

CASE NO.: 008LR988

Rosario Sánchez -v- University of Bristol

First Witness Statement of Dr Emma
Williamson

6 January 2021

Exhibits: EW1 – EW10

IN THE BRISTOL COUNTY COURT

CASE NO.: 008LR988

BETWEEN

RAQUEL ROSARIO SANCHEZ

Claimant

And

UNIVERSITY OF BRISTOL

Defendant

WITNESS STATEMENT OF DR EMMA WILLAMSON

I, DR EMMA WILLIAMSON, of The School for Policy Studies, 8 Priory Road, Bristol BS8 1TZ, will say as follows:

1. I am a Reader/Associate Professor of Gender Based Violence at the University of Bristol. I joined the University as a researcher in 1998 in the School for Policy Studies. I had a four year post in the Centre for Ethics in Medicine in the Medical Faculty from 2000-2004. Between 2004-2006, I worked for a National Domestic Abuse Charity, Women's Aid, and returned to the University on a permanent research contract in 2006 - present.
2. My day to day job involves a combination of tasks focused around conducting research, teaching, and related administration. I have been the Faculty of Social Science and Law (FSSL) Research Ethics Officer since 2015. Between 2015 and 2020, I was the Head of the Centre for Gender and Violence Research, the research centre in the School for Policy Studies where I have been based since 2006.
3. I have supervised 7 PhD students to the completion of their studies, and have examined 15. Last year I convened the undergraduate Social Policy unit on Gender

Based Violence, and this year am responsible for the MSc in Public Policy unit on Gender and Violence: International Perspectives. I currently co-supervise seven PhD students.

4. In January 2018 I was the primary PhD supervisor for both Raquel and AA. I looked at both of their applications, and interviewed both of them (online) prior to them being offered a place/funding.

Events in January 2018:

5. On January 29th 2018, I arrived late for a Centre meeting as I had been conducting fieldwork with refugee women during the morning. When I arrived at the meeting there was a discussion happening about an anonymous letter. I was confused about the discussion as I had not yet seen any of the emails which had been sent in the morning about it, and did not have any information about the issues the letter was referring too.
6. The anonymous letter was calling for the no-platforming of a meeting being organised by a Women's Place UK (WPUK) and suggested that attaching the Centre's name to the event was endorsing "hate speech" and called into question the integrity of the Centre. The Centre was not involved in hosting or organising the event.
7. After a brief discussion of the issues, at which Raquel explained she had been asked to chair the event which was external to the University, and a colleague informed me that AA had been involved in putting the anonymous letter together, I suggested that I take some time after the meeting to investigate and that I would meet Raquel in my office an hour later.
8. After the Centre meeting, I spent an hour looking at my emails, which included information about the anonymous letter, I looked up the issues on-line so that I was aware of who WPUK were and I then met with Raquel. Raquel was distressed and

concerned about the contents of the anonymous letter. In particular, she was worried that because it accused her of engaging in “hate speech” this might have an impact on her visa, on her relationship with colleagues in the Centre, and on her position in the University. During the meeting I tried to reassure Raquel that she hadn’t done anything wrong, and that as Head of the Centre, which was also wrongly implicated in being involved in the WPUK meeting in the anonymous letter, I would look into the issue further.

9. Following my meeting with Raquel I emailed AA, who was also my PHD student at that time, informing them that I was aware they were involved in writing the anonymous letter and that it would be good if I could discuss it with them. At that time I was concerned about both students and wanted to find a way to resolve the issue.
10. On 31st January, Raquel sent me an email with 35 attachments which included screen shots of comments made by AA, and others, about the WPUK meeting. This included a number of social media posts using the term TERFS in a derogatory way to a direct post from AA which stated they wanted to eat more “and with every bite my solid mass of queerness will grow denser all the better to punch those TERFS with”. This message, alongside other messages about “they haven’t seen anything yet” and “I will hassle my supervisors to be not shit” and an exchange between AA and another student where the other student claimed they wanted to get someone fired over the incident, left me shocked and concerned.

Complaint by Raquel:

11. Raquel submitted her complaint to the student complaint office at the beginning of February 2018.
12. On the 6th of February I met with Charlie Foster (PGR Director in the School) to discuss the issue. One of the things we discussed was that Raquel and AA had desks in the

same office, and as Raquel had complained about the behaviour of AA, AA should be offered a desk in another office.

13. On the 12th February Philippa Guereca from the student complaints team contacted me to discuss the complaint. They didn't have an understanding of the underlying context of the complaint so I outlined the different positions of trans rights and gender critical activists. I also mentioned the importance of referring to AA with gender neutral pro-nouns.

Complaint by the student AA:

14. Around this time AA submitted their own complaint which was forwarded immediately to the Head of School, Esther Dermot.
15. On the 13th February I wrote to Charlie Foster as shown in **Exhibit EW1**, stating that I did not feel comfortable continuing to supervise AA given the threats of violence I had seen in the social media posts and the complaint about the Centre of which I was Head. I outlined in that email that since the Centre meeting on 31st January I had had several members of staff come to see me in tears, and that managing that was very difficult.
16. Esther Dermot arranged to meet AA to discuss the complaint they had made about the culture of the Centre and a meeting was held on February 16th 2018. Following that meeting I was emailed by Charlie Foster, and invited to attend a meeting with AA to discuss the concerns AA had raised. On the 20th of February AA responded that they would like to meet, stating that their complaint wasn't about me personally but about the culture of the Centre. They also stated in this email that they had put the complaint in as they had been advised that Raquel was intending to submit a complaint, as can be found at **Exhibit EW2**.
17. I met with AA in a café as they were enroute to the coach station on February 21st. I explained to AA that whilst their complaint wasn't about me directly, by questioning

the culture of the centre, of which I was head, this was something that impacted on me. I also made it clear that I did not agree with defining people's genuine concerns about policy as hate speech. I sent a summary of that meeting to AA, Esther, Charlie and AA's second supervisor from Exeter University as shown in **Exhibit EW3**.

18. I continued to supervise AA until they sent an email on 26th April 2018 stating that they thought there was a conflict of interest and no longer wished to be supervised in the Centre.

Events from February 2018:

19. Following the WPUK event on 8th February 2018, the University PVC issued a statement clarifying the University's position on Free Speech, which I refer to as **Exhibit EW4**. This statement made clear that behaviours intended to intimidate the free speech of others is unacceptable.
20. Following the Centre meeting on 29th January, I saw Raquel on several occasions. Raquel was distressed about events, as was I, and she was preoccupied with the complaint and not able to focus on her academic work. I discussed this with Raquel's other supervisor Natasha Mulvihill and we decided it would be helpful to have separate meetings to provide pastoral care and academic supervision. Between 29th January 2018 and the end of May 2018, I met with Raquel five times in relation to providing pastoral care/support, and three PhD supervision meetings were held with Raquel, myself, and Natasha, which can be found at **Exhibit EW5**.
21. Following additional posts online accusing the University of Bristol of transphobia for investigating the complaint, further information was added to the University PVC's statement in May 2018, **Exhibit EW4**. That statement made clear that the investigation of the complaint was about the actions of one of the students.

22. More messages appeared online saying that the University was engaging in a campaign of transphobic hate against AA. Raquel became increasingly upset about the messages, and confused about why it was taking so long for the University to deal with her complaint. I was concerned that the time it was taking was impacting on Raquel's ability to concentrate on her academic work. On several occasions during these meetings I telephoned Keith Feeney from the Secretaries office in order to get an update on the situation to try to reassure Raquel.
23. On all these occasions I was reassured by Keith that the complaint was proceeding and that we needed to let the University get on with it. Keith acknowledged in these conversations that the situation must be difficult for both Raquel and me, as supervisor.
24. During one of these conversations I discussed with Keith whether it was appropriate for me to support Raquel at the planned hearing given I had previously also been AA's supervisor. My impression was that AA was trying to sabotage the complaints process and that me being at the hearing might be used in that way. As a result we planned for Natasha Mulvihill to support Raquel at the hearing and I was not there.
25. The date for the disciplinary hearing changed more than once.
26. As I wasn't attending the hearing I wasn't notified of the date, time or location of the hearing, but I knew it had changed more than twice because I saw social media posts ("Sisters not cisters" Facebook page) changing details about the planned demonstration.
27. On one occasion I spoke to Natasha on the stairwell at work, Natasha was surprised that I knew the meeting had been changed, as the letter she had received said the details should be kept confidential.

28. I found the social media posts worrying because they were calling for masked demonstrators to attend outside the hearing and I was concerned for Raquel's emotional well-being and physical safety. I was getting increasingly concerned about the content on social media and emailed the staff counselling service on April 30th 2018, to discuss this, as shown at **Exhibit EW6**. I met with a counsellor on the 14th May 2018.
29. As can be seen from my personal statement in January 2019 [exhibit below], I was signed off work for 4 weeks at this time due to stress.

Events from June 2018:

30. In June 2018 an initial hearing was finally held, but at that hearing only Raquel was asked questions, by AA's barrister and in front of AA. I know from my prior meetings with Raquel that she was not expecting this, Keith Feeney hadn't mention that this was a possibility and both myself and Natasha were shocked that this was allowed to happen. When I spoke to Natasha after the hearing she described it as "Kafkaesque" and that Raquel was shocked and upset at having been cross examined. At the end of the hearing Natasha and Raquel left together.
31. Natasha told me what happened and I remember us both being concerned about Raquel and whether she was ok, and not on her own. Natasha told me that Raquel had been picked up after the hearing and was staying that night with a friend.
32. Quite quickly after this hearing Raquel was increasingly upset and concerned about the fact that the University appeared to not be able to follow its own complaints policy. Specifically, she told me that she didn't understand why the university wasn't protecting her as a complainant, particularly in the hearing where she was cross examined by a barrister in front of student AA. I was concerned that the process was taking so long and that AA was being allowed to sabotage and delay the process.

33. After June 2018 further delays occurred in the complaints process, as a consequence of activists posting confidential details of the dates/times/locations of meetings on-line.
34. As Raquel's supervisor, these delays made it increasingly difficult to support her in focusing on her academic studies. As the complaint dragged on I continued to liaise with the Secretaries office and I continued to advice Raquel to let the University deal with the issue via the complaints processes, as I had been advised by Keith Feeny to do.
35. Between June 2018 and January 2019, I telephoned Keith Feeny for updates about the complaint. For seven months at various times I was told by Keith that the delay was due to difficulty in finding a suitable date for the next hearing, and identifying appropriate people for the panel.

Events from January 2019:

36. In January 2019, Raquel came to see me and told me she was worried the University was going to drop the complaint. She told me she had been asked to prepare a personal statement to outline the impact the delayed process was having on her. I was furious and angry on Raquel's behalf and also that I had not be asked to contribute to this process even though I had been in regular contact with the Secretaries office.
37. I emailed both Laura Trescothick-Martin and Keith Feeny from the Secretaries office to find out what was going on and I then put my own personal statement together which I sent to them, which can be found at **Exhibit EW7**. I received no acknowledgement of that statement nor any communication about the outcome of the review of the process which I thought was shoddy and unacceptable.
38. Following the review in January 2019, I was told by Raquel that a decision to continue with the proceedings was made. From January 2019 to May 2019 I met with Raquel

and Natasha for PhD supervision 5 times. I also met with Raquel on at least two occasions to provide additional pastoral care. Despite the delay, because the January review had decided to continue with the complaint process, I was still confident the university would see the process through, and I focused on supporting Raquel with her academic work.

Events from May 2019:

39. Raquel and I were cooperating with the Secretaries office and not talking publicly about the complaint proceedings. In May 2019 more social media posts appeared on sisters not cisters UK Facebook page accusing the university of transphobia and calling for people to attend a demonstration outside the hearing.
40. The Facebook post said: To add insult to injury, the University continue to drag out this most bogus of disciplinary proceedings. The case was adjourned on 15 June 2018 and, 11 months on, <removed> will face the disciplinary board again. This comes after the University suggested dropping the case, only to deem <removed>'s considerable mental health difficulties insufficient cause to stop proceedings, showing disregard for students' mental health and wellbeing on top of transphobia.
41. Raquel told me that the May 2019 hearing had not gone ahead as planned. I was angry at yet another delay and the impact this would have on Raquel and the universities inability to deal with the issue. I wrote an email to Laura Trescothick-Martin in the Secretaries office on 15th May 2019 expressing my anger and disappointment at yet further delays in the process and expressing my concerns for Raquel (**Exhibit EW8**).
42. I was devastated to find out from Raquel in July 2019 (17 months after the initial complaint) in a brief text message that the University was terminating the complaint. At this point Raquel was extremely upset and felt let down by the University. I too was angry that by terminating the process nothing had been resolved. I felt this set a

dangerous precedent in terms of how we advise students in the future and confidence in the Universities own policies and procedures.

43. On the 5th of July 2019 I received an email from Laura Trescothick-Martin asking if I had spoken to Raquel as shown at **Exhibit EW9**. I informed her I had not and received a reply that she would ask the well-being service to contact Raquel.
44. I then spoke to Aubrey Dye from the student well-being service who, like me, was concerned for Raquel's well-being and the impact the University's failure to see the case through would have on how we supported students in the future. I tried to contact Keith Feeney at this point, who I had been liaising with throughout, and was told he was not available to speak with me or Raquel.
45. At this time I felt ashamed that I had advised Raquel to keep quiet publicly in order to let the university deal with the complaint. I felt that by believing the University would deal with the case fairly I had let Raquel down.

Events from August 2019:

46. Because I felt ashamed of the University, in August 2019 I posted my own public statement, found at Exhibit EW10, to show my support for Raquel and to challenge the many lies which had been posted on-line during the previous 17 months. This public statement shows how disappointed I was with the University and how they had dealt with the case.
47. I met with Raquel, Laura Trescothick-Martin, and Jane Bridgewater on the 21st August 2019 off campus. Raquel also brought a friend with her. I had a couple of meetings with Raquel around this time off-campus as she felt unsafe and distressed on campus. I felt at this meeting on 21 August that there was a distinct change in attitude towards Raquel, from university staff.

48. A comment was made by one of them about not wanting to see details of the meeting “appear on-line”, I assumed in reference to my public statement which had recently been posted on line. I replied that we hadn’t been the people leaking information about the complaint process and putting lies on social media for the past 17 months.
49. I remember that Raquel asked why Keith had stopped responding to her, and I remember that he had not been taking my calls or responding to my emails either. Either Jane or Laura commented that it had been stressful for everyone, and that it was “not all about you”. Both Jane and Laura seemed angry, and I thought that their frustration with the complaint was unfairly being directed at Raquel, the complainant. I reminded Laura and Jane that Raquel was actually the person who had been bullied and made a complaint which the university had failed to deal with.
50. In the course of this conversation there was a suggestion that there were things the University could learn from what had happened. I commented that it wasn’t appropriate to ask us to help them deal with a flawed process when we were still angry that the whole process had taken so long, and not resulted in any conclusion. I offered to provide feedback at a later date about how the process could be improved.
51. There was a suggestion made that Raquel was somehow responsible for the decision to move the complaint to a disciplinary process in which we had no right to know what had happened or why. I felt this was an attempt to put responsibility onto Raquel for decisions that had been made by senior staff in the University. I was disappointed in the change in attitude towards Raquel, but given the events that had happened, not surprised.
52. Despite the complaint being terminated, Raquel wanted to consider what her options were, and Laura and Jane agreed that the Secretaries office would collate all of the evidence Raquel had provided since January 2018 in one bundle. We agreed a timeframe for this to happen so that I could make sure to be with Raquel to go through

that bundle when it came. I knew that looking at everything would be difficult and upsetting for Raquel. Raquel was sent the bundle on the 17th October. I was not sent it, and didn't know it would be sent that day. Raquel emailed me to arrange a time to meet and look through it. Raquel was still not comfortable being on campus so I arranged for her to visit me at my home on my day off and we went through the bundle together.

53. Both Raquel and I found looking through the bundle upsetting and overwhelming. I was upset that the University had failed to respond to the evidence Raquel provided them of bullying and harassment. I felt exhausted seeing the evidence of how long the University had allowed this to be dragged out.
54. I could see how Raquel would respond to incidents, asking for action from the University, only for the case to be further delayed. It felt like a betrayal that after all that time the University had not had the guts to see the process through and come to a decision/conclusion. I felt ashamed to work for the University.

My view of the University:

55. As an employee of the University of Bristol I do not take appearing as a witness for Raquel lightly. I feel that the University did not do enough to ensure that the complaint was dealt with in a timely and transparent manner. I don't know how I can support students in future when I have so little faith that the University will deal with their complaints according to their own policies and procedures.
56. I think that the University should have dealt with the initial complaint quickly and on the basis of the facts and documentary evidence which Raquel provided. I think they should have been stronger in denying that the process was transphobic, and I think they should of sanctioned AA for the threat of violence in their social media posts.

57. The University should also have sanctioned AA for breaching the confidentiality of the hearing process which resulted in AA being allowed to sabotage the process, further bully and harass Raquel, and ultimately get away with threatening physical violence.

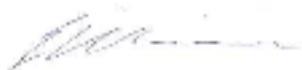
Impact on Raquel:

58. This whole process has, in my opinion, had a significant detrimental impact on Raquel. There have been times over the last 4 years when she has felt unable to engage with “the University”, including looking at emails, or attending campus. We have tried to separate out those issues and her academic studies by meeting off campus, and writing to her on her personal email address. Raquel has been distressed by the constant delays in dealing with her complaint, and the injustice of that. From February 2018 we tried to separate out meetings to discuss the case and Raquel’s academic work, but that was very difficult. Raquel got increasingly frustrated and exasperated at the lack of progress from the University. This made her depressed and anxious, and often distracted.
59. The fact that the University took so long to deal with the initial complaint, only to end the disciplinary proceedings with no outcome, has had a significant impact on Raquel’s Studies. At times Raquel has felt unable to engage with me and her other supervisor and has withdrawn from her studies.
60. I believe that the University should have dealt with the initial complaint swiftly. Sanctioning student AA for the inappropriate posts, for breaching the confidentiality of the hearings, and for misrepresenting the nature of the complaint. Failure to do this has led to reputational damage to the university, the Centre for Gender and Violence Research and to Raquel herself.

61. Raquel has shown immense strength over the last four years, but she has changed over the course of this process. She is more anxious now than previously, and less likely to engage with me and others in the University.
62. Initially I supported Raquel thinking the complaint would be dealt with within a couple of months and I could refocus attention on Raquel's academic progress. The delays meant this didn't happen. Raquel has had phases when she has been able to focus on her academic work and other times when the events have been a significant distraction. As her academic supervisor, I have recently seen documentation relating to Raquel's adjustment disorder which describes how Raquel has responded to the events since January 2018. I recognise all of the symptoms described in the disability statement prepared by the university.

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.

Signed:



. Dated:03.01.22

Dr Emma Williamson