

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

About NEU Cymru

The National Education Union Cymru (NEU Cymru) welcomes the opportunity to respond to the Welsh Government consultation 'Relationships and Sexuality Education in schools' Guidance. NEU Cymru welcome's the Welsh Government's new guidance for Relationships and Sexuality Education (RSE) in schools. This is a huge step in the right direction to ensure all children and young people have access to age- appropriate, inclusive ¹ and high quality RSE that is empowering and relevant for all children and young people's lives.

Education professionals are highly committed to making a difference in the lives of the children and young people they deal with. Providing education professionals with the practical support to build high quality provision of Relationships and Sexuality Education as part of a "whole school approach" is welcomed.

Training should be available to all expected to plan and/ or deliver the new guidance – alongside all aspects of the new Curriculum. Sometimes this will be formal 'training' in the form of courses, sometimes this will be the opportunity for education professionals to experience good practice examples in other schools and / or settings.

The way in which head teachers and governing bodies approach the provision of Relationships and Sexuality Education within the new curriculum and the level of support given to education professionals to effectively plan and deliver the content, determines the effectiveness of schools in promoting positive, healthy relationships and ensuring their pupils have good physical, mental, emotional and social well-being.

Consent

Anecdotally, members tell us that the number of under age children who may have engaged in sexual relations, forced or otherwise, may be seriously underestimated by many schools and decision makers. Despite raising concerns with police and social services, often the perpetrators go unpunished and are on occasions still in the same school as the victims.

Thus consent should be centrally important within RSE, and the age at which consent can be given must be highlighted throughout.

¹ <https://neu.org.uk/articles/statement-support-inclusive-relationships-and-sex-education-rse>

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)

Whilst the reference to physical, mental and emotional health and well-being is welcomed, we also feel that reference should be made to a young person’s social well-being ², particularly as the guidance refers to *‘Understanding how relationships are formed, developed and maintained enables us to develop the skills and attitudes that allow us to create healthy relationships of our own’*.

Relationships in this instance should also include reference to online relationships (social media, and online contact between partners using various platforms and smart phone apps) within the introduction.

We believe this would go further towards the aim to *‘support young people to develop the knowledge and skills needed to effectively navigate these rapidly changing influences and establish respectful, fulfilling relationships throughout their lives. These may include family relationships, friendships, professional relationships and sexual relationships.’*

² <https://www.uow.edu.au/student/wellbeing/UOW112638.html>

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)

Throughout the guidance document, there are several references to schools adopting a ‘whole school approach’. The guidance makes it clear that RSE is not just about teaching sex education as a topic on its own. Aspects could also be covered in PSE or tutor time.

The guidance states that adopting a ‘whole school approach’ to RSE is about ensuring that everyone within the school community can contribute to the development of the content of RSE within individual schools.

Workload

Whilst this is welcomed in principle, we are concerned that this has not been fully workload impact assessed.

Whilst the document does support a ‘whole school approach’, we are concerned this will increase the workload for those education professionals who will be leading on the development of RSE.

To *‘consult with learners, parents and carers when designing their RSE curriculum’* is something that we think is important to get a *‘high quality and effective RSE’*, but this, on top of their existing commitments, will have a negative impact on workload.

We would welcome assurances that those education professionals who will be responsible for developing and creating the new RSE content within the new curriculum in their schools, will not see an increase in their current workload.

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)

Any signposting and links that will assist education professionals to develop and deliver a high quality and effective RSE are welcomed.

External Support

Useful information relating to the WNHSS, AWSLCP and CAMHS.

Annex A

Useful information. However, a full definition of sex education would be more beneficial rather than mentioning that it includes education about AIDS, HIV and STIs.

Annex B

Useful legal information in relation to the age of sexual consent and the Sexual Offences Act.

Annex C

Useful list of organisations with links to their websites so that schools can see how they can benefit their pupils if required.

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)

We are concerned there isn't anything in the guidance which states that the signposting section and annexes must be used. Within the **Action required** part it says that '*Schools must have regard to this guidance when implementing their sex education policy and relationships and sexuality education provision*'. It should state that the signposting section and annexes must be considered.

Annex A

The first reference to Annex A is on page 2 where it states that a '*full summary of the legislation regarding sex education in the curriculum is included*'. There is no other reference to it within the document, which we believe would be helpful.

Annex B

The first reference to Annex B is also on page 2 where it states that '*a full summary of the law on the age of consent to sexual activity is included*'. There is no other reference to it within the document, which we believe would be helpful.

Annex C

The first reference to Annex C is on page 14 where it states that the Annex '*provides contact information for organisations that can support learners across a range of issues; such as, LGBTQ+, sexual health and domestic violence*'. There is no other reference to it within the document, which we believe would be helpful.

Whilst the signposting section and annexes are useful, it needs to be made clear in the guidance that schools must consider them when developing the content of RSE.

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

Contents page

'Working with specialist providers' should be changed to 'Working with external providers' (or vice versa) as that's what's on page 10 of the guidance.

Introduction

Clear explanation of what is required of teachers and schools under 'The legal obligations surrounding sex education'.

Whole School Approach

Clear explanation of what a whole school approach is. We would suggest a change to the wording of the final sentence in the second paragraph to 'Schools **MUST** enable their teachers to access learning that can support them to develop confidence and knowledge regarding RSE topics'. We would also welcome sufficient funding to enable schools to be able to support education professionals to undertake professional learning.

Curriculum design

Clear explanation of what is required of teachers and schools. The use of examples in the Annexes are welcomed.

Links to Policies

Clear explanation of link to other school policies. However, where the guidance under Bullying states, 'Schools and education services should make it clear that all forms of bullying are entirely unacceptable and deal with any suspicion of bullying in accordance with the school's behaviour policy', we would prefer that every school has a separate Bullying policy, and that this statement be amended to reflect that.

External Support

Useful information relating to the WNHSS, AWSLCP and CAMHS.

Annexes

It must be made clear in the guidance that schools must consider them when developing the content of RSE.

We would welcome assurances that those education professionals who will be responsible for developing and creating the new RSE content within the new curriculum in their schools, will not see an increase in their current workload.

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?

Whole School Approach

We would suggest a change to the wording of the final sentence in the second paragraph to ‘*Schools MUST enable their teachers to access learning that can support them to develop confidence and knowledge regarding RSE topics*’. As stated above, we believe that WG should provide sufficient funding to ensure this happens.

Curriculum design

Clear explanation of what is required of education professionals and schools. The use of examples in the Annexes are welcomed.

The Sex Education Forum (SEF) published a high quality RSE curriculum design tool in 2018, which acts as an extremely easy to use checklist setting out topics that should be included at each key stage ³. The introduction of a new section to the guidance that similarly spells out in clear, straightforward terms, the minimum expectations for each key stage, or at least by the end of primary and by the end of secondary would be welcomed.

There is no reference in the guidance as to how a victim of sexual abuse or violence should approach the reporting of an incident. This would be welcomed.

Links to Policies

Clear explanation of link to other school policies. However, where the guidance under Bullying states, ‘*Schools and education services should make it clear that all forms of bullying are entirely unacceptable and deal with any suspicion of bullying in accordance with the school’s behaviour policy*’, we would prefer that every school has a separate Bullying policy, and that this statement be amended to reflect that.

The NEU and UK Feminista’s ground-breaking study, ‘*It’s just everywhere*’: A study on sexism in schools – and how we tackle it ⁴, which was conducted in 2017, clearly shows that schools, education bodies and Government must take urgent action to tackle sexism in schools. Sexual harassment, sexist language and gender stereotyping are commonplace in school settings, yet teachers report feeling unsupported and ill-equipped to respond. It also recommends that schools take a zero-tolerance approach to sexual harassment.

Some members tell us there is a hidden pool of pupils whose mental health issues are either undiagnosed and/or unsupported arising from sexual violence. How to support those pupils should be highlighted in this guidance.

External Support

Useful information relating to the WNHSS, AWSLCP and CAMHS. However, some members have highlighted that there remain serious problems accessing mental health support (CAMHS, etc.) and a more specific issue of managing the transition from child to adult mental health services. We believe this needs to be given more prominence in the guidance, along with the recognition that schools are not resourced to try and provide such support themselves. Thus the role of the Local Authority and health are paramount.

Annexes

It must be made clear in the guidance that schools must consider them when developing the content of RSE.

Annex B

Some members have highlighted the number of children, predominantly girls, under the age of 13 who have been legally raped (who may have given consent but are not legally able to do so) is seriously underestimated by many schools and decision makers. Despite sharing

this information with police and social services, often the perpetrators go unpunished and are on occasions still in the same school as the victims. The Department for Education in England have produced some guidance with advice around support for girls who have experienced sexual violence and there has been evidence here of perpetrators being put back into the same class as survivors ⁵.

This needs to be highlighted in the guidance so that schools are aware of the problem and are subsequently able to inform pupils under the age of 13 of the law relating to consent and also support those that have been raped in their schools and make it easy for them to be able to report any incidences.

Whilst the signposting section and annexes are useful, it must be made clear in the guidance that schools must consider them when developing the content of RSE.

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

⁴ <https://neu.org.uk/sites/default/files/2019-01/sexism-survey-feminista-2017.pdf>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

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?

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)

How much engagement a school needs to have with parents/carers/community will depend on how schools propose to involve all parties concerned and gather their views and opinions.

Whilst we appreciate and agree that *‘engaging with parents and carers can assist schools in shaping provision which takes account of their wishes and concerns’* and that it can *‘enhance the delivery of positive messages around RSE, with parents and carers having a central role to play in terms of reiterating and reinforcing these messages with their children’* we are concerned that schools may not be able to meet the demands of all parties involved in their development and planning of RSE. Welsh Government guidance on the new curriculum for parents and carers would be welcomed to lift the burden on schools, and to answer the most frequently asked questions.

Depending on how they engage with the parties, synthesising and reconciling a range of views in a diverse community may prove challenging, and beyond the scope of all schools. We would welcome assurances that those education professionals who will be responsible for developing and creating the new RSE content within the new curriculum in their schools, will not see an increase in their current workload.

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)

The guidance provides a framework for schools to design its provision but is at a relatively high level.

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

Training for everyone expected to plan and/or deliver RSE should be made available and be resourced by WG. This will sometimes take the form of a 'course' or sharing good practice. Either of these options will need to be resourced and will take time.

Specific training on how to run restorative justice sessions as in case Study 2 in Annex D would be welcomed. There are many organisations, such as Welsh Women's Aid, that could run sessions on domestic and sexual violence to equip teachers with the information they need to teach RSE.

The case study schools in Annex D providing peer support to schools that are just starting to think about implementation would be very beneficial.

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 checked="" type="checkbox"/>
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Supporting comments (no more than 250 words)

Provision will need to be planned at a whole school level and education professionals will need to plan their individual lessons within this context. In terms of teachers' statutory conditions of service, it is not the responsibility of teachers not in receipt of a Teaching and Learning Responsibility payment (TLR) to plan schemes of work.

Schemes of work and programmes of learning are best created by teachers and leaders with the requisite training, experience and expertise. Individual teachers may be required to contribute to this whole-school planning, but to do so effectively they would require training and support on how to deliver RSE and how to deal with issues arising from it.

We would welcome assurances that those education professionals who will be responsible for developing and creating the new RSE content within the new curriculum in their schools, will not see an increase in their current workload

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

It is vital that there is parity of provision in both languages and that provision should reflect the linguistic nature of the school and its catchment area.

The guidance will also be available in Welsh, for those Welsh medium and bilingual schools, and this will ensure that Welsh is treated no less favourably than English.

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

See Question 11.

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.

We welcome the additional support in respect of inclusivity, LGBTQ+ and Violence against Woman Domestic Abuse and Sexual Violence, however it is very important that education professionals have training not only on how to deliver the new curriculum but also on how to deal sensitively with those pupils experiencing these issues at home, and how to help those pupils.

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: