

Response to the Complaint from Stonewall

1. This is a response to the complaint about me by Stonewall. This was sent to me in an email to me from Maya Sikand on 6 November 2019 at 2pm. The portions of the complaint that I am asked to respond to are in relation to two tweets, specifically (emphases in Maya's email):

Tweet 1 (22 September 2019)

Stonewall recently hired Morgan Page, a male bodied person who ran workshops **with the sole aim of coaching heterosexual men who identify as lesbians on how they can coerce young lesbians into having sex with them**. Page called "overcoming the cotton ceiling" and it is popular.

Tweet 2 posted on 27.10.19

@NicholasHellen thank you for your article. On this issue, I and many other women are grateful to @thetimes for fairly & accurately reporting on **the appalling levels of intimidation, fear & coercion** that are driving the @stonewalluk trans self-ID agenda.

2. The tweets are put to me as breaches of Core Duties 3, 5 and 8. These provide:

Core Duty 3: You must act with honesty and integrity

Core Duty 5: You must not behave in a way which is likely to diminish the trust and confidence which the public places in you or in the profession.

Core Duty 8: You must not discriminate unlawfully against any person.

3. The tweets are also put to me as breaches of the BSB Guidance. The specific portions of the BSB Guidance which I am said to have breached have not been identified. * I am proceeding on the basis that the BSB Guidance referred to is the guidance on social media. This was issued in October 2019, prior to Tweet 1. The only aspect of this guidance which I can identify to be material is at paragraph 3. If I am incorrect in this, and there is some other aspect of the BSB Guidance that I am said to have breached, please identify it and I shall respond accordingly. Paragraph 3 reads as follows:

*Comments designed to demean or insult are likely to diminish public trust and confidence in the profession (CD5). It is also advisable to avoid getting drawn into heated debates or arguments. Such behaviour could compromise the requirements for barristers to act with **honesty and integrity** (CD3) and **not to unlawfully discriminate against any person** (CD8). You should always take care to consider the content and tone of what you are posting or sharing. Comments that you reasonably consider to be in good taste may be considered distasteful or offensive by others.*

*Correction: this specific BSB Guidance was in fact detailed in Maya Sikand's email communication about the Stonewall complaint.

Summary of my Response to the Complaint

4. I deny that the tweets identified are in breach of the Core Duties or the BSB Guidance.
5. It is my understanding that Morgan Page ran workshops with the sole aim of coaching heterosexual men who identify as lesbians on how they can coerce young lesbians into having sex with them. I have set out below why I have reached this understanding. Stating this understanding cannot be a breach of the Core Duties or the BSB Guidance.
6. It is my understanding that **appalling levels of intimidation, fear & coercion** are driving the @stonewalluk trans self-ID agenda. I have set out below why I have reached this understanding. Stating this understanding cannot be a breach of the Core Duties or the BSB Guidance.
7. As the tweets were sent on the basis of my honest understanding (which I maintain is a correct understanding), I cannot be said to have acted without honesty and integrity. Core Duty 3 is therefore not engaged, or if it is engaged, it is not breached.
8. As the tweets were sent on the basis of my honest understanding (which I maintain is a correct understanding), I cannot be said to have diminished public trust and confidence in the profession. Core Duty 5 is therefore not engaged, or if it is engaged, it is not breached.
9. Neither were the tweets designed to demean or insult. In Tweet 1 I referred to Morgan Page, but it is my understanding that my tweet was accurate reflection of their activities, and I do not agree that this can be said to have demeaned or insulted Morgan Page. I do not understand who is said to have been demeaned or insulted in Tweet 2 given that nobody is referred to within it other than the author of the article whom I was complimenting.
10. I cannot identify any discrimination in the tweets. No explanation has been offered of the protected characteristic relied on, the individual or individuals said to have been discriminated against, the conduct of mine which is said to have caused less favourable treatment or had the purpose or effect of creating a hostile intimidating or degrading atmosphere, or how that conduct is said to be related to a protected characteristic. If these points can be explained to me, I would be prepared to answer them fully.
11. The complaint against me by Stonewall is an act of discrimination, on the basis of my philosophical belief, my sex and my sexual orientation. I have been exposed to a negative treatment because I hold and express a belief in Gender Critical Feminism. The belief is a s.10 Equality Act 2010 philosophical belief because it is compliant with the test in Grainger v

Nicholson. It is of the deepest concern to me that Chambers, in accepting the complaint and advancing it against me may also be engaging in the same discrimination against me.

The basis of my philosophy

12. Gender Critical Feminism is a well established and recognised strand of feminism. It holds that sex is an observable reality. A person's sex is defined by whether, if their body is functioning as it should, their organs produce sperm or eggs. There is no historical example of any human whose body produced both. As a result of this, gender is not a replacement or alternative to sex, but is merely an identity concept. A person may feel that that they identify to a particular gender, but a person's gender cannot supplant their sex. As a result of this, a person who has the gender identity of a trans woman (a person born as a male, but who identifies as a woman) is not a woman. The same is true of a trans man. If they choose to so identify, then that is to be respected, and for example if they have chosen and adopted pronouns these can be used. But in any scenario in which that chosen gender identity conflicts with the rights of women, then the rights of women should prevail. A person cannot change sex and rights, freedoms and provisions that are reserved to women are reserved to women on the basis of their sex, not their gender.
13. I came out as a lesbian at the age of 17, just as s.28 of the Local Government Act 1988 became the law of England and Wales. As you know, this law prevented local authorities from providing any guidance whatsoever to young lesbian, gay and bisexual people.
14. By the age of 21 I was living on the Castro, in San Francisco, California, in the early 1990s, at the height of the AIDS epidemic/pandemic.
15. I am a survivor of male sexual violence in childhood. In 2015, my abuser was convicted and sentenced to 10 years imprisonment at Oxford Crown Court and is a serving prisoner in England and Wales. I have lifelong anonymity in respect of this matter. I disclosed this to my then head of chambers Henry Blaxland QC and to my current joint head of chambers Leslie Thomas QC, in 2015.
16. I have worked in the voluntary sector with women and children survivors of sexual violence, overwhelmingly male predatory sexual behaviour.
17. And, as you know, I have practised at the bar of England and Wales for nearly 20 years, almost exclusively defending, often men accused of serious violent crime.

18. I have been pro LGBT rights since my teens. The rainbow flag and that movement were not mere symbols to me; they were a lifeline when I had nothing else, no family and no friends outside of that community.
19. I have lived and worked within a solidly pro lesbian, gay and bisexual community for my formative years, from my late teens until my mid 20s. This community included gender non-conforming, cross-dressing and transsexual friends, colleagues and allies.
20. I believe passionately that transsexual and transgender people must enjoy protection from discrimination, and I have tried to mirror this belief in my personal and professional life. I have also stated so publicly, see for example my address at the Woman's Place UK at Oxford University on 25/10/19: <https://www.youtube.com/watch?v=ibJaJDaWpME> and https://www.youtube.com/watch?v=r_J3m8u891Q.
21. I have benefited greatly from the transsexual women who have helped me in my life and who I count as friends and comrades.
22. However, while I accept unequivocally that some people born to one sex would wish to live as the opposite sex, and should be permitted to do so, I do not believe that people can literally change their sex. I do not believe that a male bodied person can become a female or vice versa. This is not a statement of bigotry but of biological reality.
23. Until recently, the process of being recognised as transsexual or transgender was about a process of transition, it was not declaratory.
24. I am in broad support of the current law as enshrined in the Equality Act 2010, namely that those wishing to live as the opposite sex at law must demonstrate that they are undergoing a process of transition.
25. I do not believe that changing one's legal sex at law can or should be possible by mere declaration, especially when the consequences for women of men doing so are profoundly dangerous.
26. I am therefore fully opposed to any proposal to revise the GRA to allow for sex self-ID or gender self-ID, solely on the basis that it lacks any safeguarding procedures whatsoever and undermines the autonomy and safety of women.
27. I am vehemently opposed, horrified and dismayed at Stonewall's stated policy of pursuing sex self-ID with the slogan "acceptance without exception", which in practice means that there are no exceptions that it seeks to impose on any man declaring himself a woman, even if that male bodied person is a sex offender, rapist or violent. This is not to say that trans people are inherently more likely to be a sex offender, a rapist, or violent.


But men are statistically more likely to hold those characteristics. Therefore, if men are permitted to identify as women, there is a statistical likelihood that people who hold those characteristics are granted entry into spaces that had previously exclusively been the domain of women, and therefore women are placed at greater risk. This is particularly important in women's prisons and women's refuges where particularly vulnerable women, who are more likely to have already experienced male violence and sexual violence are likely to be found.

28. The previous Chief Executive of Stonewall, who oversaw the genesis of the self-ID agenda there, Ruth Hunt, is on record in the Observer (19/5/19) as saying in response to women's concerns about safeguarding with sex self-ID that "men are always going to rape women." See this screenshot:

The question over whether gender self-identification "will lead to men raping women" is, she says, the wrong one. "Men are always going to rape women. The question should be: 'Will the increase in gender fluidity increase the risk of men masquerading as women?' Let's talk about that. Don't talk to me about self-ID - I've spent my life being told I'm not woman enough. It's about treating people as they want to be treated, and when it causes no disadvantage to me whatsoever, who am I to challenge it? When someone says they're gay, we don't go: 'Well, have you done anything gay? How gay?'"

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29. The legal provision for these single sex women's only spaces is set out in statute in the Equality Act and was a crucial and hard-won exception to discrimination provisions. I am profoundly distressed that in a rush to

provide trans women with easy access to changing their sex, we are throwing women's rights under the bus.

30. I am horrified and appalled that Stonewall has opened the door to men who wish to be abusive to lesbians and women. All that is needed is for that male bodied person to declare themselves 'trans' and they can coerce, harass and intimidate lesbians and radical feminists with impunity.

31. Further, heterosexual male bodied persons with full beards are declaring themselves 'lesbian' and arguing that lesbians who reject them as sexual partners are being transphobic. See for example:

<https://www.buzzfeed.com/patrickstrudwick/this-transgender-woman-has-a-full-beard-and-she-couldnt-be-h>

This Trans Woman Kept Her Beard And Couldn't Be Happier

<https://www.feministcurrent.com/2019/05/02/stonewall-has-sold-out-lesbians-and-its-time-they-be-held-to-account/>

Stonewall has sold out lesbians and it's time they be held to account

The basis of my understanding in the truth of Tweet 1

32. It is true that Morgan Page ran workshops with the sole aim of coaching heterosexual men who identify as lesbians on how they can coerce young lesbians into having sex with them. Here is a screenshot of a workshop at Planned Parenthood Toronto:

The Workshops

Workshop Cycle 1:

Overcoming the Cotton Ceiling: Breaking Down Sexual Barriers for Queer Trans Women, with Morgan M Page

Overcoming the Cotton Ceiling will explore the sexual barriers queer trans women face within the broader queer women's communities through group discussions and the hands-on creation of visual representations of these barriers. Participants will work together to identify barriers, strategize ways to overcome them, and build community. Open to all trans women and MAAB genderqueer folks.



33. The term "Cotton Ceiling" refers to people who were born as men but identify as women being unable to have sex with lesbians because lesbians do not want to have sex with someone who has a penis. I believe that a person

with a penis is by definition a man. I believe that it is profoundly homophobic to require a lesbian to have sex with a man and to call her transphobic or otherwise bigoted should she refuse to do so.

34. This is coercive sexual behaviour; if it were not, no workshops would be necessary. It is regarded by many women and lesbians as an example of rape culture. It has been reported on in the national press for some time. See for example:

<https://www.newstatesman.com/politics/feminism/2018/07/why-were-lesbians-protesting-pride-because-lgbt-coalition-leaves-women>

Why were lesbians protesting at Pride? Because the LGBT coalition leaves women behind: Misogyny doesn't vanish at the flicker of a rainbow

<https://terfisaslur.com/cotton-ceiling/>

The Cotton Ceiling – lesbian women must consider trans women as potential sexual partners

<https://queerfeminism.com/2012/03/27/the-cotton-ceiling-is-real-and-its-time-for-all-queer-and-trans-people-to-fight-back/>

The Cotton Ceiling Is Real and It's Time for All Queer and Trans People to Fight Back

<https://twitter.com/docstockk/status/1076762017585905664?lang=en>

(Professor) Kathleen Stock, Tweeting at @Docstockk

<https://www.thetimes.co.uk/article/lottery-thousands-pay-for-former-trans-stripper-to-sway-public-opinion-6lw9xbwgr>

Lottery thousands pay for former trans stripper to sway public opinion after the £500,000 given to Mermaids, the same amount has gone to Stonewall to 'empower transgender leaders'

35. I am utterly aghast that an LGBT charity, Stonewall, would employ an individual who espouses this homophobic message. It confirms to lesbians and non-lesbians alike that women's safety and our sexual autonomy is secondary to the sexual desires of men. We are to be forced at law to have zero boundaries from predatory men and that we are to be accused of thought crime and have our livelihoods threatened if we express any opposition.

The basis of my understanding of the truth in Tweet 2

36. It is true that there are appalling levels of intimidation, fear & coercion that are driving the Stonewall trans self-ID agenda.

37. I refer you to the complaint from Stonewall about me on which this process is founded. The complainant identifies as the "Head of Trans Inclusion at

Stonewall". This is a corporate complaint, made by Stonewall to my Chambers (which, for the purposes of this complaint is to all meaningful extent my employer. The complaint conveys the express intention of causing me to lose my tenancy ("for Garden Court Chambers to continue associating with [me] ... puts us in a difficult position with yourselves ... I trust that you will do what is right"). This is done to me on the basis of my philosophical belief and because I disagree with the Stonewall trans self-ID agenda. It is a direct threat to my livelihood, which naturally has caused me a great deal of fear. This is an example of the intimidation and coercion to which I was referring in Tweet 2.

38. Please scrutinise the complaint and the elements which have not been put to me by Chambers. Its oppressive and deliberately misleading nature ought to have rendered all aspects of it unfit for any investigation at all. Each of the various allegations made against me are unsupportable. By way purely of example:

- a. *"Retweeting threats of violence: 'I am a walking hate crime'".* This is plainly a deliberate and malevolent misrepresentation of the tweet to which it refers. The tweeter is obviously referring to the fact she is deemed by Stonewall to be a "walking hate crime" because she does not ascribe to Stonewall's views. There is no possible interpretation of the tweet that could conceivably be labelled a hate crime.
- b. *"Liking and writing posts calling trans women men" and using the statements of "because some men like performing femininity we are eliminating every safe space women have" and "I put the rights and safety of women before men who want to live as women".* Neither of these two statements is controversial in the context in which they are given. They are only controversial if one ascribes to Stonewall's agenda that men can be women and vice versa.
- c. *Writing tweets calling for trans people to lose their current legal rights: "Women & girls have suffered, and continue to suffer, at the hands of predatory & abusive men. It is offensive & unacceptable to suggest, much less legislate, for a system whereby *any* man can declare himself lawfully to be a woman."* There is no aspect of my statement which is controversial. Stonewall's reference to "current legal rights" is based on a deliberate and malevolent misrepresentation of the current law. I have no doubt that the Head of Trans Inclusion at Stonewall will be fully aware of this, and I would anticipate that Garden Court Chambers can also assess the invalidity of this statement of law. Specifically, under the Gender Recognition Act 2004, only those men with a Gender Recognition Certificate can declare himself lawfully to be a woman. It is not a "current legal right" that any man (or woman) can do so – only those people with GRCs can do so. For abundant clarity, my belief is that while s.9 GRA provides a legal right to be treated legally as a woman, it cannot

conceivably turn a man biologically, physically and anatomically into a woman. That would be transubstantiation, which is not within the gift of legislation.

- d. *Writing posts that misgender trans women by saying they have “male privilege”* Trans women have male privilege. They have been raised as male in a patriarchal society and have benefitted from this in myriad ways as all males have done. This is the meaning of male privilege. Male privilege is not erased when the male identifies as a trans woman. This is not a controversial statement.
- e. *Calling trans people and their campaign for equality “trans extremism” which is highly inflammatory and encouraging of violence.* Notwithstanding that I do believe that it is extremist to assert that sex does not exist and only gender exists (which is a foundational principle of the Stonewall position on trans issues), it is plainly a malevolent fiction that the mere statement of my belief is “encouraging of violence”. I have never encouraged violence and I abhor it. Moreover, my statement referred to Stonewall’s campaign, not trans people’s campaign. Stonewall does not speak for all trans people.

39. Every single aspect of the complaint contains the same misleading and malevolent twisting of fact and meaning. I believe the examples above are sufficient to demonstrate the point, but if you require me to set this out in respect of any other aspect of the complaint that I have not explicitly dealt with, I would be prepared to do so.

40. The complaint itself therefore – an attempt by Stonewall to deny me my livelihood through a series of false and misleading allegations, purely because they disagree with my belief – is demonstrative of the truth of Tweet 2. However, it is proportionate to provide the wider context of Stonewall’s conduct in this sphere and my direct experience of it.

41. My Twitter account was anonymous until around September 2019. It was anonymous because I was frightened to come out as a Gender Critical Feminist. I knew that I would be called a TERF, originally an acronym for trans exclusionary radical feminist but now a recognised slur, thrown at women like me by men and women. I have seen examples of men who implore TERFs to “choke on their ‘girdicks’”. These are threats of rape and torture which are made to women because those women hold a belief about the rights of women.

42. Remarks of this nature are not isolated. They are endemic to the trans self-ID agenda and the silencing of women who hold beliefs like mine. I raised these concerns with the Head of Chambers last year when I objected to any formal alliance with Stonewall. I also included the link below, which I would invite you now to review. My concerns were ignored.

