

## Department for Education consultation: Relationships education, relationships and sex education, and health education

Submission on behalf of Christian Medical Fellowship (CMF) by Philippa Taylor.

The CMF) was founded in 1949 and is an interdenominational organisation with over 5,000 British doctor members in all branches of medicine. A registered charity, it is linked to about 80 similar bodies in other countries throughout the world.

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

**Neither agree nor disagree**

The terms used in this section are left undefined, with insufficient information on *what* will specifically be taught to children, and *how*, so it is difficult to assess whether the content is age-appropriate or not.

Nevertheless, we are concerned that ambiguity in language means that sensitive and contentious issues could be raised that may undermine a family's own beliefs and values, and religious sensitivities. It is therefore important that parents should be given the right to withdraw their children from Relationships Education lessons.

Moreover, the guidance should explicitly state that it is neither age-appropriate to teach primary school pupils about LGBT issues and relationships, transgender issues, pornography, contraception, and sexually transmitted infections, nor to raise the subjects of physical and sexual abuse.

It is important to provide for the reality that what is 'age appropriate' varies between children, and it is parents, not teachers or schools, who are best able to judge what is most appropriate for individual children.

While we welcome many of the terms used in the guidance, a common understanding of terms such as 'positive relationships', 'friendships', 'family relationships' and 'relationships with other peers and adults' cannot be assumed. These may or may not be suitable topics for classroom discussion in a primary school *depending on the meaning attached to them*.

We have concerns that marriage is reduced to merely one 'type' of stable, caring relationship, when the research evidence on marriage (defined as an exclusive, permanent, monogamous union of one man and one woman) overwhelmingly demonstrates that it is far more stable than any other relationship structure and is associated with positive outcomes for parents and children alike (and indeed society). Research clearly demonstrates that it is the life-long commitment found in marriage, not cohabitation or civil partnerships that offers the most benefits to couples, children and society. Marriage is not equivalent to civil partnerships, which do not entail the same life-long commitment and responsibilities. We would like to see marriage given a special status on teaching.

We also have concerns about the danger in encouraging children to examine whether '*family relationships are making them feel unhappy or unsafe*' (p16). While we understand the reasoning behind this, for a minority of home situations, it may in fact serve to cause confusion and false perceptions in children in homes whether there is normal or reasonable parental discipline.

**11. 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?**

**Neither agree nor disagree**

CMF welcomes references in the guidance for the need for teaching on kindness, consideration, honesty and truthfulness in relationships, along with self-control and generosity.

However, we are concerned that children will be taught that every family relationship and structure is equally valid and must be celebrated. This risks not only undermining marriage and its distinctiveness (and the well-known evidence of the benefits it brings to families) but puts all relationships as the same, regardless of their level of commitment.

The guidance should distinguish between the need to *respect* others and their relationships, while not forcing, or subtly coercing, children and their parents to agree that they are the same and should all be *celebrated*. This would sail close to ideological indoctrination as it is in opposition to the faith-based beliefs and sensitivities of many people regarding family relationships.

It would seem appropriate that schools also cover the positive nature of relationships with parents, siblings, extended families.

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

**Strongly disagree**

There is no requirement cited here to teach on marriage and its importance for family life, despite this being required under section 403 of the Education Act 1966.

However, the acknowledgment that: '*Sex education is not compulsory in primary schools*' is very welcome, as is the guidance that primary schools who decide to teach aspects of sex education must consult with parents and allow parents the right to withdraw their children.

It would be helpful if parents were consulted on *what* is covered in sex education, and *how* it is to be covered and *who* is to deliver it. In particular, parents should be informed whether school staff or an external organisation will provide this and what they will cover.

Parents must always be given an opportunity to view the materials used.

## **Relationships and Sex Education (RSE)**

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

**Disagree**

As noted in our response to Q10, it is important to provide for the fact that what is 'age appropriate' will vary between children, so it is essential that parents, not teachers or schools, are able to judge what is most appropriate for individual children. For some younger children, teaching on LGBT and transgender issues will not be age appropriate, and may also not be appropriate for the child's

family values. Such teaching should not be forced on all children and all children should not be assumed as having similar values **and background**.

**14. 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?**

### **Disagree**

Sex education policy has been, and still is, largely driven by concerns about teenage pregnancy and STIs and, more recently, the importance of the adequacy of 'consent'. Advice given on SRE by leading campaigners is generally devoid of references to morality, marriage or family life. It talks about sex as a normal and pleasurable fact of life for youngsters and, apart from stressing the importance of contraception and consent, it has nothing to say about the moral context in which sex is to be enjoyed.

A comment by a school nurse illustrates this well: *'I don't consider I've failed if a girl gets pregnant as long as she's got pregnant because she knew where advice was and chose not to access it'*.

<http://eprints.mdx.ac.uk/17336/1/OMarkThesis.pdf>

If teaching on 'health protection' is around safer sex, not abstinence, then not only are we reducing negative sexual outcomes to teenage pregnancy and STIs but, importantly, the underlying *values* of such education are revealed: the presumption of sexual experimentation by children.

There is always a moral dimension where human relationships are concerned. Youngsters need to be taught how to critically evaluate the moral messages that are currently presented to them (under the guise of being neutral and 'value-free') and not to reduce morality to consent. We need to move beyond immediate health outcomes towards a more holistic understanding of young people's relational and emotional wellbeing.

Rather than merely warn against the narrowly defined dangers of unplanned pregnancy and STIs, or the importance of consent (which of course are important warnings) we should be confident about presenting a more positive moral message about the significance of sexual relationships and the goodness of healthy sexual intimacy in the context of life-long fidelity. There is no reason not to: the SRE Guidance 2000 by the DfE said that young people often complain that there is a *'lack of any meaningful discussion about feelings, relationships and values'*.

Children's greatest need in RSE is not more autonomy, but support and guidance as they develop holistic sexual values and attitudes. We therefore welcome the draft guidance statement that young people should understand 'the reasons for delaying sexual activity'. But there is no guide until when? Or why? When is 'the appropriate time' to 'develop safe, fulfilling and healthy sexual relationships'? What does it mean to convey knowledge about safer sex and sexual health 'in a non-judgemental way'? Does this mean that nothing is to be considered off-limits and that there are no moral absolutes in the realm of sexual behaviour? Stating that this 'information' should be delivered in a 'non-judgemental way' implies that there are no consequences to underage sexual activity that children might need protecting from.

We would welcome clear guidance on teaching on sexual intimacy as an expression of love and self-giving, and on the positive reasons for saving sexual intimacy for marriage.

It seems to us that if a secular world view has a voice and influence in RSE, then there should be a presumption that a religious voice is *equally appropriate and rational* within policy reasoning and formulation. Both are world views held by a significant percentage of the population and should be represented in a pluralist and multi-faith society.

We also note that, as a minimum, if the 'starting principle' of 'the law' is to be followed through then pupils must be taught that the legal age of consent is 16 and they should not engage in sexual activity before that age.

On sexual health, the draft guidance states that pupils should be taught how the risk of STIs 'can be reduced through safer sex (including through condom use) and the importance of and facts about testing'. However, there is no mention of the fact that the surest way of avoiding STIs is to confine sexual intimacy to a lifelong, mutually faithful relationship with an uninfected partner.

As stated in earlier concerns, this guidance tends towards undermining the special status of marriage and its long-term commitment and benefits to children and society.

The draft guidance also states that while LGBT themes '*should be integrated appropriately into the RSE programme*', faith and other perspectives on sexual orientation may be better explored '*in other subjects such as Religious Education*'. Yet this suggests that LGBT interests should take precedence over religious and philosophical concerns, which we strongly dispute. Both 'sexual orientation' and 'religion or belief' are protected characteristics under the Equality Act 2010. One should not be given preference over another.

**15. 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?**

**Strongly disagree**

The statutory right of parents to withdraw their children from secondary school sex education must not be changed to a '*right to request that their child be withdrawn*'. This change would significantly undermine parents. Education law states that pupils should be educated in accordance with the wishes of their parents and that due respect should be paid to parents' religious and philosophical convictions.

The current right to withdrawal is rarely used so will not impact most children, but for some, this right is highly important. Moreover, the fact that the right is there can serve to discourage schools from radical approaches to sex education. It serves as a useful deterrent and a prompt for schools to ensure parents are aware of the teaching. It does not need to be removed.

Importantly, head teachers should not have the power to overrule parents as primary educators of their children.

## **Engaging with parents and the wider community**

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

**Disagree**

We welcome the recognition that parents have a vital role in the development of their children's understanding about relationships and that parents are the most significant influence in their children's growth and maturity.

We also welcome the proposal that all schools should work closely with parents when planning and delivering Relationships Education and RSE.

However, this vital and central role of parents would be undermined if the parental right of withdrawal from sex education (see Question 15 above) is taken away.

Therefore, we ask that the present automatic right of withdrawal is retained, with no 'exceptional circumstances' (a term which is undefined) in which the wishes of parents may be overridden. Parents should retain the right to withdraw their children from RSE lessons for as long as they bear the legal responsibility for their children's education.

## Delivery and teaching strategies

**21. 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?**

**Neither agree nor disagree**

If schools are to engage in meaningful consultation with parents, it is vital that curriculum content is not tightly prescribed. Schools must be left free to respond to parental concerns and sensitivities (including faith-based sensitivities) without being constrained by detailed curriculum requirements.

Faith schools must be free to teach according to the main tenets of their faith. All members of the school community (staff, pupils, parents, and governors) who hold to a faith position, whether in a faith school or not, must have the freedom to express their views without fear of discrimination, coercion or disciplinary action.

## Statutory Guidance

**24. 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?**

We welcome the statement that faith-based sensitivities must be taken into account and that schools with a religious character will be able to teach about relationships from their perspective.

## Draft Regulations

**28. Do you agree that the draft regulations clearly set out the requirements on schools to teach the new subjects of Relationships Education, RSE and Health Education?**

**Disagree**

As noted earlier, we oppose the removal of the right of withdrawal by parents of their children from sex education at secondary school (section 4(3), 12 (2) and 13 (25a)).

**28. We are required to set out in the regulations the circumstances in which a pupil (or a pupil below a specified age) is to be excused from receiving RSE or specified elements of it. The draft regulations provide that parents have a right to request that their child be withdrawn from sex education in RSE and that this request should be granted unless, or to the extent that the head teacher considers that it should not be.**

**Taking into account the advice to schools on how head teachers should take this decision, in paragraphs 41-46 of the guidance, do you agree that this is an appropriate and workable option?**

**Strongly disagree**

As noted above, parents must retain the final say in deciding how and when children encounter complex adult relationships and head teachers should not be able to overrule parental decisions. There will be a range of interpretations of 'exceptional' and any genuine concerns about the welfare of a child can be dealt with under existing safeguarding procedures.

There is no clear distinction between relationships education and sex education within the overall subject of RSE. If the subjects are integrated, it will not always be clear exactly what topics parents can request the withdrawal of their children from.

**29. Do you have any other views on the draft regulations that you would like to share with the department? Please include this information in the text box below.**

Sex education policy has been, and still is, largely driven by concerns about teenage pregnancy and STIs and, more recently, the importance of the adequacy of 'consent'. Advice given on SRE by leading campaigners is devoid of references to morality, marriage or family life. It talks about sex as a normal and pleasurable fact of life for youngsters and, apart from stressing the importance of contraception and consent, it has nothing to say about the moral context in which sex is to be enjoyed. It is simply assumed that sexual activity is a normal and inevitable stage in the development of children and young people. Consequently, genuine abstinence promotion is viewed as an obstacle rather than an option in the promotion of 'safe' sexual behaviours. *Choice* becomes the prime value, irrespective of what the choice actually *is*.

A comment by a school nurse illustrates this well: *'I don't consider I've failed if a girl gets pregnant as long as she's got pregnant because she knew where advice was and chose not to access it'*.

(<https://cmfblog.org.uk/2018/08/30/sex-education-and-the-myth-of-neutrality/> )

If teaching on 'health protection' is around safer sex, not abstinence, then not only do we reduce negative sexual outcomes to teenage pregnancy and STIs but, importantly, the underlying *values* of such education are revealed: the presumption of sexual experimentation by children.

There is always a moral dimension where human relationships are concerned. When sex education programmes presuppose that there is no apparent right or wrong in teenage sexual activity (just freedom of choice) they do not provide a robust and coherent moral framework for the guidance of young people. As such, they cannot be said to be in the best interests of youngsters, who are left rudderless. They give young people little to aspire to and nothing to validate their intuitive sense that sex is best kept for committed relationships.

*Christian Smith observes that: 'Emerging adults can jump into intimate relationships, assuming that sex is just another consumer item, recreational thrill, or lifestyle commodity. But many of them soon discover the hard way that sex is much more profound and precious than that. But then it is too late.'*

*They feel they have lost a part of themselves that they cannot recover.'*  
(<https://cmfblog.org.uk/2018/08/30/sex-education-and-the-myth-of-neutrality/> )

Youngsters need to be taught how to critically evaluate the moral messages that are currently presented to them (under the guise of being neutral and 'value-free') and not to reduce morality to consent. Secular values are not neutral. The lack of a belief in God does not imply an impartial understanding of the world and morality. One's assumptions about God, humanity, ethics and truth must come from somewhere. Being able to discuss how different worldviews shape SRE would help young people to make truly informed choices about their health and wellbeing. We need to move beyond immediate health outcomes towards a more holistic understanding of young people's relational and emotional wellbeing.

So rather than merely warn against the narrowly defined dangers of unplanned pregnancy and STIs, or the importance of consent (which of course are important warnings) we should be confident about presenting a more positive moral message about the significance of sexual relationships and the goodness of healthy sexual intimacy in the context of life-long fidelity. There is no reason not to: the SRE Guidance 2000 by the DfEE said that young people often complain that there is a *'lack of any meaningful discussion about feelings, relationships and values'*.

[http://webarchive.nationalarchives.gov.uk/20130403224457/https://www.education.gov.uk/publications/eOrderingDownload/DfES-0116-2000\\_SRE.pdf](http://webarchive.nationalarchives.gov.uk/20130403224457/https://www.education.gov.uk/publications/eOrderingDownload/DfES-0116-2000_SRE.pdf)

Children's greatest need in RSE is not more autonomy, but support and guidance as they develop holistic sexual values and attitudes.

There is no reason why a faith-based world view should be treated as *any less appropriate* than a secular, humanist or other world view, particularly as the virtues of Christian love and chastity are dispositions which could really enrich the moral discourse of RSE.