dancing and stripping. All of the above activities are gendered in that overwhelmingly, it is women who are paid and men who pay. The fact there are some male strippers or that women may sometimes pimp other women in prostitution does not negate the fact such sexual commercial exploitation is gendered. (See www.uri.edu/artsci/wms/hughes/).

Is it therefore acceptable that Sex Industry vacancies should be allowed to be advertised in Jobcentreplus branches and which said vacancies are overwhelmingly directed at women, who accept such positions because there is no other work available to them. Is it acceptable that there

	<p>should be a large number of women made available for male customers to sexually exploit and often commit rape and other forms of sexual assault?</p> <p>This is not gender equality but systematic state condonement and acceptance that women's rights are irrelevant because an undetermined number of women must be made available for men's sexual exploitation, commodification and consumption.</p>
Individual 16	<p>I find it incredible enough in the 21st century that the media generally appears to consider women's equality to consist of having access to pole dancing classes or working naked in sex encounter establishments. That the government is giving credence to this systematised and institutionalised belittling and degradation of women is beyond belief.</p> <p>Not only does this practice clearly breach the Gender Duty Act Of 2007, it gives the lie to government claims to support women's rights. In a climate where rape goes virtually unpunished, 1 in 5 people believe a woman is to blame if she is raped, where most counties of the UK do not provide services for rape victims, and where it is seen as perfectly fine for women and girls to focus their self esteem solely on gaining male attention for prancing naked - and thereby providing an invitation to the male population to view women primarily as sex objects - is this really something the government should be doing?</p> <p>Would you be happy with your daughter getting such a job? And think of the parallels - many black American slaves colluded with their 'owners' to disparage the Anti-Slavery Movement. Did this make the Anti-Slavery Movement wrong to try to abolish slavery?</p> <p>Why are you bothering even to pose the question - you should already know the answer.</p>
Individual 17	<p>I do not believe there is a legal basis for extending a decision relating to a chain of retail lingerie and sex toy shops to virtually the entire sex industry. Ann Summers shops hold retail licences and are not licensed as sex shops. The core function of an Ann Summers shop is to sell articles to customers for their use, not to actually provide services of a sexual nature. Employment within an Ann Summers shop is therefore entirely different from selling sexual stimulation (and sexual 'services' in many cases) in a lap dancing club, 'escort' agency, 'massage parlour', strip web cam, chat line etc. For this</p>

	<p>reason I dispute DWP's 2003 decision to accept advertisements for all `adult entertainment employers' on the basis of the Ann Summers ruling.</p> <p>By carrying advertisements for `AE jobs' the DWP is essentially acting as a recruitment outlet for pimps and legitimising `jobs' – many of which are fronts for prostitution. The serious contradiction between legitimising an industry by carrying its advertisements and then stating that `safeguards' are in place / employers offering illegal services will be removed are not addressed by the consultation document.</p>
Individual 18	<p>The short answer is 'I think it stinks'. The longer version is that, as a woman, I find it offensive and discriminatory that Jobcentre Plus should be encouraging people to participate in trades where women are harassed and abused for cash. I have suffered from sexual harassment many times while simply working in ordinary offices and I dread to think what sex industry workers placed by Jobcentre Plus must be having to endure.</p> <p>The fact that Jobcentre Plus was prepared to take on sex industry vacancies horrified me at the time it was forced upon the agency by the Ann Summers ruling, and I greatly welcome this consultation as an opportunity to address the issues and hopefully stop this practice.</p> <p>I would be interested to hear about the results of the consultation and any resulting action by the DWP.</p>
Individual 19	<p>I do not believe there is a legal basis for extending a decision relating to a chain of retail lingerie and sex toy shops to virtually the entire sex industry. Ann Summers shops hold retail licences and are not licensed as sex shops. The core function of an Ann Summers shop is to sell articles to customers for their use, not to actually provide services of a sexual nature. Employment within an Ann Summers shop is therefore entirely different from selling sexual stimulation (and sexual `services' in many cases) in a lap dancing club, `escort' agency, `massage parlour', strip web cam, chat line etc. For this reason I dispute DWP's 2003 decision to accept advertisements for all `adult entertainment employers' on the basis of the Ann Summers ruling.</p> <p>By carrying advertisements for `AE jobs' the DWP is essentially acting as a recruitment outlet for</p>

	<p>pimps and legitimising `jobs' – many of which are fronts for prostitution. The serious contradiction between legitimising an industry by carrying its advertisements and then stating that `safeguards' are in place / employers offering illegal services will be removed – are not addressed by the consultation document.</p> <p>I urge the DWP to reverse its policy of accepting and advertising positions from within the `AE industry' because of its negative impact on gender equality and because doing so legitimises an industry which for many women involves abuse, violence and harm.</p>
Individual 20	<p>I do not believe there is a legal basis for extending a decision relating to a chain of retail lingerie and sex toy shops to virtually the entire sex industry. Ann Summers shops hold retail licences and are not licensed as sex shops. The core function of an Ann Summers shop is to sell articles to customers for their use, not to actually provide services of a sexual nature. Employment within an Ann Summers shop is therefore entirely different from selling sexual stimulation (and sexual `services' in many cases) in a lap dancing club, `escort' agency, `massage parlour', strip web cam, chat line etc. For this reason I dispute DWP's 2003 decision to accept advertisements for all `adult entertainment employers' on the basis of the Ann Summers ruling.</p> <p>By carrying advertisements for `AE jobs' the DWP is essentially acting as a recruitment outlet for pimps and legitimising `jobs' – many of which are fronts for prostitution. The serious contradiction between legitimising an industry by carrying its advertisements and then stating that `safeguards' are in place / employers offering illegal services will be removed – are not addressed by the consultation document.</p> <p>I urge the DWP to reverse its policy of accepting and advertising positions from within the `AE industry' because of its negative impact on gender equality and because doing so legitimises an industry which for many women involves abuse, violence and harm.</p>
Individual 23	<p>I am totally opposed to the objectification and use of other people's bodies, which means their actual selves as the body cannot be distinguished from the person, for pay. It demeans those whose bodies are used in this way. I know that many women enter this 'industry' as a better-paid alternative to other worse-paid work. However, if one imagines a similar arrangement e.g. the use of black people's black</p>

	<p>skin by white people on a paid basis, one can see how demeaning and objectionable such an idea would be, and one that government agencies certainly could not promote.</p> <p>There is also the fact that normalisation of the 'adult industry' tends to normalise activities on the edges of it e.g. pimping, violent attacks, trafficking of women and girls.</p>
Individual 25	<p>I do not believe there is a legal basis for extending a decision relating to a chain of retail lingerie and sex toy shops to virtually the entire sex industry. Ann Summers shops hold retail licences and are not licensed as sex shops. The core function of an Ann Summers shop is to sell articles to customers for their use, not to actually provide services of a sexual nature. Employment within an Ann Summers shop is therefore entirely different from selling sexual stimulation (and sexual 'services' in many cases) in a lap dancing club, 'escort' agency, 'massage parlour', strip web cam, chat line etc. For this reason I dispute DWP's 2003 decision to accept advertisements for all 'adult entertainment employers' on the basis of the Ann Summers ruling.</p> <p>By carrying advertisements for 'AE jobs' the DWP is essentially acting as a recruitment outlet for pimps and legitimising 'jobs' – many of which are fronts for prostitution. The serious contradiction between legitimising an industry by carrying its advertisements and then stating that 'safeguards' are in place / employers offering illegal services will be removed – are not addressed by the consultation document.</p> <p>I urge the DWP to reverse its policy of accepting and advertising positions from within the 'AE industry' because of its negative impact on gender equality and because doing so legitimises an industry which for many women involves abuse, violence and harm.</p>
Individual 26	<p>I felt very strongly that I wanted to comment on this consultation as an individual.</p> <p>I think putting pressure on unemployed women to work in the AE industry is very wrong. By advertising these vacancies you ARE putting pressure on women to apply to work in a dangerous and exploitative industry.</p> <p>I think the very term "Adult Entertainment Industry" is wrong, as it seeks to legitimise the sex industry.</p>

