

Response to consultation

Relationships Education, Relationships and Sex Education (RSE) and Health Education

November 2018

The Church of England Education Office serves children and young people in a variety of church and educational settings and seeks to promote an education that allows children and young people to live out Jesus' promise of life in all its fullness. In the statutory sector the Church engages through governance and pastoral contact with every category of school and has particular responsibility for provision of education in 4,644 Church of England schools. A quarter of primary schools and over 200 secondary schools are Church of England, educating approximately one million children.

We are committed to working with the Government as the guidance on RSE is developed. We look forward to further engagement in this work and the opportunity to respond to the full consultation that will follow this call for evidence.

Health and finance education

The Church of England Education Office welcomes the fact that health education has been included in the statutory guidance and are confident that this will help inform and enrich RSE programmes of study as well as helping support pupils at a time when there are growing concerns about the rise in the number of pupils reporting mental health problems. There has always been a considerable cross over between health education, what is now RSE, and financial education. We therefore feel this addition makes sense and will help give the new subject a more distinctive and holistic feel.

We are disappointed, however, that personal social health and economic (PSHE) education has not been made statutory and we are concerned that this will result in financial education being squeezed out of the school timetable. We do not consider the current provision in maths and citizenship are enough to ensure that pupils are properly prepared to navigate their way in our economy and we fear that this will result in many pupils leaving school economically illiterate. Family debt issues have

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a big impact on relationships and on mental, and potentially, physical health. We feel this is a missed opportunity. We note that citizenship is not a national curriculum subject in the primary phase and all the evidence and research that is coming to us through the Lifesavers programme indicates that effective financial education must start from establishing values and attitudes at the primary phase. www.lifesavers.co.uk/

This decision appears to run counter to the other government priorities on increasing social mobility and integrated communities and we feel particularly concerned for those trapped in rural poverty.

Developing a school policy

We welcome the requirement that all schools must have a detailed RSE policy that must be developed in consultation, working with parents to reflect the community the school serves. We are concerned, however, that this could be a complex and time-consuming process for some schools and have some concerns about teacher workload. We would expect the DfE to support and ensure guidance being developed by various bodies to support this process. (para 12-15)¹

Values and ethos

We welcome the fact that RSE teaching is placed within the context of seven values (or virtues) which will help ensure a moral basis for RSE teaching. These values (honesty, integrity, self-control, courage, humility, kindness, forgiveness, generosity and a sense of justice) will fit well with the Christian values promoted by Church schools. (para 55)¹

We are glad that all schools must take account of the religious background of their pupils in developing their policy and programmes of study for RSE (para 19)¹

We welcome the fact that teaching about marriage is expected at both primary and secondary phases and that pupils will be taught (paragraphs 65/66)¹ about the importance of:

- ‘resisting the pressure to have sex’,
- ‘Why marriage is an important relationship choice’
- ‘that they have the choice to delay sex or to enjoy intimacy without sex’

We are concerned to ensure that children are given the knowledge and skills they need to navigate and to flourish in loving relationships built on honour and respect. To do this they first need to develop self-worth and resilience to some of the negative images of our media driven world.

The Church of England encourages relationships and sex education to be placed in a context of Christian teaching and spiritual development, with sexual relationships being understood in the context of loving, faithful relationships. For Church of England schools, this is the essential focus for

¹ The Department for Education, *Relationships Education, Relationships and Sex Education (RSE) and Health Education Draft for consultation: July 18* (The Department for Education 2018)
<https://consult.education.gov.uk/pshe/relationships-education-rse-health-education/>

what it means to be ‘respecting the religious ethos’ of our schools and it is a vital element of what makes RSE in Church schools distinctive.

We support the principle that relationships education and health education is statutory at both primary and secondary phases and that sex education is statutory at the secondary phase and recommended at the primary phase. We agree with the necessity of there being provision for parents to exercise the right to request that their child be excused (withdrawn) from sex education although we feel there needs to be more clarity for schools around these arrangements.

Understanding equality

There should be an equal opportunity to explore the features of stable and healthy same sex relationships. This should be integrated appropriately into RSE programmes rather than addressed separately’ (paragraph 71 page 20) ¹

It is unclear what is meant by the term ‘equal opportunity’ here. Does it mean that stable same sex relationships should be treated with equal respect? In which case we would be fully supportive, or does it mean that they should have equal curriculum time in which case we disagree. We feel this must be clarified for the sake of schools who may find themselves held to account by parents and others who may have conflicting interpretations of this paragraph.

In our guidance to schools Valuing All God’s Children we said

Relationships and sex education should take LGBT people into account. Sexual orientation should be included within RSE in the secondary phase.²

Conversely in paragraph 33 the DfE guidance says

Schools are free to determine how they address LGBT specific content, but the department recommends that it is integral throughout the programmes of study. As with all RSE teaching, schools should ensure their teaching is sensitive, age appropriate and delivered with reference to the law. With all RSE teaching schools should ensure that their teaching is sensitive and age appropriate’ (paragraph 33 page 12)¹

The use of ‘recommends’ could be read as giving schools an opportunity to ignore or avoid including LGBT specific content on the grounds that it is not age appropriate. This does seem to contradict the point made in paragraph 71 and to have two contradictory paragraphs in the guidance will lead to confusion for schools.