<https://terfisaslur.com>

See Appendix for extracts

43. The Tweets in that link are dated but a search using 'Terf' or 'T3rf' on Twitter will bring up contemporary posts of more of the same. They indicate just how long Stonewall has been aware of the nature and extent of the abuse lesbians face from men and trans women online. Please take a moment to read some of those comments. You will agree that they are truly shocking.
44. I note that our door tenant Prof. Alex Sharpe, has repeatedly used the term TERF as an expletive online and on Twitter and has publicly, and repeatedly, commented favourably about chambers distancing itself from me and the LGB Alliance (see Appendix). I note also that she has not been subjected to the same process as I have been. Prof Sharpe is singled out for praise in the Stonewall complaint about me.
45. I also note that Gendered Intelligence, a trans rights organisation which I understand tenant Michelle Brewer is a trustee of, solicited complaints about me from organisations, including Stonewall, and the general public (see Appendix).
46. I was frightened to come out on Twitter as gender critical because I feared the backlash that has become a deliberate political tool of the self-ID agenda advanced by Stonewall and its proponents and I was fully aware that I was working within what had become an oppressive and unsafe environment for me as a gender critical feminist at Garden Court Chambers. I did come out as gender critical publicly on twitter after the death of a colleague and fellow Gender Critical Feminist Magdalen Berns, and the vile abuse online from trans activists that celebrated her death at 36 from brain cancer. Her dying wish was that we should be brave, that we were not going to be effective in opposing the erosion of women's rights and the silencing and terrorising of lesbians online if we remained anonymous.
47. Rather than call out the misogyny directed at lesbians and women online, Stonewall has sought to pour petrol on the flames. Stonewall, a political lobbying group, has told lesbians like me that we must "get with the T" and that there is "no debate" about this. It was an order, reinforced with menaces. Stonewall organised for people to carry banners "L with the T — Not a debate" at Pride marches. Lesbians who disagreed were targeted for abuse, violence and threats — at Pride events around the country. A group of lesbians were asked to leave a bar on London's South Bank because they wore T-Shirts stating their same sex attraction to other females. The police were called and they were forcibly ejected from the premises.

48. At a Women's Place meeting of gender critical feminists in Brighton in September 2019, attendees were subjected to physical threats and intimidation. The windows were kicked and banged as the meeting took place. You can see a video of it here: https://youtu.be/XGGPAgsA_WU. I believe Women's Place is the organisation the complainant is referring to in the complaint in the reference to "Woman's Pace", and which it is stated is "regarded by many LGBT rights and anti-violence organisations to be a hate group". While Women's Place is labelled a hate group by Stonewall, I am not aware of any other organisations that label it a hate group. This is because Women's Place is nothing of the kind.
49. Stonewall's use of language like "hate group", which has absolutely no basis at all in fact and is used deliberately falsely, leads to the physical intimidation against Gender Critical Feminists such as that depicted in the video above. There is no instance of any gender critical feminist engaging in any such physical intimidation against supporters of Stonewall, much less against Trans people.
50. Please read this article in which Simon Fanshawe, a founder of Stonewall, set out his concerns. He gives specific examples, including seeing banners which read "Death to TERFS". https://www.holyrood.com/inside-politics/view,cofounder-of-stonewall-calls-for-calm_14648.htm. I have helped set up the LGB Alliance with Simon, and other LGB activists who were formerly involved in Stonewall.
51. Here are further articles which summarise the reality of women who express Gender Critical beliefs and how they are treated by the Trans Activist community, which is led by Stonewall, as a result:
- a. <https://www.afterellen.com/general-news/570509-why-lesbians-no-longer-feel-welcome-at-pride-marches>
 - b. <https://medium.com/@josephinebartosch/lesbian-pride-lesbian-protest-cea2c1404cc0>
 - c. <https://pjmedia.com/trending/feminist-mom-booted-from-bar-over-t-shirt-with-the-definition-of-woman/>
52. This has been the case for some years now and is the reason why I was reticent about publicly declaring my belief. I was afraid of the backlash, which has now manifested itself in this process. Despite all of this I did decide to come out as a Gender Critical Feminist. I put my full name on my twitter profile and my profession, making it clear that I was tweeting my own views, not those of Garden Court. I did so because I could remain silent and anonymous no longer. I feel a responsibility to speak up as a black woman, as a survivor, as a lesbian and as a barrister.

53. Finally, in the midst of this horrific backlash against lesbians, Stonewall decided to unilaterally re-define homosexuality, not as same-sex attraction and desire, but as same-gender desire, thereby wiping out the identities of all homosexuals and leaving lesbians in particular, open to the predatory behaviour of any man, so long as he prefaces his coercive behaviour, demands and desires with the magic words “I am trans”, regardless of whether there is any objective evidence of this.

ECHR Rights

54. The complaint from Stonewall seeks to interfere with my Article 9 and 10 rights and is unlawful.

55. There can be no justification to interfere with my Convention rights in the circumstances of this matter, and every reason to uphold those rights.

56. The complaint from Stonewall seeks to interfere with my protection from discrimination under the Equality Act 2010, on the grounds of sex, sexual orientation and philosophical belief.

57. Gender identity is not a protected characteristic under the EA 2010, yet it is being deployed in a cynical attempt to displace the protections that I have under that act.

58. In so doing, the complaint itself, and Stonewall's conduct illustrates, the mischief of sex self-ID, namely that by mere declaration, and nothing more, any male bodied heterosexual person can in one fell swoop, and by words alone, seek to displace my protected characteristics on the basis of something completely unverifiable — that person's asserted gender identity.

Bad faith and political interference

59. Stonewall's complaint is motivated by politics and a desire to silence its critics and its political opponents — of which it had none, until recently.

60. As set out above, on 22 October 2019, myself and others launched the LGB Alliance, a lesbian, gay and bisexual political pressure group.

61. The tone of Stonewall's complaint makes it clear that they think they have entered into a quid pro quo with chambers; that chambers will “do the right thing” and sack me. This is for expressing a belief that has been expressed by many others, in the media and elsewhere, about which they can make no complaint, get no one fired from their employment, but they think they can at Garden Court.

62. Stonewall is harassing me. Their motivation is political and profoundly undemocratic.

Harassment

63. Although third party harassment is not currently actionable in the work environment, where third party actions are adopted by Garden Court, although not a traditional employer, that employer can become liable for that harassment.

64. The adoption of the complaint despite its obvious shortcomings appears to be such an adoption of a third party's attempt to harass me.

65. The chronology of the matter is illustrative. Garden Court made repeated public statements of its investigation of me **before** the complaint which is now being processed. This is troubling and raises concerns about the lawfulness of Chambers' actions, and its motivations.

66. Therefore it is of particular concern that Chambers may be (possibly unwittingly) facilitating unlawful discrimination against me and generating its own liability in doing so.

67. I would invite chambers to consider the wisdom of the embarking on the process as they have.

Conclusion

68. Nevertheless, in accordance with my obligation to chambers and the bar, I recognise that complaints have to be addressed regardless of their provenance. Despite my serious misgivings as to how this process has been pursued by chambers, my responses are as follows.

69. My tweets were designed to convey my philosophical beliefs and opinions on a matter of personal, national and international importance: the rights, safety and autonomy of women, especially lesbians, in the light of proposals for sex self-ID, in the context of a political lobbying group, Stonewall, seeking to erode and erase those rights. Since this matter has blown up in the media I receive hundreds of letters each week in support, many from members of the bar, some of which have been forwarded directly to chambers — from around the world, and I continue to do so.

70. Whilst I am entitled to exercise my Art 10 rights without unlawful interference I do nonetheless modify my behaviour online, mindful of the BSB guidance. Since coming out as gender critical online and on Twitter specifically I avoid

engaging in one on one debates and arguments. I post a tweet or a thread and I avoid commenting on any of the comments that I receive that are critical, hostile or downright abusive, thus avoiding getting into heated debates (CD3). However, I do not accept that (CD3) requires me to shy away from engaging in the issues of the day, however, contentious. The bar has always taken a lead in such matters, that arena has shifted online and to Twitter where many of us, pupil barristers to Queen's Counsel alike, engage in respectful and heated debates, and I believe we add to those debates in the best traditions of the bar.

71. I have not sought to unlawfully discriminate against anyone and I cannot identify any coherent basis to assert that I did so discriminate. I adhere to the law of the land, recognising gender reassignment as a protected characteristic. Although gender identity is not a protected characteristic I try to be respectful in my discussions around gender identity. You will note that I referred to Morgan Page as a male bodied person, factually correct, and not as a man (CD8)
72. I do not accept that I have said or posted anything in bad taste, or anything that can be considered offensive by others, bearing in mind my Art 9 and 10 rights.

Allison Bailey

21st November 2019

APPENDIX

<https://terfisaslur.com>

TERF is a slur. Examples only.





Ashley B
@magicnanners



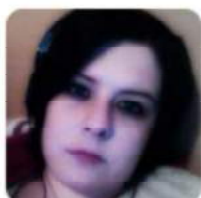
Terfs can choke on my

02/08/2015 01:54

1 RETWEET 5 FAVOURITES



Tweet



♎ д и и д ♎

@palindromicness



Enjoy my ladydick in your mouth
cuntwipe [twitter.com/gorillamikem/
S...](https://twitter.com/gorillamikem/S...)

25/07/2016, 22:56

1 RETWEET 9 LIKES



Alice Lia Maro

@slimelia



hope someone slits Germaine Greer's
saggy fucking throat

2:31 am · 26 Oct 15





aitsune
@robotgirls



shoot a terf today

08/11/2014 22:57

2 FAVORITES



Falange
@NancylsACunt



All TERFs deserve to be shot in the head

11/09/2014 20:25

1 FAVOURITE



Tweet



DJ Hormone Heist

@crystalblisters



Kill all TERFs

18/05/2015 19:09

2 FAVOURITES







Cordelia Crescent @LewdlyCordelia

12m

"TERF IS A SLUR"

Would you kindly suck on my womanly
dick?



Cordelia Crescent
@LewdlyCordelia



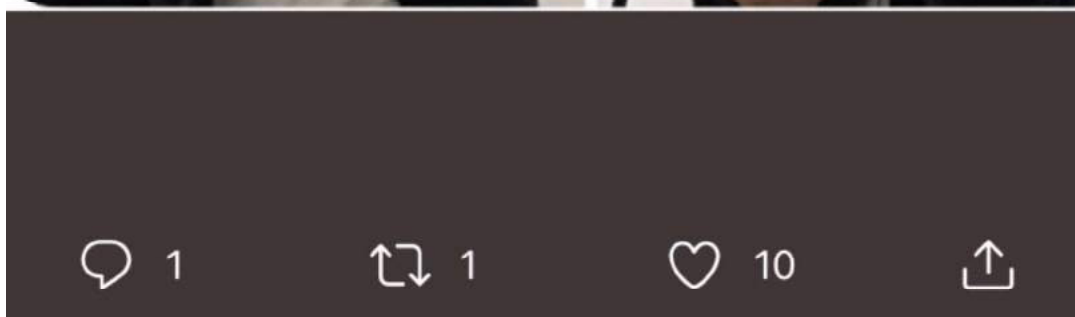
Preferably choke on it.

19/01/2015 16:41

1 RETWEET 1 FAVORITE



POV you're a terf in my mentions










@BluskyeAllison is my Twitter username


Prof. Alex Sharpe (on TERFS)

Safari 03:29 Sat 22 Dec

Tweet





 **Alex Sharpe** @AlexSharpe64


Is Sadism Popular With TERFs? A Chat With An Ex-Gendercrit


 Is Sadism Popular With TERFs? A Chat With An Ex-Gendercrit
transadvocate.com


07/10/2018, 10:05


7 Retweets 14 Likes





 **Bayne MacGregor** @BayneMacGregor · 07/10/2018
Replying to @AlexSharpe64
Someone needs to do a study like this with Transphobes.
ncbi.nlm.nih.gov/pubmed/28772014

 **Zoë Blade** @zoeblade · 07/10/2018
They really should. np.reddit.com/r/GenderCritic...

 **Bayne MacGregor** @BayneMacGregor · 08/10/2018
Hmm so they watch a lot of Trans porn... and judge Trans peoples sexuality and preferences by Trans porn... when that'd just show the preferences of the market of consumers of Trans porn.

 **(((Mia Bregovic)))** @BregovicMia · 07/10/2018
Replying to @AlexSharpe64
An excellent article. Thank you for sharing x

Tweet your reply

Tweet



Alex Sharpe
@AlexSharpe64

Nev gets it. Don't be a TERF. Be like Nev. Love over hate x

Neville Southall @NevilleSouthall

All trans people I know are lovely
Shame there is so many twats to hassle them
But hate loses to love every time
❤️❤️❤️

06/06/2018, 22:49

2 Retweets 12 Likes



Tweet your reply



Tweet

**Alex Sharpe**
@AlexSharpe64

TERFs oppose the term cis because they reject trans people's gender identities as real or legitimate. You can stand with them or you can take an ethical turn. Love over hate.

17/11/2018, 15:05

97 Retweets 539 Likes

**Kathleen Stock** @Docstockk · 18/11/2018

Replying to @AlexSharpe64

Is this really the acceptable standard of analysis at your institution these days, Alex? Crikey.

3

13

197

**Alex Sharpe** @AlexSharpe64 · 18/11/2018

Ouch.

1



3

**Alex Sharpe** @AlexSharpe64 · 18/11/2018

After having read your piece on conversion therapy, all I can do is implode with laughter. 😂

3

1

13



2 more replies

**SEAN** 🇫🇷 🇮🇹 🇬🇧 🇵🇹 🇪🇸 🇮🇸 🇩🇪 🇦🇹 🇨🇪 🇪🇺 @esseeeyeeenn · 18/11/2018

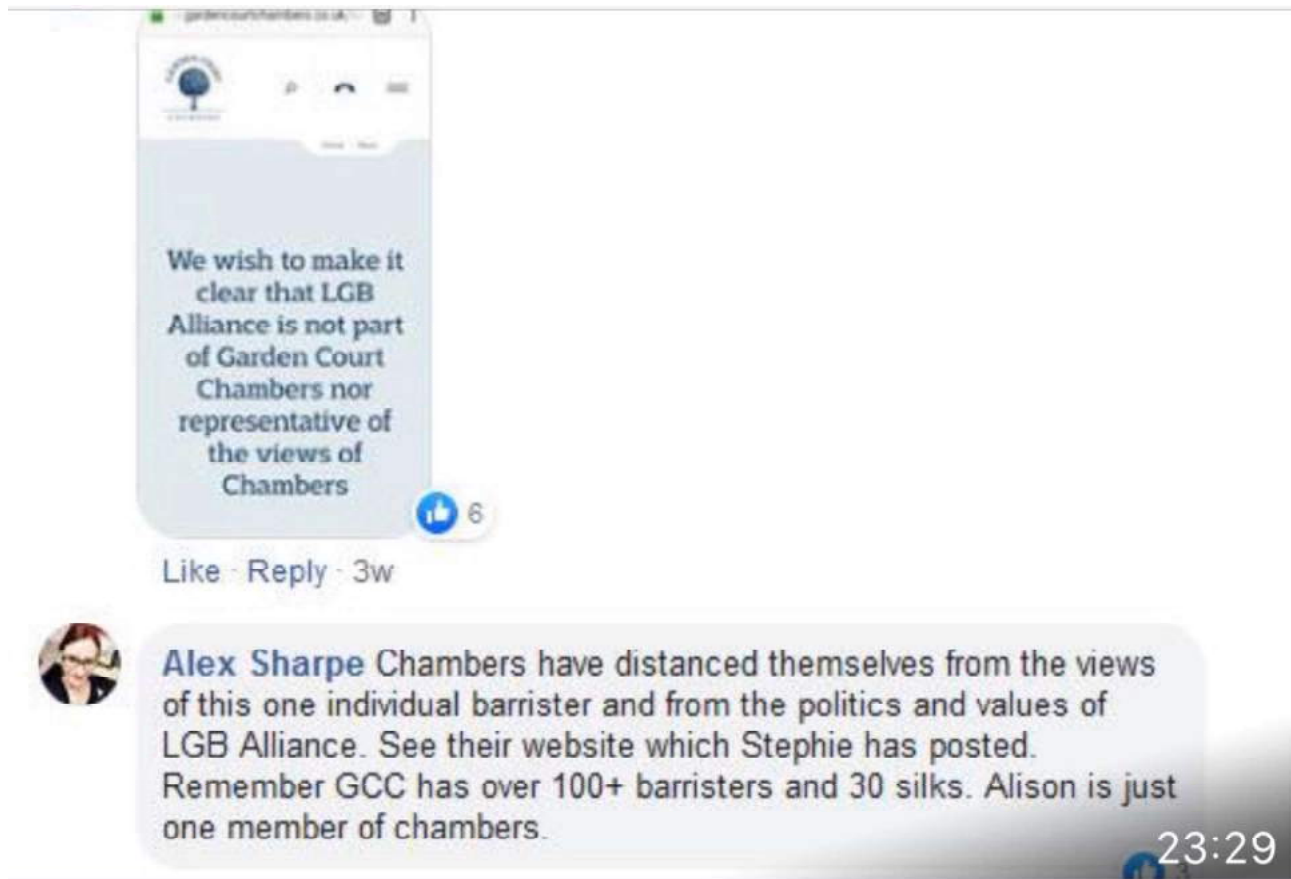
Replying to @AlexSharpe64

Actually as a gay man I oppose the term "cis" because after a lifetime of being bullied & beaten for failing to conform to male gender stereotypes NOONE gets to say I'm "comfortable with my assigned

Tweet your reply



Prof. Alex Sharpe, public comments about me and the LGB Alliance





Alex Sharpe 
@AlexSharpe64



Replying to [@AJPrincep](#)

A member of chambers is associated with the LGB Alliance break away group. Chambers, which comprises over 100 barristers, is distancing itself from this group, and by implication, from its politics and values.

Gendered Intelligence, soliciting complaints about me from organisations, including Stonewall

