

Relationships and sexuality education (RSE) statutory guidance and code

Consultation response form

Your name: Lorna Kelly

Organisation (if applicable): The Faculty of Sexual and
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Your address:

Responses should be returned by **16 July 2021** to:

Curriculum and Assessment Division
The Education Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to:

e-mail: curriculumforwales@gov.wales

Respondent type (please select one from the following)

Child or young person	<input type="checkbox"/>	Employer/business representative	<input type="checkbox"/>
Parent/carer	<input type="checkbox"/>	Professional body/interest group	<input checked="" type="checkbox"/>
Schools governor or member of school management committee	<input type="checkbox"/>	Voluntary sector (community group, volunteer, self-help group, social or co-operative enterprise, religious, not for profit organisation)	<input type="checkbox"/>
Mainstream school practitioner (head, teacher, teaching assistant, etc.)	<input type="checkbox"/>	Regional consortium	<input type="checkbox"/>
EOTAS provider (PRU staff, independent school staff, other provider, etc.)	<input type="checkbox"/>	Local authority	<input type="checkbox"/>
Higher education (including universities/academic institutions)	<input type="checkbox"/>	Further education	<input type="checkbox"/>
Politician (Senedd member, county councillors, MP, etc.)	<input type="checkbox"/>	Other respondent group not listed above, please specify:	<input type="checkbox"/>
Lobbyist	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>

Question 1 – Do you agree that the explanation of the definition of RSE is clear?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Please explain your answer:

The language used in the definition lacks clarity.

We suggest using the definition given by the Sex Education Forum, which defines RSE as: *“learning about the emotional, social and physical aspects of growing up, relationships, sex, human sexuality and sexual and reproductive 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 and reproductive health and well-being”.*

[Research](#) shows young people who learn about sex and relationships mainly at school are less likely to report poor sexual and reproductive 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, factual and comprehensive relationships and sex education which promotes good sexual and reproductive 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.

Question 2 – Do you agree that the principles for embedding RSE are clear?

Strongly disagree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input checked="" type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Please explain your answer:

Yes

Question 3 – Do you agree that the structure and content of the guidance clear?

Strongly disagree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Please explain your answer:

The content lacks clarity in areas and we would recommend using simpler clearer language throughout to make the document more concise and less open to interpretation.

The guidance lacks clear references to resources like the factual, evidence-based Abortion Factsheet that we have published together with the Royal College of Obstetricians and Gynaecologists (RCOG) to support schools to deliver accurate RSE lessons in secondary schools. Updated in 2021, this free [resource](#) has been endorsed by Public Health England and renowned organisations in this area such as the PSHE Association and Sex Education Forum (SEF). In an area of education that is prone to being affected by myths and false information, this resource provides accurate information and objective facts about abortion care, informing students about what an abortion is, how it is performed and what the entitlements are within the context of abortion care.

We are calling upon the Welsh Government to include the Abortion Factsheet within the Relationship and sexuality education (RSE) statutory guidance and code as a factually accurate resource for educators to use as part of their RSE lessons. We also recommend identifying other factually accurate resources from trusted organisations in the field which cover teaching on all pregnancy options including contraception and where/ how to access these services.

Additionally, we have had sight of Brook's response to this consultation, and we support their recommendations on the content.

Question 4 – We propose that the content set out in the three broad stages of the guidance will become mandatory as part of the RSE code. Do you agree that they encompass what is important about RSE for all learners' ages and developmental stages?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Question 5 – Do you agree that the RSE code section of the guidance is clear and appropriate?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Question 6 – Do you agree that the mandatory elements of the guidance (the RSE code) are the right ones? Is anything missing that should be included?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Question 7 – Do you agree that the guidance offers relevant information to support practitioners when designing their school curriculum for RSE?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Please explain your answer:

We would like to provide a combined response to questions 4-7

There is a lot of good content in the code, but it is not sufficiently clear or accessible.

We recommend a complete revision/restructure of the three themes, which are confusing, ill-defined and include overlap/repetition. Apart from the gaps and the overlaps, the code does not effectively explain the architecture of a spiral/developmental/building blocks curriculum and the way in which topics are revisited with additional content/complexity.

Without this the success of teaching will depend on the competence of individual teachers to plan and deliver the curriculum. This will result in unequal quality of provision throughout schools and risk many children being delivered inadequate Relationships education, too late in their development.

In many subjects (particularly at secondary level) teachers are specialists and may reasonably be able to design a curriculum. However, we know that most teachers do not have in depth knowledge or understanding of RSE topics, of what high quality RSE would look like, or of how to develop a spiral curriculum which provides lessons that are developmentally appropriate, timely and relevant. This code does not provide teachers with sufficient information from which to develop their own curriculum. Schools should be strongly advised to choose their RSE resources from reputable sources i.e. only organisations which are evidence-based and medically accurate.

We are calling upon the Welsh Government to include the joint FSRH/ RCOG Abortion Factsheet within the Relationship and sexuality education (RSE) statutory guidance and code as a factually accurate resource for educators to use as part of their RSE lessons. We also recommend identifying other factually accurate resources from trusted organisations in

the field which cover teaching on all pregnancy options including contraception and where/how to access these services.

We believe that this code should be comprehensive and should capture key topics that are essential to a high quality RSE curriculum. Anything that is absent from the guidance and code or sits elsewhere in non-statutory guidance will be considered optional by schools. Some schools will take this as permission to ignore essential topics. Others that rightly choose to cover these issues because it is best practice to do so may feel exposed as they will not have the backing of a statutory document.

We are concerned about significant gaps in the code, which if reflected in a school curriculum would make it unfit for purpose. The key topics emphasised (in bold) should be included in the code even if the detail of what should be covered is addressed elsewhere.

- There is one reference to **STIs**, but there is no reference to STI prevention, safer sex, or condom use.
- **There is no reference to HIV**
- **There is no reference to contraception** - it is essential that secondary pupils are taught about the full range of available contraception and the options which are most effective (e.g. long acting reversible contraception (LARC)). Teaching should be medically accurate and highlight that whilst condoms are an important means of preventing HIV and STIs, they are not the most effective form of contraception.
- It is also important that **pupils are taught how and where to access sexual and reproductive healthcare services** including contraception.
- **There is no reference to unintended pregnancy, pregnancy decision-making or pregnancy options, the decision to become a parent, to adopt or to have an abortion** - we strongly advise that this section clearly states the need for students to be taught medically accurate, evidence-based and non-biased information on **all** pregnancy options, including abortion. This should be done with reference to medically accurate resources. We would like to highlight the factual, evidence-based Abortion Factsheet that we have published together with the Royal College of Obstetricians and Gynaecologists (RCOG) to support schools to deliver accurate RSE lessons in secondary schools. Updated in 2021, this free [resource](#) has been endorsed by Public Health England and renowned organisation in this area PSHE Association and Sex Education Forum. In an area of education that is prone to being affected by myths and false information, this resource provides accurate information and objective facts about abortion care, informing students about what an abortion is, how it is performed and what the entitlements are within the context of abortion care.
- **The references to sex and sexuality** are vague and non-specific. **All RSE curriculums must be LGBTI+ inclusive.**
- **There is no reference to the law specifically in relation to sex and sexual consent.**
- **There is no reference to the way in which substance and alcohol use intersect with sexual behaviour and impact on people's ability to evaluate risk, make decisions, stay safe, provide or ask for consent.**
- **There is no reference to young people's rights to access confidential, free and open access services or to consent to their own care** as a topic within the code.
- **There is no reference to some harmful practices** e.g. honour crimes; sexual exploitation; FGM/C; forced marriage; physical, sexual, and emotional abuse and neglect. Peer on peer abuse in the code is limited to knowing that it is illegal, rather than how to understand, recognise and report abuse.

Question 8 – We would like to know your views on the effects that the RSE draft statutory 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

We will not be answering this question as we do not feel that we are qualified to comment on the Welsh language however, we do appreciate that having multi-lingual policies aids equality and diversity.

Question 9 – Please also explain how you believe the proposed RSE draft statutory 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

We will not be answering this question as we do not feel that we are qualified to comment on the Welsh language however, we do appreciate that having multi-lingual policies aids equality and diversity.

Question 10 – 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.

Teacher Training

It is essential that the guidance is paired with a commitment to train teachers and provide adequate resources for schools to deliver relationships and sexuality education. Currently, provision for the training of teachers, allocation of time and training pathways are lacking. It is not possible to develop and effective curriculum without them.

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:

