1. Do you agree that the content of Relationships Education in paragraphs 50-57 of the guidance is age-appropriate for primary school pupils?

Yes, agree. All of the content is appropriate for primary aged children. However, given that content is not split out by Key Stage or Year a lot will depend on teacher competence and good curriculum planning in order to ensure that topics are not addressed too late in a child’s education. More emphasis should be put on the importance of *timeliness* in the guidance as a whole. Reference should be made to developmental milestones and life events such as puberty and transition from primary to secondary school as well as children’s natural curiosity to understand the world around them by asking questions such as ‘where do babies come from?’ These stages are set out in the Sex Education Forum’s [curriculum design tool](http://www.sexeducationforum.org.uk/sites/default/files/field/attachment/SEF_Curriculum%20Design%202018.pdf).

There are also serious omissions in the content, particularly the exclusion from Relationships Education of the concept of the human life-cycle and learning correct names for genitalia. Without this foundational knowledge about life cycles and naming all external parts of the human body it will not be possible to safeguard children, and the learning about puberty in the Health Education curriculum will not be tethered to the relevant key concept, i.e. that puberty signifies fertility and that a sperm and egg are needed to make a baby. Greater emphasis on the importance of sex education would help to address this. Content on human life-cycles and correct terms for body parts including genitalia could be included with the puberty education section of Health Education, or included in Relationships Education, explaining that stages in life cycle bring changes in relationships and emotions e.g. puberty, new baby and death.

In the content table ‘how to respond safely and appropriately to adults they may encounter who they do not know’ is fine to include but the greater challenge is responding to adults who they do know which is a greater risk in relation to sexual abuse, so this point needs to be expanded.

1. Do you agree that the content of Relationships Education as set out in paragraphs 50-57 of the guidance will provide primary school pupils with sufficient knowledge to help them have positive relationships?

Potentially, yes, but much will depend on the frequency, timing and quality of the content. There is also a fundamental gap relating to safeguarding children as there is no clarity in the guidance that schools must use correct terms for genitalia (penis, testicles, vulva, vagina) in order to ensure a consistent knowledge of vocabulary that children can use including if they needed to seek help with abuse. This goes against the advice of the Education Select Committee, (2015), Ofsted (2003) and UNESCO (2018) and also against the Catholic Education Service scheme of work for RSE in primary schools. Paragraph 57 provides a good opportunity to insert ‘To ensure all children have a consistent vocabulary that they can use to communicate about their bodies and to get help if they need to it is essential that schools use correct terms for genitalia and other parts of the body and that euphemisms to do with sex and relationships are avoided.

There needs to be a clear statement that LGBT people and relationships are part and parcel of teaching about healthy relationships in primary and secondary school. This can be demonstrated in relation to families – but also it is helpful to children to learn the meaning of terms such as lesbian, gay, bisexual and trans.

We would recommend editing ‘that others’ families, either in school or in the wider world, sometimes look different from their family, but that they should respect those differences and know that other children’s families are also characterised by love and care for them’ and replacing with the following: ‘that all families, either in the school community or in the wider world are different, that they should respect those differences and know that love and care for each other are fundamental features of family life’.

We are not aware of any evidence base to support this assertion: ‘A growing ability to form strong and positive relationships with others depends on the deliberate cultivation of resilience and positive character attributes, or ‘virtues’, in the individual.’ We recommend that this line is removed from paragraph 56 along with all mention of virtues. It would be far more appropriate to talk about the cultivation of values such as equality and respect. A whole-school approach to values is what is needed – thus the link with British Values / SMSC and school ethos.

Children also need to learn relationships skills through practise – this is a different type of knowledge and not just about facts. This is dealt with well in paragraphs 51 and 52 but then seems detached from what comes in the table of contents. It would be helpful to make a broader point about the importance of building in opportunities of ‘practising knowledge’ into lessons, for example practising scenarios where pupils ask for help so that there is evidence they would be able to use new vocabulary in real-life situations. This is relevant at both primary and secondary.

Because FGM is more likely to happen to girls at primary age it is also very important that Relationships Education content covers learning about the body and basic rights to bodily autonomy including correct terms for genitalia.

1. Do you agree that paragraphs 61-64 clearly set out the requirements on primary schools who choose to teach sex education?

The guidance needs to provide a definition of sex education and of relationships education – currently the onus is put on primary schools to create their own definition, which is not acceptable. The Sex Education Forum define RSE as “learning about the emotional, social and physical aspects of growing up, relationships, sex, human sexuality and sexual health. It should equip children and young people with the information, skills and positive values to have safe, fulfilling relationships, to enjoy their sexuality and to take responsibility for their sexual health and well-being”.

The onus is put on sex education in primary school **not** being compulsory. This negative approach is a backward step and results in guidance which is less progressive than the 2000 guidance. The 2000 guidance has a clear statement at the start of the section on primary schools (1.12): ‘The Department recommends that all primary schools should have a sex and relationship education programme tailored to the age and the physical and emotional maturity of the children’. The onus should be put on the Department’s **expectation** that sex education **is** taught in **all** primary schools in order **to meet pupil needs**. This must be foregrounded and moved out of the current location within paragraph 63, as the point is easily lost in the current format.

Learning about human life-cycles including conception and birth is a key concept that children need to understand in order to make sense of learning about puberty. Learning ‘where babies come from’, and that a sperm and an egg is needed to make a baby are the stepping stones to understanding conception, and to making sense of body changes at puberty. This needs to be taught through a graduated approach – but there is conflict with the point about consulting parents ‘before final year of primary’ about the details of teaching. The engagement with parents should be from the start of primary, and teaching should be mapped across the primary years. We recommend editing this statement as follows: ‘Meeting these objectives will require a graduated, timely, programme of sex education, which begins early in primary school.’

The expectation that ‘primary schools should consult with parents before final year of primary school **about the detailed content** of what will be taught’ is unrealistic and unfeasible– this would not be the case for other subjects science, English or computing. Instead the school should engage with parents as they develop their policy and share with them the materials they will use and explain how they will be used. Many parents would be disappointed if schools said they are only starting to cover sex education in Year 6 and this would be against good practice identified by Ofsted.

We recommend that the point about supporting parents with their role in RSE at home at the end of paragraph 63: ‘This process should include offering parents support in talking to their children about sex education and how to link this with what is being taught in school’ is kept in a separate paragraph as it’s an important point and is rather lost.

1. Do you agree that the content of RSE in paragraphs 65-77 of the guidance is age-appropriate for secondary school pupils?

Strongly agree. All of the content is appropriate for secondary aged children. However, given that content is not split out by Key Stage or Year, curriculum planning and design and teacher competence will be key to ensuring that topics are addressed in a timely manner for children. It is important that pupils are consulted in relation to the age at which content is taught. A common weakness of RSE is that content is taught too late.

Paragraph 65 focuses exclusively on information. However evidence shows that young people need to develop their personal competencies in order to have healthy relationships, these include communication skills. There are opportunities in the tabled content to change statements focused on knowledge e.g. pupils should know how to...’ to ‘pupils should be able to..’ There could also be a link made in paragraph 70 about the importance of living out or practising values in everyday school life.

1. Do you agree that the content of RSE as set out in paragraphs 65-77 of the guidance will provide secondary school pupils with sufficient knowledge to help them have positive relationships?

Potentially, yes, but much will depend on the frequency, timing and quality of the content. There needs to be a clear statement that LGBT people and relationships are part and parcel of teaching about healthy relationships in primary and secondary school, and should appear as examples in scenarios so that there is visibility of LGBT people and their relationships in the curriculum. It is also essential that teaching about the many important sexual health topics listed under the secondary content is LGBT-inclusive and specific.

Please remove the content from the main table for secondary RSE about learning to show respect ‘including those in positions of authority’. This could be judged as encouraging young people not to seek help should they experience abuse or other ill-treatment from people in positions of authority. When people have authority they have power and it would be more useful to teach young people to understand how power is a factor in relationships and sex.

The references to virtues (paragraph 70) are inappropriate in the RSE guidance. Our question to the Department is ‘Is there any evidence that relationships education is most successful where teaching about positive relationships is underpinned by a wider, deliberate cultivation and practice of resilience and positive virtues in the individual?’. Virtues such as self-sacrifice, forgiveness and self-control can be hugely problematic in the context of healthy relationships, for example if a young person is being coerced or abused they may then believe their role is to forgive and endure rather than seek help. References to virtues could be replaced by references to values such as equality and respect and link with British Values. The 2000 guidance refers to values, this is not a new thing.

Paragraph 71 would benefit from some minor changes. The sentence ‘There should be an equal opportunity to explore the features of stable and healthy same-sex relationships’ might be clearer if it said ‘same-sex relationships should be equally represented when learning about stable and healthy relationships’.

A statement needs to be included about fostering gender equality and LGBT+ equality throughout the teaching of RSE. If this is applied as a principle it is more consistent and achieves the ambition of integrating LGBT inclusion and gender equality rather than treating either as an add on or standalone topic. There are opportunities to reference gender stereotyping as a specific form of stereotyping in the primary content under respectful relationships.

Paragraph 75: Teaching about FGM should not be optional as it is relevant to every school, thus the mention ‘Schools may also want to address the physical and emotional damage caused by female genital mutilation (FGM)’ needs to be strengthened to a must – and learning about the law in relation to FGM needs to be listed as required content under ‘being safe’ in the secondary content. Because FGM is more likely to happen to girls at primary age it is also very important that Relationships Education content covers learning about the body and basic rights to bodily autonomy including correct terms for genitalia.

1. Do you agree that paragraphs 36-46 on the right to withdraw provide sufficient clarity and advice to schools in order for them to meet the legal requirements?

We disagree that Headteachers should automatically grant a request for a child to be excused from sex education. There should always be a conversation about why the parent wants to excuse their child so that the Headteacher can address any misunderstandings, explain more about the benefits of sex education, and of learning this with peers.

It should be made clear that if parents choose to withdraw their child from RSE they have a **responsibility** to provide RSE to their child at home. It would be very helpful to describe the role that schools can have in supporting parents who chose to excuse their child from RSE with materials and resources so that RSE can be provided at home and thus meeting the needs of the child. Similarly, it would be more helpful to focus on how good quality communication from school to parents generally results in increased confidence from parents that the RSE provided is appropriate and useful to their child and thus in reduced numbers of parents choosing to excuse /withdraw their child.

16 N/A

17 N/A

18 N/A

19 N/A

20. Do you agree with the approach outlined in paragraphs 36-46 on how schools should engage with parents on the subjects?

Paragraph 36 should be amended to reference sex – thus: ‘The role of parents in the development of their children’s understanding about relationships and sex is vital. Parents are the first educators of their children. They have the most significant influence in enabling their children to grow and mature and to form healthy relationships.’ It is important to mention sex here given that parents have been given the right to excuse their child from school sex education.

Paragraph 38 should be amended to include sex education so that it reads: ‘Parents should be given every opportunity to understand the purpose and content of Relationships Education, sex education and RSE’.

1. Paragraphs 108-109 in the guidance describe the flexibility that schools would have to determine how they teach the content of their Relationships Education/RSE/Health Education. Do you agree with the outlined approach?

Yes, however it would be useful if schools are required to evidence that they have consulted pupils about their needs, and/or if it’s made clear that Ofsted will be looking for such evidence.

How have the resources listed in the draft guidance been selected? No SEND resources are included and none produced by the Sex Education Forum. There is one faith specific resource listed. Schools should be advised to choose their RSE resources from reputable sources i.e. organisations with clear aims and values and evidence based and medically accurate. A list will always become obsolete as resources are updated and new things published. It is also important to note that only through training will schools know how to select and use good resources. The most helpful approach is to train teachers with the skills to identify and if necessary adapt resources.

1. Do you agree that paragraph 44 of the guidance provides clear advice on how headteachers in the exceptional circumstances will want to take the child’s SEND into account when making this decision?

It is not clear how a Headteacher is supposed to make decisions about exceptional circumstances. The United Nations (see UNCRC reports) state that every child has a right to education about healthy relationships and reproductive and sexual health – the proposed regulations and guidance do not uphold this. The safeguarding risk for the child or young person would be very important to consider, but this is not mentioned as an example. It is true that being excluded from lessons can have a detrimental impact on children and that children are more likely to learn their RSE second-hand from peers. If Government is unable to give examples of exceptional circumstances – or of cases when it would / would not be appropriate to reject parental request then it is hard to imagine how schools will manage this in practice. We recommend that practice examples and case studies are developed as a companion guide to the core guidance.

1. Do you agree that paragraphs 30-32 of the guidance provide sufficient detail about how schools can adapt the teaching and design of the subjects to make them accessible for those with SEND?

The point is clearly made about the importance of accessibility, differentiation and personalisation. However no concrete examples are provided to show what this looks like in practice, and there is very little training available to support schools in doing this specialised work. We call on the Government to invest in training to support schools with SEND appropriate RSE – both in mainstream and special school context, and to support a practice-sharing network and documentation of practice examples.

1. Do you have any further views on the draft statutory guidance that you would like to share with the department? Do you think that the expectations of schools are clear? Please include this information in the text box below.

As a whole the guidance is yet to be provide the sort of clear and authoritative leadership that schools need to support them in the implementation of statutory, high quality RSE. The content list provides clarity about content, but the other sections of the guidance will be difficult to make sense of for schools. Some issues are confusing because of the very mixed tone they are addressed with for example in relation to sex education and parents excusing children. These sections need to be edited to improve consistency and to achieve the kind of positive tone that is expected of updated guidance, twenty years on from the 2000 guidance and in an era when there is widespread support for RSE that protects children.

In relation to LGBT inclusion there is very little said and some ambiguity as to whether or not it applies in primary school. This guidance is being published in the era of Marriage Equality so there need be no ambiguity at all about teaching reflecting the reality of diverse family life in Britain today, or of providing accurate information about the meaning of terms such as lesbian, gay, bisexual and trans. There needs to be a clear statement about values – and not virtues. The values promoted by high quality RSE are consistent with British Values / SMSC – there is an opportunity to make the link.

The guidance needs to make the point that to address inequalities the whole RSE, Relationships Education and Health Education curriculum need to be fostering gender equality and LGBT equality throughout. This will benefit all pupils including those with protected characteristics.

The sections on protected characteristics and SEND are quite daunting and need to be supported by examples in practice.

We are concerned that children attending independent schools could miss out on the Health Education content including about puberty.

Rather than requiring schools to take the religious background of all pupils into account when planning teaching – which is potentially an impossible task it would be better to require schools to reflect varied and relevant religious and cultural perspectives when planning teaching. It is also vital that teachers know they must differentiate between fact and opinion. The key thing is to plan teaching which is child-centred and relevant and gives pupils opportunities to discuss experiences, perspectives and views safely.

It would be very helpful to include a statement about the importance of leadership from the headteacher and governors to implement RSE to a high quality. Providing heads with a list of reasons why RSE is of benefit would be a helpful tool here. An example is provided below:

High quality school RSE:

* Results in earlier identification of safeguarding concerns and contributes to the prevention of harm
* Results in young people delaying sexual activity and having healthier, more consensual relationships
* Is part of a broad and balanced primary and secondary curriculum and prepares children for adult life
* Is supported by the majority of parents and strengthens home-school partnership
* Is children and young people’s preferred way to learn about relationships and sex, together with input from parents and carers
* Takes a positive approach to sexual health and human sexuality, which is in keeping with children’s rights and human fulfilment
* Ensures that pupils know about the law and how it applies to them so that they can take responsibility for their actions, recognise abuse and seek help if their safety and wellbeing is threatened
* Is enjoyable to teach when staff have sufficient training in the relevant pedagogical skills and subject knowledge

Beyond the publication of the guidance we are concerned about how Government will support implementation of high quality RSE. We urge the Government to commit ring-fenced funding to training and support schools to develop high quality RSE. We also call for a regular subject report to be commissioned from Ofsted (such as the PSHE – not yet good enough report, from 5 years ago) so that there is some evidence of progress in schools in implementing high quality RSE and knowledge of gaps.

30 October 2018
Sex Education Forum

**Supporting materials**

Government SRE guidance (2000) <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/283599/sex_and_relationship_education_guidance.pdf>

Draft updated Government RSE, Relationships Education & Health Education guidance (2018) – including link to online survey for submitting your response to the consultation <https://consult.education.gov.uk/pshe/relationships-education-rse-health-education/>