

# Draft relationships and sexuality education guidance 2018

## Consultation response form

Organisation (if applicable): FPA

This response has been endorsed by the Faculty of  
Sexual and Reproductive Healthcare

Responses should be returned by 1<sup>st</sup> 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](mailto:RSEGuidance@gov.wales)

**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?

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

Context

The Welsh Government has announced a new RSE curriculum from 2022. The updated guidance should clarify what the status of the new guidance is in the context of the curriculum overhaul, including when the updated guidance will be revised in line with changes to the law.

Evidence base

[Research](#) shows young people who learn about sex and relationships mainly at school are less likely to report poor sexual health outcomes. School RSE also increases the likelihood of people choosing to have sex for the first time at comparatively later ages, reduces the likelihood of experiencing a sexually transmitted infection (STI), reduces the likelihood of young people engaging in unsafe sex or reporting distress about sex and reduces the number of unplanned pregnancies. Evidence also shows that the skills developed within RSE lead to [improved academic attainment](#).

Young people have a right to high quality and comprehensive relationships and sex education which promotes good sexual health and equal and enjoyable relationships. Despite this RSE often faces opposition. Understanding the benefits of RSE can help reduce anxiety about RSE and as such the benefits of RSE should be made clear in the introduction.

Legal requirements

Whilst the introduction outlines some of the legal requirements of schools in relation to RSE, the structure of the guidance is confusing. Later sections on “Sex Education Policy” and the “Rights to Withdraw” relate to the law, and as such should sit under legal obligations (in the introduction) rather than under working with external providers.

**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?

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

Whilst, an example of a “Whole School Approach” is included within the section relating to a holistic curriculum, a practical example of what a whole school approach is, in the context of relationships and sexuality should be cited within the opening section on “Whole School Approach” (page 3).

On page 12, the guidance states that a whole school approach ensures that wider school policies reinforce positive messages about relationships and sexuality, this section should include a reference to equality and diversity policies.

In addition, the inclusion of link to guidance on school uniform policies should be explained.

**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)**

Whilst the supporting documents are useful, there are some changes we recommend.

Annex B

It would be useful to include some information about the confidentiality requirements of the professionals that that may come into contact with the young people via the school or college. For example, would young people expect greater confidentiality talking to the school nurse or to a teacher if they were having consenting, abusive sexual activity if they are 15. Young people should be informed if their confidentiality cannot be kept and which professionals work within the Fraser Guidelines, which should be included in this annex or given a separate annex.

Annex C

A resource which provides information regarding the full range of contraceptive choices, reproductive health, sexual wellbeing and pregnancy choices is missing within Appendix C.

Sexwise, a digital resource, delivered by FPA, provides up to date information on all aspects of sexual and reproductive health, including contraception, STIs, unplanned pregnancy, sexual wellbeing and where to get help for all aspects of sexual health.

Online safety – include [thinkuknow.co.uk](http://thinkuknow.co.uk) the CEOPs site

Annex C should also include the [FSRH RCOG abortion care factsheet](#), which supports RSE lessons. The abortion care factsheet is a free resource for professionals in secondary schools to use in relationships and sex education (RSE) lessons. It aims to ensure that professionals involved in educating young people have a factually accurate, unbiased and evidence-based source of information about abortion in the UK.

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

Yes

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

Introduction

See response to Q1.

Curriculum design

Whilst the guidance takes a holistic approach, it lacks clarity in terms of what should be taught and how it should be delivered. There is, for example, no mention at all of identifying body parts, abortion or contraception, and only one mention of each of FGM and pornography.

[SRE for the 21st century](#) emphasises the importance of accurate education on abortion and contraception in schools and RSE should focus on such issues within a broad educational framework that can be integrated into a wider system of care. Medically accurate information about sex and reproduction is essential.

At present experienced teachers will be required to look elsewhere for guidance whilst teachers who lack experience and training may miss the teaching of vital subjects.

As with the previous 2010 guidance, we recommend that the guidance outlines the subjects which should be taught in line with the current curriculum.

We acknowledge that the new guidance points to UNESCO international technical guidance for sexuality education and references it within the section on curriculum design. Whilst this guidance is comprehensive, statements such as “schools may wish to draw upon the technical guidance” are vague and should be strengthened.

Furthermore, to provide clarity to teachers, the guidance should specifically outline the subjects to be taught, The table on page 36 of the [technical guidance](#) would be a useful addition to the guidance.

**We strongly recommend that the guidance outlines what students are expected to know and by when.**

**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?

We welcome the positive approach that the guidance take to human sexuality.

Curriculum

See response to question 5.

[SRE for the 21st century](#) and DofE guidance emphasises the importance of accurate education on abortion and contraception in schools. Education with a focus on such areas will assist in reducing unplanned pregnancies and contribute to positive public health outcomes.

### Confidentiality

While section 2.21 of the previous guidance had a section on confidentiality, this important information is missing from the new guidance.

### Adverse childhood experiences (ACES)

The guidance should acknowledge the impact of [ACES](#) and provide guidance on how schools can tailor content to meet the needs of young people.

### Online relationships

Whilst family relationships, friendships, professional relationships and sexual relationships are cited on page 1, online relationships are missing. The importance of online relationships to many people, particularly young people, should not be underestimated. Brook's Digital Romance report, for example, found that 38% of the young people surveyed had been in relationships with people they had first met online, a figure that was even higher for LGBT+ young people.

### Working with external providers

Many external providers provide excellent resources and support to provide relationships and sex educations.

However, there are [examples](#) of schools working with groups who provide incorrect misinformation in a manner which stigmatises and excludes.

Research by [Education for Choice](#) (2013) shows that many organisations ideologically opposed to safe sex before marriage, abortion and homosexuality are invited to deliver RSE. In the process, they disseminate inaccurate information.

The guidance should emphasise the requirement of schools to only work with external providers that deliver medially accurate and evidence based, non-judgemental and inclusive information and resources. FSRH and RCOG have prepared a resource to support the teaching of abortion available [here](#).

FPA's [Project Jiwsj](#), which delivers SRE to vulnerable young people throughout North Wales, both in community and education settings, is an example of good practice.

**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?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input checked="" type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
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**Supporting comments (no more than 250 words)**

This section appears to be absent. The comments below refer to the approach to engaging with parents/carers and the community throughout the document.

Parents play a crucial role in the development of their children's understanding of sex and relationships and we agree that schools should work closely with parents when planning and delivering these lessons. Significantly, research shows that parents also want schools to address issues such as contraception. Evidence also shows that the familiarisation of parents with materials has the potential to enhance RSE, by improving coherence between educators' and parents' messages to children about sex and relation.

Having said this, parents' individual values should not influence the content of RSE lessons.

All children and young people have the right to high quality, comprehensive relationship and sex education, which promotes good sexual health and equal and enjoyable relationship.

RSE provides young people the skills and information they need to have safe relationships and is vital to young people's wellbeing. Evidence from a [2015 study](#), for example, shows that young people who learn about relationships and sex education mainly at school were less likely to have experienced non-volitional sex or distress about sex.

Given this, we do not believe that parents should be able to withdraw their children from this important part of their education. We strongly recommend that the Welsh Government strengthen the language surrounding a parents right to withdraw their child and encourages schools to work with parents to reiterate the benefits of RSE and ensure as few children as possible miss out on their education.

Within the draft guidance the right to withdraw the learner from RSE remains until the learner attains the age of 19. This right is at odds with the legal age of consent and the fact that a young person could legally be sexually active but not have the right to access RSE to help them access age appropriate information. This will also be at odds with the new guidance for England which will enable the learner themselves to choose to access RSE from three terms before they are 16.

**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 briefly touches on engaging with learners (page 8) but does not offer advice or guidance on how best to do this. We recommend that information on the Wales [Children and Young People's Participation Standards](#) be included in the guidance.

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

Specific details on what should be taught and when should be added to the guidance.

In addition to this, the guidance should signpost to medically accurate and evidence based resources. Alongside this response we have submitted a list of evidenced based resources, compiled by FPA to facilitate effective teaching.

No list of teaching resources can be exhaustive or be future proof as such high quality training is necessary to give teachers the skills they need to utilise and adapt available resources. Training should build the confidence of teachers and give them skills to know what to teach and how to deliver it, as well as how to fit this into a whole school approach. Teacher competence must also be coupled with both dedicated and designated time in the curriculum.

As well as continuing professional training, RSE components should be part of initial teacher training.

The Welsh Government should make a commitment to for teacher training which should be supported by a funding package.

**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?

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

The guidance lacks clarity and specificity to enable non-specialists to effectively deliver the guidance.

**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**

The updated guidance provides opportunities to use Welsh in the context of health and emotional wellbeing, it also provides opportunities to expand information on sexual and reproductive health services in Welsh.

Having said this, at present there is a paucity of high quality resources, which are available in Welsh.

**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**

To ensure positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, the Welsh Government should make funding available for the translation of high quality resources, such as those produced by FPA.

**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.

About FPA

FPA is one of the UK’s leading sexual health charities. Our mission is to champion people’s right to sexual and reproductive health and wellbeing.

We provide inclusive and evidence based information, education and training on relationships and sex education, contraception, pregnancy choices, sexually transmitted infections and sexual wellbeing to the public and professionals.

For more information about FPA’s work, please visit [www.fpa.org.uk](http://www.fpa.org.uk).

Tone

We welcome the holistic, rights based and positive approach to RSE that the guidance adopts. Whilst we welcome flexibility, we are concerned that some of the language within the guidance, which, for example states that “schools may wish to” rather than “schools should” will allow some schools to avoid teaching certain subjects. To encourage equity in opportunity to learn, we recommend that the Welsh Government strengthens language surrounding the teaching of RSE.

Developmentally appropriate V timely education

We welcome the acknowledgment that issues should be taught before the onset of physical changes, however we believe emphasis should be given to timely information. Information is rarely given too early and pupils rarely report knowing too much. Rather, the opposite is normally true, [2016 survey](#) conducted by the Sex Education Forum, which found a quarter of girls started their periods before it was covered at school is illustrative of this.

Provision of sanitary products

We welcome the commitment to provide sanitary products, the guidance should clarify that products should be provided free of charge in primary and secondary schools.

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:

