

## Response ID ANON-GJT3-Q2FY-T

Submitted to Review of the RSHE statutory guidance  
Submitted on 2024-07-11 15:13:16

### About You

1 Are you responding to this consultation as an: Organisation, for example, a charity, school/college or think tank, or individual?

Organisation

2 If you are responding as part of an organisation, would you prefer your response was kept confidential?

No

3 If you are responding as an individual, are you responding as (please select all that apply):

4 If you are responding to this consultation as an organisation, are you responding as:

Other

5 Are you responding to the consultation with an interest in: Please tick all that apply

Primary schools, Secondary schools, Faith schools, Alternative provision/special schools, School sixth forms, FE college, Sixth form college, Designated institutions

6 If you want all, or any part, of your response to be treated confidentially in response to a freedom of information request, please explain why you consider it to be confidential.

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

### Introductory Questions

7 If you are responding as an individual, are you:

Over 18

8 What is your sex?

Female

9 Is the gender you identify with the same as your sex registered at birth?

Yes

10 Where are you based?

Other

### Review Timetable

11 Do you agree that we move away from a rigid commitment to review the guidance every three years?

Yes

### Structure of the guidance

12 Do you agree that the changes to length and style of the guide make the guidance easier to understand and follow?

Yes

### Schools' relationships and sex education policies

13 Do you agree that these changes will do enough to ensure that schools are transparent with parents and that parents have sufficient control regarding what their child is learning?

No

14 If you would like to explain your answer, please do so here.

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

To achieve full and effective transparency, and ensure a standard of quality assurance for relationship and sexuality education, the policy and curriculum should be handled at a national level. The UNESCO sustainable goal 4 affirms the right to “ensure inclusive and equitable quality education and promote lifelong learning opportunities for all” and this includes relationship and sexuality education. We also raise concerns around the topics being separated into relationships education and sexual education. To provide comprehensive sexuality education, these topics need to be taught concurrently as they are interlinked and provide context for each other. We also raise our concern around how questions will be answered if it is deemed to be “restricted” content as without appropriate teacher training and support, and due to the delaying of vital sexuality education it is likely questions will be raised and incorrect information spread between students. It is vital that if students are asking questions, they receive an answer in a way that is appropriate to their age and stage and does not omit information due to the teachers fear they will be admonished for providing ‘unnecessary’ detail. For example, Neurodivergent students may require more detail to understand the nuance and complexities than other students, however, this could be just as relevant to non-neurodivergent students who are more analytical thinkers.

## Openness with parents

15 Do you agree with our proposed approach to increased transparency on RSHE material?

No

16 If you would like to offer any comments to explain your answer, please do so here.

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There are concerns around providing content to parents as described in the consultation. There are benefits to providing information to parents such as providing further sexuality education that they may not have received, ensuring that conversations continue within the home. However, there are obvious concerns that needing to inform parents and educate them about sexuality education content will further burden teachers who have an already cumbersome workload. If parent-involvement is mandated, this should not allow the power for parents to omit or approve any content. Rather, this could open the door for conversations to be had between parents, teachers, and the school community to foster relationships and build connections.

This process should not allow a veto power to remove content or approve such content, as it should be best practice and culturally-sensitive and imperative that the content be taught. This level of scrutiny is not applied to other subjects and reinforces a shame and negative view of sexuality education which harms students, teachers, and the school community alike.

When sexuality education is comprehensively implemented, it should be afforded the same respect as other academic areas. For example, parents are not informed of the specific content that is taught in other health classes such as those focused on alcohol consumption, or content taught in geography. It is essential that schools assert their confidence to teach young people about this critical content to build trust.

## Age limits on teaching certain subjects

### Flexibility for age limits

17 Do you think this flexibility is sufficient to ensure that pupils are adequately safeguarded?

No

18 Do you think this flexibility is warranted?

Yes

19 If you would like to explain your answer to questions 17 or 18, please do so here

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

The terms “unnecessary details” are ambiguous and subjective, as much of what could be considered unnecessary could be considered essential or relevant to students. Information would be dependent on the needs of the children and the context they find themselves in.

Comprehensive RSHE is a protective factor. Placing strict limits on what can be discussed across ages may result in students being at risk of harm. The flexibility outlined is reactive rather than proactive, which means the harm may be done before the preventative education. Generation alpha is an ipad generation, and they have information at their fingertips from early childhood. It will be irresponsible not to educate them. Teaching good digital habits from kindergarten (e.g sleep hygiene) will set them up to have protective digital habits and eSafety in future.

Young people can menstruate as young as 8 years old and thus need to be prepared for physical and emotional changes. We advise for this to commence from Year 3. Emotional regulation needs to be taught far earlier. We advise reconsidering age limits to be reduced or applied at a stage where they are most appropriate in response to a classroom's needs.

Research indicates that young people are far better equipped to navigate their lives particularly in the realm of RSHE if they are prepared and are aware of changes and content they may encounter prior to engagement. Age limits are set to high but we acknowledge and agree with the flexibility.

## Sexual orientation

20 Do you agree with changes to the lesbian, gay and bisexual content in the LGBT section (note that the next section provides an opportunity to comment on text about gender identity and gender reassignment)?

No

21 If you have any comments to explain your answer, please do so here.

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

There is no need to “streamline” teaching Lesbian, Gay, Bisexual, and Transgender topics. This is antithetical to a whole-of-school approach, which is best-practice and gold-standard in health education, including Relationships and Sexuality Education. LGBTQIA+ information should be spoken about soon and often in an age-appropriate way, as exemplified in this fantastic resource <https://tsto.gdhr.wa.gov.au/diversity/what-is-sexuality> from Australia. LGBTQI+ identity is about much more than sexual activity, by limiting information from early childhood, young people, families and teachers are being denied opportunities to be seen as whole and complex individuals, perpetuating dangerous stereotypes and myths that have long been debunked by academic evidence. Omitting these discussions does not render safer societies, instead delaying or avoiding such vital information increases risk of suicide and other mental health issues. If we would celebrate a heterosexual teacher taking leave to get married or having a baby, why should we not do the same for LGBTQIA+ people? Omitting these conversations will raise more questions than answers and when we don't answer our children's questions, they search on the internet, which can be much worse and lead them to information that is far more harmful than simple conversations we could be having in the classroom and at home. Discussions about LGBTQIA+ folks should be common, normalised, and happening beyond the classroom, including in the playground to ensure inclusion, acceptance of diversity and empathy for all people.

## Gender reassignment

22 Do you agree with the proposed changes related to gender identity and gender reassignment in the guidance?

No

23 If you have any comments to explain your answer, please do so here:

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

Basing the guidelines on the Cass Report is unfounded, and directly contradicts UNESCO's International Technical Guidance on Delivering CSE.

UNESCO affirms that schools must teach about all aspects of gender at age-appropriate stages. Teaching about gender-reassignment in the context suggested in the guidelines is inappropriate. All people have a gender identity and this is typically formed by age 4. Further, we know that gender stereotypes are a driver of gender-based violence and thus comprehensive discussions on gender should be part of protective behaviours from the start.

We also affirm that information covering transition (gender reassignment) should include social, medical, and legal transition. Many individuals will choose one or more of those ways to transition and can be a life-saving process.

We believe that it is vital not to conflate biological sex and gender. These are distinct concepts, and both do exist on a spectrum. There are 60+ intersex variations that are important to discuss with young people. Teaching that gender is a spectrum does not make people transgender or encourages young people to be gender diverse. It allows those who are transgender to have the language, be seen and recognised. Much research supports this.

We are concerned by the view that cartoons or simple images cannot be used to explain complex topics to children. Children's books use this technique to explain complex information in a manner that isn't explicit or graphic.

Finally we affirm the need for comprehensive teacher training and suggest consulting experts such as UNESCO, WHO, Rutgers, and Family Planning Association, not parents, for guidance on appropriate, evidence-based, and evaluated materials.

## Addressing prejudice, harassment and sexual violence

24 Do you agree that the revised content on addressing prejudice, harassment and sexual violence is a helpful response to evidence of the prevalence of sexual abuse in schools?

Yes

25 If you would like to explain your answer, please do so here.

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

We believe these additions are useful but believe the proposed age limits will hinder the progress made in this area. Within these proposed measures, information related to sexual violence would not be taught until Year 9. However, young people need to be made aware of this information prior to this age in order to be equipped to navigate and have skills to protect themselves where they may have already experienced sexual violence, sexual harassment or abuse. Of course, this does not include explicit detail about sexual violence, but operates as a protective measure to aid in prevention and help-seeking behaviours. Further, teachers and educators will require support and training to navigate this sensitive information. Engagement with external stakeholders is also recommended in the event stakeholders have been endorsed and audited to ensure they meet standards.

\*If there aren't standards, perhaps there need to be standards implemented? I.e suitably qualified, trauma-informed etc

We would also add that while this information is vital, it needs to be balanced with positive information about sex. Recent research has found that information about consent, sexual violence and online image-abuse when only talking within the context of sexual assault, violence and abuse can result in creating fears around sex for young people. Information should be balanced with positive information about sex, depicting sex in a positive light and being approachable about reasons why people have sex, with focus on romance and connection to balance risk and safety information. This gives an overall, more realistic and balanced depiction of sex. This can be extended to online sex too.

## Primary sex education

26 Do you agree with the restriction on teaching sex education only in years 5 or 6?

No

27 If you would like to make any comments to explain your answer, please do so here. It would be helpful if you could share your own views on appropriate age limits for this topic, for example if you think they are too low or too high.

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

We believe that delaying the introduction of sex education until upper primary school is detrimental to the safety and well-being of students. Early sex education encompasses essential topics such as body awareness and safety, consent, respectful relationships, and safe sex practices.

Introducing sex education to the youngest students is crucial for several reasons. First, it provides them with the tools to advocate for consensual experiences and understand what respectful relationships entail. Additionally, it helps them comprehend their bodies and how to keep themselves safe, ensuring they engage in positive experiences. Avoiding the discussion of topics related to sex in a school setting only shelters them temporarily, as they can easily access information through digital means and other sources outside of school. It is best for a professional educator to deliver medically-accurate information in a school setting than for children to become misinformed from their peers or inaccurate sources of information.

Proposed Changes:

Age-Appropriate Content:

Integrate sex education throughout Reception to Year 6, ensuring content is age-appropriate.

Cover basic topics such as body parts and body safety in the younger primary years, appropriately termed as sex education.

Creating a Culture of Trust and Honesty:

Establish an environment where students feel comfortable confiding in school staff when needed.

Ensure that sex education is not seen as a novelty subject riddled with taboo, but as an integral part of their learning.

By embedding sex education from an early age, we can foster a culture of trust and honesty. This approach ensures that students are well-informed and capable of making safe and respectful choices regarding their bodies and relationships. It is imperative that we update the curriculum to reflect these values and priorities, promoting the overall well-being and safety of our students.

## Secondary topics: Online and Media, Respectful Relationships, including friendships, and Being Safe

28 What constitutes harmful sexual behaviour and why, and that such behaviour is unacceptable, emphasising that it is never the fault of the person experiencing it. This should not be taught before year 7. Do you agree with this age limit?

No

29 We have placed an age limit on the following content in the secondary Respectful Relationships, including Friendships topic: That some types of behaviour, including within relationships, are criminal, including violent behaviour and emotional abuse, such as controlling or coercive behaviour. Schools should not, however, teach about the details of violent abuse before year 9 as it is important that pupils are not introduced to distressing concepts when they are too young to understand them. Do you agree with this age limit?

No

30 We have placed an age limit on the following content in the secondary Online and Media topic: About circulating images and information and how to safely report to trusted adults the non-consensual creation or distribution of an intimate image. Pupils should understand that making, keeping or sending naked or sexual images of someone under 18 is a crime, even if the photo is of themselves or of someone who has consented, and even if the image was created by the child and/or using AI generated imagery. Pupils should understand the potentially serious consequences of asking for naked, semi-naked or sexual images, including the potential for criminal charges and severe penalties including imprisonment. This topic should not be taught before year 7. Do you agree with this age limit?

No

31 We have placed an age limit on the following content in the secondary Online and Media topic: The impact of viewing harmful content, including pornography, that presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others, and can negatively affect how they behave towards sexual partners. This can affect pupils who see pornographic content accidentally as well as those who see it deliberately. The risks of inappropriate online content can be discussed in an age-appropriate way from year 7,

however, the details of the sexual acts in question should not be discussed before year 9. Do you agree with this age limit?

No

32 We have placed an age limit on the following content in the secondary Being Safe topic: The concepts and laws relating to harmful sexual behaviour, including sexual harassment, revenge porn, upskirting and taking/sharing intimate sexual photographs without consent, public sexual harassment, and unsolicited sexual language / attention / touching. This should not be taught before year 7. Do you agree with this age limit?

Yes

33 We have placed an age limit on the following content in the secondary Being Safe topic: The concepts and laws relating to sexual exploitation, grooming, stalking, and forced marriage. This should not be taught before year 7. Do you agree with this age limit?

Yes

34 We have placed an age limit on the following content in the secondary Being Safe topic: The concept and laws relating to sexual violence, including rape and sexual assault. Whilst it's important for pupils to understand the key principles around sexual offences and violence, for example the importance of understanding what consent means, schools should not teach about this in any sexually explicit way before year 9. Do you agree with this age limit?

No

35 We have placed an age limit on the following content in the secondary Being Safe topic: The physical and emotional damage which can be caused by female genital mutilation (FGM), virginity testing and hymenoplasty, where to find support, and the law around these areas. This should include that it is a criminal offence to perform or assist in the performance of FGM, virginity testing or hymenoplasty, or fail to protect a person under 16 for whom someone is responsible from FGM, or to take girls who are UK nationals abroad for FGM, regardless of whether it is lawful in that country. This should not be taught before year 9, except for where schools have identified a greater risk of FGM at an earlier age or have pupils who have been affected by FGM and need support. Do you agree with this age limit?

Yes

36 We have placed an age limit on the following content in the secondary Being Safe topic: The concepts and laws relating to domestic abuse including controlling or coercive behaviour, emotional, sexual, economic or physical abuse, and violent or threatening behaviour. Schools should not teach about the details of violent abuse before year 9 as it is important that pupils are not introduced to distressing concepts when they are too young to understand them. Do you agree with this age limit?

No

37 If you would like to offer any comments about the age restrictions in the secondary Online and Media, Respectful Relationships, including Friendships, and Being Safe topics please do so here. It would be helpful if you could share your own views on appropriate age limits for these topics, for example if you think they are too low or too high.

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

We believe these age limits are too high given the average age of access to pornography in the UK via research conducted by the Children's Commissioner for England is 13 and for some young people they are known to access content as young as 7 or 8.

<https://www.childrenscommissioner.gov.uk/resource/pornography-and-harmful-sexual-behaviour/> Research found that young people are less traumatised or harmed by content if they are aware of what sexual content is and what it entails prior to engaging with it. Therefore from a harm-minimisation and trauma-informed perspective it is vital that youth are provided information as early as possible. Young people need to have these discussions earlier to safeguard and prepare them for sexual content online and protect them from potential online predators and upsetting explicit material. We propose that age-appropriate language can be used, so suitable discussions can be discussed as early as possible starting with appropriate and inappropriate digital/social media use, and how to critically engage with the online world. Conversations around sexual content online and abuse should occur as early as possible to ensure that children are protected and safe online.

Conversations early are absolutely vital to protect young people and assist young people to identify whether they are in abusive homes or experiencing abuse in their lives. This means age and stage appropriate language can be used to discuss these topics as early as Kindergarten. Friendship discussions should occur far earlier as young people need skills to identify healthy relationships early. These limits are far too late. While more explicit and mature aspects can be discussed in later years, these topics can still be addressed in appropriate ways in the early years.

Secondary topic: Intimate and sexual relationships, including sexual health

38 Do you agree with the age restriction on the secondary intimate and sexual relationships, including sexual health topic?

No

39 If you would like to offer any comments about this age restriction, please do so here. It would be helpful if you could share your own views on appropriate age limits for these topics, for example if you think they are too low or too high.

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Whilst the average age for sexual debut in the UK is currently around 16-17. Research confirms that sexual debut is later in youth who are educated appropriately. Therefore, the delay of sexual education is likely to increase the likelihood of earlier sexual experiences, higher rates of STI's and unintended pregnancies. Sexual education is a protective factor for violence, abuse, assault, and therefore ensures harm minimisation. Waiting for a crisis before providing information on sexual acts and related consequences, and where to get help puts youths mental and physical health at risk. WHO affirm that sexual health is not just the "... absence of disease, dysfunction or infirmity. Sexual health requires a positive and respectful approach to sexuality and sexual relationships, as well as the possibility of having pleasurable and safe sexual experiences, free of coercion, discrimination and violence. For sexual health to be attained and maintained, the sexual rights of all persons must be respected, protected and fulfilled." (WHO, 2006). The access to comprehensive, good quality information about sex and sexuality is vital to the sexual, mental, and physical health of all people. Impacts from delayed or lack of sexual education will extend to community, legal, and justice settings causing increases in violence and poorer health outcomes.

## Health and wellbeing

40 Why social media, some apps, computer games and online gaming, including gambling sites, are age restricted. This should not be taught before year 3. Do you agree with this age limit?

No

41 We have placed an age limit on the following content in the primary Online Safety and Harms topic within health education: The risks relating to online gaming, video game monetisation, scams, fraud and other financial harms, and that gaming can become addictive. This should not be taught before year 3. Do you agree with this age limit?

No

42 We have placed an age restriction on the whole of the primary Developing Bodies topic within health education. This should not be taught before year 4. This covers; growth, change and the changing adolescent body, this topic should include the human lifecycle. Puberty should be mentioned as a stage in this process; the key facts about the menstrual cycle, including physical and emotional changes. Do you agree with this age limit?

No

43 The secondary Health and Wellbeing topic is now clear that, given the sensitivity and complexity of content on suicide prevention, direct references to suicide should not be made before year 8. (Note that there is more detail on suicide prevention content in the curriculum provided in the 'Suicide Prevention' section shortly). Do you agree with this age limit?

No

44 If you would like to offer any comments about these age restrictions, please do so here. It would be helpful if you could share your own views on appropriate age limits for these topics, for example if you think they are too low or too high.

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

The majority of this guidance appears to acknowledge the nuance and complexity of sexual education and related sexual health topics. Unfortunately, rather than address training and education of teachers or ensuring that sexual education is taught to pre-service and in-service teachers so that UK youth are appropriately supported, however, the guidance appears to restrict information. This approach opposes trauma-informed, harm-minimisation, and does not acknowledge that we currently live in a digital world. Youth are curious, and this developmental milestone is important and should be supported appropriately. When not supported, youth will look for information, likely online, and due to a lack of critical thinking skills and the immense amount of incorrect and inappropriate content online; misinformation will spread. Media and Pornography literacy are needed to assist to discern and critique messaging.

Further, the disability community has long been excluded from CSE and often any type of sexual education leaving them highly likely to be a victim (1.5 to 10 times the rate of non-disabled peers) and accidental perpetrators due to a lack of knowledge and understanding of consent, boundaries, sexual acts, healthy relationships, legal rules, and relationship types. This guidance neglects the sexual, mental, emotional and physical health and wellbeing of all people. If the guidance is enacted against the international best practice principles (UNESCO) it is highly likely sexual violence will increase and mental and physical health outcomes will diminish significantly.

## Health and wellbeing

45 Do you agree with changes to the Health and Wellbeing section of the guidance?

No

46 If you would like to offer any comments to explain your answer, please do so here.

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

We acknowledge that changing from physical health and mental wellbeing to health and wellbeing is an important change that acknowledges that physical and mental health and wellbeing are vital topics that can both affect each other and are equally important. We are concerned that renaming

mental wellbeing to general wellbeing may result in the loss of mental health as talking points and an increase in the importance of physical wellbeing over mental wellbeing, however, without the matching curriculum it is difficult to ascertain. We are also seriously concerned about the focus on calories and nutritional content and the impact this may have on student wellbeing, particularly the focus on diet causing obesity. The impact this may have on young people with eating disorders, disabled students, and on students with chronic illness could be quite extreme and is not supported by evidence. Promotion of a balanced diet, of the benefits of moving your body in a way that feels good for you creates a higher likelihood of positive behaviours, and less likelihood of eating disorders and mental health and wellbeing concerns.

## Suicide prevention

47 Do you agree with the proposals on suicide prevention as set out above?

Not Answered

48 If you would like to offer any comments to explain your answer, please do so here

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

We are not qualified to make comment on this section

## Additional topics

49 Do you agree with this additional content?

Yes

50 If you have any comments to explain your answer, please do so here

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

## General comments

51 Is there anything else in the draft statutory guidance that you would like to comment on?

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation. :

We affirm that all relationship and sexuality content can be taught from birth onwards. The age-appropriate manner, resources, and language may deviate depending on the age or developmental stage of the learner. All content and language can be modified, made sensitive and simplified to align to be age- and developmentally-appropriate. For instance, much of the information in the guidance should sit under protective behaviours and as such can be discussed in age and stage appropriate ways scaffolded as the student(s) learn, develop, and gain life experience. We posit that areas should be discussed early to build foundational knowledge that can be built upon in the following years in a scaffold approach in response to the classroom needs and wants for all topics within the guidance.

We firmly believe teachers require support and training to implement effective RSE to align with best-practice principles and they are not provided this adequately in their university or professional development. Rather than focusing on the guidance, there should be a focus on ensuring that teachers are equipped with the knowledge and resources (including accessible resources) for their students. This will ensure that the content can be delivered in a safe, culturally-appropriate, trauma-informed manner that ensures harm-minimisation and provides all students with the quality education they deserve.

## Public Sector Equality Duty (PSED)

52 Do you have any comments regarding the potential impact of the guidance on those who share a protected characteristic under the Equality Act 2010, whether negative or positive? How could any adverse impact be reduced and are there any other ways we could advance equality of opportunity or foster good relations between those who share a protected characteristic and those who do not?

Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation.:

The suggested guidance if initiated will have a long-lasting impact on different protected characteristics under the Equality Act 2010 in a negative manner. Knowledge is power, and by restricting the transmission of knowledge the government will successfully disempower UK youth from being able to understand basic information about their body and how to keep themselves safe and healthy. Justice rates, and research show that for communities who do not receive appropriate and adequate sexuality education, rates of perpetrating increase, and likewise, rates of victimisation increase - with further increased rates for minorities, such as the disability community. Without providing accessible, culturally safe, and well-rounded knowledge to youth, this guidance lets down the very people it should be protecting. Good comprehensive Relationships and sexuality education invites all people, particularly those in protected characteristics into the conversation, not excluding them. This means ensuring the education is culturally sensitive, incorporates or acknowledges religious ideologies into the teaching without being patronising, creates accessible teaching and resources for youth with disability about all information and topics to ensure that all people are getting the same knowledge and information.