

Trans Inclusion and Gender Diversity Policy



Consultation Responses and Results

Report

CONTENT WARNING: discriminatory language, sexual violence



About this consultation

Our consultation approach

Bristol City Council is developing a new policy to provide clarity on how best to support trans and gender-diverse service users and citizens, as well as making sure other characteristics including sex-based protections are correctly and lawfully accounted for in any approach we take.

This policy will set out our overall approach, and individual council departments may still need to develop specific procedures and pathways to support trans people to access their services.

As part of our process we wanted to consult with the public to make sure we're hearing all voices, that we have a clear understanding of the potential equality impact of our proposed policy approach, and that people have the chance to provide their views to support the Council to identify and rectify any gaps, issues, or ambiguities in our draft policy.

We held a public consultation between 26 August and 9 October 2022¹. As there was no statutory duty for the Council to consult on this policy, we decided that six weeks was sufficient time for people to provide their views (Local Government Association best practice recommends that authorities should plan for up to six to 12 weeks for a consultation exercise).

To provide sufficient information for respondents to consider our proposals, we published a working draft policy and an equality impact assessment that was carried out to inform the decision to begin the consultation. We also provided context on alternative policy options which we had considered but so far discounted and explained that our proposals are still at a formative stage, and that a final decision has not yet been made or predetermined by the council.

As well as targeted communications to specific communities (including providers of specialist single sex services, and faith organisations e.g., Bristol Muslim Strategic Leadership Group; Bristol Council of Mosques), we promoted the consultation at the Bristol Older People's Forum AGM and the Bristol Equality Network (with BSL interpreters and electronic notetakers). Our targeted messaging said, "Should you require any further information relating to the draft policy or how people can access the consultation in different formats please email the Equalities Team for guidance." The Accessibility Statement for our AskBristol consultation and engagement hub provided details of the accessibility of our survey platform and contact details for further support.

We did not require people to verify their identity when responding to the survey. Permitting citizens to respond anonymously is in line with GDPR (UK) principles, and we avoid collecting personal data which could identify a specific individual unless there is a need and a legal basis to do so. We check for responses with very similar wording or sentiment, and for duplicate responses or 'template' responses; however, it cannot be discounted that these are from separate respondents who share a common view, and so all responses are therefore considered.

¹ The original planned end date for the consultation was 6 October but we had reports of website issues over the August bank holiday weekend, so we extended the consultation until 9 October and advised the revised end-date on our consultation page and subsequent communications.

The consultation was targeted at people in Bristol, but we recognised that valuable contributions could come from people based across a wider geographical area; for example, organisations with relevant technical expertise or people who may work in or regularly visit Bristol but live elsewhere.

We understood from the outset that the survey was likely to be promoted and responded to by groups and organisations with strongly polarised views, so we would not be able to infer the level of support for the proposals among the general public from the survey results as a whole. However, by analysing respondents' feedback on the proposals alongside their equalities characteristics, we can gain insight about whether there are different concerns or potential impacts for people with different protected characteristics. All perspectives are considered, and the majority view is not necessarily one that will shape the final proposals or subsequent decision.

The responses to the consultation are not treated like a referendum in that there is no presumption that the most commonly expressed view will be adopted in the final proposals or the decision makers' decision. An issue identified by a minority of respondents may help shape the proposals if it is concluded that the point raised would improve the proposal.

Total number of responses

We received a total of 3,984 responses to our survey. There were 1,194 downloads of our draft policy and 532 downloads of our equality impact assessment. We also received 13 responses with consultation feedback and comments via email (see summary of email responses below). These ranged from supporting information from respondents who had also completed the survey to statements and presentations from groups or organisations as a separate response.

Traffic channels ranked by volume

- Social media
- Direct link
- Referrals
- .Gov sites
- Search engine
- Email

Responses from an organisation

We asked, "If you are responding on behalf of an organisation or group please provide the name". The list below shows the organisation names that were given in the survey, but doesn't include responses to this question with slogans like 'Sex Matters', 'Adult Human Female' etc.

- Attitude
- Avon and Somerset Constabulary
- Bangladeshi Bristol Women's Group
- Bristol City Council LGBT+ staff led group
- Bristol Education Research Group and Bad Policy Watch
- Bristol Roller Derby
- Bristol Women's Voice
- Children of transitioners.org
- Freedom Youth

- Gendered Intelligence
- Lesbian Rights Alliance, Bristol Branch
- NBT Clinical Lead LGBT+
- Non-Binary South West
- Pride Solidarity
- Protect Women Spaces
- SafeLink specialist LGBTQ+ ISVA
- Scottish Feminist Network
- ShoutOut Radio
- Standing for Women
- Trans Learning Partnership
- Trans Pride South West

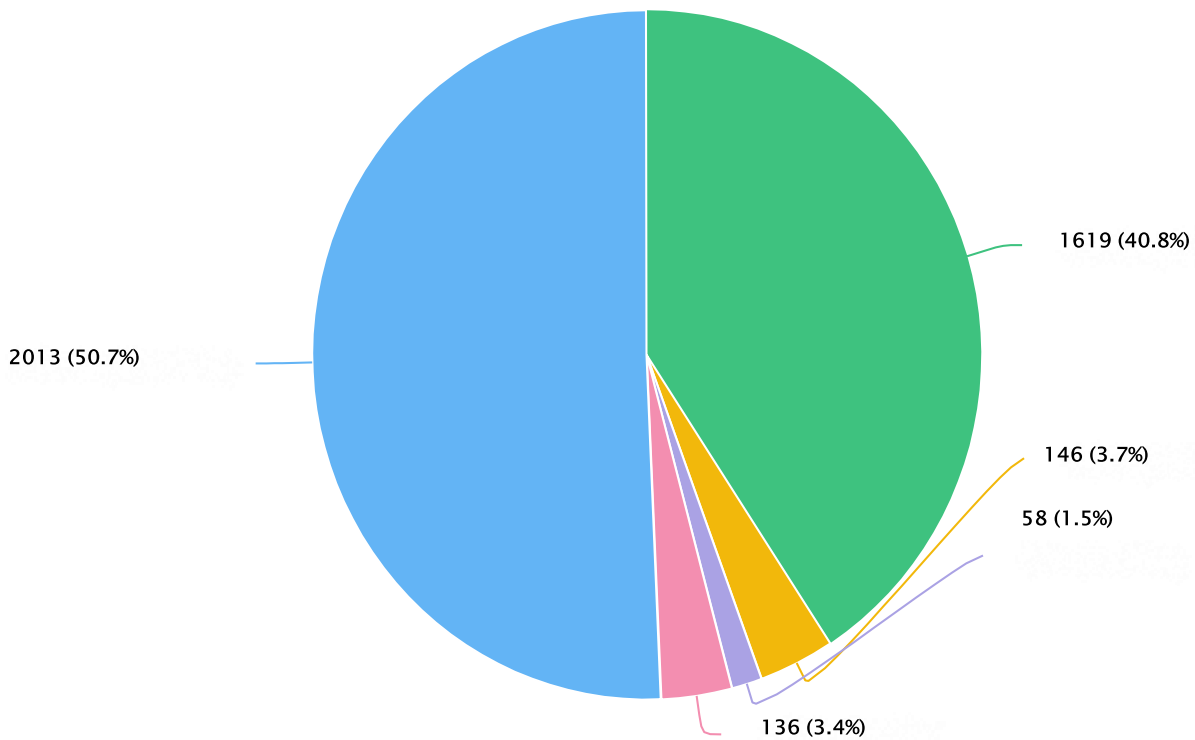
Responses by characteristic

	Respondent Characteristic	Number of Respondents	% of Respondents (who answered)	% Bristol Population
Age	Under 16	32	1%	18.51%
	16-24	556	15%	15.73%
	25-44	1697	47%	33.07%
	45-54	705	19%	10.74%
	55-74	602	17%	15.82%
	75+	25	1%	6.13%
	Prefer not to say	283	-	-
	No response	77	-	-
Sex	Female	2360	70%	50.4%
	Male	916	27%	49.6%
	Other (please specify)	103	3%	-
	Prefer not to say	514	-	-
	No response	84	-	-
Is the gender you identify with the same as your sex registered at birth?	Yes	1759	49%	-
	No	998	28%	-
	Prefer not to say	841	23%	-
	No response	379	-	-
Ethnicity	Asian/Asian British	85	3%	5.50%

	Respondent Characteristic	Number of Respondents	% of Respondents (who answered)	% Bristol Population
	Black / African / Caribbean / Black British	82	3%	6%
	Gypsy / Roma / Irish Traveller	24	1%	0.10%
	Mixed / Multi ethnic group	313	10%	3.60%
	White British	2366	73%	78.00%
	White Irish	151	5%	1.00%
	Other ethnic group	223	7%	5.10%
	Prefer not to say	594	-	-
	No response	139	-	-
Sexual Orientation	Bi	883	30%	10.6%
	Gay / Lesbian	549	19%	
	Straight / Heterosexual	1166	40%	-
	I use another term	341	12%	-
	Prefer not to say	839	-	-
Disabled person	Yes	845	25%	12%
	No	2573	75%	88%
	Prefer not to say	415	12%	-
Religion	No religion	2514	76%	37.4%
	Christian	367	11%	46.8%
	Other religion / belief	410	20%	7.6%
	Prefer not to say	533	-	-
Pregnant or given birth in past 26 weeks	Yes	65	2%	-

	Respondent Characteristic	Number of Respondents	% of Respondents (who answered)	% Bristol Population
	No	3291	98%	-
	Prefer not to say	427	-	-
Refugee or Asylum Seeker	Yes	24	1%	-
	No	3404	89%	-
	Prefer not to say	376	-	-

Do you agree or disagree with this policy approach?



Question options

● Strongly agree ● Agree ● Neither agree nor disagree ● Disagree ● Strongly disagree

Strongly Agree	1,619	40.8%
Agree	146	3.7%
Neither agree nor disagree	58	1.5%
Disagree	136	3.4%
Strongly disagree	2,013	50.7%

Views on our proposed policy approach by characteristic

There were significant differences in the level of agreement/disagreement with our proposed policy based on respondent’s characteristics. These differences were reflective of agreement/disagreement levels for the other questions in the survey.

In summary:

- Most young people aged under 25 agreed with the policy approach and most older respondents aged 55+ disagreed with it
- Most lesbian, gay and bi respondents agreed with the policy approach, whereas the majority of straight/heterosexual respondents disagreed with it
- Most trans and gender diverse people agreed with the policy approach
- Men were more likely to agree with the policy approach than women
- Disabled people were more likely to agree with the policy approach than non-disabled people
- People with no religion/belief were more likely to agree with the policy approach, and Christians were less likely to agree than people from other faith/belief groups.

The table below shows levels of overall agreement/disagreement by characteristic

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
All	40.8%	3.7%	1.5%	3.4%	50.6%
Age under 25	69.3%	3.2%	0.7%	0.9%	25.9%
Age 55+	21.6%	4.2%	2.7%	5.4%	66.1%
Lesbian, Gay, or Bi	65.5%	4.2%	1.0%	2.4%	26.9%
Heterosexual/Straight	27.1%	4.6%	1.9%	4.5%	62.0%
No religion	48.1%	4.4%	1.5%	3.1%	42.9%
Christian	37.3%	3.8%	0.8%	5.2%	52.9%
Other religion/belief	43.0%	2.6%	1.6%	2.9%	49.8%
Asian/Asian British	36.5%	2.4%	1.2%	3.5%	56.5%
Black/Black British	15.9%	3.7%	0.0%	2.4%	78.0%
Mixed/Multiple Ethnic Group	28.2%	1.6%	1.9%	5.4%	62.8%
Other ethnic group	50.7%	3.6%	2.2%	1.8%	4.7%
White British	50.5%	4.7%	1.3%	3.2%	40.2%
White Other	33.9%	2.3%	1.7%	5.2%	56.9%
Sex: Female	31.3%	2.9%	1.6%	3.9%	60.2%
Sex: Male	52.9%	5.9%	1.3%	3.0%	30.6%
Sex: Not given/prefer not to say	48.7%	3.3%	1.3%	2.4%	44.3%
Gender same as sex registered at birth	43.9%	5.1%	1.7%	4.2%	45.0%
Gender different from sex registered at birth	75.2%	4.4%	1.6%	1.9%	16.9%
Gender – not answered / prefer not to say	8.2%	1.0%	1.0%	3.6%	86.2%
Disabled person	49.0%	2.6%	1.0%	2.1%	45.3%

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Not disabled person	41.6%	4.2%	1.7%	3.8%	48.7%

Do you have any comments on our proposed policy approach?

We had 2,285 comments in response to this question which we have summarised by theme below. This summary does not include out-of-scope comments, or comments relating to other public bodies and organisations unless they were relevant to this policy. As there was a lot of crossovers in comments between questions, where appropriate we have referred to these in other sections.

Theme	Summary of comments
Agreement	<ul style="list-style-type: none"> • The policy is necessary to keep trans people safe. • This is necessary as trans people are receiving high levels of harassment and vilification • This would help me feel safer as a transgender person and would save lives • The policy will provide safety for trans people who are on long waiting lists for gender reassignment surgery • This approach challenges the media image that portrays trans people as dangerous • Policy needs to be widened to be more inclusive • Transgender women must be allowed to be in a safe place like any other women • Trans people who fall outside of the binary model of transition are less likely to ‘pass’ and more likely to experience discrimination and abuse – so it is essential that they are protected in policy. • Trans rights are human rights, and this goes for more than just male-to-female or female-to-male people. • Surgery shouldn’t be the only way to guarantee transgender and gender fluid people's rights
Gender identity is not real and transgender women are not really women	<ul style="list-style-type: none"> • Sex is immutable – cannot change DNA, chromosomes etc • The proposed policy is founded on ideology which is based on a false and unscientific belief • Gender identity / self-identification doesn’t exist • Regardless of any medical interventions (hormones or surgery) it is not possible for a biological man to become a women • Being transgender is gender dysphoria and therefore a mental illness
Men pose a danger to women and LGB community	<ul style="list-style-type: none"> • Woman and girls need protection from predatory men • The policy invites predators as men commit 98% of sex crimes, 100% of rapes and 68% of violent crimes. • Predatory men will pretend to be trans to gain access to single sex spaces and abuse women and children • Policy would place women and the LGB community in a position to be taken advantage of and wrongly accused of discrimination • Trans people are motivated by misogyny

	<ul style="list-style-type: none"> • Women’s protections and facilities need to be improved not made worse
The policy is legally/factually wrong	<ul style="list-style-type: none"> • Not all trans people are protected under the Equality Act • The proposed policy wouldn’t comply with the law • Self ID is against the law • The policy goes against the Public Sector Equality Duty • Non-binary is not a characteristic that is protected under the Equality Act 2010 • The terms in the proposal are nebulous and not legally defined • The Council should not attempt to go 'beyond' the law • Trans people already have equal rights under the law - you are proposing to give them more rights than other people.
The policy discriminates against other protected characteristic groups	<ul style="list-style-type: none"> • The proposed policy is likely to be detrimental to those with the protected characteristics of sex, sexual orientation and religion/belief • The proposed policy shows no attempt to accommodate the needs of gender critical women, women who have experienced sexual violence or religious minorities • The policy promotes one protected characteristic - you are developing a trans inclusion and gender identity policy but not a policy for all nine protected characteristics
The policy isn’t clear	<ul style="list-style-type: none"> • It’s not made clear what additional rights trans people gain from your new proposal. • You have not set out what the implications of such a policy change are. • The phrasing is too broad and easy to misinterpret. Even with the "no medical procedures" caveat, "gender reassignment" still evokes medical procedures. The policy should be rephrased to protect anyone undergoing "Gender Transition".

Providing Trans Inclusive Services

Our survey said:

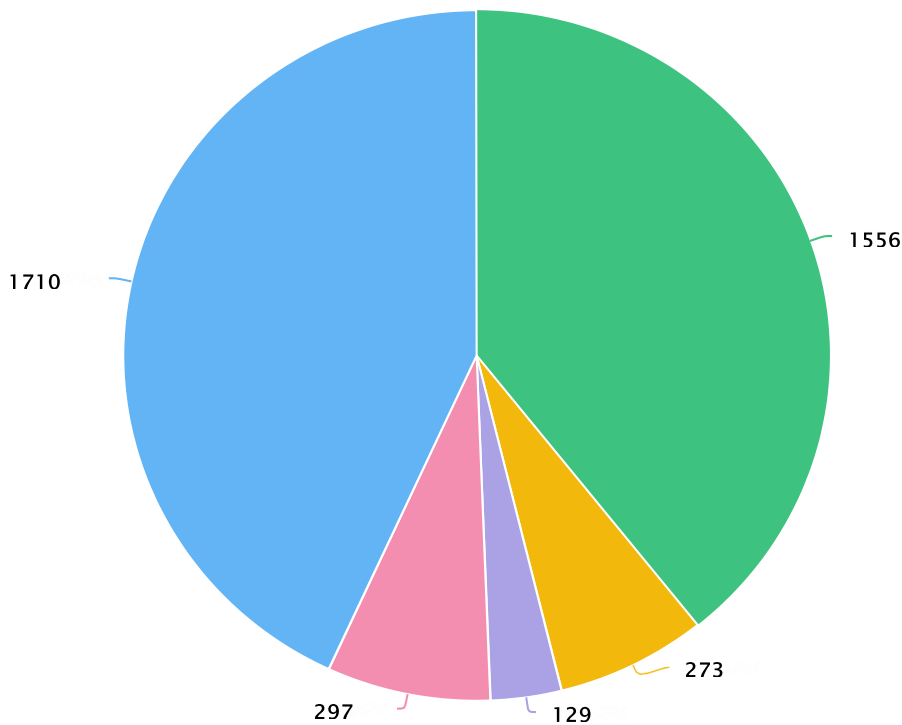
The draft policy provides general examples of good practice in providing trans inclusive services. These examples are based on [Government Equalities Office advice](#). In response to earlier engagement and consultation we’ve added examples of acceptable alternative I.D. and an explicit reference to gender-diverse people.

Examples of good practice:

- Treat trans and gender-diverse people as you would all other customers whilst considering the additional sensitivities they may face.
- Try not to assume someone’s gender simply by their appearance.
- Consider whether you need to ask someone’s gender.

- Assume everyone selects the facilities appropriate to their gender identity, including those with non-binary, gender fluid, agender or gender variant identities.
- Accept a range of ID other than a birth certificate for example a driving licence, passport, Statutory Declaration or change of name by Deed Poll. You do not usually need to see a Gender Recognition Certificate (GRC) to amend personal details.
- Ask those who transition whilst using your services how you can support them.
- Update documentation and records efficiently and sensitively.
- Publicise your good practice and inclusivity to diverse groups.

Do you agree or disagree that this is an inclusive list of good practice?



Question options

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Strongly Agree	1,556
Agree	273
Neither agree nor disagree	129
Disagree	297
Strongly disagree	1,710

Do you have any comments or further suggestions of good practice that could be included?

We had 1,924 comments in response to this question which we have summarised by theme below.

Theme	Summary of comments
Agreement	<ul style="list-style-type: none"> • These are all common sense and also protect other non-trans people whose appearance is not gender conforming • Guidance is needed to counteract recent backlash against trans people

	<ul style="list-style-type: none"> • Those seem like very modern, low effort practices that would make a difference to a marginalised population • Trans people have a huge amount of stress already and this would reduce stress and make people feel more welcome • These measures will go a long way toward alleviating many of the difficulties that trans people experience • Policy should not be derailed because of irrational fear or the small chance that fraudulent activity may occur. • Examples are a good step towards inclusivity in an increasingly hostile Britain • The approach poses no threat to anyone and hugely reduces harm and risk to trans people • The fear that men may take advantage in order to access women-only spaces is irrelevant as any policy is open to fraud and this can be dealt with appropriately • Trans or gender non-conforming people don't automatically pose a risk to single sex spaces/facilities. • Quite right to hold out against claims that trans people are dangerous to women and girls. Most sexual crime is committed by cis males not trans women. • Other countries have inclusive models for ID without any reported rise in incidents
Recommended additions	<ul style="list-style-type: none"> • Dispense with the need to provide a title (Mr/Mrs/Ms/Mx etc) or at least make it optional. • Display trans inclusive messaging including zero tolerance for transphobia • Do not take advice from or award contracts to anti-trans organisations. • Facilitate opportunities for trans people to organise, socialise and feel safe • Foster an environment where people feel free to inform you of their gender but avoid asking unless it is very important. • Make sure language used is friendly and not overly clinical / technical or othering • Need clarification it is not okay to ask about genitals outside of medical treatment • Proactively state that you support and welcome trans and gender diverse people, so they feel safe and welcome using your service and facilities • Provide info for service users on how they can update their personal details • Review and update forms to be inclusive of non-binary people • Trans awareness sessions for staff (including for commissioned services) • Trans inclusive services are not the same as trans intelligent services - services need to be beneficial for trans people to access them and receive proper care. • Where incorrect assumptions are made, apologise and ensure the use of the right pronouns / name moving forward. • Work with recognised trans inclusive services
Points of note and clarifications	<ul style="list-style-type: none"> • Make it clearer that this good practice works within the caveat of existing lawful exemptions for single sex services as appropriate

- The second and third bullet points should utilize stronger language than "try" and "consider"
- You should not be asking for ID from a trans person in any situation where you would not be asking for it, as a matter of course, for a cis person.
- You may need to be more specific about what "be sensitive" means as trans people are often asked intrusive personal medical questions on the pretext of showing an interest / meeting needs
- Both enrolled and unenrolled Deed Polls should be accepted as paying for an enrolled Deed Poll is not accessible to everyone
- Pronouns can be indicative of gender but are not all "words we use to refer to people's gender" e.g. I, me, you, they, our, we
- Personal information pertaining to medical transition should still be treated as 'Special Information' and held sensitively, and in line with existing data protection laws.
- Changing a name on legal ID can be expensive and inaccessible to some transitioning people living in (or near) poverty.
- Even in cases involving a transsexual there is not an immediate right to use the preferred facilities at the start of their transition (see para 47 of the Croft case, per Lord Justice Pill).
- Freedom of speech and expression: "Some people may hold ideological objections to recognising trans people or transgender status, and the relationship between different faith groups and trans people is complex and varies widely" - the use of the term 'ideological' is loaded here. It would be better and more appropriate to say that "Some people have beliefs that conflict with recognising trans people or transgender status, and..." Similarly, the final sentence "...such genuine discussion should not necessarily be considered hate speech or motivated by transphobia" is also loaded because it implies that, most of the time, such genuine discussion probably is motivated by transphobia. The language could be amended so that it does not appear loaded, e.g., "... such genuine discussion should not be considered hate speech or characterised as motivated by transphobia". There is significant crossover between the trans, disabled and BIPOC communities.
- Use of pronouns in signatures etc. should be entirely optional with care not to create any pressure to do so because: some trans people will not be ready to do this / don't want to misgender themselves; people with gender-critical views should not feel compelled to do this
- "Ask those who transition whilst using your services how you can support them" - recommending more subtle approach that allows people to openly request support on their own terms.
- Using pronouns makes a person's gender salient for others as well as for themselves which can activate 'stereotype threat' likely to disadvantage women disproportionately.
- In draft policy recommend saying "preferred pronouns" not "correct pronouns", which may be misleading.
- Because gender reassignment surgery waiting lists are long and private medical treatment is expensive there a lots of trans people who may not appear to have transitioned but are still planning to undergo transition.

	<ul style="list-style-type: none"> • ‘Gender-diverse’ term may be problematic because it assumes there is a normal - we should be moving away from limited/fixed expectations • Provide additional practical support for the trans community, particularly trans people of colour e.g., adequate housing and mental health care, campaigning for better access to healthcare as more than anything this is what trans people need - not words but action.
Safeguarding concerns	<ul style="list-style-type: none"> • Biological women need single sex spaces • Policy should prioritise the safety of women and girls first and above everything else. • Good practice examples deny the reality of sex based offending risk and male abuse • Will discourage women who have been raped, sexually assaulted or are merely cautious about their privacy, dignity and safety, from using facilities where they may be vulnerable for example undressed. • Changing name and gender allows fraud / crime / abuse • No one should be allowed to falsify their records by changing a sex marker • Examples will allow criminals to evade DBS and safeguarding checks • Allowing multiple and alternating genders erodes true recognition of abuse of women as a sex class by biological men • Make men’s spaces safer and address male/male violence so men regardless of their 'identity' feel safe in men's facilities - women and girls are not your human shields. • Ignores that main victims of domestic and sexual abuse are women, and most perpetrators are men • In the UK trans women offend at a higher rate than men in regard to violent crime and sexual offences. • This policy will allow men with beards into women’s spaces if they feel like it • Transphobia should not be confused with advocacy for sex-based rights: for example a concern that males who are not genuinely trans will abuse access to single-sex spaces is not transphobic. • If you are not seeking proof of ID how will you operate an effective safeguarding process? • Males will pose as trans / non-binary to gain access to women only spaces • if a member of staff sees an 8yr old girl go into a female toilet, shortly followed by male bodied person and cannot assume they are related, should they intervene for safeguarding purposes?
Issues around the recognition of trans people	<ul style="list-style-type: none"> • You <u>should</u> assume people’s sex because gender doesn’t exist. • ‘Gender diverse’ is meaningless - does this include a man in a dress? • Men pretend to be women because of auto gynephilia / fetishes • Women's services are designed for those with female biology and no trans identifying male needs them. • Ensure diversity monitoring includes Sex so that gender identity does not erase particular issues for 'biological women'

	<ul style="list-style-type: none"> • There should be a distinction between 'genuine' trans people who live as opposite sex and others who are not genuine / present how they feel that day • Approach is asking people not to trust their natural instincts in relation to the sex of others. Will stop Muslim and orthodox Jewish women from using single sex services if they are no longer genuinely single sex • Use ICD-11 codes (as gender dysphoria is delusional / a mental health disorder) • Single sex services should be accessed on the basis of biological sex only, not gender identity • changing appearance should not be an assumed indication that someone is transitioning or has changed gender. • I presume you would know the difference between a man that wishes to change gender (by hormones and surgery), and the many men who cross dress and seek sex with other men while living as heterosexual? • A change of name by deed poll or other method is not a viable method of proving gender • letting trans people access single sex spaces makes them mixed sex • Make third spaces instead for trans people • Non-binary people should use services and facilities according to their biological sex, not personal preference • individuals who consider themselves to be gender fluid etc. do not have a right to use facilities designated for the opposite sex to their birth and legal sex, as there is no legal process of gender reassignment available to these individuals, and no general right under U.K. law to use facilities which match with your gender identity.
<p>Comments about updating records / I.D</p>	<ul style="list-style-type: none"> • Need a clear policy on how to update records in line with the GRA and GDPR • Gender Recognition Certificate is not 'ID' in the sense that it is not required unless updating birth certificate, death certificate, marriage records). • Deed poll along with proof of address/utility bill etc. should be sufficient for changing details • Make records flexible/easily changeable for gender for people who are exploring gender. • Information recorded on a I.D. may not be correct if the person has not been able to change it.
<p>Concerns that examples are based on 'gender ideology'</p>	<ul style="list-style-type: none"> • You are asking people to deny their own beliefs or the reality of their senses • I will refuse to comply with any compelled speech - Pronouns Are Rohypnol • A person does not become the opposite sex just because they say so. • There is no legal definition of gender so the policy should not refer to it • This good practice is derived from trans lobby groups and should be disregarded • The approach demands that people believe in gender ideology
<p>Concerns approach does not sufficiently</p>	<ul style="list-style-type: none"> • The policy should reference EHRC Guidance <u>Separate and single sex service providers: a guide on the Equality Act sex and gender reassignment exceptions</u>

reflect existing law / external guidance	<ul style="list-style-type: none"> • The policy approach should reflect <u>Suella Braverman statement</u> on the Equality Act 2010 and single sex spaces, August 2022 • The Government Equalities Office no longer supports the practices outlined above so the citation is out of date
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Examples of Unacceptable Behaviour

Our survey said:

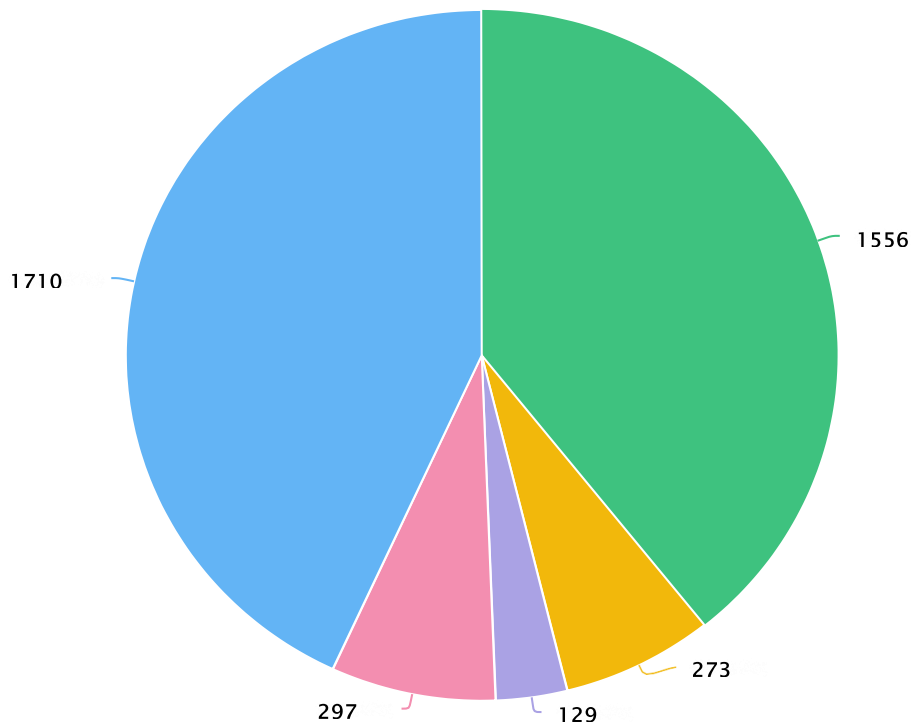
All people have the right to be treated with dignity and respect regardless of their gender identity, gender expression and sex characteristics.

The draft policy identifies some examples of unacceptable behaviour:

- Deliberately disclosing somebody's trans status, trans history or transition without their consent
- Asking intrusive questions about somebody's gender identity or transition
- Verbal abuse, including threats, derogatory name-calling, insults, ridicule or belittling of trans people
- Telling inappropriate jokes about somebody's gender identity, gender expression or sex characteristics
- Displaying or circulating offensive material relating to somebody's gender identity, gender expression or sex characteristics, for example by email, text message or via the internet
- Violence or the threat of violence

Accidentally using an incorrect pronoun can simply be a mistake based on lack of awareness. However, some people who hold discriminatory views about trans and gender-diverse people may use deliberate mis-gendering or dead-naming (calling a trans-person by their birth name) as a deliberate tactic for harassment and bullying.

Do you think this is an inclusive list of examples of harassment and unacceptable behaviour?



Question options

● Strongly agree ● Agree ● Neither agree nor disagree ● Disagree ● Strongly disagree

Strongly Agree	1,454
Agree	607
Neither agree nor disagree	470
Disagree	299
Strongly disagree	1,076

Do you have any comments or further examples of harassment and unacceptable behaviour that could be included?)

We had 1,853 comments on this survey question which we have summarised by theme below.

Theme	Summary of comments
Agreement	<ul style="list-style-type: none"> The list is helpful and comprehensive Protections are necessary because of the extent of harassment against trans people The examples are Important because this behaviour can increase suicide and depression in trans people If the hate and suspicion which is directed at trans people was shown to other minority communities, we would not hesitate to respond. The policy needs to be accompanied by appropriate training, resources, and mediation for council staff. These protections lay the foundation for a stronger protection for cis people too

Additional examples	<ul style="list-style-type: none"> • Asserting that trans/non-binary people are inherently a threat is harassment • Extreme / exaggerated focus on the perceived risk that trans people pose to others • Refusing to use someone 's chosen name • Minimising the extent of discrimination and harassment against trans people • Examples of ‘dog-whistle’ phrases which are not directed at an individual but at whole trans community which are toxic or exclusionary e.g., "adult human female", "women's sex-based rights", "XX chromosomes", "#StandWithRowling" • Include harassment based on biological sex / reference to genitals etc. • Greater care should be taken to look at council funded groups who display transphobic behaviour • Online bullying and harassment • Needs clearer distinction between accidental and deliberate misgendering e.g., intentional, and repeated • People who use internet as a platform for trans hostile views, although not targeting individuals, directly can indirectly impact staff and service users • challenging someone's right to be in a gendered space is also harassment/discrimination • "Trans identified male" is an example of deliberate misgendering • calling trans men ‘women’, or trans women ‘men’ • de-gendering or calling someone neutral pronouns e.g., ‘them’ when they are trans-feminine can be discriminatory • Continually raising the topic of gender identity with trans people for debate (in the same way that it would not be okay for an atheist, even though they are entitled to hold their views, to keep telling people of faith they are wrong) • Doxing – revealing personally identifying information about people online without their consent (including deadnaming and disclosing trans history). • Deliberately ostracising or leaving trans people out of discussions and groups • Organisational harassment - use of vexatious freedom of information requests and complaint procedures to attack organisations who support trans or non-binary customers • Make it clear that the examples of unacceptable behaviour are not exhaustive, so people don't think other variations are ok
Ambiguous wording	<ul style="list-style-type: none"> • Difficult to judge if incorrect use of pronouns is deliberate or a mistake • People who reject gender altogether may not wish to be asked their gender • Intent and context are essential to assess whether behaviour is unacceptable • Displaying or circulating offensive material – trans people are too easily offended, who decides what is ‘offensive’? • important to make distinction between accidental misgendering (may impact older or disabled people more) and doing so deliberately to cause offence, distress or to make a point • In the wrong context most of these behaviours would 'out' the trans person in question and put them at risk of violence in certain situations. • Who decides what is appropriate or inappropriate? • What does ‘intrusive’ mean?

	<ul style="list-style-type: none"> • If I wear a t-shirt that says, "Believer in biology" or "Transwomen are men" (which is factually true) is that considered displaying offensive material? • Ensure the policy approach does not insist/enforce use of pronouns – which can out people without their consent
Overreach / going too far	<ul style="list-style-type: none"> • Anyone can claim a trans identity and then claim they are being discriminated against • trans status should be restricted to people with a gender recognition certificate • ‘Transphobia’ is not irrational or greatly exaggerated fear of trans people - women have entirely rational reasons to be wary of biological men • Pronouns use should only be sex based He/Him – Male, and She/Her - Female. • The list of unacceptable behaviour is problematic because it is aiming to go beyond the law • Examples of harassment interfere with the right of gender critical people to freedom of expression and protections under ‘Religion and Belief’ in the Equality Act (93 references to Forstater case) • The list is based on ‘gender ideology’, which is unproven / not valid • People do not have the right not to be offended • Banning jokes is problematic as policy should not dictate a sense of humour • Autistic or older people may be accused of harassment if they misgender a trans person • Wording "people who hold discriminatory views about gender-diverse people..." is problematic because it presumes gender-critical views are discriminatory.
Safeguarding concerns	<ul style="list-style-type: none"> • ‘Deliberately disclosing trans status’ - needs clarification as may need to for safeguarding reasons in some contexts • Trans women are inherently more dangerous because they are really men • Forcing women to pretend a man is a woman lowers her barriers for safety and is gaslighting / silencing • Trans status should be automatically/routinely disclosed to keep people women and children safe. • In a single sex space women should be able to challenge a genetic male • Should be able to ask intrusive questions e.g., about medical status to know whether people in safe spaces have a penis. • Should be able to speak out if I feel threatened by a man
List includes activities which should be allowed	<ul style="list-style-type: none"> • Correctly sexing someone should not be an issue / no such thing as misgendering trans people - just correctly identifying based on sex • Deadnaming / deliberately disclosing someone’s trans history without their consent should be allowed because trans people should not be able to hide their past identity • Requiring people who do not believe in gender ideology to conform to preferences of those who do is unacceptable

Examples are 'one-sided'	<ul style="list-style-type: none"> • Policy approach is unnecessary because it only protects a small cohort – why doesn't this include all women as 50% of the population, or other groups who are much larger in number? • List does not include misogyny, harassing people with gender critical views, or violence against women and girls • Using terms like 'TERF' and 'cis' are equally unacceptable behaviour and should be included • The examples protect one group at the expense of others • Men dressing as a parody of women is offensive
Trans is not real	<ul style="list-style-type: none"> • Gender is not protected by the Equality Act, so the approach is wrong • How can you discriminate against something that isn't real? • Sex is immutable and clearly defined, whereas gender is vague and arbitrary • Misgendering is not transphobic or offensive because it is the truth to say humans cannot change sex • Misgendering' assumes trans people have a right for people to recognise them as preferred gender

Use of shared facilities

Our survey said:

Our proposed policy approach is that Bristol City Council will support trans service users and citizens (including non-binary, gender fluid, or agender people) to use the toilets and facilities that best fit their gender identity. In response to earlier engagement feedback, we added reference to the need ensure that facilities meet the needs of those who may require longer, more frequent use of separate cubicles to meet their health and sanitary needs.

In developing our current policy approach, we also considered an option of not recommending free selection of facilities (because of early engagement feedback which expressed concerns about women and girls potentially feeling less safe). We have discounted this option on the basis that although some people may feel less comfortable because they don't accept transgender identity or think that trans people pose an increased safeguarding risk to others, this is not itself a legitimate or proportionate reason to exclude trans and gender-diverse people from using preferred facilities.

Our draft policy says:

“The Government Equalities Office Guidance confirms that a trans person should be free to select the facilities appropriate to the gender in which they present. The Guidance also states that when a trans person starts to live in their acquired gender role on a full-time basis, they should have the right to use the facilities for that gender.

Gender neutral facilities mean everyone shares the same space for waiting and hand wash facilities. Unisex – or universal – toilets are dedicated, self-contained toilets which maintain privacy for the single user. Where the Council provides

gender neutral toilets this will comply with the Government Regulations by ensuring ‘separate rooms containing conveniences are provided for men and women except where and so far as each convenience is in a separate room the door of which is capable of being secured from inside’.

The provision of toilets and washing facilities should be reviewed on a case-by-case basis in line with existing guidance, taking into consideration the requirements and limitations of specific locations, in particular to meet the needs of those who may require longer, more frequent use of separate cubicles to meet their health and sanitary needs.”

Do you have any comments on our proposed policy approach to the use of shared facilities?

We had 2,790 comments on this survey question which we have summarised by theme in the table below.

Theme	Explanation
Agreement	<ul style="list-style-type: none"> • The proposal is the fairest approach for as many as possible. • Using the correct facilities for your gender should be a fundamental right. • Trans people should use the toilets they feel most comfortable in with their gender identity • Trans people are legally allowed to use the facilities matching their gender at any point of their transition. It's imperative this is protected so as not to alienate them from everyday life in public. • This is a fair policy that rightly disregards discriminatory views that trans and non-binary people pose an inherent threat. This would not be an acceptable stance to take against any other marginalised group. • This has been the reality for trans people for a very long time, with no evidence that this causes any harm to anyone else. It is only in the last few years that this has become a controversial topic due to the rise in gender critical ideology. • The chance of trans people getting harassed in the wrong bathroom is so much greater than trans people harassing others. Trans people are not rapists or predatory males • Current policy approach that provision of facilities should be on a case-by-case basis as dictated by law is correct • In the absence of real evidence that trans people pose a risk to cis women in bathrooms, it's important to ensure that one group isn't being valued over the other • Historically racists cited their discomfort with and perceived risks of Black people as a reason for segregation. • While cis women may feel uncomfortable knowing they may be using a private facility in the vicinity of a trans person, that alone is not a sufficient counter to the discomfort and evidence-based safety risk of trans people being delegated to a bathroom they visibly do not belong in.

	<ul style="list-style-type: none"> • BCC have adopted a community toilet scheme – would like to see all participants in this scheme being trans inclusive and that this be a specific requirement for the scheme.
Unisex facilities	<ul style="list-style-type: none"> • All toilets in people's homes are unisex - why is this a problem? • Many cafes, venues and small workplaces have unisex separate cubicles, and it seems to work fine. • Nearly all potential issues are around shared communal spaces which would be entirely mitigated by separate unisex facilities • Please always provide sufficient self-contained unisex facilities - this removed grounds for complaint for transphobes and provides a truly safe harassment-free facility for the people who honestly don't feel comfortable in either facility. • Provide sanitary bins in all toilets • Self-contained toilets may not provide sufficient space for women with a pushchair or toddlers • Self-contained toilets may pose a safety risk if someone collapses and needs medical attention • There should also be separate accessible toilets so that disabled toilets are not blocked by increased users • Unisex must not be a way to reduce facilities • Unisex or self-selection and privacy for all is the only workable approach here. • Unisex toilets with separate washbasins would benefit people of faith for washing • Wherever possible (therefore especially in new builds) you should prefer to provide individual hand-washing facilities in the toilet cubicle, rather than shared hand washing. It reduces both problems • I feel uncomfortable using unisex facilities with separate locking facilities because they are also used by men (not clean / hygienic etc.)
Gender neutral / mixed facilities	<ul style="list-style-type: none"> • Women who have suffered from sexual assault and violence do not feel safe in gender neutral spaces • Council should be doing everything possible to ensure non-binary people aren't forced to choose between male or female provision when needing to use the bathroom • We should have 'gender-neutral facilities' in as many places as possible. It is archaic to split toilets, etc. by what gender we are • Gender neutral facilities are not accessible or inclusive for some disabled people and faith groups • No-one likes 'gender-neutral' toilets. They are uncomfortable for men and women • Unisex self-contained toilets with private space for hand washing are acceptable, but "gender neutral facilities" are not as safe or inclusive • Men have their penis out in gender-neutral toilets • As a nonbinary person I often have anxiety about choosing which (gendered) toilet to use. I feel that neither option fits my presentation or gender, and I am worried about my safety whichever I use • Private space for individuals will always provide better security than communal space

Single sex facilities	<ul style="list-style-type: none"> • The proposed policy approach fails to give sufficient weight to relevant considerations of privacy and decency as legitimate reasons to exclude transgender people from single sex services • Toilets should be segregated on the basis of natal/biological sex • Women and girls are uncomfortable sharing single-sex services with men, not trans people • Women use the ladies toilet as a safe space to get away from aggressive or predatory men • Women's spaces are for biological women and are protected under law • You should provide separate facilities based on sex (rooms with a door containing cubicles) and clearly marked as such. • Toilets have been invaded by males with sexual fetishes who get a kick out of being in these spaces • Male spaces should welcome all males including males who are non-binary, trans, gender fluid etc. Female only spaces already tend to welcome all females including those who identify as non-binary, trans etc.
Faith groups	<ul style="list-style-type: none"> • The policy will have a negative impact on faith groups, particularly Muslim and orthodox Jewish women, where there is prohibition on free mixing between men and women in public spaces • Muslim women cannot adjust head coverings, or wash in preparation for prayer in front of men • Reference to a <u>Muslim women focus group</u> with objections to sharing space with trans people e.g. “Islam doesn’t revolve around what other people might think they are”² • Many toilets are cleaned and maintained by mixed-sex teams. Does this exclude women of faith from using them? If so, this concern is seldom brought up in any context outside of the rights of transgender people, despite being far more prevalent
Safety and safeguarding	<ul style="list-style-type: none"> • Concerns of women are not on the whole about the danger posed by trans women, but about the unintended consequences of a policy that makes it impossible for a woman to challenge any male's presence in a female space. • Needs to be much more action against sexual violence and domestic abuse generally. If women felt safer, and sexual crime was properly prosecuted perhaps there would be less deflected hysteria about safety in toilets • Provide CCTV outside toilets for safeguarding • Would turn Bristol into a sex offenders' paradise, with leering, intimidating men able to claim special trans identities and enter women's spaces at will • How male does a person have to look before they can legitimately be challenged? • What is your evidence that trans-women do not pose an increased risk to women and girls? • we live in a culture that fosters hypervigilance in girls and women and makes girls and women responsible for sexualised male violence

² Of 64 Muslim respondents 81% were women and one told us they were trans.

	<ul style="list-style-type: none"> • Until people with penises stop assaulting people without penises I believe it is necessary for people without penises to have protected spaces away from people with penises • Trans women are not a threat to cis women • The high level of violence against women and girls perpetrated by genetic men means it is reasonable and proportionate to exclude them from women's facilities • This is a rapists charter • How are you going to tell the difference between a genuine transexual trans identified male and a predatory voyeur, rapist, paedophile? • policy will stop women challenging a man with a beard entering a women-only space • One 'trans' person who will offend and abuse is one too many and therefore for the safety of the majority of the population, access to sex-specific spaces like changing rooms and toilets must be kept to those who are that sex • Men who mean harm to women and girls will go to great lengths to gain access to them (e.g. by training to be a priest or a teacher)
<p>Issues in 'policing' single sex toilets</p>	<ul style="list-style-type: none"> • There is no acceptable way to exclude trans women and trans feminine people from using female toilets/facilities without personal intrusion and harassment • Observing and reacting to women with suspicion according to whether they appear sufficiently feminine according to vague and anti-feminist characterisation is highly problematic • There is already a great deal of harassment of trans people on the basis of "you shouldn't be here" - including masculine looking women being accosted because they are assumed to be trans • Saying that a person cannot use the correct facilities for their gender will mean that trans/gender diverse people who "pass" are likely to be unaffected if they take the risk, but trans people who don't pass, and gender non-conforming cis people will be at risk of abuse and threats • Any other policy approach is unenforceable practically unless you require every single user of these facilities to carry an acceptable form of identification that would prove their gender • Using the correct facilities for at least two year's is a requirement to apply for a GRC and is often needed to get NHS support to medically transition. This has been the case for almost 20 years, and even before that, trans people were using the correct facilities without any increased risk to cis people • We teach children that 'Pants Are Private', grown adults shouldn't be concerned with what the person in the next stall has going on • Transphobes stalking trans people into bathrooms to harass them is abuse. • We can and should address inappropriate / illegal behaviour as and when it occurs rather than persecuting trans people • Transgender people can only be excluded from the single sex services of their acquired gender identity on a case by case basis - not as a blanket ban • Trans people should not have to defend existing protections to access services they feel comfortably match their affirmed gender (other than in exceptional circumstances)

	<ul style="list-style-type: none"> • Trans people should not have to worry about being assaulted in a public rest room • Trans people just want to go to the toilet... please just let us • Trans people have been using facilities, based on their chosen gender, for decades, with virtually no issues. • Trans people are at much higher risk of being assaulted by cis people in bathrooms than the other way around • The ridiculous "man in a dress harassing women in toilets" trope has never materialized, and indeed an actual sexual predator is hardly likely to be deterred by signage or policy
Comments on law and external guidance	<ul style="list-style-type: none"> • The policy approach is misapplying / misrepresenting the law and existing guidance • The Equality Act protections (and lawful exemptions) relate to the defined characteristic of 'gender reassignment' only so there are no lawful circumstances in which a 'gender fluid' or 'non-binary' genetically male person should be using a women only single-sex provision. • The Equality Act 2010 defines women as a 'female of any age', provisions in favour of women, by definition, exclude those who are biologically male. • The Council is violating good practice in consultation because it has already made its mind up about free selection of facilities by trans people. • Department for Levelling Up, Housing, and Communities has developed an approach to have all new public buildings be fitted with toilets which are single-sex only, indicating gender neutral toilets are not safe for women and girls https://www.gov.uk/government/news/all-public-buildings-to-have-separate-male-and-female-toilets • Attorney General advice is: It is lawful to exclude trans (MTF) in women's private spaces because while they may incur a modest (emotional) disadvantage this is outweighed by the more serious disadvantage faced by women and girls • Government Equalities Office Guidance is out of date
Points of note / wording	<ul style="list-style-type: none"> • The wording of the statement "a trans person should be free to select the facilities which they feel appropriate to the gender in which they present" seems to emphasise the individual's outward/physical presentation rather than internal connection to gender • Reference to law/guidance saying "when a trans person starts to live in their acquired gender role on a full-time basis they should have the right to use the facilities for that gender" is needlessly exclusive to trans people • It is not possible for non-binary or gender fluid people to live in their acquired gender role on a full-time basis. • have signage making it very clear that harassing other users of the shared facilities is unacceptable

Do you have any other comments on our draft Trans Inclusion and Gender Identity Policy?

We had 2,931 comments on this survey question. The summary below does not include feedback which reiterates comments made in response to previous questions.

Theme	Explanation
Wording and definitions	<ul style="list-style-type: none"> • ‘Single-sex groups and services have a right to have concerns answered and heard, and such genuine discussion should not necessarily be considered hate speech or motivated by transphobia’ - is questionable because without exception their concerns are centred on a belief that trans women are inherently threatening by their presence, which is transphobic discrimination • Diversity monitoring which asks, “Is the gender you identify with the same as your sex registered at birth?” is problematic because it assumes a person has a gender identity, other than their Sex. The solution to this question is to ask about difference: "Do you have a gender identity that is different from your sex registered at birth". • Freedom of speech and expression - This section is essential. The word 'necessarily' should be removed • Gender and Sex - 'Gender identity is our own...' this sentence should be rephrased to make clear that many people do not hold the belief that there is such a thing as a gender identity, and therefore these people do not have one • Gender Identity could be defined: "this refers to a person’s internal experience of gender, which may or may not be deeply felt and may or may not correspond to that associated with the sex they were assigned at birth". • Policy should say agender not a-gender • Rape/sexual abuse is not 'male violence against women'. Rape and sexual abuse can and does happen to everyone, of every sex and gender, by any sex/gender, and trans people of all types (trans men, trans women, nonbinary people) are ALL statistically more likely to be survivors of sexual assault and abuse than any cis person because of our being trans • Sexual Orientation - This section defines sexual orientation only in relation to being trans, which is confusing and inaccurate. It should also include the actual definition of sexual orientation: being homosexual is being attracted to someone who is the same sex, being heterosexual is being attracted to someone who is the other sex • The definition of "Cisgender" needs an additional sentence: "As with trans identities, it should never be assumed that a person is happy to be described as, or identifies as, cisgender" • The 'Gender and Sex' section is simplistic and could play into bio-essentialist arguments • The idea that trans women need to be hyper feminine and trans men need to be hyper masculine in order to be their gender is problematic / driven by stereotypes

	<ul style="list-style-type: none"> • The Intersex definition is not clear: it needs an additional sentence: "This does not mean that they are neither male nor female. Most intersex people are either male or female and all have a sex registered at birth." (it is a very common misunderstanding that intersex people are genetically neither male nor female or are both) • the phrase 'a trans man who still has female sex organs' is used, this could be better phrased as 'a trans man who has not undergone gender confirmation genital surgery' or 'a trans man who has a vulva' • Transphobia definition including 'greatly exaggerated fears and concerns' is problematic because there is so much real evidence of genetic males abusing women and girls - this is a legitimate fear • Transphobia definition should be amended because the wording implies that there IS a potential 'threat' trans people pose to society and/or public safety • When contrasting sex with gender, important to note that biological sex status can be complex / non-binary, and legal sex assignment at birth is typically based on a quick visual inspection of the new born, not analysis of chromosomes etc
<p>Criticisms of the policy and consultation approach</p>	<ul style="list-style-type: none"> • The Equality Impact Assessment (relating to the draft policy and decision to begin a public consultation) was biased / misleading / incomplete • Criticisms of the Council's <u>Trans Inclusion Silver Motion</u> (which is outside the scope of this policy) • You must publish information on what groups you have consulted on this policy, in particular, what 'gender critical' women's groups you consulted with • You must publish a risk assessment for this policy • The policy approach does not address the public sector equality duty requirement to foster good relations between people who hold a particular protected characteristic and those who do not • The data gathered by the survey is invalid because the consultation does not require proof of identity or location • There is poverty and huge inequality in the city of Bristol, please focus on this important issue. Gender ideology is largely a middle class focus which does not help those most in need of support (working class poor people)
<p>Comments on law/guidance</p>	<ul style="list-style-type: none"> • When the Equality Act was written it was only intended for a small minority – now trans people are taking over / too many • The EHRC's latest guidance linked in this draft policy is highly inflammatory and has been condemned by other leading equality watchdogs around the Western world as being deliberately discriminatory against trans people • There will be legal challenge against the policy approach if it goes ahead • Note the experience of the Republic of Ireland, where people can change their legal sex by making a Statutory Declaration, without a two-year waiting time or medical references, and the fact that this has not resulted in an

	increase in attacks on women or sexual harassment of women in toilets or other facilities
stakeholder engagement / lobbying	<ul style="list-style-type: none"> • Consultation is open to anyone whether or not they live in Bristol so likely to be abused by pressure groups • Online hate groups have circulated / promoted this consultation • There is a new campaign to claim (largely without evidence) that trans women using women's toilets is something that has only recently begun to happen and is causing problems • The references you have used to justify the policy approach are from lobby groups who stand to benefit (in some cases financially) by implementation Council should research connections between transphobia, the far right and evangelical beliefs in the UK (e.g. https://transafety.network/posts/) to contextualise these responses • Policy should not be dominated by Stonewall • Trans ideology is encouraging mental health issues and transitioning is self-harm • Proposed policies are pandering to small but vocal minority of trans activists

Summary of email responses

The table below gives a summary of the 13 email responses about the draft policy we received during the consultation period.

<p>Email from individual 28 August Advising that the consultation details were being shared online by national gender critical groups and warning this could sway results</p>
<p>Email from individual 29 August 2022 Response from a trans woman saying they have been using women's facilities for many years without issue and saying concerns which have only emerged in recent years are harmful and divisive</p>
<p>Email from organisation 8 September 2022 Response from a national group with Bristol membership representing children of transitioners. Strongly critical of policy approach citing multiple sources to evidence risk to women and girls from abusive men. Concerned that women's groups are being bullied by local trans inclusive organisations. Additional comments about out-of-scope issues such as conversion therapy.</p>
<p>Email from individual 12 September 2022 From mother of daughter living in Bristol. Concerned that the policy approach does not consider feelings of safety for women and girls, compared to the feelings of trans people.</p>
<p>Email from organisation 13 September 2022 Email from a representative of local charity supporting victims of rape and sexual assault, who advised they had completed the survey and also wanted to share a link to supporting schools in trans inclusion at council level.</p>
<p>Email from individual 28 September 2022 Asking why we were only holding a six week consultation</p>

Email from individual 1 October 2022
The policy approach is unlawful because it discriminates against people who hold gender critical beliefs, which are protected by the Equality Act
Email from individual 3 October 2022
Response with legal comments on draft policy, and Bristol City Council Trans Inclusion Silver Motion. Comments that the policy approach is flawed because it is based on false/biased 'gender identity ideology'
Email from individual 4 October 2022
Technical comments with suggestions for minor amendments to policy wording re. sex, gender and Gender Recognition Act
Email from organisation 7 October 2022
Detailed feedback from a Bristol based community group set up in response to Bristol City Council Trans Inclusion 'Silver Motion' and this consultation. Response includes comments that the policy approach is flawed because it is based on false/biased 'gender identity ideology'; criticism of the consultation methodology, and Equality Impact Assessment; and wider concerns about the activities of trans activists
Email from an individual 7 October 2022
Criticism that because our consultation is not limited to Bristol residents it will be promoted nationally by trans activists
Email from an organisation 9 October 2022
Statement from the Bristol branch of a lesbian rights organisation: The policy approach is against the law because gender is not a protected characteristic and ignores 'sex' and 'sexual orientation'. The equality impact assessment does not examine how the policy will impact other protected characteristic groups. Comments on wider concerns about external organisations, and lesbians being pressurised to have sex with trans women
Email from an organisation 10 October 2022
Criticism of previous BCC Trans Inclusion 'Silver Motion' and proposed policy approach on the basis that it is potentially harmful to women and children. Criticism there is lack of sufficient evidence in the equality impact assessment. Comments about external organisations and policies

Recurring words and phrases

In presenting this report we have summarised the feedback from the consultation responses. However, this summary may not adequately convey the high levels of fear and hostility expressed by some respondents, particularly in relation to women's' and girls' safety. To give an indication of this strength of feeling we have compiled a table of some commonly occurring words and phrases below. A full report of all unredacted comments, which includes multiple examples of overt hate speech, will be made available to decision makers as a separate appendix.

"Abuse" / "Abusive"	600
"Danger" / "Dangerous"	499
"Predator" / "Predatory" / "Perpetrator"	378
"Harm" / "Harmful"	338
"Misogyny" "Misogynistic"	269
"Rape" / "Rapist" / "Raping"	265
"Attack"	143
"Pervert" / "Fetish"	114

"Sexist"	90
"Offence" "Offences"	89
"Appalling"	78
"Violent"	73
"Paedo" / "Paedophile" / "Pedo"	65
"Disgusting"	52

How will this report be used?

- ✓ We have analysed the consultation responses and updated the draft policy and equality impact assessment in response to our findings.
- ✓ We have made a 'you said, we did' document to summarise the changes we have made in response to consultation feedback.
- ✓ This consultation report (plus unredacted comments and emails) has been made available to decision makers prior to adopting the policy.