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Empowering, Degrading or a ‘Mutually Exploitative’ Exchange For Women?:
Characterising the Power Relations of the Strip Club

By Katy Pilcher

Abstract
This paper seeks to characterise the gendered and sexualised power relations of both female and male strip clubs, and to signal what this means for establishing positive definitions of female desire. It is argued that while it is not useful to present female strippers, or female patrons of male strip clubs as purely passive victims of male heterosexism within these venues, it is equally damaging to assume that these venues represent a whole-scale challenge to conventional oppressive gender and sexual relations for women. Some research has even suggested that both strippers and their patrons are engaged in a ‘mutually exploitative’ power relationship. Moreover, further empirical research documents key points where female dancers have perhaps wielded ‘more’ power over patrons at certain moments, and female dancers have highlighted feelings of empowerment and highlighted potential for gender and sexual relations which position women as passive to be subverted within stripping. However, such feelings are often temporally specific and are not applicable to all women in the strip industry. It may be particularly hard for these to manifest in women concentrated in the least economically-rewarding areas of the industry who have less ‘power’ to resist compromising their bodily boundaries. Furthermore, it is argued that women watching male strippers does little to reverse the ‘male gaze’, and nor does this male occupation carry as much negative social stigma with it as female stripping suffers. It is thus argued that the overwhelming picture, stemming largely from accounts of former dancers and from empirical studies of individual clubs, suggests these venues in fact do very little to challenge normative hetero-oppressive sexual scripts.

Keywords: strip club, power, gender

Strippers, and sex workers more generally, ‘embody one of the most contradictory locations’ in Western society (Spivey 417). They are at one and the same time charged with replicating and reproducing the sexual objectification of women through endorsing dominant constructions of heterosexuality, while a diametrically opposing stance would suggest that stripping may actually empower women. Invoking such views, radical feminists and sex libertarians have respectively been engaged in the ‘feminist sex wars since the 1980s. The strip club has been described as a place where men watch a female stripper, or ‘exotic dancer’, remove ‘all or most of her clothing in a sexually suggestive fashion to a paying audience’ (Bernard et al 2). A variety of power relations exist within the strip club and similar locales, not only between the stripper and client, but also between the strippers themselves and with management and the wider legal authorities. Such complex power relations make any simple suggestion that power is a ‘zero-sum’ game, solely in the hands of one party, difficult. More recently the emergence of male

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1 Katy Pilcher wrote this essay during a Sociology degree at Warwick University. Having completed an MA in Social Research (with distinction) at Warwick University last year, she is now undertaking an ESRC-funded PhD there.
stripping has posed a challenge to the idea that strip clubs represent a microcosm of wider male heterosexual dominance over women. Moreover, with writers such as Smart claiming there now exist a variety of ‘heterosexualities’, it could be questioned whether her suggestion is applicable to stripping, in that the strip club may actually present one way in which women can positively express, rather than be repressed by, heterosexuality. However, it will be argued that such possibilities of transformations in conventional power relations within the strip club arena are somewhat optimistic, as both female and male strip clubs reproduce normative heterosexist scripts to a great extent.

Heterosexuality, the coupling of men and women together, has typically been ingrained within Western culture. Such embeddedness has nonetheless been named and challenged by Adrienne Rich, who challenged the traditional assumption of heterosexuality as being the natural norm for human beings. Rich viewed heterosexuality as an institution which was maintained as the sexuality, the ‘compulsory’ heterosexuality, through a variety of powerful societal sanctions. She suggested that, unlike men, ‘women lack the collective power to determine the meaning and place of sexuality in their lives’ (237). Such an idea has been furthered by Holland et al, who argue that heterosexuality, rather than being concerned with male and female sexuality simultaneously, effectively ‘is masculinity’. From their empirical research, these authors conclude that heterosexuality is a single standard which systematically privileges men. They claim women possess a ‘male-in-the-head’; an institutionalised notion of what heterosexuality entails, which, far from expressing any positive female-defined sexuality, centres around male pleasure and ultimately reproduces ‘male dominance’. Similarly, for Jackson, heterosexuality should be critiqued for its ‘heteronormativity’, namely ‘the normative status of heterosexuality which renders any alternative sexualities ‘other’ and marginal’; and secondly, for its ‘hetero-patriarchal’ or ‘hetero-oppressive’ status, which makes heterosexuality ‘systematically male dominated’ (163). Using this idea of heterosexuality privileging male pleasure and not encompassing same-sex sexualities, it will be questioned to what extent the strip club invokes or indeed perhaps challenges such oppressive power relations.

For many radical feminists the strip club merely replicates conventional ‘power dynamics in mainstream society’ through which men hold considerable power over women (Ronai and Ellis 295). Strip clubs are viewed as reproducing the patriarchal construction of women as ‘ubiquitously available sex objects’ (Pasko 64). Following her personal experience of a career in stripping, Holsopple, suggests strip clubs not only reproduce heterosexual scripts which reinforce gender inequality, but that they also ‘facilitate and normalize men’s violence against women’ (16). She claims male punters routinely ‘attempt and succeed at penetrating strippers vaginally and anally’ and that dancers frequently encounter sexually demeaning verbal abuse (9). Further still, she perceives permeable boundaries between the strip club and the act of prostitution. She documents instances where female strippers are coerced by male employers to engage in sexual activity either with punters or themselves, under threat of being sacked, raped or beaten if they resist. Lewis reports comparable incidences which she claims left strippers feeling disempowered and victimized. We thus see here that both the male client and management are able to wield a considerable amount of power over the stripper. Indeed, as Chapkis argues, strip clubs in the United States are situated somewhere between prostitution, which is illegal, and entertainment and performance, which is sanctioned.
Whilst many club policies specify bodily boundaries that the client cannot breach then, such rules exist superficially to protect management against legal action rather than existing for strippers’ protection, as ‘management rarely communicates the rules to customers’ (184). Chapkis also importantly highlights how management has extended its control over female strippers through the wage system. In the American club Chapkis studied, management implemented a system of ‘commission’ which dancers had to pay on every dance they sold. However, as it was impossible for management to keep a record of every dance sold, dancers were required to pay a fixed ‘daily’ commission, which could actually be more than a dancer would earn in any given shift. Management thus ‘effectively both reduced workers’ earnings and their ability to determine which practices they will perform, as dancers increasingly performed ‘extra’ services in order to counter this income problem (199). Thus, for these writers, strip clubs are inevitably characterised by male power and violence against women, and therefore should be abolished.

Another line of argument suggests that stripping merely mirrors women’s subordinate role in the wider society. Women engaging in stripping only hold the power to ‘play a game that they know well; in some form, they have been forced to play it for years’; one which is seen as a natural extension of their conventionally domestic or ‘caring’ role (Ronai and Ellis 295). Indeed, many writers have used Hochschild’s concept of ‘emotional labour’ to highlight how dancers not only have to maintain ‘a certain physical image’, ‘but also to create a certain emotional environment for customers’ (Wood 22). Wood suggests men seek not merely erotic thrills, but a companion; someone whom they can ‘interact’ with and who makes them ‘feel cared about’ (23). In support of Wood’s argument, Deshotels and Forsyth document the negative consequences of emotional labour for strippers, particularly the fact that dancers in their study felt their continual performance of a specific sexual self significantly hindered their ability to create ‘an authentic sexual self’ outside of the club (234). Similarly, in her characterisation of stripping as a ‘confidence game’, Pasko suggests that the female stripper’s constant sexual and emotional manipulation of the punter and their constant performance of a ‘false intimacy’ for clients can make intimate relations with sexual partners and friends outside the strip club environment difficult (49). As strippers are so accustomed to, and indeed ‘continue to relate to others on manipulative sexual terms’, it is hard to switch-off from their ‘con game’ (62). This notion of a ‘con game’ could be problematised however, as it suggests the existence of a ‘real’, authentic sexual self prior to the stripping performance. Yet, Judith Butler suggests that ‘identity is performatively constituted by the very “expressions” that are said to be its results’ (24). In this sense, there does not exist a ‘real’ identity prior to the ‘con game’, as all identity is in fact a performance, enacted through a repetition of acts which because of their repeatedness, ‘produce the appearance of substance, of a natural sort of being’ (33). Nevertheless, from Pasko’s and others’ arguments here then, it certainly seems that a stripper’s employment also mimics and reproduces heterosexual power relations more generally, particularly in privileging male heterosexuality, to a great extent.

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2 Many British clubs also operate a similar system of commission. See Dan Gooding’s BBC 3 documentary *Amy: My Body for Bucks*, which documents the experiences of a young woman working in a club in the West Midlands and her attempts to survive on minimal earnings whilst paying ‘fees’ to the club to be able to work there.
Yet, it is not merely the power exercised by the male client or managers over the female stripper which is problematic, as relations between the female dancers themselves frequently exhibit power imbalances. Certainly not all strippers experience gaining access to employment and working within a club in the same way. As Wolkowitz argues, due to management privileging certain ‘types’ of women based on class, ‘race’ and other social identity factors, some women ‘lack the embodied cultural capital necessary for obtaining work in the better-paid clubs’ (142). Chapkis similarly suggests both clients and club managers prefer white women as dancers. Due to such racism, women of colour are ‘disproportionately clustered in the least well-paid and most stigmatized sectors of the sex industry such as street prostitution’ (187). Such women may thus have little capacity to defend their own bodily boundaries, given that they may be denied ‘access to types of work that carry more opportunities to exercise discretion’ (Wolkowitz 141).

Moreover, even once entry has been gained to an establishment the power relations between dancers do not disappear. Spivey suggests dancers can employ ‘common bonding strategies among themselves to acquire group-like status as a defence mechanism’, such as all refraining from dancing and clothing themselves if some of the dancers are being harassed by clients (425). Further, dancers may form what Korczynski has termed ‘communities of coping’, through which they exchange with each other their feelings about irate customers and their disgruntlements concerning management. However, such an approach does not account for the fact that, as Barton argues, these dancers are constantly in competition with one another in competing for the male clients’ attention. For example, empirical research documents the existence of certain ‘contests’ held within the strip club which generate further competition between the dancers, such as ‘The Tiniest Tan Line’, which is based on who has the most aesthetically appealing genital region (2002, 593). Pasko similarly suggests dancers form cliques and will only share clients who are tipping generously with those dancers they consider not to be the ‘nasty’ girls who incorporate sexual acts into their stripping routine (63). Indeed, in a more recent study, Barton (2007) found that strippers are constantly seeking to ‘Other’ their fellow dancers, by contrasting themselves against ‘dancers working in a certain part of the United States, older dancers, fatter dancers, less educated dancers, dancers in terrible relationships, and so on’, as a defence mechanism against the stigma attached to being a stripper (586). Whilst such a strategy may alleviate feelings of individual negativity on the part of the dancer, overall, by ‘othering’ dancers ‘the stripper reproduces in her own world what the “morally correct” society does vis-à-vis the stripper world’, in that she ‘reinforces rather than deconstructs the cultural stereotypes that burden all dancers’ (587). Therefore, the power relations between dancers suggest that although certain women may be able to access more economically rewarding strip clubs, or those where individual bodily boundaries can be maintained, this is not an opportunity open to all women. It could further be argued that even in the ‘better’ clubs, relations of solidarity between dancers are fragile. There is little potential for subverting negative stereotypes of strippers even within clubs, due to the ultimate structuring of clubs around an element of competition, with strippers continually competing among each other for the highest tipping clients.

Conversely, sex libertarians have claimed the strip club may actively challenge oppressive power relations. Many strippers and academics alike have suggested that stripping can actually be empowering for women. Following Smart’s suggestion that
there is the possibility of developing a woman-centred heterosexuality which is not male-defined (234), it could be suggested that the fluidity of the strip club allows strippers to express their own meanings of their ‘heterosexualities’. Certainly, for Johnson stripping could provide a space for women to develop a ‘heterosexuality without heterosexism’ (2002, 46). She envisions this as including ‘less restrictive gender roles, allowing for female masculinities and masculine femininities’; the uncoupling of sex from reproduction so that sexuality can be ‘justified by pleasure alone’; heterosexuality, or indeed a variety of ‘heterosexualities’, as not necessarily ‘the norm’ for sexual relationships; and further, ‘nonpenis-centred sex’ (49). This, she imagines, would allow for a more positive expression of female-centred desires. Similarly, Frank suggests female stripping critiques socially constructed notions of a passive female sexuality. Performing femininity for male punters could be interpreted as a process of ‘doing’ and ‘subverting “girl”’ (179), for as Pendleton argues, ‘[u]sing femininity as an economic tool is a means of exposing its constructedness and reconfiguring its meanings’. Therefore, by exposing the instability of heterosexual roles, by showing they are performative, sex workers effectively ‘fuck with heteronormativity’ (79). As such, stripping becomes interpreted as ‘feminist’, acting as a ‘potentially transformative political move’ (189).

It could be questioned to what extent it is in fact a female version of sexuality which is being expressed here however, for in performing typically feminine roles in their stripping careers, this space may merely provide an arena for women to exercise a sexuality which is male-defined. Indeed, whilst strippers enact a specific performance of femininity, whether they are actively challenging gendered power relations in such a performance is open to debate. It could equally be argued that surely by continually performing gender roles which objectify women, strippers are merely reinforcing and reproducing these oppressive gender categories? Moreover, as Wolkowitz highlights, in instances where the male client ‘seeks in the performer’s personal attention a confirmation of their own masculinity’, not merely a theatrical performance, then conventional gendered power relations are reproduced (130). As Wood argues, male patrons not only pay to see a female naked body, but also ‘pay to be seen by the women’, so that they can glean confirmation of their desirability to women and also their power to gain female attention (10). Frank argues however, that the ‘feminism’, or female empowerment is ‘not in the stripping per se’, but in the ‘stories’ and meanings strippers themselves attach to their acts (203). Whilst specific scenarios in a club may look oppressive to women then, and similarly the male patron may feel powerful relative to women dancers, Frank’s argument suggests that it is the female strippers’ own meanings and self-definitions of their strip acts that may signal feelings of female empowerment.

The strip club may actively challenge gendered power relations which stipulate a passive role for women. Indeed, from her own experiences of stripping, Johnson positions the strip club stage as a public space where she can ‘achieve a freedom and control of motion that I do not possess in other places’. She suggests the strip club ‘is a place where moving like a girl no longer denotes uncertainty, incompleteness, inadequacy’, and can thus be potentially empowering for women, especially as it challenges conventional notions of women as sexually passive and demure (1999, 150). Moreover, due to the incredible economic power the strip club wields women, this may in fact sets up a power relation in which the female stripper is more powerful than her male client. Such an idea has been critiqued by those who point out that, ultimately, the female
stripper is dependent upon the male punter’s money, which reinforces elements of traditional masculinity that position men as economic providers and exercisers. However, sex liberationists would contest such an idea on the grounds that whilst the male punter has the monetary power to pay strippers to perform certain acts, strippers still exercise control ‘through their ability to seduce patrons into “submission”’ or to “put them on the spot” in front of their friends’ (Liepe-Levins on 11). Furthermore, in the social hierarchy of the strip club ‘the ability to spend money does not necessarily guarantee a customer’s ability to wield power’ due to the fact that the man who is the ‘biggest tipper is often labeled the “biggest sucker”’ (Liepe-Levinson 4).

In a further critique of the radical feminist viewpoint which stipulates that stripping reproduces the dominance of men over women in sexual relations, it has been claimed that an outright ban on stripping may actually worsen power relations for women. Indeed, Lewis suggests feminist discourses which present stripping as harmful to women construct the woman as a ‘fearful, protected feminine object’, reducing ‘women’s sense of agency’ and victimising them (213). She additionally claims that abolishing strip clubs would not challenge male heterosexual privilege, but would instead ‘perpetuate patriarchal notions of the subordinate status of women relative to men’ and would reinforce divisions between culturally defined ‘good girls’ (who the state will protect) and ‘bad’ girls as the strippers, who will be punished (213-14). Moreover, perhaps we should consider the fact that strippers may feel sexually and erotically empowered through their ability to command the male gaze. Certainly a respondent in Pasko’s study claimed she felt ‘beautiful’ when a ‘rich tourist or celebrity’ came to look at her (61). Again we might ask though; is this really challenging heterosexual power relations? Surely women perfecting their embodied image and deriving pleasure from men looking at their accomplishments does not represent a challenge to conventional images of feminine beauty but instead increases their objectification by men? More recently, Levy has further invoked the notion that female stripping replicates heterosexual power relations. Citing women who engage in such acts as ‘Female Chauvinistic Pigs’ who effectively collude in their own oppression, Levy considers stripping to be ‘more of a parody of female sexual power than an expression of it’ (98). However, Wood argues that rather than adopting the view that strippers are purely sexual objects at the mercy of their employers and clients, this does not mean that the opposite power reversal is taking place. As whilst strippers are active agents, not purely the ‘victims’ of managers and clients, and whilst female strippers can feel empowered in their individual interactions, they ultimately engage in actions which benefit the male customer.

It may prove useful to move towards a reconciliation of both these opposing stances, to suggest that the power relations of the strip club can be characterised as fluid and continually changing, as we certainly cannot ignore the variation in stripping experiences (Weitzer, 2000). Indeed, Foucault suggests power is not a zero-sum game, but that one person can exercise power, or feel empowered, at the same time and without taking that power away from another. Therefore, there could be times in which the relationship between stripper and punter is ‘mutually exploitative’ (Erickson and Tewksbury 273). A study conducted by Egan illustrates this point succinctly. Egan found that management in one of the clubs she studied sought to control what genres of music were played in the club, such as avoiding the use of hip-hop, which many managers felt would contradict the ‘classy’ image of the club. However, dancers countered such
musical barriers to their performances by telling regular patrons of the club that a forbidden song that they wish to dance to is ‘our song’, and thus management then has to play the song if a patron requests it so as to maintain their custom. While strip club owners still exploit dancers in many of the ways documented, as Egan argues, this incidence indicates that dancers can resist management’s rules at certain key points, and through this musical strategy in particular, ultimately ‘subverted the male bonding upon which the club is predicated’ (208). Further, it can allow the stripper to feel a sense of empowerment in having secured her music selection, and in her ability to play music songs which send a political message to the club. As through singing the lyrics along with the song, dancers felt ‘powerful’, ‘strong’ and ‘like [they] have a say’ and felt that achieving the playing of certain frowned-upon songs allowed them to tell ‘the customers and owners to fuck off’ (214).

Thus, radical feminists such as Ronai and Ellis, in representing stripping as reproducing the ‘power dynamics of mainstream society’ which represent women as a ‘subordinate group’ relative to men, disregard the feelings of individual empowerment women can derive from stripping, merely casting female strippers a victim-like status (295). However, this is not to deny that female stripping reproduces conventional heterosexual power relations to a great extent, which is an element largely underplayed by sex libertarians. Indeed, although she herself views this activity as transgressing heterosexual norms, even Frank recognises that most male punters will not view her activities in such a way, and thus questions whether anything is really ‘transformed or subverted’ when she dances (200). Moreover, Barton points out that although dancers may feel a real sense of ‘power’ over men whilst stripping, such a feeling is ‘transient’. Through interviewing female strippers at different stages in their stripping careers, Barton found that those who expressed feelings of ‘empowerment’ deriving from stripping were likely to be novices, and that ‘women move from feeling empowered to feeling oppressed’ after a few years in the trade (2002, 599). This usefully highlights that at certain key stages women may be able to contest heterosexual power relations through stripping, but that such feelings of empowerment are temporary. Moreover, perhaps even more damagingly, a stripper’s relative power in the club, has little transference to “legitimate” arenas’, as it does not ‘elevate their status or influence in political, social and economic realms that shape power relations’ (Wesely 487).

However, it could be questioned whether all forms of strip clubs reproduce unequal heterosexual relations. Indeed, as Smith argues, events where men strip for a female audience have typically been presented as a challenge to traditional heterosexual scripts, as they are cited as evidence of ‘women’s sexual freedom’ and of ‘just how far women have come’ (68). From her observations of women who watched male strippers, Smith suggests male strip clubs transgress heterosexual boundaries which position women as sexually passive in the sense that they represent ‘one place in which women can show themselves as actively desiring’ (83). Similarly, Montemurro suggests that whilst heterosexuality traditionally suggests that ‘[m]en are the pursuers and women the pursued’, such a conception is challenged in the male strip club where a female audience watches men strip, and thus in this sense ‘men dancers are objectified by women patrons’ (299). Furthermore, Peterson and Dressel suggest female customers at such venues challenge normative gendered power relations as they act in a manner which is inconsistent with traditional femininity, such as being loud and sexually aggressive.
That said, empirical research suggests heterosexual power relations are not entirely challenged in male stripping. Montemurro suggests the power of the female audience is limited as it is typically the male strippers who hold the active sexual role as they approach female patrons. Indeed, typically during a lap dance ‘the woman is seated and takes a more passive role while the man gyrates’ above her (299). In addition, male strippers do not perform ‘emotional labour’ to the same extent as women strippers, as interactions with female customers are ‘brief’ (Tewksbury 178). Furthermore, Liepe-Levinson suggests that unlike male patrons, women seem less interested in objectifying the male dancers and ‘taking up power positions as sexual scrutinizers’ themselves (9). In this sense, women frequent male strip clubs less for exercising an objectifying ‘gaze’ upon male bodies, and more for the fantasy of being desired by the male dancers, which Liepe-Levinson suggests ‘cannot help but reproduce and reinforce the social power and authority of the penis-phallus’ (152). This indicates that there is no simple reversal in gendered power roles when a woman becomes a strip club patron, as women patrons ultimately reproduce conventional gender and sexual scripts, through which male sexuality presides.

The working conditions of male strippers are also acutely different from their female counterparts. Unlike venues where women strip for money, male strippers dance within socially acceptable environments, such as theatres and concert halls, and further they considered to be ‘shows’ you could ‘take your grandmother’ to (Tewksbury 174). This does little to challenge the image of female stripping or overt expressions of female sexuality as ‘dirty’ or ‘sleazy’, whilst reinforcing male sexual expression as ‘something better, something more socially normative’ (Tewksbury 174). Moreover, rather than adopting the ‘sex object’ role of the female stripper, male strippers reconstruct these traditionally female roles to emphasise traditional masculinity in order to ‘improve’ an occupation which was previously the exclusive domain of women, and to enable the extension of male ‘patriarchal privileges not available to female strippers’ (Tewksbury 169). Moreover, the male stripper’s nudity, unlike the naked female stripping body, ‘may refer less to the vulnerability of the body than to additional demonstrations of power and sexual expertise’ (Liepe-Levinson 9). Liepe-Levinson claims the male stripping role is recast as one of masculine power and domination because the ‘sex object’ role is dangerous for men to occupy as it could ‘feminize’ the male and include ‘the possibility of his being gay’, which, if following Connell’s 1995 model of the gender hierarchy, would relegate the male stripper to a ‘subordinate masculinity’ (184). The role of the male stripper thus has to be ‘masculinized’; ‘made socially acceptable for men’ (Tewksbury 179).

It can be seen, then, that strip events do little to subvert normative heterosexual power relations which privilege men. Yet as empirical research with female strippers has indicated, a sense of empowerment from stripping can be felt by individual women, especially among those women ‘new’ to stripping (Barton, 2002), yet also from self-proclaimed feminist strippers, such as Johnson (1999) and Frank. Analysing the specific power relations between women however, indicates that such feelings of empowerment are fragile and cannot be experienced by all female strippers. What is also perturbing is the way male stripping has heralded a new arena for female sexual freedom. In actuality, such arenas empower the male stripper in a manner that can never be achieved by women in the same occupation. Rather than challenging normative heterosexuality, men ‘crossing over’ and occupying a traditional female preserve does little but ‘maintain
men’s privileged social status’ (Tewksbury 180). Indeed, the construction of the male stripping role along the lines of a heterosexual masculinity further belittles those deviating from the heterosexual norm, and suppresses the possibility of any reconstruction of the male role along less hegemonic lines. Moreover, although we certainly do need to work towards creating less oppressive, less male-defined sexualities for women, the rather narrow definition of female sexuality performed in the strip club arena does little but mimic traditional gendered power relations. For as Wesely suggests, and as Levy’s critique of the alleged new ‘raunch culture’ among women reminds us, stripping, and sex work more widely, ‘rewards young women for their bodies in a culture that too often sends young women the message that this is their only value’ (501). Both female and male strip clubs then, are places where gender roles are negotiated and contested, with ‘power’ never being a fully zero-sum game, as female dancers are active agents who can resist male dominance and feel relatively ‘empowered’ at key moments. This is certainly important for moving away from connotations of women strippers as primarily being passive victims of men. Yet with stripping performances mimicking normative heterosexual, with male strippers occupying a higher social status than their female counterparts, and with the competition between dancers for higher paid and better working conditions still existing for female strippers, it seems inappropriate to conclude that stripping can be ‘empowering’, or that it can create a positive definition of desire for all women. Ultimately, strip clubs are sites where ubiquitous male heterosexual privilege is cemented rather than challenged.

References


