

# Relationships and sexuality education (RSE) statutory guidance and code

## Consultation response form

Your name: Simon Murphy

Organisation (if applicable): DECIPHer

e-mail/telephone number: +44 (0)29 2087 9609

Your address: DECIPHer, Cardiff University, 1-3  
Museum Place, Cardiff, CF10 3BD.

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](mailto: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 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 checked="" 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?

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

The explanation for RSE (under the specific title 'What is RSE') at present feels a little abstract. We commend that the definition includes a rights and equity based approach and appreciate that there is real value in focussing on what learners will achieve from RSE and what it aims to do. We also commend inclusion of the glossary which helps practitioners understand terms within the guidance. However, a clear and succinct definition would support interpretation of this section, for example expansion of the third paragraph under the 'what is RSE' heading which comes closest at present.

The sections on 'developmentally appropriate' and 'RSE for learners with special educational needs or additional learning needs' follow on from the section on 'what is RSE.' It is currently not clear whether these are included in the definition of RSE. While we value the importance of taking into account learners' ages, knowledge and maturity, there are significant limitations to using a developmentally appropriate approach to RSE delivery. It is important here to clarify that by developmentally appropriate reference is made to developing the curriculum with, and for, young people; ascertaining student voice, taking this into consideration and tailoring curriculum to their experiences and needs. Guidance should be given for practitioners on how to ensure RSE is

relevant to learners' lives: for example, through pupil voice, and by utilising robust academic research in Wales (e.g. The School Health Research Network tailored biennial school reports which capture relevant data in this area). This will ensure that, by definition, RSE is also needs led and 'experience-near', which is not necessarily the same as developmentally appropriate. 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. Therefore, Co-production of the school curriculum is vital, and clear guidance on how schools can do this is currently missing from the document.

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

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

We agree that the principles for embedding RSE are clear, and are generally in agreement with the breadth and content that they cover. We would like to commend that the principles are preventative, inclusive and positive, and incorporate a whole school approach. While the principles are of real value, at present there is a gap in the guidance as to specific instruction exactly how schools and practitioners should implement the guidance and develop and deliver their RSE curriculum. It may be that further supplementary guidance is to follow; however, there are several areas where the guidance should present a clearer, more detailed picture of what is required from teachers and schools. Given that research demonstrates RSE is typically delivered by staff with no specialist training, and who report feeling anxious and underprepared to deliver it, clearer guidance on developing the content of and implementing the curriculum are paramount. For example, the guidance should provide more guidance about implementing the principles, such as how schools might develop a whole school approach for RSE, how will they seek, assess suitability of, and employ specialist external expertise to deliver RSE, sources of training for practitioners and how to work with learners, families and communities. While we agree with principles, we believe there should be more concrete guidance on how to implement the principles. For example, reference can be made the English guidance, where there is more guidance given in relation to delivery, such as how to manage sensitive discussions and difficult questions, and links to training modules on different topics: <https://www.gov.uk/guidance/plan-your-relationships-sex-and-health-curriculum>

As in our response to question 1, there is an emphasis on 'developmental progression' as well as RSE 'responding to, and being respectful of the lived experiences of learners.' We agree with these but believe that both sections would benefit from more involvement from young people to 1) understanding what is happening in the lives of young people, and 2) using this information to guide and shape the curriculum content to respond to their lived experiences. Overall, reframing these to relate more to young people's experiences and needs, rather than developmental appropriateness. Ensuring the RSE curriculum is experience and needs led should be one of the underpinning principles of RSE.

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

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

While there are clearly structured subheadings within the document, there feels like a lack of logical flow between these sub-sections, particularly in Section 1. For example, the sections on developmentally appropriate and RSE for learners with special educational needs or additional learning needs feels rather out of place between the 'what is RSE' and more legislative context sections. Including developmentally appropriate and ALN sections within 'what is RSE' would help practitioners gain a more holistic view of what RSE is in its entirety. The legislative context is a separate, but related section.

Similarly, while the subheadings are useful, content within each of the subheadings would benefit from greater coherence. For example, the section on RSE being developmentally appropriate starts to drift into content on whole school approach with little explanation of what this means, and the section on the Equality Act moves into healthy and respectful peer-to-peer relationships and the whole school approach. It may be beneficial to have other sections, or to move specific content to other sections for coherent messaging.

**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?

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

We appreciate the challenge and complexity of encompassing what is important about RSE for all learners ages and developmental stages in three statements. The three broad strands/stages relate well to each of the three statements and cover important aspects relating to RSE. However, because of the broad nature of the three statements, the content set out in the three broad strands is very generalised. In order to really give real meaning to the content there needs to be more detail, to expand on these headings and unpack what is meant for each of them. With such broad, overarching headings, there is a risk that topics will not be covered in sufficient quality, breadth and detail and important content might be missed. Similarly, with such broad content on what teaching should focus on (e.g. characteristics of equitable, consensual and loving relationships), there is a risk that messages may be delivered inconsistently depending on the perspectives of individual practitioners. Again, the training modules linked to by the English RSE guidance do provide more content to help practitioners develop their curriculum and lessons and ensure consistency of messaging.

We believe the content covers important areas for RSE, however would like to see a greater focus on online identities and relationships in strand 1, given the evidence of the importance of social media in particular on identity formation and relationships with peers. We believe within strand 3 is also lacking specific content on sexual harassment and forms of gender-based violence. This is particularly important, given the recent evidence highlighting the prevalence and severity of sexual harassment and gender-based violence in Welsh schools.

Again, we would like to take the opportunity to highlight the limitations of employing a developmentally appropriate framework reliant on age ranges without ascertaining and integrating the voices and experiences of young people into curriculum design, development and delivery to ensure it is needs led for those groups.

Generally, there is a large focus on principles and values that should be delivered, which should be commended, however greater detail on content, messages and implementation is also now required.

**Question 5** – Do you agree that the RSE code section of the guidance is clear and appropriate?

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

We believe the RSE code section of the guidance is mostly clear and appropriate. However, the three statements and content within is rather high-level and would benefit from more detail on specifics of content and delivery. While we commend the integration of RSE across all AOLES, more detailed guidance is needed for practitioners on how to do this, beyond the Science and Technology area. While the Humanities area is highlighted, more detail on how content can be integrated would be beneficial for practitioners designing and delivering the new curriculum.

**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?

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

The three mandatory elements are sufficiently broad to encompass relevant aspects of RSE. However, without more specific, detailed guidance on content and delivery it is possible that with such broad overarching headings, important content might be missed. In order to mitigate the broadness of the headings, it may be important to specify sub-themes of content within them in order to ensure nothing is missed.

**Question 7** – Do you agree that the guidance offers relevant information to support practitioners when designing their school curriculum for RSE?

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

While we agree that important principles for the delivery of RSE have been broadly identified, at present we do not believe there is sufficient guidance for practitioners to design

their school curriculum for RSE. We have already highlighted some key areas of concern; for example, in relation to how to incorporate young people's views and experiences into curriculum development, design and delivery. The English guidance contains more detail for practitioners on design, with more links to training modules on specific RSE areas and specific guidance on how to select and adapt appropriate RSE resources. It also has more detailed guidance on supporting learners with SEN and how to practically manage sensitive discussions and handle difficult questions. We know from research that confidence levels of many practitioners developing and delivering RSE is low, and this level of detail within the guidance would be beneficial and ensure consistency of delivery through confident, skilled professionals. Consideration should be made of a detailed plan to upskill the education workforce with specialists in RSE through CPD and Initial Teacher Training who can then ensure all practitioners are knowledgeable and comfortable in this area of learning. There is also nothing relating to support for teacher wellbeing when delivering these potentially personally triggering topics. Similarly, given the increased risk of disclosures as a result of teaching new subjects, there is no clear link to the relevant safeguarding guidance and policies and associated guidance (e.g. Guidance for education settings on peer sexual abuse, exploitation and harmful sexual behaviour, All Wales Practice Guide on Safeguarding Children where there are concerns about Harmful Sexual Behaviour and the Wales Safeguarding Procedures).

**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**

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 external high quality providers because they do not offer services or materials in Welsh.

**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**

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 external high quality providers because they do not offer services or materials in Welsh.

**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.

Overall there are many strengths of the guidance presented. Some additional issues we would like to raise relate to the development of policy by schools. We welcome that the policy should 'specify how the views of learners will be sought'; however, we feel this should be extended to integrate the views of learners (as well as families, communities etc.) into the design of the curriculum. Similarly, while the development of policy section demonstrates the importance of safeguarding policy, more clarity is needed about more effective mechanisms for staff to put safeguarding training into action, deal with disclosures etc., or by linking explicitly to other relevant guidance the RSE guidance should be read in conjunction with. 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. Therefore, this is an important area, and is currently missing from the guidance.

We would like to draw attention to the value of the School Health Research Network in Wales. A network of all secondary schools in Wales which collects data from students aged 11-16 on a range of health and wellbeing topics, including those related to RSE. Network schools are invited to take part in the biennial survey (next conducted in Sep-Dec 2021) from which they will receive a tailored school feedback report containing their anonymised student data. These tailored reports have information on student dating and relationship experience, sexual behaviour (older students only), sexual harassment, and bullying, as well as communication with, and perceptions of, staff. Such information can play an important role in schools health action planning, and supporting the integration of student voices and experiences into the development and delivery of their RSE curriculum.

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: