

Response ID ANON-Q2TN-BNSD-C

Submitted to Guidance for Schools and Colleges: Gender Questioning Children
Submitted on 2024-02-20 12:22:36

Rationale and guiding principles

About you

1 Are you responding to this consultation as an:

Organisation, for example, a charity, school/college or think tank

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):

N/A

Please specify :

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

Other, please specify

Please specify:

I am responding on behalf of the Christian Medical Fellowship, an association of Christian doctors, nurses, midwives and medical students.

5 Are you responding to the consultation with an interest in:

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 : Age

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

Not Answered

8 What is your sex?

Male

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

Yes

10 Where are you based?

England

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

Structure and overall guidance

11 Do you think the structure of the guidance is easy to follow?

Yes

12 If you answered no, how could the structure of the guidance change to make it easier to follow?

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

13 Does this guidance provide practical advice to support schools and colleges to meet their duties effectively?

Yes

14 If you answered no, how could we improve deliverability placed on schools and colleges whilst still providing for schools to meet their duties?

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

Responding to Requests and Engaging parents

15 Does this section provide enough detail to help schools and colleges support children?

Yes

16 If you answered no, in which of the following areas do schools and colleges need further guidance to support a child? [tick all that apply]

How schools and colleges should involve parents in decisions

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 grateful to the DfE for underlining the importance of parental involvement in decisions about their children.

However, the guidance includes the statement that teachers do not have an automatic duty to inform parents if their child is asking questions at school about their gender. We suggest that the statement needs qualifying to the effect that schools must inform parents in all but the rarest of circumstances where there are known safeguarding grounds.

As healthcare professionals, we are only too aware of how complex cases of gender questioning and confusion can be. The interim Cass report has drawn attention to inadequate assessment procedures and 'fast-tracking' referrals to Gender Identity Development Services. We suggest that schools should not be permitted to make such referrals and request that this be added to the guidance in the clearest of terms.

Schools should not be teaching as facts contested views such as that it is possible to be a girl in a boy's body (or vice versa). It is our conviction that the best long-term outcome for children who are questioning their gender is for them to be reconciled to, and 'at home' in, their biological sex bodies.

Our concern is that this guidance lacks statutory force and schools may choose to ignore it. We are already hearing of schools, that have chosen to pursue the 'affirmation' approach promoted by Stonewall, advising their staff to 'set aside' the guidance.

Can you please confirm that compliance with the guidance will be assessed as part of school OFSTED inspections, and that wilful disregard of the guidance will result in downgrading?

17 Think about the points outlined for schools and colleges to consider on pages 9-11 regarding making decisions about how to respond to requests for social transition. Are these points helpful?

Yes

18 If you answered no, what considerations would be more helpful for schools and colleges to consider? For example, when assessing whether to support a child wishing to socially transition, do you think different weight should be given to the views of parents, the age of the child, the long- and short-term impacts on the child, the impact on other children, and any relevant clinical or medical advice?

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 guidance, in our view, is a great improvement on the current confusing situation. Thank you.

We do feel that the guidance could have gone further still, and will comment further in answer to later questions.

Registration of Name and Sex

19 Does this section on page 12 provide enough detail for schools and colleges to ensure each child is recorded correctly and according to the Education Act 1996, Pupil Registration (England) Regulations 2006, GDPR and the Data Protection Act?

Yes

20 If you answered no, what further information should be included to help schools and colleges?

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

Changing Names

21 Does this section on page 12 provide enough detail for schools and colleges to respond to a child's requests to change their name?

Don't know

22 If you answered no, in which of the following areas do schools and colleges need further guidance to respond to a child's requests to change their name? [tick all that apply]

How schools and colleges should make a decision about a child's request to change their name, When schools and colleges might refuse a request in relation to a child changing their name

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

In our view, the guidance needs to go further and be unequivocal.

The interim Cass report makes clear that changing names and/or pronouns are not neutral steps - they affirm the child in the process and direction of transitioning. It makes it more likely that the child will disdain their own body and strengthen the wish to receive puberty blockade, long-term transsex hormone therapy, and, in time, possible surgical reconstruction. The apparently trivial step of changing names starts them on a journey that is anything but trivial.

It also confuses other children to hear a teacher applying names to their classmates that conflict with biological realities. It undermines the credibility of that teacher in their eyes.

We strongly advise that the guidance makes it categorically clear that no school or teacher may change the name of any child, whether in primary or secondary education.

Pronouns

23 Does this section on page 13 provide enough detail for schools and colleges to respond to a child's requests to change their pronouns?

Yes

24 If you answered no, in which of the following areas do schools and colleges need further guidance to respond to a child's requests to change their pronouns? [tick all that apply]

When schools and colleges should refuse a request in relation to a child changing their pronouns

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

Using pronouns that are congruent with biological sex rings true in the ears of children. Changing pronouns attempts to make real what is manifestly untrue. It is a deception that undermines confidence in the schools and teachers that employ them. Trust is at the heart of the relationship between the child and the teacher; if the teacher is speaking untruthfully, that trust is eroded for all children in the class.

As stated above, in answer to Q.22, the Cass report makes clear that changing pronouns is not a neutral step - it promotes in the child concerned a rejection of their bodily sex, and lends weight to their trajectory towards transitioning. Instead of helping them to align their mind with biological realities, it encourages them to think that it is their body that is 'wrong' and should be changed. It is known that at least 80% of gender-questioning children will go on to identify with their natal sex by the end of puberty if a policy of watchful waiting is adopted. Early affirmation, through changing names and pronouns, will make it more likely that a child will progress to puberty-blocking agents and then trans-sex hormones, with unknown and possibly harmful results. In our view, if a boy believes he is a girl (or vice versa), then the problem lies in his mind, not his body. The aim of treatment should be to align his thinking with his body.

We welcome the statement in the guidance that no teacher or pupil should be compelled to use 'preferred' pronouns.

Single-Sex Spaces - Toilets, Changing Rooms and Showers and Boarding and Residential Accommodation

25 Does this section on pages 14 and 15 provide enough detail for schools and colleges to respond when a child who is questioning their gender makes a request to use facilities (e.g. toilets, changing rooms, showers and boarding and residential accommodation) designated for the opposite sex?

Yes

26 If you answered no, in which of the following areas do schools and colleges need further guidance? [tick all that apply]

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

27 Think about the circumstances provided in the guidance on pages 14 and 15, outlining the option for schools and colleges to find alternative facilities. Does the guidance provide enough support to help schools and colleges determine how to offer alternative facilities?

Yes

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

28 Does this section provide enough detail for schools and colleges to support children who do not wish to use accommodation that is designated for their sex in relation to boarding and overnight accommodation?

Yes

29 If you answered no, in which of the following areas do schools and colleges need further guidance? [tick all that apply]

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

Uniform

30 Does this section on page 16 provide enough detail for schools and colleges to respond to a gender-questioning child who makes a request in relation to uniform?

Yes

31 If you answered no, in which of the following areas do schools and colleges need further guidance to respond to a gender-questioning child, who makes a request in relation to uniform? [tick all that apply]

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

Physical Education and Sport

32 Does this section on page 17 provide enough information on what to do if a gender questioning child asks to participate in a certain sport or activity with the opposite sex?

Yes

33 If you answered no, in which of the following areas do schools and colleges need further guidance to support children taking part in PE or sport? [tick all that apply]

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

34 Think about the circumstances provided in the guidance on page 17, outlining the need for fairness and safety in PE or sport. Does the guidance provide enough support to help schools and colleges determine what is fair and safe?

Yes

35 If you answered no, what further support should be included to help schools and colleges determine what is fair and safe in PE or sport?

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

Single-sex schools

36 Does the guidance on the application of the Equality Act to admissions to single sex schools on page 18 provide enough information to support single sex schools in making decisions about the admission of children who are questioning their gender?

Don't know

37 If you answered no, in which of the following areas do schools and colleges need further guidance to support effective decisions on the admission of children who are questioning their gender [tick all that apply]

Something else

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 admissions to single-sex schools should be based on biological sex. Data relating to self-identified gender should not be collected as part of the admissions process. Where single-sex schools for girls admit a small number of boys, then the criteria for admission must be fair and transparent. In our view, it would not be acceptable for an oversubscribed single-sex school to admit opposite-sex applicants. Nor should it be possible for a boy who identifies as a girl to gain access covertly to an all-girls school.

38 To individuals responding who work in, or represent single-sex schools:Has your single-sex school previously had to make a decision on the admission to your school of a child of the opposite sex (regardless of whether or not the school admitted the child)?

Not Answered

39 If yes, was that child questioning their gender?

Not Answered

Please do not add any details which may easily identify you or your organisation.:

Public Sector Equality Duty [PSED]

40 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 give reasons for your answer and try to limit your response to under 250 words:

Sincerely held beliefs, religious or not, and gender reassignment are both protected characteristics under the 2010 Equality Act. Schools should aim to foster understanding, respect, and healthy relations between those on different sides. There can be no place for mockery, bullying, or abuse of any kind. Overzealous trans activism and religious bigotry, alike, are unhelpful.

Brief periods of gender questioning in early childhood can amount to no more than normal inquisitiveness. Persistent gender dysphoria is, thankfully, uncommon though distressing. In our view, it is best understood as a form of disability - a distortion of the normal process of growing identity awareness. This is far from cause for celebration. We suggest that for schools to participate in Pride activities, making rainbow-coloured flags, etc, is to miscast 'gender diversity' as cause for celebration, and to coerce children into low-level activism in support of an ideology that is as perverse in its effects as it is unfounded in its convictions.

General

41 Do you have any comments on the overall approach of the guidance?

Yes

If yes, please detail below and try to limit your response to under 250 words.:

We broadly welcome the tone, content, and overall approach of the guidance. Thank you.

42 Do you have any further comments you would like to share on the draft of the guidance that have not been captured above?

Yes

If yes, please detail below and try to limit your response to under 250 words.:

Our main concern is that it lacks statutory force. Schools and colleges that have taken on board advice from organisations like Stonewall and Mermaids are already encouraging staff members to ignore the new guidance and persist with their 'affirming' model.

Hopefully, school Ofsted inspections will include scrutiny of the degree to which the guidance has been implemented, but it may require a successful legal challenge against a school or local authority where the guidance is being ignored to create a legal precedent that would lend force to the guidance.