	<p>The risks and harm caused by the sex industry is well known. And this attempt to bring the sex industry into job centres - which are there to help individuals find employment is putting them at risk - and likely to cause harm.</p> <p>I'd also question whether this really fits with the governments position on gender equality and sexual discrimination. This industry depends on the sexualisation and sexual objectification of women and girls, which has far-reaching impacts throughout society. The End Violence Against Women Coalition has called on the government to help end this sexualisation as it does increase violence. And the proposal to advertise AE vacancies in job centres instead increases this.</p> <p>In these uncertain economic times, many women will be needing to use the services of Job Centre Plus. The idea that were I to become unemployed, I would be asked to consider working in AE is very disturbing. I do not believe this is the same as asking me to work in shops such as Ann Summers which are providing articles for sale to be used by individuals off the premises. Asking me to provide services of a sexual nature is legitimising jobs which are a front for prostitution.</p> <p>Please take this into account as part of the consultation.</p>
Individual 27	<p>I've only just been informed about this consultation. I haven't had a chance to read it all but I found out a while back about such job adverts possibly being in public job centres and was absolutely appalled. No human should be expected to exploit themselves in this way and I really do hope that unemployed people are not being pressured into such jobs by the threat of losing their benefits. I will look into this issue more closely and write to my MP etc. Such jobs are harmful to society, presenting human beings as objects, with no concern for their feelings as individuals and being merely there to be used by other people.</p> <p>This harms our relationships in society and is related to all forms of violence and coercion against people, not just sexual violence. Aside from this, no person must be pressured into this sort of work - it can surely only lead them into worsening feelings about themselves and their value as well as making others feel it is acceptable to use other people for their own gratification with no regard for the other person.</p>

Individual 28	I object to jobs in the sex industry being advertised at job Ctr this puts vulnerable people at risk.
Individual 29	I couldn't believe it when I heard today that there was consultation to advertise jobs in the sex industry. This would surely put pressure on women to go for interviews in jobs they would never normally apply for just to satisfy government demands to get the unemployed back to work. This is totally wrong and the Job Centre is not the place to advertise this sort of job.
Individual 22	<p>I do not believe there is a legal basis for extending a decision relating to a chain of retail lingerie and sex toy shops to virtually the entire sex industry. Ann Summers shops hold retail licences and are not licensed as sex shops. The core function of an Ann Summers shop is to sell articles to customers for their use, not to actually provide services of a sexual nature. Employment within an Ann Summers shop is therefore entirely different from selling sexual stimulation (and sexual 'services' in many cases) in a lap dancing club, 'escort' agency, 'massage parlour', strip web cam, chat line etc. For this reason I dispute DWP's 2003 decision to accept advertisements for all 'adult entertainment employers' on the basis of the Ann Summers ruling.</p> <p>By carrying advertisements for 'AE jobs' the DWP is essentially acting as a recruitment outlet for pimps and legitimising 'jobs' – many of which are fronts for prostitution. The serious contradiction between legitimising an industry by carrying its advertisements and then stating that 'safeguards' are in place / employers offering illegal services will be removed - are not addressed by the consultation document.</p> <p>I urge the DWP to reverse its policy of accepting and advertising positions from within the 'AE industry' because of its negative impact on gender equality and because doing so legitimises an industry which for many women involves abuse, violence and harm.</p>
Individual 21	<p>The Ann Summers ruling of 2003 can be heavily disputed. To accept adverts for prostitutes and lap dancers, for example, based on a court case relating to jobs selling adult material at parties and in shops, is absurd.</p> <p>The DWP contradicts itself by offering positions within the 'adult entertainment industry' then willingly taking precautions to reduce the blatant and known risks associated with it, such as 'safeguarding' the</p>

	<p>positions.</p> <p>Although the Jobcentre claim that no-one would be forced to take a position in the sex industry, when an individual has been assessed and matched to jobs, and the advertisers are posting legitimate adverts, why should the individual not be expected to try the job if it is considered suitable for them? At what point, therefore, would a woman be pressurised, or even forced to take a sex industry position over receiving benefits, and if individuals are not offered these jobs, would the advertiser not take issue if their position was not offered/treated the same way as any other legitimate Jobcentre position?</p> <p>Some of these roles are quite clear in their nature; others are obvious fronts for prostitution. There are too many potential issues with this decision, which has ultimately allowed the Jobcentre to act as an advertising outlet for 'pimps' and in the opinion of many, has turned a government agency into a 'pimp' also. I urge the DWP to reverse the decision to accept adverts from the sex industry.</p>
<p>Letter of response signed by 198 members of the public as part of a demonstration that took place outside Brixton Jobcentre Plus office on 26 March 2009</p>	<p>"I believe that as a government agency, Job Centre Plus should not be advertising jobs for the sex industry such as 'masseurs', 'escorts', 'web cam strippers' or 'lap dancers' as these jobs often involve abuse and violence and they send out harmful messages about women.</p> <p>Advertising jobs for women to sexually stimulate men by stripping for them and / or providing sexual services for them promotes the idea that women are sexual objects who can be bought and sold and who are always sexually available for men.</p> <p>These attitudes are dangerous when we live in a society in which 1 in 3 women experiences sexual harassment or stalking in the course of her lifetime (British Crime Survey, 2004).</p> <p>The government is required to protect the rights of women to be free from violence and sexual harassment and to be seen as equals with men. The government should not be promoting jobs to women which often involve violence and abuse and which send out a message that women are sexual objects who can be bought and sold."</p>

Appendix 1 - Eaves Response: Examples of vacancies which do not meet Jobcentre Plus policy

Please note that the content below is taken directly from the JC+ website, and is just a sample of job advertisements that clearly violate JC+ agreed 'safeguarding' policy for advertising vacancies in the 'adult entertainment industry'. The yellow highlights indicate the relevant violations.

www.jobcentreplus.gov.uk (05 March 2008)

Job Title: ADULT CHAT HOST ref: HAL/58081

Location
NATIONWIDE

Hours
DAY/EVENING/NIGHT SHIFTS AVAILABLE

Wage
UP TO £50 PER HOUR

Work Pattern
Days , Evenings , Nights , Weekends

Employer
Bluewatch.mobi

Closing Date
30/04/2008

Pension
No details held

Duration
PERMANENT ONLY

Description

18+ Due to the nature of business. No experience necessary as full training/support will be provided. Must be enthusiastic with a broadminded attitude towards the adult entertainment industry. Duties will include working from home or in a Studio on the phone or via internet web cam role playing with adult callers using sexually explicit dialogue. Will be dealing with mainly male callers but employer will accept applications from both sexes. Applicants will be specifically dealing with adult material and as such if web cam option chosen will involve working in the presence of nude adult images, which may cause embarrassment. Please note that there is no obligation to consider making an application for this vacancy. Proof of age photo I.D required. EXEMPTED VACANCY - EMPLOYMENT EQUALITY ACT (AGE) REGULATIONS 2006.

Proof of age photo I.D required to be taken to interview.

How to apply

You can apply for this job by telephoning 0178 2413304 ext 0 and asking for Paul Edge.

If you are looking for work, [Tax Credits](#) could top up your earnings

This vacancy meets the requirements of the National Minimum Wage Act

www.jobcentreplus.gov.uk (05 March 2008)

Job Title: DANCERS ref: DUM/8834

Location
DUNFERMLINE, FIFE

Hours
10 HOURS PER WEEK, BETWEEN 9PM-2AM, FRIDAY AND SATURDAY.

Wage
MEETS NATIONAL MINIMUM WAGE

Work Pattern
Days , Evenings , Nights , Weekends

Employer
Private dancer Ltd

Pension
No details held

Duration
PERMANENT ONLY

Description

Vacancy not suitable for under 18's. No experience necessary. Working in a lap dancing club duties will include pole dancing and lap dancing which may cause embarrassment to some people More information on application. There is no obligation to consider making an application for this vacancy. However, if you feel it is suitable for you, please discuss it further with an adviser. Self-employed people are responsible for paying their own National Insurance contributions and Tax. For information on how benefits are affected, and whether entitlement may be lost, speak to a Jobcentre Plus Adviser.

How to apply

You can apply for this job by telephoning 01383 730500 or 07967 193054 and asking for Tanya Henderson.

If you are looking for work, [Tax Credits](#) could top up your earnings

This vacancy meets the requirements of the National Minimum Wage Act

Jobsearch Wednesday 6 August 2008

- Job Title
- LAP DANCER
- LOS/21823

Location
LINCOLN, LINCOLNSHIRE

Hours
20-36 A WEEK BETWEEN MONDAY-SUNDAY 9PM-3.30AM

Wage
EXCEEDS NAT MIN WAGE

Work Pattern
Days , Evenings , Nights , Weekends

Employer
Cloud 9

Pension
No details held

Duration
PERMANENT ONLY

Description

Self employed. Applicants must be aged 18 or over. To apply for this vacancy you must contact your local Jobcentre Plus Office to arrange an interview with an adviser. Duties require the successful applicant to be nude/semi nude. There is no obligation to consider making an application for this vacancy. Self-employed people are responsible for paying their own National Insurance contributions and Tax. For information on how benefits are affected, and whether entitlement may be lost, speak to a Jobcentre Plus Adviser. EXEMPTED VACANCY - EMPLOYMENT EQUALITY ACT (AGE) REGULATIONS 2006.

How to apply

You can apply for this job by telephoning 07979 510993 or 01522 822233 and asking for Mr Alex Buchanan.

If you are looking for work, [Tax Credits](#) could top up your earnings

This vacancy meets the requirements of the National Minimum Wage Act

Job Title

FEMALE ADULT WEBCAM OPERATOR

NHM/37956

Location
NORTHAMPTON, NORTHAMPTONSHIRE

Hours

40 PER WEEK, MONDAY TO FRIDAY, BETWEEN 9AM AND 5PM

Wage

£11481 PER ANNUM PLUS COMMISSION

Work Pattern

Days

Employer

Live Lines UK Ltd

Closing Date

28/08/2008

Pension

No details held

Duration

TEMPORARY ONLY

Description

Applicants must be female, aged 18+, enthusiastic, punctual, creative and confident. Therefore, please ignore the 'How to apply' section. Duties involve entertaining adult customers on webcam in a sexual manner and chatting live to adult customers one-to-one. Duties require the successful applicant to be nude/semi nude and involve explicit sexual dialogue which may cause embarrassment to some people. The commission rate is 15p per minute for private webcam chat. 10p per minute for group webcam chats and 14p per minute for live chats. Exempted vacancy - employment Equality Act (Age) Regulations 2006.

How to apply

You can apply for this job by telephoning 01604 824290 or 07984 817002 and asking for Miss Lauren Jones.

If you are looking for work, [Tax Credits](#) could top up your earnings

This vacancy meets the requirements of the National Minimum Wage Act

18 December 2008

Job Title

MALE & FEMALE LAP DANCERS

MHH/10458

Location

NATIONWIDE

Hours

18 TO 20 HOURS A WEEK OVER 3 DAYS FROM 7 EVENINGS, NIGHTS

Wage

NATIONAL MINIMUM WAGE OTE £500 PER NIGHT

Work Pattern

Days , Evenings , Nights , Weekends

Employer

Revolver Models 'SEE NOTEPAD'

Pension

No details held

Duration

PERMANENT ONLY

Description

Applicants must be 18 or over. Experience preferred but not essential as training can be given. Must be able to travel as will be working on a road show and in clubs. Must have no problem with nudity as the job involves successful applicant to be topless and in the presence of nudity, which may cause embarrassment. Please note that there is no obligation to consider making an application for this vacancy. However, if you feel it is suitable for you, please discuss it further with an adviser. Hours to be discussed and agreed with employer to meets business needs. EXEMPTED VACANCY - EMPLOYMENT EQUALITY ACT (AGE) REGULATIONS 2006.

To apply please send an email expressing interest in position with full name and contact details.

How to apply

You can apply for this job by sending a CV/written application to Recruitment at Revolver Models 'SEE NOTEPAD', 23 King Johns Road, Clipston Village, Mansfield, Notts, NG21 9EN, or to mail@revolvermodels.co.uk.

Appendix 2 - Eaves Response: Statement by Eaves employee when applying for Table/Lap Dancers vacancy

Statement by Eaves employee: On 17th December 2008 I called the Jobcentre Plus jobseekers direct phone line and enquired about the job detailed below. I gave them my name, an old address and an incorrect national insurance number. When I asked why they needed these details I was told "in case we need to send you a form". I was not asked anything about my age or my suitability for the job. I was given the address in Leeds, informed that the job was for Cherrywest and that I should go and ask for 'Ellie'.

Job Title

TABLE/LAP DANCERS

LPP/35581

Location

LEEDS, WEST YORKSHIRE.

Hours

36 PER WEEK, 4 DAYS FROM 7, BETWEEN 9PM-6AM.

Wage

£150 PER SHIFT

Work Pattern

Days , Evenings , Nights , Weekends

Closing Date

19/12/2008

Pension

No details held

Duration

PERMANENT ONLY

Description

"MUST BE AGED 18 OR OVER". "To apply for this vacancy you must contact your local Jobcentre Plus Office to arrange an interview with an adviser. Therefore, please ignore the 'How to apply' section" Previous experience in a similar environment would be an advantage. You will need a photograph, ID and proof of address. Duties to include, table and lap dancing in an adult club. "There is no obligation to consider making an application for this vacancy"

How to apply

For further details about job reference LPP/35581, please telephone Jobseeker Direct on 0845 6060 234. Lines are open 8.00am - 6.00pm weekdays, 9.00am - 1.00pm Saturday. All calls are charged at local rate. Call charges may be different if you call from a mobile phone. Alternatively, visit your local Jobcentre Plus Office and use the customer access phones provided to call Jobseeker Direct. The textphone service for deaf and hearing-impaired people is 0845 6055 255.

If you are looking for work, [Tax Credits](#) could top up your earnings

This vacancy meets the requirements of the National Minimum Wage Act.

Appendix 3 - OBJECT Response: Advice from legal counsel (specialised in Public Law)

The case of **R (on the application of Ann Summers) v Jobcentre Plus** does not in my opinion have general application beyond the type of retail outlet that sells the range of goods typical of an Ann Summers store. This case turned almost exclusively on the rationality of the adopted policy in relation to that type of operation. There is indeed a world of difference between such an outlet and the type of establishments that should be the subject of appropriate discrimination in the public interest. In this regard I believe that vacancies in massage parlours, escort and kissogram agencies, striptease artists, models for blue films and magazines, performers in sex shows and vacancies for work roles directly associated with the publication or dissemination of pornographic material should not be advertised in Jobcentre Plus not least because people should not be expressly or impliedly encouraged to participate in this type of industry (and should most certainly not have to justify their objection so to participate).

I believe this to be the case whether or not Jobcentre Plus chooses to withdraw express notification, encouragement and sanctioning in relation to any such advertisement. Nothing in the above case prevents Jobcentre Plus from adopting a policy that appropriately rejects advertisements for jobs in the sex industry that are or exploitative or which tend to promote exploitation and female objectification and which are wholly repugnant to gender equality principles.

Thus, looking at the findings of Newman J I would comment that whilst it is entirely appropriate for Jobcentre Plus to take into account the benefits which might accrue to jobseekers who would be prepared to take up employment in the sex industry and also the extent of its legal obligation to assist employers to fill vacancies it is nevertheless bound also to balance against this the extent to which it should be seen not to encourage activities that promote, either directly or insidiously, the exploitation and objectification of women. In this regard it is appropriate to have regard to the learned Judge's comment in para.45 of the judgment:

- "For completeness I should add that I have not forgotten that [counsel] drew the Court's attention to the past difficulties which had arisen where advertisements had not accurately described a business and where jobseekers had experienced the misfortune of discovering the true character of their new employer. For example, where they had accepted employment in a massage parlour or in escort services. These are real difficulties which, so far as possible, must be avoided but so far as they have been relied upon in connection with the taking of Ann Summers' advertisements, they are a long way from the substance of the reasons given for the policy and decision"

LEGAL ADVICE UNDERTAKEN ON BEHALF OF OBJECT 25.03.09

Appendix 4 – OBJECT Response: Statement from ‘Katie’, January 2009

“I wasn't aware that massage parlours and escort agencies were advertising at Jobcentre Plus. However, the escort agency and the massage parlour I worked at (for massage parlour read brothel) I found through my local paper, so I am sad to hear it but not surprised...

As a survivor of the sex industry in the UK - I worked as an escort and later in a brothel - I have found it almost impossible to find any validation of my absolute belief (from firsthand experience) that the sex industry is not empowering or liberating for women, and that the mainstreaming of pornography and women as objects does immense damage. Talk of 'choices' for women caught in the trap is meaningless: as a sex worker one is in the unenviable position of having to defend the indefensible - clients and the people making money from you simply won't entertain the truth. All of the women I worked alongside had drug or alcohol abuse problems and or a history of sexual abuse or mental health problems.

But I have found that people are unwilling or unable to listen when I have tried to open up about the truth behind the lies of the sex industry: I have been told 'it's not illegal' (pornography), 'men just do that' and that maybe I had a bad experience but the other women involved have chosen it - I need to 'get over it' and 'accept how things are', that I can't change things. I have found myself isolated and felt utterly hopeless with it. I am still trying to get over the emotional damage that working as a prostitute has done me”.