¹The Department for Education, *Relationships Education, Relationships and Sex Education (RSE) and Health Education Draft for consultation: July 18* (The Department for Education 2018) <https://consult.education.gov.uk/pshe/relationships-education-rse-health-education/>

² The Church of England Education Office, *Valuing All God’s Children* (The Church of England Education Office 2017) available at <https://www.churchofengland.org/more/education-and-schools/education-publications>

We can see that 'Bullying' is covered as a generic term, but little is said about homophobic, biphobic and transphobic bullying. We feel that specific mention should be made to ensure schools are mindful of the need to eradicate all forms of bullying.

The use of generic outcome statements to define content and knowledge means that the guidance is not specific about a range of subjects including gender stereotyping, transgender and intersex, religious teaching although there is scope to cover and draw examples from many contexts.

Recognising Faith as a protected characteristic in equalities legislation

As well as equal respect for same sex relationships (our interpretation of para 71), so also there should be equal respect for faith-based or other conscientious positions with regard to same-sex and other relationships.

Generally, paragraph 20 problematises religion and exceptionalises people of faith in a way that may lead to stereotyping and prejudice and that runs counter to the requirements of the Equality Act. Under the Equality Act, both sexuality, and faith and belief, are protected characteristics, and both should be taken into account equally in formulating policy.

In schools with a religious character, the distinctive faith perspective on relations may be taught, and a balanced debate may take place about issues that are seen as contentious. For example, the school may wish to reflect about faith teachings about certain topics as well as how their faith institutions may support people in matters of relationships and sex. Schools without a religious character may also wish to introduce pupils to different faith perspectives regarding the issues covered in these subjects, often in Religious Education. (paragraph 20 page 10)³

We welcome the principle that schools with a religious character are enabled to include distinctive faith perspectives and fully support the importance of providing opportunity to discuss controversial issues in a balanced way. We are, however, at a loss to understand why this is not also part of RSE in schools without a religious character.

There are many pupils of faith in schools without a religious character as there are many pupils of no faith in our schools. We are concerned that this also stereotypes community schools as secular, which is not their status. The suggestion that such controversial issues may be addressed in religious education (RE) may well reflect the practice of some schools without a religious character but to import such issues out of the context of RSE into other areas of the curriculum runs the risk of problematising and stereotyping people of faith. We would suggest rewording this paragraph and deleting 'often in religious education' from this to avoid this problem and confusion.

³The Department for Education, *Relationships Education, Relationships and Sex Education (RSE) and Health Education Draft for consultation: July 18* (The Department for Education 2018)
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Special Educational Needs and Disabilities

In the RSE grid for secondary pupils on page 23 under 'intimate and sexual relationships, including sexual health' bullet point 8 relates to choices in relation to pregnancy. We are disappointed that this does not include consideration of 'an early diagnosis of disability and/or Down's Syndrome and joys as well as challenges of bringing up a disabled/Down's Syndrome child'. This ignoring of the SEND element of this debate seems at odds with the otherwise excellent inclusion of SEND in this guidance.

Right to be excused from Sex Education

We recognise that this a complicated area of law and practice but feel that there are a couple of points that need clarification.

In paragraph 43¹ on page 20 the guidance says that 'except in exceptional circumstances' the school should respect the parents' request to withdraw their child. We feel that headteachers would welcome some clarification on what constitutes an 'exceptional circumstance.'

In paragraph 46¹ its states that 'if a pupil is excused from sex education, it is the school's responsibility to ensure that the pupil receives appropriate, purposeful education during the period of withdrawal'. Our experience in RE suggests that such a clause may encourage some parents to withdraw their pupils from sex education to access extra teaching on mathematics or English or that schools may encourage parents to withdraw their children so that they can have 'catch up' lessons.

Although the contexts are different we feel this requirement will cause confusion for headteachers and parents when dealing with requests to withdraw pupils from RE. We would suggest that this paragraph be reconsidered.

Resourcing and CPD

In his foreword the Secretary of State says, 'These subjects represent a huge opportunity to help children and young people flourish' and we would agree but this will not happen if this is not supported by appropriate resourcing and most crucially training for the teachers who will be required to deliver RSE and health education. There is an expectation that 'early adopter' schools will be implementing from September 19 with all schools following in September 20, and then that these early adopter schools would become centres of excellence for the training of others. We would like to hear more about plans for and funding of CPD for teachers delivering in these areas.

We are concerned that the guidance refers to and provides a list of 'free' resources available to support RSE and health education, but we strongly feel that some guidance should be provided to schools around the selection of and use of 'free resources'.

Relationships and sex education is an area of curriculum that has traditionally made considerable use of both religious and campaigning groups that offer drop down days and workshops on the issues and content of what is now RSE and health education. We would want to support the development of some form of national charter of good practice principles that such groups should abide by as a reassurance to schools. This might be similar to the one proposed by the Sex Education Forum.

The Church of England Education Office

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