

# Draft relationships and sexuality education guidance 2018

## Consultation response form

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Organisation (if applicable): DECIPHer: Centre for the Development and Evaluation of Complex Interventions for Public Health Improvement

DECIPHer brings together leading experts from a range of disciplines to tackle a range of public health issues, with a particular focus on developing and evaluating multi-level interventions that will have an impact on the health and wellbeing of children and young people.

The School Health Research Network This is led from DECIPHer and is a policy-practice-research partnership between Cardiff University, Welsh Government (both health and education), Public Health Wales and Cancer Research UK. Over a 6-year period SHRN has recruited all maintained secondary schools in Wales and established a data collection and reporting infrastructure that meets health and wellbeing data needs at local, regional and national levels.

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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  
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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?

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)**

We welcome the change from 'sex' to 'sexuality' in the guidance. This is supported by RSE expert agencies, existing literature, the World Health Organisation (WHO) and UNESCO.

However, the guidance provides no clear definition of 'sex' or 'sexuality'. The guidance states that 'sexuality' comes from WHO, but does not present a clear or comprehensive working definition for schools to use (e.g. in relation to policy). Without a clear definition, this may lead to confusion and key aspects of the definition (e.g. sexual health) may be missed. The RSE expert panel documents provide a clear working definition of 'sex' and 'sexuality' from WHO, and of the new 'RSE' which could feed directly into the new guidance.

The opening paragraphs of the guidance focus almost solely on relationships with limited focus on sexuality, and no reference to (the WHO definition) of sexual health. Similarly, there is little focus on what is meant by 'sexuality.' We propose a clear definition of 'sexuality' be provided, inclusive of examples and/or case studies, illustrating that 'sex' under the old guidance is included in this definition. At present it is not clear what 'sex' refers to, which is vital given that the draft guidance is working under old legal definitions. Schools require guidance about how to manage the current legal requirements within this new RSE guidance. We also suggest the document uses RSE throughout to promote consistency.

We propose that in line with the RSE expert panel, a clear glossary of terms is provided in the guidance. The clear and detailed content provided by the RSE expert panel, if incorporated into this guidance, would greatly improve the clarity of its content.

**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?

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)**

We welcome the proposal of embedding RSE in a whole school approach. This is one of the most important elements of effective RSE; the inclusion of this approach within the guidance is in line with current best practice.

However, at present the definition of a whole school approach is unclear, and the guidance provides very little support or guidance to deliver, implement or evaluate a whole school approach. This could be supported by existing research evidence, the World Health Organization Health Promoting Schools framework, and the Welsh Network of Healthy Schools Schemes (WNHSS). While we value the inclusion of the UNESCO eight core themes, which provide an excellent starting point, there is a complete absence of the content of the curriculum. We propose including the content that UNESCO provide relating to this detail, as well as the information developed by pioneer schools and other agencies (e.g.

central south consortia). To improve, the guidance would need to provide evidence-based comprehensive guidance outlining the content of RSE across all eight of the UNESCO themes, with the inclusion of examples or case studies. These could then be mapped across the six key AOLES. More attention could also be paid to embedding RSE via a whole school approach in sixth form and post 16 settings; the practicalities and details of this are not given sufficient information.

We would also like to emphasise the importance of evaluation, not only of the content within the UNESCO eight core themes, but also the implementation of this content. The challenges of implementing the Health Promoting Schools approach have been identified in existing literature (e.g. the Cochrane review by Langford et al.), the SHRN infrastructure would facilitate this evaluation.

**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?

<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)**

Annex A relates to the legal context of sex education: As outlined, more detail is needed in the guidance to support teachers to understand and adhere to the current 'sex education' legal requirements in the context of the new RSE set out in the document. The RSE panel's recommendations for comprehensive statutory guidance have not yet been implemented, therefore schools are currently operating within a legal context that requires secondary schools only to provide an extremely narrow version of biological sex education, which presents a significant challenge and needs to be addressed clearly in the Annex.

Guidance could perhaps outline which of the eight core themes were mandatory under existing legislation, and which were not (but may become mandatory if the RSE panel's recommendations to the Minister for Education are accepted and implemented).

We propose that other potentially relevant legislation and guidance (e.g. UNCRC, the Equality Act) are given equal status to the contents of Annex A and B so as not to suggest to schools that it is only legal requirements which are important.

While Annex C provides useful signposting, a more prominent network of bilingual RSE agencies, resources and networks would be of huge benefit in Wales (supporting non Welsh speakers to develop/translate and deliver resources in Welsh). The Welsh Network of Healthy Schools Schemes (WNHSS) is also not mentioned on the list.

Annex D is useful, however could be organised differently, for example thematically about the kinds of approaches across all the case study schools, what unites them as an approach and signposting the reader to more detail about each case study. It is not clear how each case study contributes to the wider aims of the guidance.

**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?

<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)**

It is clear that the Annexes should be considered, however the Annexes provide no practical guidance on how to develop, implement or evaluate a whole school approach, or deliver the proposed RSE curriculum. Similarly, the resources need to be developed more thoughtfully in respect of children and young people's needs so that they are provided with accessible information that is relevant to them and their own experiences.

**Question 5** – Do you think each section of the draft guidance is clear and explains what is required of teachers and schools?

<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)**

At present, the guidance does not provide a clear picture of what is required of teachers and schools. The guidance offers a clear and comprehensive guidance on the under-pinning principles of high quality RSE, but only lists the 8 areas to guide teachers on content. Together with the limited description and application of the whole school approach, this poses practical problems for schools required to implement the guidance.

Data from the School Health Research Network (SHRN, 2015) identified that around one third of schools in Wales do not provide any staff training in safeguarding students specifically about issues relating to sexual health and relationships. Given that RSE is typically delivered by staff with no specialist training, staff often reporting feeling anxious and underprepared for delivering RSE. Clear guidance is therefore paramount for teachers who are required to deliver the new curriculum, as is additional professional staff training and development. Evaluation of the development and implementation of the new curriculum is also crucial.

**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 outline the following gaps in information:

- 1) A more clear definition of 'sexuality' and 'relationships', and a definition of 'Relationships and Sexuality Education.' We also propose a more consistent application of RSE throughout the document. The expert panel provides all definitions.
- 2) Clearer guidance on what constitutes a whole school approach and how to create, implement and evaluate this approach, for example building on contents from the RSE expert panel, Health Promoting Schools framework and WNHSS, and using the SHRN infrastructure to support evaluation.

- 3) A clearer statement of how the legally required definition of 'sex' fits within the new definition of 'sexuality.' This also requires clarity on how the current legal requirements can be met so as not to undermine the new RSE guidance.
- 4) Clearer guidance on the curriculum content. This could involve using existing evidence to expand on the UNESCO themes and giving clear examples/case studies of how each area can be implemented using a whole school approach. The guidance still feels as though there is a focus on 'lessons' on specific topics which we should be moving away from. Similarly, more information should be provided on how to co-produce the curriculum with children and young people (and parents, teachers and wider community involvement), and build the cross curriculum content.
- 5) The guidance provides little details for sixth forms (or post 16 learners), as well as religious or faith schools to support their learners. A clearer statement on how schools will be expected to provide comprehensive, inclusive RSE ensuring all rights of the children and young people with factual, inclusive information.
- 6) We really value the mention of schools using the School Health Research Network (SHRN) data as a resource. We believe that this information could be strengthened further to support schools, for example providing examples/case studies of how the reports are being used in schools to help identify areas of good practice/concern, help target campaigns, and used as a teaching resource. SHRN is also of significant value for the evaluation of how system level changes can result in 'on the ground' changes. SHRN is now also collecting linking students self-reported health behaviour data with routinely collected health service use and educational attainment data.
- 7) In order for teachers to implement holistic, comprehensive and inclusive RSE, professional training and develop is required as well as bi-lingual resources and comprehensive guidance (e.g. a textbook). Without these, teachers will continue to lack confidence in the delivery of RSE and it is possible that RSE delivery in Wales will continue to vary in both quantity and quality and fail to address the needs of children and young people.

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

There is not a clearly outlined section on 'engaging with parents/carers/community'. We agree that parents, carers and the community should be involved as outlined in the whole schools approach (see RSE expert panel descriptions), and that this involvement should be carefully managed (e.g. to manage expectations). These process should be evidence based, and supported by evaluation. This way evidence of good practice can be developed and shared.

**Question 8** – Do you feel the guidance gives you the information you need to engage meaningfully with your learners to plan your RSE provision?

<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)**

At present the guidance does not provide clarity on how to engage and co-produce the curriculum with children and young people to ensure that it is 'needs-led' and 'experience near' (this is not necessarily the same as developmentally appropriate). Clearer guidance for example is required perhaps in the examples/case studies to clearly illustrate how teachers can work with existing information (e.g. data from the SHRN survey) and creative qualitative approaches to provide safe environments to listen and learn from children and young people. For example the ALPHA youth group at DECIPHer are regularly consulted on the co-production of key research, policy and practice areas. It is important to know what needs to be taught to young people, and when, and this needs to be led by children and young people's experiences. More public engagement work with children and young people is required specifically about the content of the curriculum in order to develop a more detailed curriculum. DECIPHer currently have an ESRC funded PhD student who is working on the development of methodological guidance for the co-production of school-based health interventions which is of key importance to this end.

The lack of guidance is compounded by the challenges for teachers delivering RSE who typically report low confidence and very little training and support to create and implement a whole school approach to RSE that responds to the needs of children and young people (i.e. without training RSE staff will not be able to confidently differentiate between appropriate and inappropriate knowledge and behaviour).

Expectations of what is an age or developmentally appropriate RSE curriculum are not often grounded in and fail to address children and young people's own learning and experience. Research has highlighted that much RSE provision is out of touch with children and young people's lived realities and the wider learning. Indeed the 'age appropriateness' of content is often drawn upon by practitioners as reasons to avoid RSE topics, thus failing to address or silencing children and young people's questions and curiosities on RSE topics. This is why professional training and development for RSE teachers is so important.

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

The following recommendations on training, support and resources would support the successful implementation of the guidance:

- 1) New statutory guidance underpinned by the core principles for Foundation Phase, Primary and secondary schools (inclusive of sixth forms)
- 2) An RSE professional development pathway (differing on the stage of education) is required to be incorporated into Initial Teacher Education and professional learning courses. This would allow an opportunity for teachers to further their professional development, specialising in RSE, with the potential for a Masters level RSE qualification.
- 3) Schools should have a specialist, trained RSE lead with access to bilingual resources and guidance to support the curriculum using a whole school approach.
- 4) Each Local Authority should have a dedicated RSE lead who works with the Consortia to provide external support, coordinate CPD and ensure consistency and quality of external organisations/providers when implementing a whole school approach.

- 5) A children and young people's implementation group, made up of representatives of schools in the Local Authority could ensure that pupil voice is heard at a Local Authority level as well as a school level. As curriculum content and whole school approaches are implemented and delivered this would ensure they are experience-near.
- 6) For Estyn to consider the inspection of RSE as part of their new inspection framework.
- 7) Welsh Government to consider a clear evaluation strategy of the new curriculum and to establish an RSE excellence mark to highlight exemplary whole school approaches to RSE delivery.
- 8) Welsh Government to establish and maintain an RSE Hwb for high quality RSE, as well as an RSE research, practice and training network to support the provision of up to date research, training and practice.

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

N/A

**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**

To ensure that the provision of RSE extends equal opportunities for people to use Welsh, the translation of key materials is essential. Service providers should be supported in this translation process so as not to exclude key, high quality providers because they do not offer services or materials 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

Please see comments Question 11.

**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.

Making RSE in the new curriculum compulsory is essential for ensuring that all children and young people in Wales have access to high quality RSE. Without this legislative change, RSE will remain a low priority for schools (e.g. Estyn, 2017), be narrowly conceived, will neglect the needs of children and young people, and will continue to create and perpetuate gender and sexual health inequalities (Ringrose, Harvey, Gill and Livingstone 2013; Albury and Byron 2015; Hope 2015; STIR 2016; McGeeney and Hanson 2017). We have discussed earlier the limitations of using ‘age and developmentally appropriate’ in relation to RSE.

All children and young people have the right to high quality, holistic and inclusive education about sexuality and relationships (European Network of Ombudspersons for Children (ENOC), 2017). The UK Government (including Wales) is a signatory to the 1989 United National Convention on the Rights of the Child (UNCRC) and has agreed to uphold the rights of children and young people as outlined in the Convention. In its recent report to the UK government (UNCRC 2016), the UNCRC noted that ‘Relationships and sexuality education is not mandatory in all schools, its contents and quality varies depending on the school, and LGBT children do not have access to accurate information on their sexuality’ (UNCRC 2016; 63(b) p.16) (see also the recent ENOC 2017 statements). The UNCRC recommends that the state ensure that meaningful SRE is part of the mandatory school curriculum in all schools (64(b)). In addition, this is also consistent with Objective 2 in the Welsh Government’s National Strategy on Violence against Women, Domestic Abuse and Sexual Violence (2016-2021) which states that the new curriculum must include the importance of safe, equal and healthy relationships.

Compulsory RSE is, however, just a starting point and the process to ensure every child in Wales receives high quality, rights and equity based, inclusive, holistic RSE should follow with the development of comprehensive statutory guidance setting out a core curriculum. It is this core curriculum that all children and young people are entitled to receive. Indeed, the core curriculum should take the form of the ‘whole school approach’ model, as well as the development and delivery of professional training to ensure schools are equipped to deliver high quality RSE



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