

Draft relationships and sexuality education guidance 2018

Consultation response form

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Responses should be returned by 1st April 2019 to

Health and Well-being AoLE Team
Arts, Humanities and Well-being Branch
The Education Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: RSEGuidance@gov.wales

Question 1 – We have changed the name of Sex and Relationships Education (SRE) to Relationships and Sexuality Education (RSE). Does the introduction in the new guidance fully explain the scope and context of RSE?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

The introduction (under ‘What is Relationships and Sexuality Education?’) is very good in explaining the scope and context as it relates to relationships education. However, sex education is a broader topic than just relationships and also includes topics such as sexual health, reproduction, contraception and abortion, puberty, menstruation, FGM, and pornography. These aspects are lacking from the current definition, which only relates to relationships.

Furthermore, we understand the rationale for renaming the subject to relationships and sexuality education, and it is essential that the subject is fully LGBT-inclusive. But since ‘sexuality’ has multiple meanings, we think that it would be sensible to provide a definition of sexuality, much as is found on page 14 of the Expert Panel’s report, so as to ensure that the intended meaning here is not overly narrowly construed.

We are concerned that the legal obligations spelt out relate only to the law as currently stands. It would be helpful if the Welsh Government was to indicate at the soonest opportunity how the guidance will be revised to be in line with the legal changes that are also currently being proposed.

We think the guidance should also emphasise how all pupils should receive full, comprehensive, and developmentally appropriate RSE, regardless of their own personal background or the type of school they attend (e.g. if they go to a voluntary aided or voluntary controlled schools with a religious character). The benefits of such education are clear, and are worth emphasising from the outset.¹

Finally, we note that in two places the section on legal obligations refers to ‘sex and relationship education’. This presumably should say ‘relationships and sexuality education’.

Question 2 – This guidance has been structured around a ‘whole school approach’. Is it clear what a ‘whole school approach’ is? Does this guidance support you to deliver this?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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Supporting comments (no more than 250 words)

The definition of a ‘whole school approach’ is very clear and the point is re-emphasised well throughout the guidance, for example in the section on holistic RSE. However, we think more should be done to ensure that this becomes a reality. As with every other subject, for

¹ See e.g. <https://www.sexeducationforum.org.uk/sites/default/files/field/attachment/SRE%20-%20the%20evidence%20-%20March%202015.pdf>

RSE to really be taught well, it needs dedicated staff who have training specifically in the subject and will take a lead in coordinating it within each school.

What training will the Welsh Government be providing teachers? Will it be possible for trainees to do initial teacher education in the subject? Perhaps these are not questions that relate to the content of the guidance specifically, but the Welsh Government should not reform the guidance in isolation and should seek to make such wider changes alongside its revision. The Expert Panel was very clear on the need for these wider reforms in part 4.

Further, as we outline in questions 5-6, we think this guidance is badly lacking in any kind of detail. Such detail, if added, could helpfully provide more direction for how RSE can link up with other subjects.

Question 3 – The draft guidance should be read alongside the signposting section and annexes A, B and C. Are the annexes and signposting links useful and informative?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

As per our answer to question 1, we are concerned that the legal obligations spelt out (here in annex A) relate only to the law as currently stands. It would be helpful if the Welsh Government was to indicate at the soonest opportunity how the guidance will be revised to be in line with the legal changes that are also currently being proposed.

The list of organisations being signposted to (in the main text and annex C) is good and fairly comprehensive. We would recommend also including fpa, Brook, bpas, and Karma Nirvana.

Question 4 – The draft guidance should be read alongside the signposting section and annexes A, B and C. Is it clear that the signposting section and annexes must be considered and is this helpful and practical?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

See our previous answer regarding clarity around impending revisions to the law.

Other than that, there are no references to the signposting section earlier in the document bar the contents page. A statement could usefully be added to the introduction making it clear that the draft guidance should be read alongside it and the annexes.

Question 5 – Do you think each section of the draft guidance is clear and explains what is required of teachers and schools?

Yes	<input type="checkbox"/>	No	X	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

We really like the rights- and gender equity-based approach, and what content there is is good.

However we are concerned that there isn't really any substance to underpin the broad directions given. There is no detailed information about what should be taught by each key stage or even what might be. We discuss the gaps in response to question 6, of which we regrettably think there are many, but one big problem is that there is lack of clarity over what is developmentally appropriate for different age groups.

Case studies are relied upon to do too much of the heavy lifting. (We note that some of them were not originally developed for this purpose but for Estyn's 2017 review of healthy relationships education.²) This approach makes things that should come across as core requirements instead coming across as one option amongst many. It also leads to information not being laid out in an easy to follow way (teachers have to jump about through the guidance rather than having something they can chronologically follow) and perhaps enables the gaps in provision.

As a result of this we are seriously concerned that the guidance does not guarantee schools will teach a comprehensive and robust RSE programme. The guidance also does not provide schools with clarity as to what is recommended to be taught when.

Question 6 –Thinking about each of the sections, do you feel there are:

- any gaps in information? And if so, what do you feel should be added that would be useful and helpful in your delivery of RSE?
- any parts that are particularly helpful?

There are huge gaps in information and we are seriously concerned about the variable quality of the curriculum that schools will produce as a result of this guidance.

Last year the Sex Education Forum (SEF) published a high quality RSE curriculum design tool.³ That tool acts as an extremely easy to use checklist setting out topics that should be included at each key stage. (The phrase 'key stage' is only mentioned six times, three of which are in case studies!)

We think that the Welsh Government should urgently:

- a) Add a new section to the guidance that similarly spells out in clear, straightforward terms, minimum expectations for each key stage, or at least by the end of primary and by the end of secondary. Without that there is no direction as to what teaching in a timely manner looks like, and no guarantees at all that such teaching will therefore prepare pupils for challenges that lie ahead before they face them. There is also

²
<https://www.estyn.gov.wales/sites/default/files/documents/A%20review%20of%20healthy%20relationships%20education.pdf>

³
https://www.sexeducationforum.org.uk/sites/default/files/field/attachment/SEF_Curriculum%20Design%202018.pdf

nothing on Gillick competence, i.e. the point at which young people acquire the rights to make decisions for themselves, rather than being dependent upon their parents.

- b) Go through the topics covered in the SEF tool and make sure all of them are covered in the guidance. A large number are missing entirely. For example:
- i) at ages 3-6, the SEF tool talks about naming body parts, including private body parts, and who children can talk to if they're worried about or need to know something – all of which plays a strong safeguarding role. It opens up the topic of 'where babies come from', and growth and development since infancy. Some of these topics, such as body parts, are not discussed at all in the guidance, whereas the others only get a passing mention at best and in no way is it made clear what it's expected pupils will know by the end of key stage 1.
 - ii) at ages 16 and beyond, the SEF tool takes about the challenges of long-term relationships, dealing with break-ups, communication skills, parenting, body image and self-esteem, contraception, abortion STIs, pornography, and infertility. STIs are mentioned in annex A but otherwise these topics are again missing.

In general there is no mention at all of identifying body parts, abortion or contraception, and only one passing mention of each of FGM (in the signposting) and pornography (in an example). These are shocking omissions. Could a primary school deliver its whole RSE programme without teaching about the names of different body parts and yet be said to be teaching in line with the guidance? Could a secondary do likewise but without teaching about abortion and contraception?

The current guidance, although far from comprehensive enough, does have something setting out expectations for learners at different key stages. It has a whole section headed 'abortion', had extensive coverage of contraception, and a reference to body parts. In many ways therefore this new guidance is a serious step back.

We appreciate that the wider curriculum reforms may represent a trend away from prescription. But this document is only guidance, so is not prescriptive anyway; and further, in a context where there's been no compulsory teaching before, no initial teacher education, and schools generally have had no specialist teachers, they need this kind of detailed guidance in a way they may not in other subjects.

The PSHE Association has also produced a very good and comprehensive programme of study for personal, social, health, and economic education (PSHE) in England.⁴ We appreciate that this is geared towards the English subject, but the PSHE Association has also produced guidance on how the programme of study fits with the Welsh subject of personal and social education,⁵ and we hope that the programme of study could similarly assist the Government in providing inspiration for what should be covered in its RSE guidance.

Question 7 – Do you agree with the approach outlined in the section 'engaging with parents/carers/community' on how schools should plan and develop their RSE policies?

4

<https://www.pshe-association.org.uk/curriculum-and-resources/resources/programme-study-pshe-education-key-stages-1%E2%80%935>

5

<https://www.pshe-association.org.uk/curriculum-and-resources/resources/personal-and-social-education-pse-wales-how-pshe>

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

There doesn't appear to be such a section.

Question 8 – Do you feel the guidance gives you the information you need to engage meaningfully with your learners to plan your RSE provision?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

See answers to questions 5-6, above: while the broad tone is right, there is a serious lack of clarity in how the guidance is laid out, and a lack of substance. Good teachers will need to look elsewhere for the support and guidance they need to plan their high-quality RSE. And we are very concerned that others will miss vital topics.

Question 9 – What kind of training, support or resources would you like to see to help support the successful implementation of the guidance?

As above, we think the guidance should be significantly rewritten to add detail on what pupils should be taught by each key stage, and ensure very important topics are not missed.

In the absence of that, significant supporting resources are needed to provide schools that extra direction. We refer to the Sex Education Forum's curriculum tool in our response to question 6, and would commend SEF's resources more generally (for instance, its whole school approach audit tool⁶).

In terms of training, as with all other subjects, we struggle to see how RSE can be taught well without the introduction of initial teacher education. It is only by introducing dedicated specialists, who both have an expert curriculum knowledge and the capacity to coordinate teaching across a school, that the subject can be taught properly. This is exactly what the expert panel called for in part 4 of its response.

The Welsh Government should also ensure that Estyn's inspections are robust enough to consistently pick up on failures in teaching in schools. In 2017 we published a highly influential report that analysed Ofsted's inspections of PSHE/RSE in England over the previous year, and we found that the subject was referred to much less in inspections than any other; when it was it was invariably positive; and many vital topics were not mentioned in any inspection at all. This was in spite of Ofsted's own subject-specific report identifying that teaching was inadequate in many schools.⁷

⁶
https://www.sexeducationforum.org.uk/sites/default/files/field/attachment/Whole%20School%20Approach%202.0_0.pdf

⁷
<https://humanism.org.uk/2017/01/27/major-new-bha-report-school-inspections-almost-totally-neglect-pshe-and-sre/> and <https://humanism.org.uk/wp-content/uploads/2017-01-25-FINAL-Healthy-Happy-Safe.pdf>

A similar survey has not been conducted in Wales, so we cannot comment in detail on what the situation is with Estyn. But the non-statutory nature of RSE adds extra importance to ensuring that the subject is inspected in detail and the Welsh Government should seek to ensure that this is the case. The 2017 Estyn thematic review of healthy relationships education only focused on just that and not on sex education. Further, the report only focused on schools selected for having strong practice in this area and didn't include any review of schools with poor practice.

Question 10 – If you are not a specialist delivering SRE/RSE in your school, is this guidance sufficient to help you plan and deliver it for your learners?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

N/A. See our response to question 9.

Question 11 – We would like to know your views on the effects that the updated relationships and sexuality guidance would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Supporting comments

N/A. This question is outside of our remit.

Question 12 – Please also explain how you believe the proposed relationships and sexuality guidance could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Supporting comments

N/A. This question is outside of our remit.

Question 13 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

About Humanists UK

At Humanists UK, we want a tolerant world where rational thinking and kindness prevail. We work to support lasting change for a better society, championing ideas for the one life we have. Our work helps people be happier and more fulfilled, and by bringing non-religious people together we help them develop their own views and an understanding of the world around them. Founded in 1896, we are trusted to promote humanism by over 85,000 members and supporters and over 100 members of the All Party Parliamentary Humanist Group. Through our ceremonies, pastoral support, education services, and campaigning work, we advance free thinking and freedom of choice so everyone can live in a fair and equal society.

We have a long history of work in education, children's rights and equality, with expertise in the 'religion or belief' strand. We have been involved in policy development around the school and the curriculum for over 60 years. We also provide materials and advice to parents, governors, students, teachers and academics, for example through our Understanding Humanism website (<https://understandinghumanism.org.uk/>) and our school speakers programme. We have made detailed responses to all recent reviews of the school curriculum, and submit memoranda of evidence to MPs, civil servants and parliamentary select committees on a range of education issues.

Our Wales Humanists Coordinator is a member of the Welsh Government's strategic stakeholder group for curriculum reform. We are an active member in England of the Sex Education Forum (which for many recent years our Education Campaigns Manager was on the steering group of), the PSHE Association, and the Children's Rights Alliance for England (CRAE).

Our primary interests in education relate to issues surrounding the curriculum (in particular PSE/RSE, RE, citizenship, and science), collective worship/school assemblies, and state-funded religious schools. With respect to PSHE/RSE in England, in 2017 we wrote the highly influential report *Healthy, Happy, Safe?* in which we demonstrated that Ofsted had not been inspecting the subject in detail and therefore could not be relied upon to ensure that schools were teaching it.⁸ This helped drive forward the impetus for compulsory RSE, which was then introduced in England and, subsequently, in Wales.

The importance of compulsory RSE

We note that the Welsh Government is currently consulting on a white-paper proposal to make RSE compulsory for all pupils under the age of 16. We firmly support this plan. It is crucial that all pupils attending state schools in Wales are provided with high-quality, comprehensive, and accurate education about relationships and sex, not least because this is what all the best evidence demonstrates will ensure that they are able to grow up healthy, happy, and safe. The evidence shows that young people who have had good RSE are likely to have sex for the first time later than others, and when they do so it is more likely to be consensual and safe and, therefore, less likely to lead to unwanted outcomes such as STIs, teenage pregnancies and abortion. The public health and wellbeing imperative is extremely strong.^{9 10}

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<https://humanism.org.uk/2017/01/27/major-new-bha-report-school-inspections-almost-totally-neglect-pshe-and-sre/> and <https://humanism.org.uk/wp-content/uploads/2017-01-25-FINAL-Healthy-Happy-Safe.pdf>

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<https://www.sexeducationforum.org.uk/sites/default/files/field/attachment/SRE%20-%20the%20evidence%20-%20March%202015.pdf>

¹⁰ <http://unesdoc.unesco.org/images/0018/001832/183281e.pdf>

We particularly welcome the focus on developmental appropriateness which, while it takes account of the age of pupils, also gives due regard to their physical and cognitive development, as well as the experiences of learners when planning the RSE curriculum. However, it is essential that this type of provision should be available to children irrespective of the type of school they attend (including schools with a religious character) or the beliefs of their parents.

Equality implications

There doesn't appear to have been any consideration of the equality implications of the revised guidance. The Welsh Government should conduct a full equality impact assessment.

However, we think the proposed changes may have a negative impact across a range of protected characteristics, including sex and pregnancy and maternity. The drawing back of detail in the guidance leaves young people exposed to less comprehensive teaching by certain schools, and we fear this will have a negative impact later on in life.

The guidance says very little about religion or belief or faith schools.

On religion or belief, we suggest the following changes:

1. It says 'Wherever possible, education practitioners should be aware of, and sensitive to the personal circumstances of individual learners. This should enable them to deliver suitable tailored content to the religious and cultural background of learners...' But good RSE should be comprehensive in teaching knowledge and skills that all young people should have, regardless of religion or belief. This – and the fact that this should not be subverted because of concerns about faith – should be made clear. At any rate the reference to 'religious and cultural background' should be amended to be inclusive of the non-religious.
2. Case study two says that 'Faith leaders from the local community come into school to increase children's understanding of the main faiths represented at the school.' This should be made inclusive of humanist school speakers. Similarly, where it says 'The curriculum promotes respect and understanding of the many faiths and cultural identities of the pupils.' this should be amended to refer to 'the many religions and beliefs of the pupils'.

On faith schools, the guidance should make clear that all schools are expected to teach comprehensive and age-appropriate RSE, regardless of whether they have a religious character and if so what that character is. Church in Wales and Catholic schools, whether voluntary aided or voluntary controlled, should not be able to opt out and provide their own denominational curriculums instead. Again, RSE is about imparting factual information about a range of topics and providing young people the skills to navigate relationships and sexuality. Every young person needs such information, because pupils in all schools may find they need support with a sexual health issue, or because they are LGBT, or for some other reason.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: