

22/03/2019

Draft guidance on relationships and sexuality education: NSS consultation response

Submitted by email to RSEGuidance@gov.wales

1. This submission is made by the National Secular Society (NSS). The NSS is a not-for-profit non-governmental organisation founded in 1866, funded by its members and by donations. We advocate for separation of religion and state and promote secularism as the best means of creating a society in which people of all religions and none can live together fairly and cohesively. We seek a diverse society where all are free to practise their faith, change it, or to have no faith at all. We uphold the universality of individual Human Rights, which should never be overridden on the grounds of religion, tradition or culture.
2. Education is the largest area of our work, as it is where a lack of secularism most impinges on the rights of UK citizens. We campaign for a secularist and inclusive approach to education, free from religious discrimination, privilege or control and where pupils from all backgrounds have their rights respected.

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?

Supporting comments (no more than 250 words)

3. Yes.
4. We are extremely supportive of the expert panel's recommendations that RSE curriculum be embedded in a rights based approach. The change from SRE to RSE is positive because the stress is on human interacting and relating that extends beyond romantic/sexual relationships. The change from sex to sexuality is also positive because it emphasises a more personal and less clinical focus more relevant to each individual pupil.

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?

Supporting comments (no more than 250 words)

5. Yes.
6. Most educational professionals will understand what a 'whole school approach' is and it is a good thing. A rights based approach should inform all areas of curriculum development and delivery.

7. Teachers who do not have primary responsibility for RSE content should receive the necessary training and support to recognise and respond to issues regarding relationships and sexuality, wherever they arise.

Question 3 – The draft guidance should be read alongside the signposting section and annexes A, B and C. Are the annexes and signposting links useful and informative?

Supporting comments (no more than 250 words)

8. Yes
9. Annex C could be strengthened in two ways. Firstly it should be recognised that any list will have difficulty being kept up to date, as new providers develop resources of programmes of support and best practice evolves beyond resources that may previously been exemplary.
10. Secondly schools will need more general advice about identifying appropriate signposting and external resources. Care must be taken to ensure schools do not accidentally direct students towards inaccurate, discriminatory or ideologically motivated material. Anti-LGBT and anti-reproductive choice materials may not be immediately recognised by teachers without adequate experience or support.

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

Supporting comments (no more than 250 words)

11. No.
12. The document is poorly laid out with sections inconsistently differentiated. There should be a clear summary section and the bullet point list on page 11 should be expanded into a check list or self-evaluation tool against which schools can compare their RSE policy.
13. While we support flexibility for schools, there is insufficient information on content and a lack of clarity on expectations. We expand on these in Question 6, below.

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?

14. The guidance should contain clearer advice on:
 - Ensuring education is non-discriminatory and inclusive. This should include information on recognising unconscious bias and on selecting broad and balanced content and examples.
 - What core content must be included at different developmental stages.
 - Managing parental concerns and the right to withdraw.

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?

Supporting comments (no more than 250 words)

15. No.

16. There doesn't appear to be a section with this title, but there is a section on "relevant, engaging and coproduced" on page 8.
17. While we largely support the approach advocated here, care needs to be taken in some areas. Positive engagement with parents and pupils is important and has the potential to enrich any area of the curriculum. However RSE is an area where if schools are not supported then disproportionate and inappropriate pressure from some parents can undermine the subject.
18. The sentence: "Parents and carers need to know that they can become actively involved in the determination of the school's statutory sex education policy and that the school's RSE programme will complement and support their role" could lead to an unreasonable expectation on some parents behalf that RSE will entirely cater to their preferences or prejudices.
19. Parents have the right to be consulted on and informed about the RSE curriculum in their school and to have any concerns listened to. But this cannot descend into a hecklers veto. An example from England would be schools in Birmingham and Manchester that have been pressured to discontinue the use of the resource "No Outsiders" in RSE and other lessons, following protracted protests and intimidation by parents who complained that the lessons contradict their interpretations of Islam because they promote acceptance of LGBT people.¹
20. The guidance should set out how any schools receiving unreasonable pressure over their RSE curriculum will be supported.

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.

21. An area of concern for the National Secular Society remains the inappropriate deference to religious groups, through either accommodations for faith schools' ethos or the (perceived) religious background of pupils. For example: "*Wherever possible, education practitioners should be aware of, and sensitive to the personal circumstances of individual learners. This should enable them to deliver suitable tailored content to the religious and cultural background of learners.*"
22. The guidance must make absolutely clear that this cannot be allowed to interfere with their Public Sector Equality Duty and duty to deliver a rights based, comprehensive and non-discriminatory RSE curriculum for all pupils, regardless of school or background.
23. In our report *Unsafe Sex Education: The risk of letting religious schools teach within the tenets of their faith*, (Welsh appendix),² we found that all secondary faith schools in Wales with a policy taught RSE in accordance with a faith ethos. Such euphemistic language often provides cover for schools preaching shame based and discriminatory attitudes and distorting or withholding information about contraceptives and abortion.
24. Two final points. Firstly we recommend that in the interests of transparency, to dispel myths and to make the identification of good/bad practice easier that all schools have a duty, not only to have an RSE policy available on request, but published on their website.

¹ <https://www.secularism.org.uk/news/2019/03/more-schools-suspend-diversity-teaching-under-muslim-pressure>

²

25. Secondly, the reference to the WHO's definition of gender equity as "being more than formal equality of opportunity, it refers to the different needs, preferences and interests of women and men. This may mean that different treatment is needed to ensure equality of opportunity", should be accompanied by a warning that this should not be misinterpreted or used as cover for gender stereotypes driving curriculum content.

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