

**Draft relationships and  
sexuality education guidance  
2019**



**Christian Concern guidance for responding**

**How to respond**

You can access the online consultation at the following link:

<https://gov.wales/draft-guidance-relationships-and-sexuality-education>

The deadline for responding is **Monday 1<sup>st</sup> April 2019**.

You can read our guidelines for how to respond to the consultation at the following link:

<https://www.christianconcern.com/our-issues/action-alert-tell-the-welsh-government-to-redraft-its-relationships-and-sexuality-education-guidelines>

**Consultation  
response form**

Your name: Carys Moseley

Organisation (if applicable): Christian Concern

e-mail/telephone number:

[carys.moseley@christianconcern.com](mailto:carys.moseley@christianconcern.com)

Your address:

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 type="checkbox"/>	<b>Not sure</b>	<input checked="" type="checkbox"/>
------------	--------------------------	-----------	--------------------------	-----------------	-------------------------------------

**Supporting comments (no more than 250 words)**

It would be helpful to have a link to the relevant World Health Organisation documents underpinning this change. Citizens need to know the sources for the philosophy in the draft guidelines.

The introductory paragraph 'What is Relationships and Sex Education?' explains that the WHO are for 'sexuality education'. This means that RSE is an outgrowth of and dependent upon sexuality education. The fact that friendships and professional relationships are included in this paragraph shows that there is deep confusion about the nature and purpose of RSE within the Welsh Government. There is general agreement across society that neither friendships nor professional relationships should be sexualised. As such there is a case for removing reference to them here. It is also concerning that there is nothing in this initial paragraph about biology, fertility, childbearing, marriage and kinship and their relationship to sexuality. These are the core reasons why the concepts of sexuality and relationships belong together. To exclude these is to endorse an arbitrary view of their relationship that makes little sense of how human societies across the world function, and how they need to function so that people are more likely to flourish.

**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"/>
------------	--------------------------	-----------	--------------------------	-----------------	-------------------------------------

**Supporting comments (no more than 250 words)**

It is clear that the whole school approach means that themes and values taught in RSE lessons may also be included in other parts of the curriculum or school activities. However, the initial paragraph on a 'Whole School Approach' does not explain what 'inclusive relationships' are. It is not clear why they alone are being foregrounded here. Marriage is sexual and is an exclusive relationship and therefore stands in contrast to this.

**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"/>
------------	--------------------------	-----------	--------------------------	-----------------	-------------------------------------

**Supporting comments (no more than 250 words)**

Annex A – legislation on Sex Education and the curriculum is clear

Annex B – legislation on the age of consent – The Annex should have included a link to the All Wales Child Protection Procedures. Given that Annex B deals with legal matters this is an unacceptable shortcoming of this part of the consultation.

**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 type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	----------	-------------------------------------

**Supporting comments (no more than 250 words)**

It is clear only when the Annexes are mentioned.

Why does this question and the previous one not ask for our views on Annex D?

**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"/>
-----	--------------------------	----	-------------------------------------	----------	--------------------------

**Supporting comments (no more than 250 words)**

No. On page 9 the guidance suggests that ‘Secondary schools should consider training learners as peer educators in the provision of their RSE programme.’ It is worrying that no lower age limit is proposed for this. It is also a very naïve idea. Sexualised bullying is always a problem in schools, and students who are particularly clever bullies could worm their way into such roles in order to better control and manipulate their victims.

Although the RSE guidance requires material to be positive in outlook, it has a lot to say about the need to ‘challenge the impact of harmful social attitudes and expectations in relation to sex, gender, sexualities and relationships; such as sexism or gender based discrimination.’ This automatically makes discussion of sex-related differences a negative and stigmatised matter. In reality the need for RSE arises from fundamental sex-based characteristics, behaviours and differences which need to be acknowledged positively or at least neutrally before more critical approaches make any sense. A good and relevant example here is the existence of separate sports teams for males and females.

The guidance suggests field trips and focused whole school assemblies. The Welsh Government needs to provide examples for these. Field trips for sexuality have extensive safeguarding implications. Holding them is an idea that is obviously very easy to abuse by both teachers and students.

**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?

There is little here about the actual content of RSE lessons. For example how does the Welsh Government propose to square the circle with regard to biological sex and self-identified gender? There is a huge debate across the UK about this, with great concern being expressed by parents and others about the seriously damaging effects of transgender ideology on teenage girls.

There is also nothing here about the level of detail in sexuality education in relation to human fertility. Will fertility be left more or less to Biology lessons, given that the Education Minister has complained that RSE in the past has been too focussed on Biology? RSE needs to teach students the social, emotional and relational aspects of biology and fertility in relation to sexuality in order that they can grow up to handle the life cycle as mature adults.

Taking the ‘whole school approach’ could enable teachers to address these matters in History and Geography lessons as well.

**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"/>
--------------	--------------------------	-----------------	--------------------------	-----------------------------------	-------------------------------------

**Supporting comments (no more than 250 words)**

There isn't such a section. You probably mean the last paragraph in the section ‘Relevant, Engaging and Coproduced’ on page 8. This suggests the consultation’s approach to parental involvement and rights is half-hearted. The guidance should have had a specific heading on ‘Engaging with parents and carers’. This is surely conceptually distinct from ‘Engaging with the community’, a concept which is perhaps more difficult to explain and justify. The Welsh Government needs to explain exactly what that means. We mostly agree with what is in the paragraph that seems to be under consideration.

**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 type="checkbox"/>
------------	--------------------------	-----------	--------------------------	-----------------	--------------------------

**Supporting comments (no more than 250 words)**

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

There needs to be training for teachers and staff on the fundamental place of fertility in human sexuality in all its dimensions – biological, relational, social, political. Students need to be made aware of different viewpoints on the significance of human fertility within modern society. This is particularly important in relation to religious beliefs.

**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"/>
------------	--------------------------	-----------	--------------------------	-----------------	--------------------------

**Supporting comments (no more than 250 words)**

**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**

**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**

**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.

We wish to state here the importance of respecting the wishes of Christian and other parents who may have some concerns about some of the content of the RSE curriculum. We note in this respect, in addition to our previous remarks above about marriage and fertility, that there is nothing at all in this draft guidance about choosing abstinence from sexual behaviour and sexual relationships. Whilst as adults we might assume that this would be covered under discussions on consent, the two issues are not exactly the same because not only is the age of consent 16, but the guidance also presupposes use of the All Wales Child Protection Procedures. Students need to be taught and shown that abstinence is a valid and important choice in intimate relationships, especially outside of marriage. The guidelines need to acknowledge this and especially in view of the tendency for the teaching of various major religions to the effect that sexual behaviour belongs only within marriage.

There is also nothing in this guidance that confronts the serious problem of promiscuity and casual sex in today's society, and the negative effects it can have on mental health and well-being. We want to see the Welsh Government committing itself to addressing this in a redrafting of the guidelines.

There is much talk in the guidelines of LGBTQ education. However what students need to be told is that sexuality (in the sense of sexual attraction) is in the case of many people fluid and variable, particularly among young people. Students need to be taught that there is a distinction between sexual identity and attraction.

### **Interpreting the UN Convention on the Rights of the Child**

We note that the consultation documents evidence the fact that the Welsh Government is using a radical interpretation of the UNCRC as a form of 'soft law' that is seriously at variance with the plain meaning of the UNCRC itself. As such we wish to make some major corrections.

### **'Gender' and 'Gender identity' should not replace sex in RSE guidelines**

We are very critical of the Welsh Government's interpretation of the UN Convention of the Rights of the Child and the emphasis on 'gender identity' as an aspect of identity. This is a reference to the chapter 'Preservation of Identity' commenting on Article 8, on page 115 in the third edition of the UNICEF Implementation Handbook for the UNCRC, published in 2007, 'The child's physical appearance, abilities, gender identity and sexual orientation'. Throughout the third edition of the Implementation Handbook very little mention is made of a child's sex. It is clear that the Handbook has effectively replaced 'sex' with 'gender identity' despite paying lip-service to the former. However Article 2 of the text of the Convention itself lists sex and not 'gender identity' as a characteristic of a child that should be respected and protected. Moreover UK law (Equality Act 2010, Human Rights Act 1998) lists sex, not gender identity, as a characteristic. The Welsh Government therefore has no legal grounds for interpreting the UNCRC the way it does in the consultation document. It should not have recourse to this Handbook, which is not a legally binding document and which has clearly smuggled in the concept of 'gender identity' in order to erase the reality of sex. This means that these guidelines need to be redrafted to recognise sex as a fundamental protected characteristic of children and adolescents.

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: