

Response ID ANON-GJT3-QA2U-H

Submitted to Review of the RSHE statutory guidance
Submitted on 2024-06-20 11:53:18

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):

N/A

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:

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

Review Timetable

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

No

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. :

We welcome the proposed changes to guidance that, if followed, would give parents greater knowledge and involvement in what their children are being taught at different stages of their education. We are also pleased that the guidance when published will be statutory.

However, we are also aware of the embedded nature of the 'affirmatory' response in some schools, based on the ideological stance taken by organisations like Stonewall and Mermaids, some of which, we understand, have been telling staff to ignore the recent, non-statutory guidance.

We ask what measures will be in place to ensure compliance with the statutory guidance, when published? Will such compliance be assessed as part of Ofsted inspections, for example, and will disregard of the guidance result in downgrading?

Openness with parents

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

Yes

16 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 welcome the acknowledgment that parents are "the first educators of their children, and schools should make sure parents are aware of what is being taught in RSHE." Similarly, we were pleased that the Education Secretary, Gillian Keagan, writing in 'the Sun.' referred to the Cass Report as having 'hammered home that progressive ideology must never be allowed to take precedence over the need to protect children from things that they are too young to understand. That is why the guidance we are publishing today will leave no room for doubt, making totally clear that teachers should not teach about the contested issue of gender identity. Teachers are there to teach children facts, not to push the agendas of campaign groups."

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. :

We understand the need for flexibility that permits schools to teach age-limited topics earlier, in response to local circumstances where the SLT agrees it is necessary for safeguarding purposes.

Overall, our concern is that sex education generally is 'accelerated' and children exposed to realities that they are ill-equipped to handle, emotionally. An exaggerated concern over safeguarding can provoke an over-readiness to introduce emotionally immature children to adult concepts that they are unable to process. The whole area (of sex) becomes associated in a child's mind with something dirty and forbidden, or, worse, with something to fear, such as abuse and violence. Ideally, a child should first learn about sex from their parents, as an expression of their love and loyalty for each other, and taught in school in a similarly positive way.

Yes, there are some ugly things in the world that children will have to learn about, but not before they have grasped hold of the much better story!

In general, we would like to see all the age-limits increased by one year. In particular, we believe that year 9 is too early to discuss 'explicit details of violent abuse, including the detail of topics such as rape, sexual assault, female genital mutilation (FGM), virginity testing and hymenoplasty.'

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. :

Under section 41 in the consultation document, it is assumed that same sex relationships are stable and healthy. In reality, statistics indicate that opposite sex relationships are both more stable and are also the environment where children are most likely to flourish. Of course, there are stable same

sex partnerships and children in such arrangements who do flourish, but we contend that if pupils are to be 'taught the facts and the law about sex, sexual orientation and sexual health,' as per Section 42, then they should be given the full facts, based on credible evidence and not cherry-picked to support an underlying bias.

Gender reassignment

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

Yes

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. :

We welcome the changes that have followed the publication of the Cass Report.

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. :

Awareness is good; anxiety isn't. It is clearly helpful to raise awareness and discuss concerns, and to this extent we welcome the proposed 'extensions.' Our concern is that the guidance could also raise the levels of anxiety and confusion in young people of both sexes at a time in their lives when so much is changing.

Wise teachers in this area will be at a premium.

Primary sex education

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

Yes

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. :

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?

Yes

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?

Yes

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?

Yes

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?

Yes

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?

Yes

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?

Yes

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 that, as a general principle, children should be taught what normal, respectful and mutually caring friendships and relationships look like, before advising them of the risks of distorted, harmful ones.

The age limits referred to above, in paras 28-36 are all expressed in terms of 'not before.' In general, we think these limits are set too low and would like them all raised by one year. This is particularly the case in sections, 29, 31, and 34-36 where violent, distorted and disturbing material would be covered. In our opinion, children aged 13/14 years, in Year 9, do not reliably have the emotional maturity to cope with such material and would find it distressing. As stated above, it is important to raise awareness and discourage foolishness in a timely manner, but we are concerned that fears and revulsion could be triggered by 'too-soon' an exposure to more disturbing material.

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?

Yes

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.

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

Again, we agree that such topics should not be taught before year 9, but consider it would be better they not be taught before year 10.

We note, under point 5 of the section on intimate relationships in the consultation document, that comprehensive teaching about contraception should be given. In our experience, this is generally taught in a 'value-free' manner, the emphasis being on reliability and ease of use. It is not generally made

clear that any hormone contraception can act not by preventing ovulation but by preventing implantation of the early embryo. This is of course more likely with some preparations than others, but it should be made clear that for those couples who wish to be absolutely certain that their contraception will not act post-fertilisation, hormone preparations will be an unacceptable choice.

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?

Yes

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?

Yes

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?

Yes

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?

Yes

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. :

In Section 41, we suggest the age-limit be increased to 'not before year 4.'

Health and wellbeing

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

Yes

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. :

Suicide prevention

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

Yes

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. :

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. :

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.: