

**IN THE COUNTY COURT**

**Claim Number: 008LR988**

**AT BRISTOL**

**B E T W E E N:-**

**Raquel María Rosario Sánchez**

**(Claimant)**

**-and-**

**University of Bristol**

**(Defendant)**

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**Claimant's Witness Statement**

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I, Raquel María Rosario Sánchez, of [REDACTED] am the Claimant in this matter and shall say as follows:

**Introduction**

- (1) I am a writer, campaigner and academic. My field of expertise is feminism, and all areas of my works are focused on ending violence against girls and women.
- (2) I was born in the Dominican Republic, where I lived until I was 19 years old. I left to study in the United States, where I enrolled on an undergraduate degree in International Studies with a Minor in Women and Gender Studies. Afterwards, I went back home to do a year-long internship at the Violence Against Women Prevention Department at the Ministry of Women. I then returned to the United States to do a master's degree in Women, Gender and Sexuality Studies and graduated in 2016. I returned again to Santo Domingo to work at the Shelter

Work Department at the Ministry of Women. I left my country again in late 2017 to do a PhD with the Centre for Gender and Violence Research at the University of Bristol.

- (3) Both my campaigning work and my career in the media started when I was aged 6 years old and participated in a child-led human rights campaign sponsored by UNICEF which developed into a weekly television news programme where all reporters were children and teenagers. From that point on, my campaigning has focused on children and women's rights. In recent years, this has shifted to women's sex-based rights and I have advocated for these legal protections in the Dominican Republic, the United States, Spain and the United Kingdom.
- (4) Since May 2016 I have had a column twice a month with El Caribe, the second oldest newspaper in the Dominican Republic and among the most reputable in both credibility and prestige. When I moved to Bristol, I was a contributor to Feminist Current, which is Canada's leading feminist website. I also write for Tribuna Feminista, The Critic, UnHerd, Spiked, República Femina, La Que Arde and La Réplica, among others.
- (5) Since 2019, I have been a Spokeswoman and Trustee of FiLiA, an international feminist charity. I am also an Associate Member of the British feminist campaigning organisation Woman's Place UK, a Founding Member of the international feminist alliance Contra el Borrado de las Mujeres, and the President of Women Talk Back!, a feminist organisation based in Bristol.

### **My Views on Feminism**

- (6) The fundamental aspects of my feminism are:
  - (a) We live in a patriarchal society that benefits men and boys over women and girls. To both consolidate and perpetuate this power imbalance, the male sex

class relies on the subjugation of the female sex class through different forms of oppression.

- (b) Male violence against women and girls is a systemic and structural worldwide problem, that is both manmade and based on sex. Around the world, the vast majority of girls and women cannot escape the sex-based discrimination and violence they are subjected to, by males, because biological sex is immutable, material to everybody's life and central to the functioning of patriarchy.
  - (c) Sex discrimination exists therefore women and girls need reserved places, separate spaces where appropriate and distinct services to address their specific needs. All feminist work, around the globe, hinges on women having clear data on sex-based oppression and on society being able to develop policies that are evidence-based.
  - (d) While there are conflicting theories about gender, biological sex remains a scientific and incontrovertible material reality. Every cell in the human body reveals our sex and sex is a biological variable that affects how people react to disease, medicine and the treatment of illnesses. There are only two sexes: male and female. I believe that the statement "woman is an adult human female" is a neutral statement of fact.
- (7) These are interlinked throughout all aspects of my work, one way or another, and in academia where my research explores the purchase of women, by men, for sexual purposes.
- (8) My feminism is relatively widely held. Perhaps in common with most forms of feminism, it is primarily held by women. Several organisations hold the same set of feminist beliefs. I rely on the witness statements of Dr Judith Green from

Woman's Place UK, Dr Nicola Williams from Fair Play for Women and barrister Naomi Cunningham from Sex Matters to demonstrate this.

- (9) Within academia, I have been studying male violence against women for about a decade and working on it for a similar amount of time, so I was fairly knowledgeable of the theoretical background and the practical ramifications of the sex and gender debate for society before I came to the UK.
- (10) However, from 2015 to 2017 there was an increasing focus on the implications of the concept of "gender identity" within Feminist Current. Nowadays, there are hundreds of websites platforming content that is critical of the material ramifications of this novel concept but, back then, Feminist Current was one of the few outlets that covered it.
- (11) Through our platform, I became aware of the escalating tensions taking place in some Anglophone countries with trans activists targeting feminists who expressed opposition to gender identity theories. In February 2017, I had read that the Vancouver Women's Library in Canada was vandalized and subject to violent intimidation from trans activists' protesters. In September 2017, I read and heard about a 60-year-old woman named Maria MacLachlan who was assaulted by trans activists at Speakers' Corner during a meeting to discuss proposed reforms of the Gender Recognition Act 2004. I saw a video of the assault on YouTube and I recall being extremely shocked at the images of a middle-aged woman being beaten to the ground by a group of twenty-something males who appeared to be around two metres tall, and that this was supposedly done in the name of human rights. In April 2018, a male trans activist named Tara Wolf was convicted of assaulting Maria MacLachlan at the Speakers' Corner meeting.

## **Enrolling at the University of Bristol**

- (12) I first became aware of the PhD course at the Centre for Gender and Violence Research in early 2017. Following my graduation from my Master's Degree, I explored the possibility of pursuing a PhD. In total, I applied to about six to eight different programmes around the world, and received unconditional offers from most of them.
- (13) I then contacted my country's Ministry of Higher Education, Science and Technology to inquire what their possibilities for funding could be. These were dependent on partnerships between the Ministry and the individual institutions. During the summer of 2017, the Ministry informed me which of the universities that had made me an unconditional offer were on their partnerships list. I was most excited about the offers from the University of Glasgow and the University of Bristol, which both had partnerships with the Dominican government. The deciding factor for me was that, whilst the University of Glasgow offered me a supervisor who specialised in studying violence against women, at the University of Bristol they had a whole Centre for Gender and Violence Research. I wanted to be among a team of experts dedicated to this topic and I was keen on the collegial aspect of being in a physical space, with a group of people, all working together to end violence against women. Therefore, I chose Bristol.
- (14) I was so excited about studying at the University of Bristol that I printed my acceptance letter and I pasted it on my bedroom wall. When I moved into Bristol, I pasted another copy of my acceptance letter on my bedroom wall.
- (15) I couldn't quite believe that this was my new life and that I would get to lead it, doing research that I cared so much about and becoming an expert myself. I had spent all 2017 worried about PhD programmes and visa concerns, so to finally be present at the University of Bristol felt like everything had aligned perfectly for me.

### **Support from my Government**

- (16) The Government of the Dominican Republic pays the Defendant's fees for my course. I applied through the institutional channels within the Ministry at all times. I was awarded a scholarship which was conditional on maintaining and demonstrating the same level of excellent academic performance that I had demonstrated throughout my academic career. Conditional on this performance, I have to renew a separate scholarship contract every year, for the duration of the PhD.
- (17) At the moment, I am in the UK on a student visa. I can only remain the UK while I am on a qualifying course of study. If I leave my course for whatever reason, or suspend it for a certain amount of time, my immigration status is revoked and I must leave the country.

### **Arrival in the UK**

- (18) I left Santo Domingo on 17 November and arrived in Bristol on 18 November, 2017. Although I was aware of some high-profile women in the British feminist movement whose work I followed closely, I didn't have any friends or family in the UK when I came to this country. The only person I had met, over Skype, was Dr Emma Williamson who was at the time the Head of the Centre for Gender and Violence Research and interviewed me before accepting me into the PhD programme. I found accommodation online and built my life from scratch upon arrival.
- (19) I first went to the University on 20 November 2017 for a 10am appointment with my supervisors, Dr Emma Williamson and Dr Natasha Mulvihill. There were a number of delays both within the Ministry with my contract and with the UK Consulate in Santo Domingo with my student visa. This meant that I arrived towards the end of the academic term and did not have a cohort experience. I

was on my own when I was shown to my PhD desk, around the School of Policy Studies and throughout all induction conversations. I met colleagues and fellow PhD students by myself, slowly and sparingly.

- (20) My supervisors agreed that the unusual nature of how I began my programme, and being so far away from home meant that I was isolated. They suggested I should socialise. I began to look online for feminist events near me where I could meet fellow-minded women. I found an event called 'Hardcore Hate: Pornography as the Propaganda in the War on Women' that was organised by a feminist organisation called Critical Sisters in Gloucester and would feature feminist writers whose names I recognised.

#### **Invitation to Chair WPUK Meeting**

- (21) On 9 December 2017, I attended the Critical Sisters event. I didn't know anyone there but some women recognised me because some of my articles had become popular in segments of the UK feminist movement. A number of women approached me, some located in Bristol, and we became friends. One of these women was Clarissa Payne.
- (22) A few weeks after the Gloucester event, I met Clarissa in the café of the hotel where I first stayed when I arrived in Bristol. She told me she was one of the local organisers for a meeting of Woman's Place UK (WPUK). I had first heard about WPUK prior to coming to the UK, while I was writing for Feminist Current.
- (23) Clarissa explained the logistics of the WPUK Bristol event. She listed the tasks that had been completed, such as confirming all the speakers, arranging the venue and liaising with the Police. She told me that all they were looking for was a chair for the meeting but they hadn't found the right woman. Since I was a recognised writer, she asked me if I would like to do it. I immediately said yes.

(24) The WPUK event was titled 'A Woman's Place is Speaking Out' and was scheduled for 8 February 2018. I was listed in the promotional poster as 'Raquel Rosario Sanchez, Chair, Feminist Current'. The short biography stated: "Chaired by Raquel Rosario Sanchez, Writer and Researcher. She specializes in ending male violence against women and girls and is currently pursuing a PhD with the Centre for Gender and Violence at the University of Bristol."

### January 2018

#### Campaign against WPUK Bristol Meeting

(25) I now know from reviewing the Defendant's disclosure (which I received on 22 December 2021) that the Defendant's staff were involved in the campaign to shut down the meeting. On 11 January 2018, a student named Rosa Targett wrote an email with the subject line 'Gender Research Centre' to someone at the Gender Research Centre (**Exhibit RMRS1 page 13**). Ms Targett stated:

*"I've heard through the grapevine that this may be held at UoB, certainly one panelist is involved in a big research project at the university and the chair is a PhD student in policy studies. I want to find a way to make it absolutely clear to the university that anti-trans events (which is exactly what this is, however they dress it up as intellectual debate on the complexities of the law) will not be tolerated on campus."*

(26) The recipient's name has been redacted by the Defendant, but it appears to be Spencer Blackwell, who was the president of the LGBT+ Society and an organiser of Trans Pride South West. He replied:

*"Thank you for getting in touch with me about this, this is deeply concerning. I hope there is something we can do as you say to*



*show that the university is not a space for TERF views or transmisogyny.”*

(27) The word ‘TERF’ is a term of abuse used by trans activists to dehumanise, threaten and incite violence against women who hold or express views critical of gender. I have included at **Exhibit RMRS2** screenshots from the website “TERFisaslur.com” which shows examples of this (the original pdf of the screenshots runs to 50 pages - I have included only two pages to show the general tenor of the material. The remaining 48 pages contain material of the same nature). On 14 February 2020, Justice Julian Knowles of the High Court stated in the Miller vs The College of Policing judgment: *“I understand that ‘TERF’ is an acronym for ‘trans-exclusionary radical feminist’. It can be a pejorative term.”* In all contexts in which it was used about me, it was explicitly used as a pejorative term, and as I have set out above and below it was commonly accompanied with threats of violence or invitations to violence.

(28) In an undated screenshot (**Exhibit RMRS3**), Rosa Targett confirmed she was communicating with a senior member of the Gender Research Centre by stating publicly on Facebook:

*“There seems to be lots of different responses to this and they look like they’re becoming coordinated, which is great. The Gender Research Centre at UoB have suggested holding an alternative, trans positive event to counteract the bullshit narrative of this event.”*

(29) As **Exhibit RMRS1** shows, Rosa Targett’s email was escalated to Suzanne Doyle, the co-Chair of the of the staff LGBT+ Network (and her co-chair Nick Skelton: page 11); Tracy Brunnock, the Equality, Diversity and Inclusion Manager (page 10), Vicky Layton, the Equality Diversity and Inclusion Officer

(page 9), and Will Marsh, the Defendant's Head of Media and Deputy Head of Communications. Their response to the event was uniformly negative.

(30) The Equality, Diversity and Inclusion Officer Vikki Layton wrote on 16 January 2018 (**Exhibit RMRS1 page 8**):

*"In looking at the freedom of speech policy, I think this is definitely worth flagging to the public relations team public-relations@bristol.ac.uk (as this is being badged as a 'public meeting' on Eventbrite). They can then get in touch with Raquel to ask where she intends to have the event. Ultimately, in accordance with the policy this event may breach the following: "As an institution, the University is mindful of its responsibilities to ensure that its premises are not being used for unlawful purposes, including those which may negate the enjoyment of that freedom for others. When permitting its premises to be used, the University must therefore consider what may be said. The University is not obliged to allow its premises to be used by members of the public or by organisations which might wish to do so, nor is it obliged to admit members of the public to meetings taking place on its premises (providing that it does not exclude on a discriminatory basis) and must take account of other legal obligations, including those around the bounds of lawful speech and assemblies that may lead to serious disorder or breaches of the peace."*

<https://www.bristol.ac.uk/media-library/sites/secretary/documents/student-rules-and-regs/freedom-speech-policy.pdf> However this will be for the public relations team to decide (and ultimately senior management, again in accordance with the policy). Are you happy to pursue this with them?"

- (31) There was absolutely nothing in the event's publicity, or at the event itself, that could have reasonably been described as "unlawful purposes". All videos from the WPUK Bristol meeting speakers are available on YouTube, so everyone can witness that this was a group of women discussing public policy and feminism. The use of the label "unlawful purposes" demonstrates that female-centred feminism was treated by university staff as being bigoted, unacceptable and worthy of sanction.
- (32) Throughout the thread at **Exhibit RMRS1**, Spencer Blackwell was copied in. He was also copied in on a separate thread overlapping on the same subject (**Exhibit RMRS4**), which also included Esther Dermott, the Head of School for Policy Studies (page 2), Lucy Hicks, the Policy Studies School Manager, Julie Jupe the Head of Communications and Director of External Relations (page 3 and 4), Philippa Walker, the Head of Media and PR (page 3) and Rachel Everington, the Deputy Director of Marketing. The email thread was to discuss the University's public statement about the event. At page 2, Suzanne Doyle requests specifically that it is provided to Spencer Blackwell.
- (33) Spencer Blackwell was in turn liaising with other trans activist students on Facebook who were coordinating attempts to have the meeting cancelled (**Exhibit RMRS5**). I did not know any of this at the time, and have only been able to observe this on receipt of the Defendant's disclosure (and despite the redactions to Spencer Blackwell's name). What this disclosure shows is that senior employees of the University were colluding with the people who wanted to shut down our feminist event, and who were using threats of violence to do so.
- (34) On 25 January 2018, the student referred to in these proceedings as "AA" made an incorrect allegation (**Exhibit RMRS6**) that the event was due to be hosted by the Centre for Gender and Violence Research on campus. AA said they would

approach the Centre for Gender and Violence Research to lobby them to cancel the meeting.

(35) An Open Letter was written by trans activist student AA and was edited by Nathan Eisenstadt, one of the few male staff members of my Centre for Gender and Violence Research. At the time, both were my colleagues and neither of them contacted me personally to discuss this matter, prior to working together on the Open Letter that they published anonymously.

(36) The Open Letter stated, in part (**Exhibit RMRS7**):

*“We, the undersigned academics and students, call for the cancellation of the “A Woman’s Place” event in Bristol, and a statement from the Centre for Gender Violence Research, one of whom plans to chair the event. It is therefore of particular concern that the event is to be chaired by Raquel Rosario Sanchez, a member of the Gender and Violence Research Centre at Bristol University. Attaching the centre’s name to this event implies that it endorses providing a platform for hate speech, and calls into question the integrity of the Centre and of the University as a whole. Trans people are an inextricable part of the University community. The needs of trans people, and in particular trans women and trans feminine people, are integral to feminist campaigns and spaces. There is no difference between “feminists” spreading transphobic and transmisogynistic ideas or spreading racism or homophobia. We want no part in this. We ask that the University of Bristol, and all its departments, stand up and resist the perpetration of harm against trans people.”*

- (37) In publishing this Open Letter, both AA and Eisenstaedt were comparing me with racists, and therefore calling me a racist. Unlike them, I am not white. I am a mixed-race woman born and raised in the Caribbean. In the UK, that makes me a member of a minority. To be accused of racism by two white people from the UK is particularly offensive. However, my primary concern was the accusation that I was “perpetrating harm” against trans people by chairing a meeting on public policy. This was absolutely false: there was no perpetration of harm or “hate speech” of any kind, and nothing at all to indicate that there would be.
- (38) Also on 25 January 2018, a student named Sage Brice wrote: “Open call to Bristol Feminists to cancel the Woman’s Place UK meeting” (**Exhibit RMRS10RMRS8**). A number of fellow students publicly coordinated strategies to get the feminist meeting cancelled and started the bullying and harassment campaign against me rolling.
- (39) On 25 January 2018, I was visiting Clarissa in Weston-Super-Mare. I was with her when we started to see the social media campaign targeting the event and me personally starting to be disseminated online. Going back into Bristol by myself on the train that evening, I felt dread and uneasiness. I was worried that hundreds of people who were angry online knew my face, but I didn’t know anyone’s face. I had seen the physical attack against Maria MacLachlan by trans activists in September and I was concerned for my safety. At that point, I had made friendships with women in London, Cambridge, Bath and Weston-Super-Mare but I still hadn’t met many people in Bristol itself. I felt very exposed, and I considered the climate of hostility and aggression that trans activists had created around me to be dangerous, particularly given how isolated I was in the UK at that point.
- (40) On 26 January, AA wrote publicly on Facebook (**Exhibit RMRS8**):

*“PLEASE SHARE WITH ANYONE YOU KNOW CONNECTED TO ANY UNIVERSITY ANYWHERE\* Sign this open letter that specifically holds the Centre for Gender and Violence Research to account for endorsing (however unintentionally/accidentally) the “Woman’s Place Event” endorsing hate speech against trans people. The event is due to take place in Bristol on 8<sup>th</sup> of Feb but its our duty to make sure IT DOES NOT TAKE PLACE. There is a meeting at the Centre on Monday and it would be ace to have loads of people signed up, to show them that this is NOT OKAY. Thanks all!”*

- (41) The next day, Nathan Eisenstadt emailed all the members of the Centre for Gender and Violence Research sharing the Open Letter he had edited alongside AA. Nathan wrote (**Exhibit RMRS10**):

*“You may be aware that this open letter is circulating calling for a cancellation of the “A Woman’s Place” event hosted by the Centre on the 8 February. The letter also requests a response from the centre. Please can we put this on the agenda for Monday’s meeting? Given emotions, good intentions and pain that are often tied up in questions of trans-exclusion within feminist spaces, I am not proposing an online discussion of this (but obviously that’s your call individually).”*

- (42) A long email exchange between the 23 people Nathan cc’ed on the email ensued.
- (43) This email, attaching the Open Letter singling me out for abuse, was my first introduction to my new colleagues at the Centre for Gender and Violence Research since I hadn’t had time to even meet them and introduce myself.

- (44) On 26 January 2018, Spencer Blackwell wrote (although I did not know this until I saw the Defendant's disclosure in these proceedings) (**Exhibit RMRS1 page 5**):

*“There is a petition addressed to the Centre for Gender Violence Research circulating against the event, here: [link]. It would be really fantastic if people who wanted to could sign this petition and share it further amongst staff networks. It is really important to have a unified and strong response to this event, and it would be fantastic to have wide and diverse support.”*

- (45) I was the only person named in the Open Letter so all the intimidation was targeted against me. The united and strong response elicited by the Open Letter drafted by a trans activist student and edited by a male staff member at the University of Bristol resulted in threats of physical violence and abuse against me: people made numerous threats on social media to physically assault me. They wrote that I should be punched and turfed out. I have been called 'TERF', transphobic scum, trash, nasty, bigot, heinous, sickening, among other dehumanising terms during periodic campaigns of vilification targeting every feminist event that I participated in both inside and outside the University of Bristol campus, all around the United Kingdom, starting in January 2018 and onwards. At **Exhibit RMRS11**, I have included some of these, further context to which is given below.
- (46) Very shortly afterwards, also in late January 2018, AA posted on Facebook (**Exhibit RMRS12**): “UPDATE: 200 people already signed open letter! Thanks everyone let's keep it up and terf out them TERFs.” AA had previously posted publicly about 'punching terfs' and bragged about being an 'extreme trans activist'.

- (47) AA posted on social media about travelling to London to support Tara Wolf at Wolf's trial for the assault of Maria McLachlan). The support event was organised by the national Sisters Uncut organisation and AA encouraged others to attend.
- (48) Around this time and amongst the uproar generated by both trans activist students and staff members at the University of Bristol, someone with the username Dusty Amerie Richmond wrote publicly on Facebook (**Exhibit RMRS13**):

*"If you live in Bristol and are truly a trans-ally, please go to [the Woman's Place event on 8 February 2018] armed with s dozen eggs and your finest collection of obscenities to hurl at attendees. Oh and feel free to slap a TERF upside their bigoted, hateful face."*

- (49) As a result of the intimidating climate fomented against me, someone named Alice Laura wrote: "If you can go and punch a TERF, you have my blessing." (**Exhibit RMRS14**) Again, I was the only person named on any of the trans activists' material, so I was the only person that anyone reading these threats of violence could identify as being a target of that violence.
- (50) On 27 January 2018, someone using the twitter username 'Bleeding Woman' wrote: "Extremist trans activists are really shooting themselves in the foot by attempting to shut down meetings for women to discuss how legislative change impacts on them. Trans activists reveal themselves to be authoritarian, misogynistic, childish and without coherent arguments." AA shared a screenshot of this message adding the following commentary:

*"They think the open letter makes me an extremist trans activist? They haven't seen anything yet"* (**Exhibit RMRS15**).



(51) The above message is a threat and the University of Bristol has policies in place to address conduct of this nature. One of these policies is the Unacceptable Behaviour policy which states:

*“Unacceptable behaviour may involve actions, words or physical gestures that could reasonably be perceived to be the cause of another person’s distress or discomfort. Unacceptable behaviour does not necessarily have to be face-to-face, and may take many forms such as written, telephone or e-mail communications or social media.*

*3.2 Some examples of unacceptable behaviour are included below:*

- *aggressive or abusive behaviour, such as shouting or personal insults*
- *spreading malicious rumours or gossip, or insulting someone*
- *lack of awareness or consideration of diversity, particularly when related to a protected characteristic under the Equality Act 2010*
- *overbearing supervision or other misuse of power or position e unwanted physical contact*
- *offensive comments or body language”*

(52) Throughout all this, despite the fact that its employees were involved in the vilification campaign, the University of Bristol took no steps to assess any risk to my safety. The Defendant only provided one on 27 September 2019, after I requested that they conduct a risk assessment by phoning and emailing different employees seven separate times. The fact that I had to repeatedly make this

request indicated to me that they were only prepared to do this begrudgingly and with great reluctance.

## **February 2018**

### **Initial Complaint**

- (53) Given what was happening around the 8 February 2018 WPUK event, I became deeply concerned that I was so isolated while at the centre of such a vitriolic storm. Having arrived in the UK less than two months before, I was also experiencing an extreme form of culture shock on multiple levels.
- (54) In the Dominican Republic, women are allowed to hold public meetings about policy matters without fear of abuse or intimidation. It is unheard of for even conservative or religious sectors to set about seeking to cancel events about women's rights. With a history of tyranny and dictatorship in our recent past, the public's disapproval of violent threats and intimidation in political life is such that if this were to happen, it would be universally condemned by all political parties and sectors in society. The only people I had to discuss this with were my family in the Dominican Republic. But my family had no context to understand what I was experiencing, which they (and I) found to be bewildering. Nobody, including myself, could comprehend that in the United Kingdom, people were trying to bully me into accepting fewer legal rights than the ones I enjoyed in the Dominican Republic, such as the right to freedom of speech, freedom of assembly, and the right to [REDACTED] free from abuse and discrimination.
- (55) My parents felt exasperated that they had no way to protect me from the targeting I was receiving from trans activists' students and staff members at the University of Bristol. To compensate in some way, they made me promise that I would spend the day of the WPUK Bristol event among other women, so I wasn't alone at any point. They also made me promise that I would spend the night at

someone else's house and that I wouldn't be alone that night so I arranged to spend the night at a feminist acquaintance's spare room.

- (56) At that time, and until I received the Defendant's disclosure in these proceedings, I did not know that University staff were involved in the campaign of vilification and intimidation, but I felt that the University was doing nothing to stop it and therefore nothing to protect me. My overwhelming concern at that point was that I had just gone through a lengthy and stringent process to secure my student visa and I worried about the impact this targeting could have on my immigration status. I remember thinking to myself constantly, "what if an immigration official finds this content?"
- (57) Having worked as a policy analyst prior to coming to Bristol, I assumed that the University should have some policy regarding the intimidation that I was experiencing. Therefore, I looked around the University of Bristol website, found the Student Complaints information and followed the instructions. I filed a student complaint on 1 February 2018 (**Exhibit RMRS16**).

### **My Complaint**

- (58) My 1 February complaint named the following:
- (a) Sage Brice
  - (b) Rosa Targett
  - (c) Frankie Gluskevic
  - (d) AA
  - (e) Mathilda Lunalice Rain
  - (f) The Bristol University Intersectional Feminist Society

But only AA was investigated by the University, and this investigation concluded abruptly without reaching a conclusion.

### **The Defendant's Internal Communications**

(59) From disclosure made by the Defendant on 22 December 2021, I now know that on 2 February 2018, Julie Jupe, the Head of Communications reproduced a statement to be issued by my School of Policy Studies and the School of Sociology, Politics and International Studies stating (**Exhibit RMRS4 page 3**):

*“SPAIS and SPS are aware that a public event taking place on 8 February organised by the campaign group ‘A Women’s Place’ has prompted concern among some staff and students. The event is not taking place on University premises and is not sponsored or organised by the University. We consider it is important that staff and students associated with the University are able to act independently outside of their academic roles, to either participate in or protest against this or other events.”*

(60) This statement was drafted by, among others, the Head of the School of Policy Studies where I study, Esther Dermott. Rather than asking me if I needed support as a newly arrived PhD student facing intimidation, Dermott decided to email eight different staff members to coordinate a public statement that was, essentially, about me. On 4 February, Dermott wrote (**Exhibit RMRS4 page 1**):

*“Can these statement please NOT be circulated internally yet – I am still in discussion with the HoS of SPAIS and Head of their Gender Research Centre to confirm their agreement. I recognise the value of an agreed statement – hence my work on developing this – but if it is circulated before the relevant parties have Oked it, it could cause more problems rather than alleviating them.”*

(61) As I have set out above, the Gender Research Centre was not my school, and its senior staff were involved in the campaign which included abuse against me.

Therefore, the University was coordinating with my abusers (or, at the least, with people who were coordinating with my abusers, as was Spencer Blackwell) about the University's public statements about me.

- (62) As the Head of the School of Policy Studies, Esther Dermott has a direct duty of care towards me. Yet from the period of January 2018 to the summer of 2019, not once did she reach out to me directly and ask how I was doing.

### **8 February 2018 – WPUK Event**

- (63) Due to the ongoing threats, the WPUK meeting organisers only revealed the venue details to ticket holders on the afternoon of the meeting. On 8 February, trans activist students in balaclavas gathered around the Bristol City Centre hoping to locate the event. Sisters Uncut circulated a photo taken inside the event, and shared by an attendee on social media, asking if anyone knew where our venue was so they could attack it.
- (64) The WPUK Bristol event was held in a venue close to the City Centre. The speakers were Judith Green from Woman's Place UK, researcher Lynne Harne from the Lesbian Rights Alliance, parenting trainer Stephanie Davies-Arai from Transgender Trend and journalist Jo Bartosch representing the feminist group Critical Sisters.
- (65) There were about 120 attendees. There were fewer than five men in attendance, and everyone else was a woman. This is the norm at feminist events which discuss sex-based feminism. I have been to dozens of such meetings, and I do not think I have ever attended one where males made up more than 10% of the attendees. The organisers, the speakers and the attendees were delighted that, after sustained pressure and intimidation, we were finally able to gather in peace. The mood in the room was of buzzing excitement at the beginning and towards the end of the event, but the speeches and question and answer segments were

measured. Both segments focused on the experiences of women and girls, and how each speaker interpreted the sex and gender debate was affecting women's lives and legal rights. There was no "anti-trans" speech or sentiment expressed by anyone.

### **Defendant's Initial Handling of Complaint**

- (66) On 19 February 2018, I submitted further details to my complaint, about the Student Union Motion (returned to below at paragraph (68)). (The complaint is at **Exhibit RMRS17, page 18-19**). The email exchange that then followed with Philippa Guereca described the Defendant's initial handling of the complaint.
- (67) Philippa referred me to SARI (**Exhibit RMRS17** page 9), a charity dealing with hate crimes in Bristol. As set out at paragraph 64 of the Particulars of Claim, I later found out through the Secretary's Office that SARI advocated against me, behind my back, in the subsequent disciplinary proceedings and lobbied the University of Bristol to dismiss the complaint I had made over the intimidation I was receiving, solely because AA identifies as trans.

### **27 February 2018 – Students Union Motion**

- (68) Having failed to cancel the WPUK Bristol Meeting on 8 February 2018, two students at the University of Bristol, Charlotte Buchanan and Francesca Gluscevic, drafted and presented a motion to prevent feminists who defend sex-based rights from speaking on campus. The motion was titled 'Prevent Future Trans-Exclusionary Radical Feminist (TERF) Groups from Holding Events at the University' and stated (**Exhibit RMRS18**):

*"A collection of Trans-Exclusionary Radical Feminists (TERFs) held an event in Bristol on 08/02/2018 entitled 'A Woman's Place is Speaking Out', with the support of at least one member of University staff. Allowing events that put trans students' safety at*

*risk is in direct violation of the aims outlined in the Code of Conduct. We seek to implement measures to prevent similar events from taking place with the endorsement of members of University staff.”*

(69) Among the measures the trans activist students sought was:

*“The formation of an events committee within the Student Union with representatives from the liberation networks to collaborate with the relevant bodies (e.g. the University; any given department, or society) in vetting proposed speakers/groups.”*

(70) This motion was put forward for students to vote on it on 27 February 2018 at the Bristol SU Annual Members Meeting. The climate of hostility towards feminists was so heightened at the time that students wrote to me concerned about the effect the motion would have. At this point, the climate of hostility towards me had become too intimidating, so I did not attend the meeting.

(71) Regarding this motion, the Bristol SU said in a statement to the media (**Exhibit RMRS19, page 3**):

*“The motion to ‘Prevent Future Trans-Exclusionary Radical Feminist (TERF) Groups from Holding Events at the University’ was debated and passed by students through secret ballot at our Annual Members’ Meeting.”*

(72) Although the Bristol SU is a legally separate entity from the Defendant, both are closely interconnected and the ban on feminists sought to prohibit women from speaking at venues and events inside the Bristol University estate.

### **Response to my Complaint**

(73) On 27 February 2018, the Student Complaints Officer, Phillipa Guereca, wrote to me about my complaint. She wrote (**Exhibit RMRS17, page 18**):

*“Rather than deal with this matter under the Student Complaints Procedure, the Chair of the EDI Group has decided to use your recent experience as an opportunity to reaffirm the University's commitment to freedom of speech and to condemn attempts to prevent discussion about topics of concern through hostile and abusive comments on social media.”*

- (74) Given the timing (this was on the same day as the Bristol SU motion), it was and remains my view that the University had no concern about my safety at all, and viewed the abuse and threats towards women – including me – as a legitimate form of free speech.
- (75) On 27 February, the Pro-Vice Chancellor for Research and Enterprise and Chair of the EDI Group Nishan Canagarajah issued a statement on behalf of the University. This was the statement which had been discussed previously between the University's staff (paragraph (59) above). The published statement included the following (**Exhibit RMRS20**):

*“[This] presents an opportune time to affirm our commitment to freedom of speech and to the rights of all our students and staff to discuss difficult and sensitive topics. Universities are places of research and learning, where debate and dissent are not only permitted but expected, and where controversial and even offensive ideas may be put forward, listened to and challenged. Intellectual freedom is fundamental to our mission and values. Our freedom of speech policy underlines the vital importance of our right, as members of a free and democratic society, to speak openly without fear of censorship or limitation, provided that this right is exercised responsibly, within the law, and with respect for others*



*who may have differing views. We do not condone attempts to silence discussion before it has even taken place or the use of stereotyping or threatening language to prevent debate.”*

(76) From the disclosure I received on 22 December 2021, I now know that this statement about academic freedom of speech was a complete misrepresentation of what was in fact happening. A week after the statement, on 5 March 2018 the Director of External Relations Alicia O’Grady wrote a list of topics on an email (**Exhibit RMRS22**). One of her bullet points was “TERF”. She wrote: “*There’s a pretty negative report on the TERF vote on RTUK.*” By indicating her support for the banning of feminists who advocate for sex-based rights – such as me – from discussing feminism on campus, the Director of External Affairs was expressly contradicting the external press statement which had been published a week previously in favour of academic freedom of speech on campus. By using the term “TERF” she was adopting the abusive language that had been deployed against me, and which had been accompanied by threats of violence. There is nothing in the disclosure to indicate that any member of staff to whom the Director of External Affairs sent this email saw anything untoward or objectionable in her conduct. Nobody at the University appears to have even considered whether the public statements in favour of academic freedom of speech extended to feminists who advocate for sex-based rights, even where this was the express course of action they were undertaking at the University.

### **March 2018**

(77) Throughout March 2018, I reiterated to the University that their public statement did not constitute a sufficient or adequate way to deal with the intimidation I was receiving. On 6 March 2018, I wrote to Philippa Guereca and Nishan Canagarajah (**Exhibit RMRS17, page 11**):

*"I would like to request the legal basis for the University of Bristol dismissing my complaint. It appears as if university policies are applied arbitrarily. Some students, more privileged students, are allowed to break as many policies (and indeed, national laws) using whatever violent language and intimidating tactics as they please, with total immunity. Other students, second-class students, do not have that privilege. I would like to request that the University of Bristol informs me which policies apply to me, personally, so that this way I can know what is acceptable behaviour expected from me and what is not allowed. The frivolity with which the university is handling my targeting by failing to enact its own policies makes it difficult for me to understand what is going on legally."*

(78) The email from Philippa Guereca at page 1 of **Exhibit RMRS17** summarised the position as of 19 March 2018, which was that:

*It seems to me that your complaint has three main elements: the open letter and social media posts about the Woman's Place meeting, the atmosphere in the Centre for Gender Violence Research in which your studies are based, and the behaviour of students at the Union Annual Members Meeting.*

(79) Philippa also stated:

*"I am currently consulting with the University's Equality, Diversity and Inclusion Manager about your complaint and will update you on this when we meet."*

(80) I did not know then, but know now through the Defendant's disclosure, that the University's Equality, Diversity and Inclusion Manager, Tracy Brunnock, had

been involved in discussions around closing down the WPUK meeting (paragraph (29) above).

(81) On 22 March 2018, the University lawyer Keith Feeney wrote to me (**Exhibit RMRS23**):

*“Ms Sanchez, I will complete my review of the documentation you provided and hopefully decide a course of action in the next couple of days. The aim of any process I decide upon pursuing will be to ensure any harassment or abuse directed towards you will cease as far as possible so that you are able to continue working undisturbed on your PhD in the School.”*

(82) My PhD work in the School continued to be disturbed for the next year and a half.

**April 2018**

### **Disciplinary Proceedings by the Defendant Against Students**

(83) On or about 18 April 2018, the University's Pro-Vice Chancellor for Global Engagement Erik Lithander, who I understand is responsible for disciplinary matters, made the decision to instigate separate disciplinary proceedings against two trans activist students. I was not informed of this, but subsequently saw that AA had made a statement to this effect on social media (**Exhibit RMRS24**) The two students were selected by the University from the evidence of intimidation that I had provided the Student Complaints Officer. I had no say in the individuals who were selected for investigation, and I have not seen anything in the disclosure to explain why these two individuals in particular were chosen. As set out above, my complaint was against the University. The University never investigated its own conduct, and instead chose to open disciplinary proceedings against AA. In effect, the University chose to hide behind AA.

- (84) One of the students was the trans activist student referred to in this litigation as AA and the other was Francesca Gluscevic, who seconded the 'Ban TERFs' motion. The student who proposed the motion was not subjected to any process.
- (85) There is no relationship between AA and me outside of the unilateral way that AA forced themselves into my life by way of bullying and harassing me. We do not have friends in common and we do not travel in the same social circles. After observing the aggressiveness AA displayed towards women in January 2018, I made it clear to everyone at the University that I want nothing to do with AA. By instigating Disciplinary Proceedings that lasted around a year and a half, the University enabled AA to feel entitled and invited to be a part of my life. This is something that I deeply resent. Instead of immediately severing the tie, the University cemented the connection between bully and victim, in a way that throughout proved detrimental to me while giving room to the bully to exploit these dynamics and exacerbate their abuse, as set out below.
- (86) Notwithstanding that my complaint was not against AA, there is ample evidence, directly relating to this litigation, of AA inciting violence against women they deem 'TERFs' and trivialising the abuse of women. Although my complaint was not against them specifically, I do not disagree that AA had breached the University's rules and that it was appropriate to investigate them, based on their actions and behaviour. Examples of AA's aggression and abusiveness include the following:
- (87) On 19 April 2018, AA was filmed wearing a balaclava and being forcibly removed by the Police from a feminist public event in Bristol where they went to attack the attendees (who were overwhelmingly, if not exclusively, women). The event was titled 'We Need to Talk About Sex' and the venue was called The Jam Jar. This incident features in a Channel 4 documentary called 'Trans Kids: It's Time to Talk'. A selection of screenshots is at **Exhibit RMRS25**. In the footage that was broadcast, AA was shown attacking women: by trying to detonate a smoke bomb

in an enclosed space, by blocking the stairs and refusing to let the speakers enter the venue and by assaulting a feminist speaker while shouting:

*"I'm not 'she', you fucking cunt. My pronouns are 'they.'"*

- (88) Subsequently, one of the trans student protesters at that event wrote an article in the Guardian about their conduct at the event [**Exhibit RMRS26**]. They wrote (page 4):

*"The biggest reason I regret my participation in the protests against "We Need to Talk" is because I genuinely made people feel like I was a danger to them. I may be a trans woman, but I'm still bigger than most women and I'm still scary when I'm wearing a balaclava and shouting at you. I remember standing a few steps above Julie Bindel and Heather Brunskell-Evans and screaming down at them while Brunskell-Evans tried to hide in the corner and looked absolutely terrified."*

- (89) Even though the University had a live student complaint about this matter and an ongoing disciplinary process, from January 2018 to the summer of 2019, the University never stopped AA and other trans activist students from targeting me, or even as far as I am aware expressed the opinion that the targeting should stop. This meant that the abuse escalated.
- (90) The same trans activist students at the University of Bristol who had targeted me in January 2018 regarding the WPUK Bristol meeting on February 2018 continued to target me for the next year and a half. The bullying, harassment and intimidation described above continued when I participated in events, inside and outside University campus and throughout the United Kingdom. For example, this pattern of vilification continued when I spoke at events such as WPUK Wales on 12 April 2018, WPUK Oxford on 25 April 2018 and WPUK Bath (**Exhibit**

**RMRS11 page 5**) on 1 November 2018. It also took place inside University campus regarding events such as 'Feminist Writers Talk Back!' hosted by Women Talk Back! on 28 May 2019 at the Wills Memorial Building.

- (91) In February 2019, while the University's disciplinary proceedings against AA were ongoing, local media in Swindon reported that AA had been charged with criminal damage and a Section 4 public order offence and was accused of using threatening, abusive or insulting words or behaviour against a woman, during a protest (**Exhibit RMRS25**).
- (92) All of this information was provided at the relevant times to the University of Bristol (for example at **Exhibit RMRS28**) as I was concerned that a person with a history of escalating and inappropriate behaviour towards women had, evidently, become obsessed with me. At no point did anyone at the University speak to me about how to protect myself throughout all this. There is no evidence in the disclosure provided by the Defendant that they made any attempt to convey to AA that this behaviour should stop.

### **June 2018**

- (93) I have seen from the Defendant's disclosure that following the Freedom of Speech statement in 27 February 2018, the Head of Communications at the University Julie Jupe wrote on 13 June 2018 (**Exhibit RMRS30**):

*"I think the length is fine – given the amount of social media chatter and misinformation I think we need to be absolutely clear on the context and our position and I think this statement provides that. This also make me think about our plans for Pride 2018. I don't think we have many robust plans in place at the moment, and if there are plans by the EDI group or SU our teams are not on top of them. This is a good opportunity for us to make a commitment to*

*LGBT. Ideally, I would love to hang Pride banners between the columns of the Vic rooms, do something in Beacon House, light up Wills, have social and web in Pride colours, and have Nishan and other team members seen enjoying the March on 14 July. I don't know if we are even planning an event in Bristol Pride fortnight, but we should assign someone to look at this so we can make a plan."*

- (94) This demonstrates to me that the University saw no issue is supporting the same trans activists that were abusing and harassing me, while providing no support to me. Among the roughly 10,000 pages of documents disclosed by the Defendant, there is no equivalent correspondence in support for women's rights. There were no similar or equivalent events and demonstrations of support from the University itself, or from staff members in particular, towards feminists who support sex-based rights. This indicates that the University was prioritising trans rights activism over women's rights activism.

### **Women Talk Back!**

- (95) Following the Student Union motion on 27 February 2018 to ban feminists who advocate for sex-based rights from campus, a group of female students decided to create a feminist society where their views could be expressed without being abused.
- (96) We had a meeting with Nishan Canagarajah on 6 June 2018 to express our concerns about the bullying and harassment that was taking place on campus against feminists like us. During that meeting, Professor Canagarajah recommended that we should officialise our feminist group under the Bristol SU procedures because, according to him, that way "the University would be in a better position to protect" us should any further targeting and intimidation take place.

- (97) We worked to officialise the society under the Bristol Student Union and we affiliated in Autumn 2018. Among other things, this gave us the opportunity to host feminist meetings inside University campus without having to pay venue costs and provided a room where we could hold our women-only consciousness-raising sessions.
- (98) I have been the society's President since 2019. We held women-only consciousness raising meetings twice a month, as permitted under Schedule 3 of the Equality Act 2010, at the Defendant's Multifaith Chaplaincy and hosted larger public meetings open to everyone, such as 'Feminist Writers Talk Back!', 'Feminist Campaigners Talk Back!', 'Julie Bindel Talks Back!' and 'Feminist Academics Talk Back!'
- (99) In May 2019 Sisters Uncut Bristol posted a template letter on social media encouraging followers to contact Hugh Brady and ask him to cancel the 'Feminist Writers Talk Back!' event held at the University (**Exhibit RMRS11**, page 1). Alongside the letter the group posted images of the event speakers, including me, daubed my face with a red marker, and called the speakers and the society 'heinous', and 'nasty nasty transphobes' (page 3). The letter called the event 'hateful' and called for the closure of Women Talk Back! More invitations to physically assault us, this time inside the Defendants estate, took place on social media.
- (100) During that event, on 28 May 2019, there was an incident in which a trans activist student attempted to prevent the meeting from going ahead. The balaclava-clad student locked themselves inside our venue room and had to be removed by multiple campus security, in order for the event to go ahead. This incident was reported to the Secretary's Office at the time, both by me and by Campus Security. The response from the Director of Legal Services, Jane Bridgwater,



was that it was “interesting reading” but not a cause of concern that trans activist students continued to intimidate us.

(101) In March 2020, the targeting by student trans activists against me continued. Some trans activist students at the University of Bristol, including a male student, attended a Women Talk Back! consciousness-raising session titled ‘Boundaries’. The male student admitted knowing that this was a female-only service for women, but demanded access to our gathering on account that they identify as a woman. I spent 45 minutes in a stand-off with trans activist students, repeating the single-sex exemptions in the Equality Act 2010 over and over again. This male student is a muscular person and towered over me, which I found to be intimidating. There were a handful of women at the Multifaith Chaplaincy that night and during this confrontation, I was mostly by myself. It was ~~clear~~ from my conversation with these trans activist students that they felt emboldened to intimidate us in this manner given that the University took no action and, in fact, never concluded the disciplinary proceedings against fellow trans activist students. The March 2020 incident at the Multifaith Chaplaincy is evidence that the targeting by trans activist students against sex-based feminists on campus continued well after the University dropped the disciplinary against AA.

(102) Throughout 2019 and 2020, our events were continuously targeted. The Defendant has disclosed a security awareness spreadsheet (**Exhibit RMRS30**), which shows that our events were the only events (with one exception) graded a “red” risk. Despite this, no attempt was made at any point to address the people who were attacking us. As set out above, the reason we officialised our society was because Prof Canagarajah told us that, in this way, we would be protected. But we were given no protection at all.

### **Disciplinary Procedure**

(103) In its disclosure, the University has produced a chronology spreadsheet which summarises the main events of the disciplinary proceedings (**Exhibit RMRS31**). While I take some exception to the summaries provided for each entry, the timeline is essentially correct.

(104) In its disclosure, the University has included a pamphlet produced by AA to be distributed to protestors attending one of their disciplinary hearings on or around 15 June 2018 (**Exhibit RMRS32**). This was entitled “Why we Fight the TERF War”. It demonstrates the trans activist position at the University generally, and the tenor of the protests outside of the disciplinary hearings specifically. It included the following:

- (a) At page 2: “*TERFs... violently oppress trans people*”. This is false. I am aware of no violence perpetrated by anyone connected with any organisation defined as the “TERFs” on page 3 (or, for that matter, any violence caused by any advocate for sex-based feminism against any trans person).
- (b) At page 3: “*Meet the TERFs ... Here are a few groups on the scene at the moment*”. The document singles out “A Woman’s Place” (sic – the correct name is “Woman’s Place UK”) and Feminist Current – both organisations I have been connected with – as being “TERFs”
- (c) At page 4: “*Shall we talk about violence?*”: “*Whilst we are in no way telling people they should be violent, nor that it is the only effective tactic, we think it would be counter-productive and insensitive to condemn violence used in the fight against trans-hate given the real life dangers trans people face. For some this is an ideological, philosophical or academic fight but for people like us it's a fight to exist so don't be so quick to judge the methods used by some of our allies and comrades*”.

(d) At page 5: *“Dealing with TERFs. We must no platform and resists TERFs. This can be done in many ways, such as: Organise demos when TERFs arrange to speak: sometimes their events are held in secret ... Remember to cover your face at demos like this.”*

(e) At page 6: *“Things to shout ... “SCUM SCUM SCUM ... “YOU’RE SHIT AND YOU KNOW YOU ARE” ... “IF YOU REALLY HATE THE TERFS CLAP YOUR HANDS (CLAP CLAP)”*

(105) This was the explicit treatment that was being directed at me as a consequence of being a feminist, and as a consequence of making a complaint about the University. It was reflected in the demonstrations outside the disciplinary hearings. The University never made any commentary about this pamphlet, and they never questioned AA about it.

(106) The University organised, at least, three separate disciplinary hearings against AA, in June 2018, May 2019 and June 2019. Yet they never managed to carry any of the meetings to conclusion. The University was aware that AA was deliberately seeking to disrupt those hearings with protests, and was publishing material about the disciplinary proceedings’ location and arrangements. At various points, the University would cite security concerns posed by their balaclava-clad trans activist students, legal arguments regarding free speech and mental health concerns about AA among the reasons why these disciplinary procedures had to be halted each time.

(107) AA instructed lawyers, which they paid for by a crowdfunding page. It falsely stated that the only reason that AA was under investigation was because they had written a letter objecting to the WPUK meeting. The comments on the crowdfunding page contained abusive language such as “I’ll kick TERF folks ass [emojis] fuck TERFs” (**Exhibit RMRS33**).

- (108) A disciplinary hearing was held on 15 June 2018. I attended with a friend. The hearing was (from recollection) at 10am, and I was asked to attend an hour earlier in order to avoid the protests outside. Once I was there, I met my supervisor Dr Natasha Mulvihill in a small ante-room. Ten minutes before the hearing started, Keith Feeney came into the room and told us that AA's lawyers had produced a long legal document which made some form of legal argument about the process. He was quite flustered.
- (109) At the appointed time, I was called into the hearing. AA was present with at least one lawyer, and maybe two. The University had a panel of three, a clerk, and their lawyer. I had no lawyer.
- (110) Prior to the hearing, I was told that I would be asked questions by the panel and that it was unlikely that I would be asked questions by AA's barrister. Shortly after the hearing started, I started to be asked questions by AA's barrister. I was not prepared for this and found it intimidating. She asked me questions about my feminist views, and produced screenshots from events that were not WPUK events, but which she incorrectly described as such. At one point she put before me a print-off from a blog from the internet by someone I had never heard of which was critical of WPUK, and asked me to comment on it. I said that I had never heard of the person and never read that blog so I couldn't comment. The barrister was aggressive in her tone and made it plain that she had a negative opinion of me. I found the process dystopian and humiliating: I was being cross examined about chairing a feminist meeting and for holding feminist views, because I had complained about being harassed. Incidentally, that day, I had been invited to participate in a feminist conference in Chicago. It was the first time in my career that I had been invited to a conference and I felt proud that my work was being recognised this way. The organisers and I had coordinated for months about how to cover my travel fees, but I was told by the Secretary's Office

that this disciplinary hearing was very important and that my presence was crucial, so I rejected the feminist conference in the United States and attended the disciplinary hearing. I couldn't believe I had been asked to turn down my first conference invitation for this cross-examination by my bully's barrister.

(111) The hearing finished when I was told that my participation was complete. The hearing continued without me.

(112) I only found out later that the Secretary's Office presented the Disciplinary Panel with information contextualising the complaints from trans rights activists. But the University didn't show the Panel the letters and emails the University was receiving from women's rights campaigners. For example, on 22 March 2018, Elaine Hutton wrote on behalf of the Lesbian Rights Alliance and on 15 June 2018, Kiri Tunks also wrote on behalf of Woman's Place UK, but neither of their emails (**Exhibit RMRS34**) were put forward to the Disciplinary Committee. In these proceedings, the Defendant has also disclosed a spreadsheet which shows it received a number of emails in support of the event [**Exhibit RMRS35**] and as far as I know these were not shown to the panel either.

### **December 2018**

(113) On 5 December 2018, Tracy Brunnock the Equality, Diversity and Inclusion Manager at the University of Bristol wrote an email lobbying senior management members Nishan Canagarajah, Alicia O'Grady and Robert Kerse, and complaining that the University was investigating AA's conduct against me. Brunnock wrote (**Exhibit RMRS36**):

*"As you know, there have been tensions between the University and the trans community for some time now. This was due to the disciplinary action involving a student and a member of the University chairing an event organised by A Women's Place*

*(perceived by some as an anti-trans movement). Earlier this year, we worked incredibly hard to restore relationships with Bristol Pride, Stonewall and Trans Bristol but it now appears that these tensions are again coming to the forefront. Over the past week, my colleague Ellen Edenbrow (our lead on LGBT+ activity) has been contacted several times by students, staff and stakeholders in the city who have raised their concerns and worries for the safety of our trans students. My concern is that all of the above will damage our credibility as a supporter of trans people on a local and national level. It is becoming very difficult for my Team to maintain positive relationships with the LGBT+ community whilst responding to criticisms of the University's position on the disciplinary case. I wanted each of you to be aware of the risks surrounding this case in terms of the University potentially being asked to withdraw from Bristol Pride and also from Stonewall, both of which would damage our reputation as an inclusive employer. I have also heard that we will be receiving 'strongly worded' letters from various groups across Bristol expressing their concerns such as Trans Bristol and Bristol Pride - these are likely to be sent to the VC."*

(114) This email demonstrated the mindset of some at the University – because AA identified as trans, it therefore followed that any investigation against AA, regardless of the conduct which necessitated that investigation, was inherently transphobic. It was therefore something that the University should not pursue because it would cause friction with the trans community.

(115) It is particularly material that this was explicitly set out in an official email from the head of Equality, Diversity and Inclusion, in spite of the fact that I am an immigrant woman, with no family in the UK, who speaks English as a second

language, and who was targeted with threats of violence expressly because of my feminism. It ought to have been obvious that I was at least as equally deserving of the protection of the Equality, Diversity and Inclusion Officer as AA; but because AA identified as trans, and because I was a feminist advocating for sex-based rights, I was deserving of no attention or sympathy whatsoever other than the guilt-by-association of connection to WPUK which was falsely labelled as an “anti-trans” organisation. Despite my protected characteristics, The Equality, Diversity and Inclusion office was advocating against me - as had been the case with SARI (paragraph (67) above) – because I had been given the false label “transphobic”.

### **January 2019**

(116) On 16 January 2019, Cindy Peck, the Chair of the Disciplinary Committee wrote to me (**Exhibit RMRS37**): “As Chair of the Committee I am becoming increasingly concerned by the delay in concluding these proceedings and the impact that the delay may be having on the parties.” The University would take 11 months after she sent me that letter to finalise this matter internally.

### **May 2019**

(117) My health had been rapidly deteriorating during 2019 as a result of the stress that the University placed me under, but one event in particular brought matters to a head. On or around 15 May 2019, I had a phone conversation with University lawyer Keith Feeney. There was a disciplinary hearing taking place and I had spent months organising a feminist public meeting at the University of Bristol on 28 May. Trans activist students, including AA, were involved in the now routine intimidation and threatening behaviour against me, both in my capacity as an organiser and as a speaker. These two elements meant that my stress levels were heightened and I was concerned that my coping mechanism were not

proving sufficient enough to help me get through this situation, alone and in a continent where I have no family.

- (118) During that phone call, Keith informed me that the disciplinary hearing would be postponed for a third time. The reason Mr Feeney initially gave for this was that AA had successfully disrupted the process by organising demonstrations. An example of a meeting that had been called to disrupt a hearing is at **Exhibit RMRS38**. I asked why AA should be allowed to deliberately sabotage the process in this way, and Mr Feeney explained to me that AA's lawyers had made submissions that everything AA had done was under Article 10 of the European Convention on Human Rights. Keith said that the University had to deal with this.
- (119) This response left me reeling. My reflexive response was to laugh. I laughed and laughed hysterically and involuntarily for a very long time, like he had just told me the most hilarious joke. I have never experienced anything like it. It felt surreal and like an out of body experience. Keith did not laugh with me. He just listened to me over the phone.
- (120) When we hung up, I felt taken over by a strong urge to leave the country immediately. I didn't trust myself to be on my own so far away from my family, which is unusual because I have always been a confident and self-assured woman. Very distinctly, I felt like my sanity was leaving me and I felt terrified of losing my lucidity.
- (121) Although I wanted to leave, I had organised a Women Talk Back! event on 28 May (paragraph (100) above). There was considerable interest and backlash regarding this event, including fliers that were distributed around campus referring to me by name as a "heinous transphobic and whorephobic speaker" at **Exhibit RMRS11, page 2**. Calling me "whorephobic" is especially damaging to me: not only is it offensive and untrue, but my PhD research focuses on men who



pay for sex in the sex industry and therefore to attach a label like this to me has the potential to significantly damage my academic reputation.

(122) I wanted to cancel my participation and leave on the first flight available to Santo Domingo. But I forced myself to stay in the UK until the event, even though I was mentally unravelling and desperately craved the support of my family back home, because I knew it would send a horrible message to women if I pulled out after all the threats and intimidation this feminist event was receiving. As an organiser and a feminist, I felt a duty to see the event through. On 28 May, I went above and beyond to broadcast my usual bubbly and energetic personality even though that night it felt like a sham. It was absolutely critical to me that all the female speakers and attendees felt reassured that everything was under control, and that they felt happy and welcomed. I left the UK on the first flight I could afford after the event.

(123) I have no recollection of anything that happened between May 15 and May 28. Aside from the night of the 28<sup>th</sup>, which I remember very clearly, I have no memory of anything that happened for the next month or so.

(124) In the bundle, there is an entry on my GP Records from 18 July 2019 which states: "Low Mood. Loss of interest in previously enjoyable activity. Anxiety states. Duration of symptoms – lifelong anxiety and depression ... exacerbated by bullying on social media since Jan 18 by one person in particular". When I read this entry when I first received this record in October 2021, I was surprised because I don't remember that appointment.

(125) This is unusual because my memory is very sharp. For example, I visited my GP in 22 November 2019 and I remember that I spoke with a female doctor who had blonde hair and was about 35-45 years old. I remember that it was a clear day, where we each sat in her office, what route I took to get to the GP practice and

the conversation I had with the doctor. I even remember my perception of how she was treating me during the visit. But I have no recollection whatsoever of the July GP visit. I don't remember if I saw a man or a woman. I don't remember what time of day it was or how I got to the GP practice.

(126) After reading the note on my GP Records, I tried recalling events around that time to see if I could get a better picture of what was happening during this period and I realised that from mid-May 2019, I can remember very little. I remember May 15<sup>th</sup> (when I had the phone call with Keith), May 28<sup>th</sup> (when I had the public feminist meeting where I was both a speaker and the event organiser), and an unspecified period of time when I was back home, being looked after by my family.

(127) In that interval, I don't remember if or when I met with my supervisors, I don't remember any meetings I may have had with my friends or any conversations I may have had with the feminist organisations I am involved with. My boyfriend at the time lived in London but worked in Bristol. Every week when he was in town, I would stay with him in different hotels throughout the city, but I have no recollection of where I stayed during the summer of 2019 or where we went on dates.

(128) Furthermore, I don't remember having any conversations with my family about what was happening with the University complaints and disciplinary process (either over the phone or in person) but, somehow, everybody knew what was going on. I don't remember when or how I informed my family that I was feeling very unwell and that I needed help from them.

(129) In the process of writing this Witness Statement, I read emails showing that I made at least two separate trips to the Dominican Republic in the summer of

2019. I have no idea why there is a gap between those trips, what I would have come back for or whether I flew from Bristol or London airports.

(130) I made multiple trips to the Dominican Republic to be with my family while all of this was going on: including from 19-31 May 2018, 1-16 June 2019 and 13-21 September 2019. I would not have made those trips were it not for the fact that I felt worn-down and dejected because of the treatment I was receiving. When I was in the UK, I would spend as much time outside of Bristol as I could. I would stay in Weston-Super-Mare and Bath visiting friends almost every other weekend.

(131) I find this memory lapse over the Summer 2019 to be alarming because I can perfectly recall all other time periods of my life, usually with great detail. I didn't forget a single day or appointment other than this; but for this period I can't recall weeks or possibly even months of my life. I was obviously alive and functional, but I find it frightening how such a big chunk of my memory could be gone, presumably due to the high stress I was under during that time period.

(132) I only became aware of this gap in my memory when I discovered the 2019 GP visit notes in the copy of the records I obtained in late October 2021, and realised that I had no memory of it. This is why I didn't bring this issue up with either Dr Slinn, Dr Cullen or anybody else before then.

(133) I don't understand why I said that I had suffered from lifelong depression and anxiety during that GP visit, because it is not true. But I can see now that I was feeling very unwell at the time and I assume that my outlook on life was a lot more downhearted and hopeless than it normally is, which may have clouded my judgement.

(134) It is not true that I suffered from lifelong anxiety and depression. I have been able to successfully finish Primary, Middle and High School, and to complete

undergraduate and postgraduate higher education degrees, sometimes ahead of schedule and without any problems or concerns regarding academic performance.

(135) My whole life, I maintained this excellent academic performance while engaging in a large number of extracurricular activities, so the work I have engaged in outside of my PhD studies are merely a continuation of the very busy lifestyle I am used to leading parallel to my studies.

(136) Over the past four years, I have read countless interviews and reports from women who have gone through situations similar to mine. Some with headlines such as “Bullying made me feel suicidal”, “My PhD broke me”—bullying in academia” and numerous articles with version of the same message: “bullying ruined my life.” I made a deliberate and conscious decision that there should never be a headline along those lines about me. I have forced myself to create a life that wasn't just endurable but somewhat enjoyable, because I was aware, due to my professional training and academic background, that abusers want their target to feel misery so I didn't allow my life to become miserable.

(137) I engaged in what Andrew Sheppard, the Defendant's solicitor, derides as “non-academic activities” in order to make my life bearable because, otherwise, I would not be here.

(138) There is an account on Twitter called Do Better Academia (**Exhibit RMRS39**) that shares stories about the impact that incompetent academic management has on people's lives. Many of those people were forced out, quit, harmed themselves and some of them committed suicide. Reading these stories, it became engraved in my mind that I should never allow my narrative to become one of failure and destruction, so I overcompensated by amplifying all the positive aspects of my life that I could find. Being so far from home, and dependent on

the Defendant as the provider of my studies, the only other positive aspect was my feminist writing and campaigning.

(139) By the time I left Bristol for Santo Domingo in May 2019, the treatment I had received from the University had taken an extreme toll on me. I was barely functional and rushing to get on the first available plane back home. Prior to arriving in Bristol, I would describe myself as a very energetic person with an active lifestyle. I have also always been very active in sports (mainly football, volleyball and tennis) constantly since my early teens so my energy levels have always been high. However, since mid-2019, I have barely had the energy to take long walks.

(140) In the Summer 2019, I was with my family in Santo Domingo. I don't remember discussing what had happened but I can only describe it as a time when everyone rallied around me and were very gentle with me. Nobody asked me questions, yet somehow, they all knew. My family just made sure that I was eating, that I showered and that I knew they were around in case I wanted to talk. At the beginning, I felt like a zombie going through the motions. I very rarely cry so there wasn't any crying involved, but I felt like there was an invisible glass separating me from my feelings because I felt almost entirely numb and disconnected from myself. Slowly, my family ensured we did little activities together like running errands with my dad, listening to music in the balcony with my mum and playing boardgames with my niece and nephews, and I began to feel better. I didn't understand what was happening then but I can see now how my family was nursing me back to health.

(141) Since then, I have tried as hard as I can to resume my life as normally as possible given the circumstances. I have done nothing wrong. In 2017, I made a decision to do a PhD with the Centre for Gender and Violence Research and I firmly believe that nobody other than me should control the course of my life or

the decisions I make about my future. It is not for trans activist bullies and harassers, or an abusive institution like the University of Bristol to determine whether I should withdraw from my PhD programme with my tail between my legs so I have forced myself to push past the aversion, unpleasantness and the adjustment disorder so that I can enjoy my life as much as possible. But it has proven to be near impossible to engage with my studies while the University continues to behave abusively towards me and it feels like an active struggle to galvanise myself into doing something that felt so natural and easy for me when I first arrived in Bristol.

(142) Since the Summer of 2019, out of the seven days of the week, there are usually two or three where I feel barely functional. I am very organised, so I like to plan things far in advance but during those days I would feel barely present inside my own body.

(143) Prior to the summer 2019 I would go to my PhD office everyday Monday to Friday from 12pm-10pm. I would only leave because at 10pm an alarm would go off in my building and campus security would be called. But after that point in time, I can count with one hand the times I ventured to university campus alone.

(144) I felt that the University had made me physically unsafe. I was worried that I would be assaulted. This was a rational fear, given the experience of Maria McLachlan, and the support shown to Tara Wolf by the same activists that had bullied me, and the violence that they already had shown at events such as the Jam Jar event and AA's own disciplinary hearings.

(145) After the summer of 2019, I felt that I couldn't go to campus anymore. Firstly, because by dropping my high-profile complaint with a tacit endorsement of the bullying and harassment I suffered (as I have set out below), the University of Bristol was encouraging more of this behaviour to continue. Secondly, because

I felt an almost paralysing aversion to the University campus. This is now recognised by the clinicians who saw me as an adjustment disorder, but throughout most of this time it has felt like a very intense and unbearable aversion to anything relating to the University of Bristol. I created alternative routes so when I had to attend, I was physically present as little as possible. During the Sunday nights when I would engage in women-only consciousness-raising for the Women Talk Back! society, I would go and leave accompanied by friends. Whereas before, I was enthusiastic to immerse myself in my academic experience in Bristol, after the summer of 2019, I rarely check my University emails. And when I do, I create several mechanisms to avoid engaging with it fully, such as doing it while I am cooking or playing a movie on a separate window.

### **Medical Records**

(146) As a result of the treatment I was experiencing, I started to see counsellors the Staff Counselling and the Vulnerable Student's Office. At various points over the 2018-2019 period, the Defendant would make requests for sensitive information about the impact this situation was having on my health and my studies. On 10 July 2018, the Secretary's Office asked me to provide them the personal records of the Staff Counselling and Vulnerable Student's Office notes taken by the psychologists who had been working with me. They also asked me to provide detailed Impact Statements. One of these is at **Exhibit RMRS40**.

(147) At the time, I was informed, by Keith Feeney and Laura Trescothick-Martin, that I needed to trust the University and that this information would help the process. But I remember feeling very distinctly like the University was engaging in a voyeuristic exercise for no objective purpose other than to gawk at me. I felt exposed. There was no transparency over who got to see these sensitive

documents about me so it felt like I was being asked to strip naked in front of countless people so that they could peruse me.

(148) The Secretary's Office said that they would use these records if and when they became relevant to the Disciplinary Proceedings. No explanation was ever given as to when the documents would be relevant, or what this trigger would be. The documents demonstrated that I was becoming very unwell, as a result of what was happening, yet they delayed even opening these reports. On 10 July 2018, I coordinated with Keith Feeney to give the information the Defendant asked from me, by hand, to Sue Paterson at the Secretary's Office building.

(149) On 24 May 2019, the Deputy Vice-Chancellor and Provost Judith Squires wrote **(Exhibit RMRS41)**:

*“You have referred to your psychological records. As I understand it, you gave a copy of your records to the University representative in case they were needed as evidence of the impact that the matters you complained about have had on you. These records have not been used in the proceedings and have not been seen by anyone; they remain in a sealed envelope in a locked drawer in the Secretary's Office.”*

(150) This statement means that the University was so unconcerned with the impact the year and a half of bullying and harassment I endured, plus the Secretary's Office condition that as the victim I was ordered to maintain confidentiality throughout the entire process, that they never bothered to read the reports written by professional psychologists working with me.

(151) Squires also wrote on 24 May 2019:



*“Regarding your records being requested from the Vulnerable Students Service (now the Student Wellbeing Service), I have liaised with the University staff involved in the disciplinary case and your complaint and no one is aware of this happening.”*

(152) This is false. There is email correspondence on 17 July 2018 between Keith Feeney, Aubrey Dye-Welch (the Student Wellbeing Advisor) and I in which Aubrey provided her report from the Student Wellbeing Service on the impact this process was having on me and stated (**Exhibit RMRS42**):

*“Hello to you both, Please find attached my report with the changes specified by Raquel. Do let me know if there is anything else I can edit, or anything I can do to help with this process.”*

(153) The report was prepared by the Defendant on the basis of the records that the Defendant now appears to deny having received.

(154) I have been seen by a Staff Counsellor, a Student Counsellor, a psychologist at the Vulnerable Students Office, Dr Slinn and Dr Cullen. All of them agreed that the impact of the University's failure to address the bullying, harassment and intimidation I have suffered has been the cause of my deterioration in health. Dr Slinn and Dr Cullen diagnosed this as a prolonged adjustment disorder, that occurs following a highly traumatic or stressful event in a person's life. Yet the University has sought to discredit all and any evidence I have provided from all these professionals about the impact this process has had on my mental health.

## **June 2019**

### **Conclusion of Disciplinary Procedure**

(155) On 27 June 2019, the Student Complaints Officer Philippa Guereca wrote (**Exhibit RMRS43**):

*“I am writing to notify you that the disciplinary proceedings against AA have been terminated by the Disciplinary Committee today. As the disciplinary proceedings are confidential, I’m afraid that I am unable to give you any further details about this decision.”*

(156) I was devastated by this response. It meant that the bullying and harassment I had received was to receive no reaction from the University at all. It was effectively an approval by the University for the treatment I had received.

(157) From that point on, the University ignored all allegations against AA. While this situation was ongoing, nobody at the University had a conversation with me regarding how I could be physically safe in an environment where “violent, threatening, intimidating behaviour or language” had been taking place against me for over a year and a half.

(158) On 27 June 2019, the same day that disciplinary proceedings against AA were terminated by the University of Bristol, AA published a photo of themselves bare chested on social media with the caption (**Exhibit RMRS44**):

*“The face (and nipples) of someone deciding what new hobbies to pursue, now that the University of Bristol have dropped their transphobic joke of a disciplinary case. So many options. Eat your heart out WPUK”,* along with eight middle finger emojis.

(159) The Defendant has since employed AA.

(160) On 29 June 2019, the now Head of the Centre for Gender and Violence Research Marianne Hester wrote to Judith Squires, Deputy Vice-Chancellor, Provost and the Decision-Maker appointed by the Vice-Chancellor to deal with matters relating to my case, stating (**Exhibit RMRS45**):

*“I have been made aware that the disciplinary case against AA has been discontinued. I am obviously extremely concerned that no*

*action appears to have been taken by the University to protect the student on the receiving end of abuse, that is Raquel Rosario Sanchez. I gather that a University welfare officer has been attempting to contact Raquel. However, I must point out that where Raquel's situation is concerned 'welfare' requires that she is safe from further abuse and harassment, and merely enquiring about her 'wellbeing' will not be adequate. In retrospect we should probably have advised Raquel to take the case up outside the university (as you did successfully a few years ago against a less dangerous individual/student). But Raquel wanted to believe that the UoB would deal with and the threats to kill, harassment etc."*

### **July 2019**

(161) On 3 July 2019, Judith Squires replied stating that the reason why the disciplinary proceedings were dismissed without reaching a conclusion, or addressing the nature of the complaint was because this was a free speech matter (**Exhibit RMRS46**). I do not accept that this is an appropriate or adequate response. Specifically, Squires stated in the 3 July 2019 email:

*"The University's obligation is to ensure free speech under the law and within its Freedom of Speech Code of Practice. It is extremely important that those supporting Raquel and the University ensure that any action taken is proportionate to the alleged incidents and protects the freedom of speech of all members of the University. In this case the University's role is to maintain free speech, which includes both Raquel's right to express her views and the other student's right to protest about those views. The University does*

*not and cannot support one student's view over another's provided that their views are lawful and lawfully expressed."*

(162) I remain astonished that my conduct was equated with AA's (or the other activists') actions against me. I have never been abusive or bullying towards anyone and all I have done is chair, organise and speak at feminist meetings. The equivalence between my actions and theirs that the University adopted was entirely false and unfounded.

### **Defendant's Public Statements in July 2019**

(163) On 2 July 2019, five days after AA's public statement and the termination of the disciplinary proceedings against AA, the Pro-Vice Chancellor for Student Experience Sarah Purdy and the Pro-Vice Chancellor for Global Engagement posed holding the trans flag during Bristol Pride festivities (**Exhibit RMRS47**) which were sponsored by the University, along with Suzanne Doyle and a trans activist student.

(164) This accompanied a "Trans Pledge" that the University made on the same day. The University's Diversity and Inclusion Manager Tracy Brunnock announced the Trans Pledge stating (**Exhibit RMRS48**):

*"We are delighted to join Bristol Pride and other organisations in adding our support to this important pledge. This reaffirms our commitment to trans inclusion: there is no place for hate crime in our city. We are looking forward to working in partnership with our LGBT+ networks over the coming year to further promote trans equality."*

(165) The statement introducing the Trans Pledge included the sentence: "For further information about possible changes to the UK's Gender Recognition Act, please

see: [www.stonewall.org.uk/truth-about-trans](http://www.stonewall.org.uk/truth-about-trans)." The page at that time (it has since been changed, but an archived version is at **Exhibit RMRS49**) included a number of contentious statements from Stonewall, the LGBT lobbying organisation.

(166) These statements are inherently in opposition to the political viewpoint of feminists who advocate for sex-based rights, such as me. However, I understand that not everyone and not every institution will see the world in the same way I do. Therefore, my objection is not to the existence of alternative viewpoints but to alternative viewpoints resulting in my ability to pursue my studies being curtailed.

(167) By signing up to this manifesto, the University was taking a deliberate and contentious political stance, while at the same time professing to be neutral and unbiased. The implicit approach taken by Stonewall and Bristol Pride as contained in these documents was that people – such as me – who do not share these points of view are transphobic and bigoted. I am neither of these things, but my University, in publicly aligning itself with these views, was in effect labelling me as such.

(168) Neither in the Trans Pledge, nor in any other statement or commentary published by the University on the matter of sex and gender, is there any mention of alternative views or links to organisations supporting sex-based rights, or indeed any recognition that sex is even a protected characteristic. This shows that the University has a political commitment to trans rights activism, while ignoring sex-based rights concerns or advocacy.

(169) Again, no similar statement has to my knowledge ever been made about women or feminists by the University.

(170) Also in July 2020, the University published a document entitled 'Trans and Non-Binary Staff Inclusion Policy' (the current version is at **Exhibit RMRS50**), which included a number of contentious statements, including:

- (a) *"Where this policy refers to 'trans', this refers to a broad range of people whose gender identity or expression is not typically associated with their assigned sex at birth".* The concept of sex being arbitrarily "assigned at birth" by a midwife or other medical professional is a foundational principle of gender identity theory. I don't think it can be scientifically correct: a person's sex is defined at conception, and is not "assigned" by anyone. Parents-to-be are routinely told their child's sex after the 20-week scan. That could not be the case if sex were arbitrarily assigned at birth.
- (b) *"Trans staff can use the facilities (such as changing rooms and toilets) they feel most comfortable using."* This can result (and as set out below from paragraph (208), has already resulted) in women being required to shower in communal facilities with naked males.
- (c) *"Trans related abuse, harassment, or bullying (name-calling/derogatory jokes (written or spoken), unacceptable or unwanted behaviour, intrusive questions) are serious disciplinary offences and will be dealt with under the Acceptable Behaviour Policy and Conduct Procedure (Ordinance 28)."* This is in contrast to my experience, that where I complained about abuse, harassment and bullying by or supposedly in support of trans individuals, my complaint was not properly investigated or concluded.

(171) As I have set out above, although I disagree with them, I have no objection to anyone holding these views or beliefs. However, where they are adopted as official policy by an institution such as a University, it causes pressure for

everyone in the University to hold these beliefs, and those that do not are othered as I have been.

(172) There is no policy equivalent to the Trans and Non-Binary Staff Inclusion Policy for female students, feminist students or for women who advocate for sex-based rights.

### **September 2019**

(173) I was approached by the BBC Radio 4 Today Programme in September 2019, who wanted to report on the situation I was facing. A producer at the Today Programme contacted the University for a comment. The Head of Media at the University Will Marsh responded on 27 September 2019 stating (**Exhibit RMRS51**):

*“Our position has always been clear that we have an obligation to ensure that all students’ rights to freedom of speech are upheld. Our University should also be a place where all feel safe, welcomed and respected, regardless of gender, gender identity, race, religion, sexual orientation, disability or social background.”*

(174) For the reasons set out above, I strongly disagree that the University behaved in a way which ensured that “all students’ rights to freedom of speech were upheld”: I was subject to harassment and intimidation, while nobody who subjected me to this was subjected to any concluded process at all. The Defendant’s approach was set out explicitly in the email thread at **Exhibit RMRS51**: “The individual accused of bullying (AA) is now a Law student and our priority is to ensure they feel supported by the school at this time”. No reason was given for this express prioritisation of AA over me, and nobody on email exchange appears to have seen anything surprising in this comment.

(175) The public statement issued by the University also disclosed that I had been treated by the Student Wellbeing team. I never consented to the University disseminating to the Today Programme's audience of 6.5 million listeners around the UK that I had been receiving support through the Student Wellbeing services. As a student under their care, I was not asked whether I was content for this information to be shared with the media or the public, and I would not have given that consent had I been asked. I would have objected to the University relying on the fact that I needed assistance in order to overcome the impact of the University's actions upon me, and using the fact of that assistance in order to in some way absolve the University.

(176) It should also be noted that neither sex nor philosophical belief are included in the list of protected characteristics referred to by Will Marsh, both of which are relevant to my situation.

(177) Towards the end of summer 2019, when I returned from Santo Domingo, Jane Bridgwater from Secretary's Office referred me to a meeting with Jutta Weldes, the Graduate Dean at the Faculty of Social Science and Law. I had never met this person before this point. On 2 September 2019, she wrote to my supervisors and to me (**Exhibit RMRS52**):

*"I am at this stage largely interested in getting some information about your situation, about which I know nothing, and your supervisors' input is very important."*

(178) From the moment I met Jutta Weldes, she suggested that I should not finish my PhD, and should discontinue my studies. During our meeting on 5 September 2019, Jutta offered me three options, which were subsequently summarised by Natasha Mulvihill as (**Exhibit RMRS53**):



*“1) Raquel takes a 2-month suspension to stop the clock on her progression timetable to allow for the legal process to conclude. This would give Raquel the option of continuing the PhD later this year or of withdrawing and reapplying (see below).*

*2) Raquel can let the clock run out on this PhD and either withdraw and leave UOB or withdraw and re-apply to UOB.*

*3) Raquel could withdraw now, but this would revoke her visa.”*

(179) There is no logical reason whatsoever why I should want to withdraw from my PhD “and re-apply” to the University of Bristol, particularly given the fact that I have done nothing wrong.

(180) In the email at **Exhibit RMRS53**, Natasha Mulvihill referred to “the legal case”. At the time, I took this to mean (and I think Natasha meant) my complaint against the University, rather than this litigation specifically.

(181) Both my supervisors and I explained the circumstances that contextualised my lack of academic progress in my PhD. But Jutta told us that she was not concerned with that, and that her only concern was whether students were making academic progress or not.

(182) Around this time, I spoke to the media for the first time with an exclusive for *The Sunday Times* and an interview with the *Today Programme* on BBC Radio 4. This is when the Graduate Dean, Jutta Weldes, started to pressure me to suspend my studies. This felt punitive. I felt coerced into something I didn't want to do, but Jutta was insistent that I must suspend my studies given that I was not making sufficient academic progress on my PhD.

(183) Pressuring students to suspend their studies is not a part of any of the University of Bristol's policies and procedures. The PhD Handbook states that a suspension

request must only come from the student, not under pressure and instigated by the Defendant or its employees.

(184) Nobody from the University explained to me that, if I suspended my studies for a period of time, this would cause my immigration status to be jeopardised. This would have hindered my ability to finish my PhD, aside from generating a number of severe detriments to me.

(185) It was a pressing concern to me that I was being coerced into something that felt detrimental both to my studies and to my immigration status. I delayed suspending my studies for as long as I could, but Jutta Weldes would chase my supervisors and I repeating that I needed to commence my suspension “now”, “regardless of whether UK visa rules allow her to suspend again later.” The effect of pressuring me to suspend my studies was to end my right to remain in the UK. These dynamics would have meant that my complaint (which at that point was still live) could be discontinued without the need for the Defendant to reach a conclusion about it.

(186) I resumed my studies before the period allowed for International Studies, in part because I was worried about the visa implications this process had for me.

(187) The University instigated a number of Enhanced Academic Support plans against me that are put in place when students are struggling with their academic performance. Despite the deceptive name, these procedures are not supportive at all: they consist of very strict deadlines over the course of a three-months period that students must meet, otherwise more severe steps are taken against the student.

(188) The problems I faced with my academic performance were both the protracted bullying and harassment investigation and the psychological injury that this has created for me. The University has taken no steps whatsoever to help me

navigate the aftermath of these issues or to lessen their impact on me. Therefore, by placing me in an Enhanced Academic Support plan, the Defendant was ensuring that I was put down a path with a number of stringent targets that I would be unable to meet given that the sources of this impact were never addressed.

(189) When I, inevitably, couldn't comply with the Enhanced Academic Support plan, Jutta Weldes decided to instigate a final punitive step against me, in order to get rid of me as a PhD student. On 11 November 2021 (**Exhibit RMRS54**), she wrote a letter to me stating: "You have not met the requirements of Plan 2 and that your progress continues to be unsatisfactory. Under these circumstances the regulations require that I refer you to a Registration Review Panel for a formal hearing under the procedure."

(190) This is currently ongoing. Among the options that the Registration Review Panel may recommend are that my registration is terminated or that my registration is changed to that of an alternative degree. Although I received the letter on 11 November 2021, the University has told me that they will inform me of their decision regarding whether to terminate my registration (and get rid of me as a PhD Candidate) only after this trial takes place and after my British Residence Permit expires in mid-February 2022. There has been no explanation as to why any student, let alone a student like me, who has endured so much unnecessary trauma at the hands of the University should be in this suspended period of uncertainty and distress for over four months.

(191) It feels surreal and unnerving to observe how the University of Bristol, rather than wish for me to be a healthy and successful student, appears so determined to block and maim my personal and academic development.

**October 2019**

(192) On 15 October 2019, the University's Media Officer Beatrijs Brouwer also showed the political stance that staff members were taking towards issues relating to me. The feminist society that I preside, Women Talk Back!, organised a public event to commemorate the International Day for the Elimination of Violence Against Women on 25 November 2019 called 'Feminist Campaigners Talk Back!'

(193) The event was described as:

*"Feminist Campaigners Talk Back! At the University of Bristol invites both our University of Bristol community and members of the public, to listen and engage with feminists activists as each speaker focuses on different aspects of the interconnected forms male violence against women and girls takes in our society, including: prostitution, honour-based violence, State enacted abuse, political repression and the importance of single-sex services for women exiting abuse."*

(194) The event featured women's rights campaigners against male violence like Pragna Patel of Southall Black Sisters, Beatrix Campbell OBE, lifelong feminist campaigner Helen Steel, Karen Ingala-Smith of NIA and the Femicide Census and Dr Diana Erandi Barrera Moreno. Between them, these women are among the most recognised and successful feminist campaigners in the UK with decades of writing, multiple academic and honorary Doctorates and grassroots feminist outreach work. But Brouwer classified these women merely as "anti-trans" speakers (**Exhibit RMRS55**).

(195) This was consistent with the online abuse that I and the other women organising the meeting suffered online because of the meeting, and the attempts to shut it down (**Exhibit RMRS11, page 10**).

(196) Every time Women Talk Back! held a public event (except one occasion in which we were exempt because of a technical mistake), the University of Bristol through Judith Squires who acted as decision-maker on all public event matters, made Women Talk Back! pay £240 for “security services” so that our feminist student society could protect women from the University’s trans activist staff and students. There is no reason why the University could not cover that fee, yet the burden and responsibility to protect the hundreds of women who attended our events fell on me personally as society President.

(197) On some occasions, senior management were downright vulgar about me. On 29 October 2019, I wrote to the PVC of Student Experience Sarah Purdy:

*“Dear Professor Purdy, Hope you are well. My name is Raquel and I am the President of Women Talk Back!, the feminist student society at the University of Bristol. In May this year, we held a meeting with Professor Canagarajah to discuss a number of things, but mainly our planning for November 25<sup>th</sup>, which is International Day to End Violence Against Women. We have asked Professor Canagarajah for a follow up on some action points we left pending between the University and our Society, relating to November 25<sup>th</sup>. He is leaving quite soon and has redirected us to you, in case you might like to meet with us. We understand you are very busy but we would really appreciate an appointment so we can discuss our ideas regarding this particular matter more thoroughly, please. Let me know when you can, please.”*

### **November 2019**

(198) On 8 November 2019, Miles Taylor the senior executive assistant to Sarah Purdy wrote to her about my email saying: “How much do you want me to

prioritise the shitty email from Raquel and Women Talk Back! lot?" To which Sarah Purdy appeared to take no exception, and replied on the same day: "No need to prioritise that email." (**Exhibit RMRS56**)

(199) On 11 November 2019, Sally Heslop, Associate Pro-Vice Chancellor for Education Quality and Standards wrote to me with the Local Stage outcome of the complaint that I had lodged in February 2018. (**Exhibit RMRS57**). The following aspects of this were particularly relevant:

- (a) At paragraph 6 and 7, no explanation is given as to why I was cross examined by AA (referred to NA in the outcome)'s lawyers, merely that they requested this and the panel agreed to it.
- (b) At paragraph 8, it is acknowledged that the reason why no subsequent hearing went ahead was because "the hearing would attract protesters and cause disruption". As I have explained, being bullied, harassed and intimidated over a year and half was causing severe disruption to my studies and my health, yet Prof Heslop didn't take this into account.
- (c) At paragraph 9, that although I had been required to keep the process confidential, there had been no obligation on AA to do so, including in "seeking to whip up support for their case" and in so doing to prevent my complaint being heard.
- (d) At paragraph 13, that AA had transferred schools in order to minimise contact with me. I am not aware that this was the case at all, and have seen no evidence that AA's decision to move schools was anything to do with me. I have been informed by academics within my Faculty that AA transferred Schools after they complained about "a climate of transphobia" within the Centre for Gender and Violence Research. This is a very serious allegation

so AA was asked to produce evidence for this claim and could not provide it because it did not exist so AA then decided to transfer somewhere else.

- (e) At paragraph 13, that there was no evidence of “any... direct bullying and intimidation or of any specific threat to [my] own personal safety.” This is despite the fact that all of the evidence cited in this litigation was before the disciplinary committee and was submitted to Prof Heslop herself.
- (f) From paragraph 14-16 onwards, the outcome to my complaint turned into a criticism of me and my academic progress. The outcome “exceptionally, and as a gesture of goodwill” suggested that I leave the University. If I left, as suggested, then the University would repay my scholarship fees. But if I stayed, then it would not. The clear and intended message from the Defendant to me was that I should leave the University of Bristol.
- (g) At paragraph 22(d), a payment of £5,000 was offered to me, but only if I decided not to pursue my complaint further (paragraph 24) by appealing the Local Stage outcome. I pursued the complaint further, and the £5,000 was never paid to me.
- (h) No remedial measures were put in place to ameliorate the impact of the University delay and the unnecessary distress this process had on my PhD studies. Nobody from the University of Bristol has ever met with me to ask: “Raquel, after everything that has happened, how can we help you move forward and finish your PhD successfully?” Instead, after dismissing the disciplinary procedures against AA, the Defendant took a punitive approach towards me. I consider this punitive approach to be retaliation for daring to file my student complaint in the first place.
- (200) The University dismissed my student complaint, filed on 1 February 2018, on 19 December 2019.

## March 2020

(201) On 13 March 2020, Clarissa Payne made a Freedom of Information Request to the Defendant. She wanted to know about the complaints the University had received about inappropriate behaviour by their trans activist staff and students. She asked: "How many student complaints... have you received in relation to bullying, harassment, unacceptable behaviour, disruption and/or any anti-social behaviour enacted or displayed by antifeminist or trans rights activist staff or students at your institution? How many complaints have you received from members of the public regarding similar behaviour by your staff or students?" The timeframe for this request was 10 January 2014 to 13 March 2020.

(202) The University replied to this FOI request on 9 April 2020 by stating: "There have been less than 5 complaints which fit the criteria of this request in the specified period. Due to the low numbers, we are unable to provide any further information as it could be possible to identify the individuals concerned." The request and its response are at **Exhibit RMRS58**).

(203) This response was inaccurate. On 22 May 2019 Jami West, the personal assistant to the Vice Chancellor wrote an email with the subject line: "an idea of some of the emails received." She attached a table created by the Defendant to catalogue contacts from the public. This document was titled 'Complaints Log' (May 2019) and had a number of columns such as 'Name of Complainant', 'Person Responsible for Complaint Resolution' and 'Current Status' (**Exhibit RMRS59**). Another column is called 'Nature of Complaint'. According to this Complaints Log created by the University of Bristol, there have been 15 complaints about the behaviour described in Clarissa Payne's FOI. The table informs us that all 15 complaints were still active at the time the table was designed.



### **Matters since the Claim was Issued**

- (204) Although these matters are not pleaded in my case, they demonstrate the corporate position that the University has taken towards matters of sex and gender. These demonstrate that the University has taken a highly contentious and partisan view of this subject, which has caused disadvantage to women, in general.
- (205) The Staff Record Form that the Defendant now uses when hiring incoming staff asks questions about employees' religion, disability descriptors and ethnic origin, but it does not collect any data about sex. Collecting data on employees' sex is crucial to the development of workplace policies and to address issues relating to sex discrimination. But the word "sex" does not appear once in their Equality and Diversity Monitoring form. Instead, the Defendant asks: "Is your gender identity status the same as the gender you were assigned at birth?" and "What is your gender identify? [sic]".
- (206) In the course of these proceedings, I have been contacted by a number women at the University of Bristol who were suffering detriments due to their outspoken support for feminism or were negatively impacted by the University's political stance that prioritises trans rights activism over women's sex-based rights as they are already enshrined in UK law.
- (207) On 15 March 2021, I was contacted by a female employee who requested anonymity for fear of retaliation from the University of Bristol [**Exhibit RMRS60**]. She wrote that she was under investigation by the University for alleged transphobia: part of her job was to advise and look after the wording of University staff policies relating to family (maternity, paternity, shared parental, adoption). In a recent meeting, the Equality, Diversity and Inclusion team had required further changes, including arguing that the word "maternity" itself is exclusionary

and problematic and should be removed from the maternity policy. In the meeting she had stated that “you have to have a uterus to give birth” and that it worried her that the word “maternity” is deemed problematic in a maternity policy. As a result, a written complaint was made to the senior HR team accusing her of transphobia and abuse. She had been investigated and told to apologise.

(208) On 9 December 2021, I was contacted by a female academic who uses the University's swimming pool facilities [**Exhibit RMRS61**]. She requested anonymity for fear of retaliation both from the University of Bristol and the academic institution where she works.

(209) This female academic wrote to Matt Birch, the Director of Sport, Exercise and Health with concerns regarding the lack of single-sex spaces and facilities on campus, namely in the University's swimming pools. She informed him that she had encountered a male, in men's clothes getting undressed in the swimming pool female changing rooms while she was accompanied by her daughter. She informed Mr Birch that that she had been informed by the University's staff that this was required by University rules and regulations, and that this had resulted in her and her daughter being unable to use the pool. She stated that this was a breach of the Equality Act, and queried whether an Equality Impact Assessment had been done by the University in setting this policy.

(210) On 9 December 2021, Matt Birch replied, dismissing all her concerns and in effect stating that the University implements a policy that prioritises trans rights over the implementation of sex-based rights, such as the right to female-only spaces and services. Birch refused to say whether the University had conducted an Equality Impact Assessment when drafting this policy.

(211) On 10 December 2021, I was contacted by another female employee at the University of Bristol. She had been encouraged to put her pronouns in her work

email signature. This is a trans activist demand. When she refused and explained why this represented compelled speech, she was summoned to a meeting with the Equality, Diversity and Inclusion staff team that is on record attempting to cancel the WPUK Bristol meeting.

### **Conduct of the Defendant in this Case**

(212) I have been a student at the University of Bristol since late 2017 and, to this day, the employees involved in my student complaint, the disciplinary procedures and now this litigation have refused to respect my name. I have been called Rachel Sanchez, Racquel Sanchez or Raquel Sanchez throughout, even though I have explained multiple times to the University that, my name is 'Raquel' and that in accordance with Dominican naming custom, I have two last names, which are unhyphenated. My lawyers have explained this to the Defendant's lawyers in correspondence but it had no effect.

(213) The University of Bristol has produced a number of policies about the requirement that people use certain specific pronouns when referring to everybody in everyday life. Among these policies are the 'Using Pronouns at Work Guidance' where the University encourages employees to add pronouns on their email signature, the 'Trans and Non-Binary Inclusion Guidance', the 'Guidance for Trans and Non-Binary Staff', and a separate 'Guidance for Supporting Trans and Non-Binary Staff'. The summary of these documents is that a trans person's pronouns are a key component of their identity and that addressing the person correctly is a mark of respect needed to create an inclusive environment. But although this is the University policy for pronouns for trans people, they refuse even to address me by my correct name.

(214) Similarly, the University has repeatedly misstated the country I am from. Throughout their Defence Pleadings there are repeated references to Panama,

a country that I have never lived in and where I have no family heritage. The University of Bristol's Unacceptable Behaviour policy considers "lack of awareness or consideration of diversity, particularly when related to a protected characteristic under the Equality Act 2010" to be a form of unacceptable behaviour.

### **Email exchange with AA**

(215) In November 2021, AA wrote to my solicitor asking me to delay my access to justice by postponing this trial for a number of months while AA, who is not a party to these proceedings, sought legal advice. My lawyers are here to represent me. Therefore, by contacting my lawyers, AA was once again seeking to enter my life against my will. I consider this request to be an insult, given the severe impact that AA's deliberate disruptions had on my health and my studies, as an immigrant in the UK. This is a person who spent over a year and a half bullying, harassing and eventually mocking me over their complete lack of accountability when I complained about their abusive behaviour to an academic institution that was meant to support all students. I have zero respect for abusers and I don't owe them any form of civility at all because respect is earned. I felt hurt and betrayed because the tone of my solicitor's email in reply to AA left the door open for AA to believe that I was entertaining the possibility of collaboration between us so I made a decision to write back to AA explicitly stating that they have no place in my life, that I want nothing to do with them and severing that cord once and for all. I did not hide this correspondence from my lawyers; instead, I forwarded this exchange half an hour later to them so they were informed of what had taken place. Based on my professional experience and academic training in the violence against women sector, I consider my response to AA's email contacting me to be a logical and reasonable response from a victim to her bully, and I do not regret it.

(216) The Defendant's solicitor used my email to AA to threaten me with a Contempt of Court allegation. The sanction for such a severe infraction is potentially a prison sentence against the Claimant. Therefore, the University of Bristol threatened to put me in jail for finally standing up for myself and severing the cord with my abuser. Mr Andrew Sheppard argued that I had referred to material that my lawyers had recently received in disclosure in my email to AA. This was false – I had not yet seen or been provided with any summary at all of any of the relevant documents when I wrote to AA. I have been too traumatised to look at this material personally, and I had instructed my solicitors to assist me by summarising it for me before I saw it. At the point that I wrote to AA, they had not provided me with that summary.

(217) After the fact, the University informed me that they had invited AA to the 17 November 2021 case management conference. They never explained on what basis. The University continued to directly collaborate with AA, a student they had accused of "violent, threatening, intimidating behaviour or language" against me throughout November and December. Rather than facing any disapproval over the various policies AA violated, the Defendant rewarded AA's behaviour with an employment contract so that today AA works as a Teacher at its Law School.

### **My Non-Academic Activities**

(218) Over the course of this litigation, the Defendant has an ongoing complaint regarding my non-academic activities. I have set out above that feminist campaigning is a core component of my life, and has been since I was a child. It is also entirely complimentary to my academic studies. While I have been traumatised by the treatment of the University, my writing and campaigning work has flourished into opportunities to network in a culture and a society that is entirely foreign to me, and to distract myself from my experiences at University.

(219) While at the University of Bristol, my extracurricular activities have been highly successful. When the University criticises these, they are criticising me for receiving several personal invitations to speak in Parliament. On October 2018, I was invited to the House of Lords to talk about proposed reforms to the Gender Recognition Act 2004. On October 2019, I was invited again to the House of Lords to talk about the single-sex provision of hospital wards on the NHS. Later on in April 2021, I was invited as a Witness to give evidence before the Women and Equalities Select Committee on the matter of sex and gender policy making. These prestigious invitations were extended to me based on my professional knowledge and personal merit. They are also directly relevant to my course of studies. Instead of congratulating me because it reflects well on the University that one of its PhD Candidates is held in this regard, the University has repeatedly chosen to complain about it as if it is a failure on my part to be a successful woman.

### **Disclosure Failings**

(220) We filed the case on 18 June 2020. On that same date we included a list containing the disclosure information that I was seeking from the University.

(221) From that point on, the University deployed a number of strategies to avoid having to produce disclosure for this case. Disclosure was not a trivial point that we raised sporadically in correspondence: it has been the central problem within this litigation that was raised with the Defendant almost on a weekly basis. This meant my lawyers had to incur unnecessary costs chasing the University over emails that they would oftentimes choose to ignore. I am an international student who can only afford this litigation through the support from the public, while the Defendant is a billion-pound institution that is covered by insurance.

- (222) On 17 April 2021, District Judge Rowe made a Directions Order for disclosure that the University ignored along with another order on 5 August 2021 from District Judge Watkins, that the Defendant also ignored. We spent the rest of the year pleading with the University to comply with the several Court Orders on this matter. The only way to get the University to engage was by making Unless Order applications, which were expensive for me given that my case is funded by the public.
- (223) On 17 November 2021, Deputy District Judge Chappell made a further Directions Order stating: "By 4pm on 8 December 2021 the Defendant shall give inspection of such documents." Even though we had originally requested documents a year and a half ago in June 2020, by 8 December, the University was still making excuses about why they could not comply with the several Court Orders on this matter. I was deeply concerned about this because the Court had ordered that Witness Statements had to be exchanged by 23 December and the University still hadn't provided these documents.
- (224) On 17 December 2021, my solicitors wrote to the University's lawyer stating: "As a consequence of the Defendant's ongoing failure to make disclosure, or even to provide a timeframe by which it will provide inspection of specific disclosure documents, we seek an extension of time to serve witness statements so that we have at least seven clear days after the Defendant provides inspection." Ms Amara Ahmad also added: "Please also note that both Peter Daly and I are on annual leave and will not be responding to emails from 20 December 2021 until the new year."
- (225) Almost a week later, on the 22 December the University finally provided nearly 10,000 pages of documents with exchange of Witness Statements to take place on 30 December. This was really only "partial disclosure" because the Defendant made an arbitrary decision, counter to the court orders by District Judge Rowe

and by Deputy District Judge Chappell, to extensively redact the names of individuals within the disclosure.

(226) The effect of the late disclosure, and the redactions, was to mean that my lawyers and I had to work across the Christmas period, including on Christmas day. The use of redactions meant that we had to guess the identity of some of the relevant individuals, which greatly increased the work required. At [**Exhibit RMRS1**] for example, the Court will note that Spencer Blackwell's name is redacted. We had initially incorrectly identified a different individual, and prepared witness evidence based on that individual, but it was only on very close inspection that we realised that the redactions had been made incompetently and so were able to identify the person as Spencer Blackwell. We still do not know if there is material evidence under other redactions.

### **The Reason for my Treatment**

(227) There is no doubt in my mind that I would not have experienced the treatment set above from the Defendant were it not for the fact that I advocate for sex-based feminism. The University has made an unnecessary decision to adopt a corporate set of political beliefs subscribing wholesale to the tenets of gender identity theory which are incompatible with sex-based feminism, and includes, for example, the idea that transwomen are literally women, for all intents and purposes.

(228) The fact that I do not ascribe to gender identity theory, and that I am prepared to advocate for sex-based feminism, has meant that I have been perceived and treated as a second-class student by enough people within the University to have had the effect that I have received this unfair treatment from the University itself. I have been deemed not worthy of the protections, policies and procedures that would have been given to any student who was not a sex-based feminist.



(229) The University's approach to this viewpoint is set out in its corporate documents and how it manages its affairs: from the treatment of its staff and the running of its facilities, to the co-ordination with gender identity pressure groups in its internal and external affairs; the toleration of threats of violence and the acceptance of silencing of debate through the failure to protect women; the abandonment of the procedure against AA, the refusal to take any action against AA's breaches of the confidentiality of the procedure, and then, at the conclusion of that process, to employ AA as a tacit endorsement for their behaviour. All of these, and the other events set above which are not listed here, demonstrate the University's approach to feminists such as me.

(230) Primarily, this has impacted upon me because of the University's policy of not taking any steps at all against those who claim to be pursuing trans rights activism and its numerous practices and criterion of prioritising trans rights activism over sex-based feminism. Anyone who is identified by trans rights activists as being "transphobic" is deemed by them to be fair game for intimidation and abuse. The effect of the University's prioritisation of gender identity theory, sometimes over existing sex-based legal protections, is to confirm that those activists are right: that they can attack women such as me with immunity from any University sanction. It is therefore absolutely no surprise that this is precisely what they do.

(231) The impact of all of this on me is very significant. My studies have been curtailed to the point where I may not complete them because the University is currently considering kicking me out of my PhD programme. Even if I were to finish my degree, I will only complete my studies significantly later than otherwise would have been the case, which has meant that I have had to stay in Bristol far longer than I otherwise would have done, incurring rent and living costs and unable to gain full time work. I miss my family and my country every single day. The only

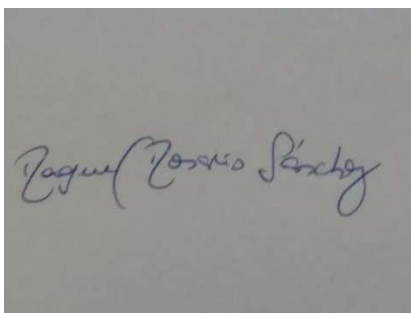
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reason why I haven't left Bristol is because it is not for trans activist bullies or abusive institutions to dictate the course of my life. But the pain of being away from each other is shared by everyone in my family, especially since things have prolonged far longer than we envisioned I would be gone. I have lost energy that I used to have and disconnected from activities I used to love. I feel as though my personality has changed: I am less outgoing and sociable and more distrustful of people. And I am coming to terms with the realisation that I have been caused trauma, by an academic institution with a duty of care to me, which may be lifelong.

### Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



6 January 2022

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Signature

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Date