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Relationships and Sexuality Education Statutory Guidance and Code: Welsh Women's Aid's Response

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About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales. These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence and all forms of violence against women and children and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

Our membership works with children and young people both as survivors of VAWDASV and in an educational and awareness-raising context. Together we aim to ensure that all children and young people understand causes of VAWDASV, recognise abuse and know where help is available. Our member services work to ensure those affected are identified, protected from further harm, and supported to recover and thrive through accessing high-quality specialist services. We do this by promoting a 'whole education approach' to VAWDASV prevention and early intervention. We are also a partner in the delivery of 'Ask and Act' under the [National Training Framework](#), which aims to inform, upskill and build the confidence of public sector workers to identify and respond to people experiencing / perpetrating abuse.

In 2017 we joined other stakeholders in feeding into the SRE Expert Panel's Review of Sex and Relationships Education in Wales.¹ Since August 2020, we have been a regular contributor to the Welsh Government's RSE Working Group, and in October 2020 gave formal evidence to the Welsh Parliament's Children, Young People and Education Committee on the proposed RSE Curriculum.

Introduction

We are pleased to have the opportunity to comment further on the development of the RSE Code and statutory guidance. At the outset, it is important to reiterate our full support for the aims of introducing a new, mandatory, RSE curriculum that is rooted in principles of rights, equity, and inclusivity.

We consulted three groups of stakeholders to inform our response to this consultation: young (secondary school age) survivors of domestic abuse; adult survivors of domestic abuse and other forms of violence against women; and Child Support Workers from three specialist services in Wales. Our response to each question is informed by our own organisational stance as well as the views expressed during these consultative exercises. As the umbrella organisation for Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) in Wales, our response will be focused on the areas of the Code and Guidance which align to the preventing, and supporting survivors of, VAWDASV.

Key Recommendations

The specific consultation questions are addressed in full below. However, a summary of our key recommendations is as follows:

Recommendation 1: We recommend editing the definition of RSE so that it better reflects that which was proposed in the *Curriculum for Wales (Draft) Guidance*.² It should state more clearly some key characteristics of high quality RSE, including being evidence based and scientifically accurate; and being based on, and promoting, gender equality and human rights.

Recommendation 2: We recommend that the Guidance clearly defines a 'whole school approach' in terms of its core elements (education for pupil, staff, and parents/carers; active participation of pupils and staff; community engagement; healthy school culture, supported by policies; partnerships with local specialist services /experts; ensuring high quality information, advice and support is available and accessible to all; and mechanisms for monitoring impact and informing change). It should be made clear that all these aspects, together, constitute a whole school approach.

¹ *The Future of the Sex and Relationships Education Curriculum in Wales: Recommendations of the Sex and Relationships Education Expert Panel*. Available online: <https://gov.wales/sites/default/files/publications/2018-03/the-future-of-the-sex-and-relationships-education-curriculum-in-wales.pdf>

² Welsh Government (2020) *Curriculum for Wales guidance*. Cardiff: Welsh Government.

Recommendation 3: We recommend that the principles are edited to explicitly identify the role of specialist services in (a) providing training for staff on specialist issues and (b) delivering sessions on specialist topics, especially concerning forms of VAWDASV, and (c) providing specialist support to pupils (and staff) who want it. The benefit of (a) and (b) in ensuring that those who are affected can easily request / access specialist support should be highlighted.

Recommendation 4: We recommend that the Welsh Government undertakes further consultative exercises with children and young people to ask their views about what they consider to be 'developmentally appropriate', the points at which they believe the different aspects of the curriculum should be introduced, as well as their views more broadly on whether the 'content' in the Code is sufficient.

Recommendation 5: We recommend that the Code explicitly identifies *all forms* of VAWDASV, including sexual harassment, and includes in the Code the aim of understanding the link between the impact of sexist practices, norms and stereotypes on the perpetration / prevention of VAWDASV.

Recommendation 6: We recommend that the guidance includes a section about seeking pupil voice to inform the content and sequencing of the curriculum in a way that is responsive to their developing needs, and recommends effective mechanisms for pupil engagement.

Recommendation 7: We recommend that the guidance is edited to state that all PRUs and maintained schools, primary, secondary and special, must (not should) have an up-to-date written RSE policy to replace the 'sex education policy'. We further recommend that the guidance elaborates on the importance of proactively engaging with parents and carers. Finally, on this issue, we recommend that the guidance contains an appendix in which a template RSE policy is provided, which sets out clearly how policies on confidentiality, safeguarding, child protection, and VAWDASV relate to RSE.

Recommendation 8: We recommend that the guidance recommends that all education settings employs a dedicated RSE lead to lead on the development and implementation of the RSE curriculum.

Recommendation 9: We recommend that the guidance is updated to include examples of best practice in relation to all areas of RSE, and that it contains a list of quality assured RSE resources developed and/or quality assured by specialists and signed off by the Welsh Government.

Recommendation 10: We recommend that the guidance is edited to ensure that there is no scope for misinterpreting the obligation of school settings to ensure that their curricula are inclusive of LGBTQ+ orientations / identities.

Recommendation 11: We recommend that the Welsh Government commits to provide ring-fenced funding for RSE professional development – both for current staff, but also to be embedded into future teacher training. We also recommend that the Welsh Government commits to increasing the funding available for specialist support for children and young people who experience VAWDASV.

Consultation Questions

Question 1 – Do you agree that the explanation of the definition of RSE is clear?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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We are pleased to see reference to the United Nations' Convention on the Rights of the Child in the Introduction/Definition. We believe it is a valuable reminder to those tasked with implementing the curriculum that RSE aims to realise many rights of children which are enshrined in an international treaty which forms the basis of public policymaking for children and young people in Wales.

However, we are of the view that the definition of RSE is lacking. There was a general agreement across all groups who fed into our response that the language employed in the definition is too vague, and that it does not give a clear idea of what RSE *is*. Rather, it only states some of the outcomes which it is hoped RSE will achieve.

We would also emphasise a further limitation of the definition identified by the adult survivor group whom we consulted: it does not explain sufficiently *why* RSE is needed. It fails to explain that children and young people are already being educated about relationships and sexuality in their daily lives, whether this is in school, inside their own homes, or in wider communities (including online). This may include, for example, the modelling and/or promotion of unhealthy or harmful relationships, and of stereotypical 'desirable' body types, sexuality, and/or sexualised behaviour. In other words, the definition fails to contextualise the need for a positive, alternative RSE which challenges these norms and stereotypes and, in the words of one young survivor, "teaches everyone that they should be treated the same, no matter what they choose to be".

In the VAWDASV sector education has long been recognised as essential for preventing VAWDASV. However, school communities (staff, pupils, parents, wider community) are not experts in VAWDASV and do not necessarily have an understanding of its root causes. Therefore, we cannot assume that they will possess an understanding of why RSE is a necessary and powerful tool for preventing VAWDASV, as well as identifying those in need of support.

We understand the Welsh Government's desire to promote a positive, outcomes-focused approach to RSE, in line with the wider curriculum. However, it is our view and the view of the groups we consulted that harmful behaviour, relationships, stereotypes and norms need to be labelled explicitly for the intended audience to appreciate the value of RSE in preventing harm, and to achieve the four overarching purposes of the curriculum.

We recommend editing the definition of RSE so that it better reflects that which was proposed in the *Curriculum for Wales (Draft) Guidance*.³ It should state more clearly some key characteristics

³ Welsh Government (2020) *Curriculum for Wales guidance*. Cardiff: Welsh Government.

of high quality RSE, including being evidence based and scientifically accurate; and being based on, and promoting, gender equality and human rights.

Three other points were raised by members of the groups which the Welsh Government might want to consider: first, some thought that the acronym “RSE” can be confusing, especially given its similarity to the Religion, Values and Ethics acronym. It was suggested that perhaps “SRE” might be better.

The second point relates again to the name of the curriculum: some respondents felt that the name “relationships and sexuality education” and its definition does not make it clear enough that it is OK for young people to choose not to be in relationships/sexually active: i.e. RSE is not just about relationships with others but about one’s relationship with one’s self. Many of the respondents agreed that having a healthy relationship with one’s self is paramount.

The third point was an expression of support of the definition’s inclusion of the function of RSE in helping young people to understand how relationships and sexuality “shape...the lives of others”, as well as one’s own life. The groups felt that it is important for consideration of the impact of one’s behaviour on others to be given prominence in the curriculum.

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

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Our view, and that of the groups whom we consulted, is that some of these principles are clear, while others are less clear. Here we focus on the ones which, in our view, need clarifying.

First, we are pleased that delivering RSE through a ‘whole school approach’ (WSA) is identified as a core principle, but we believe that a clearer definition of a ‘whole school approach’ could be offered. From our involvement with schools, specialist services, and the statutory sector, we know that people have vastly different understandings of what constitutes a WSA. In recent years there appears to have developed a strong conviction that it is the right approach to take to various issues (e.g. mental health and wellbeing, tackling bullying, addressing harmful sexual behaviour), but little consistency in the way in which it is explained. Some professionals talk about it exclusively in terms of education for pupils and training for staff (not a WSA); others include some additional principles, such as pupil engagement and/or community engagement. It is rare, however, for it to be discussed in terms of the nine principles set out in the Welsh Government’s own guidance on implementing a ‘whole education approach’ to VAWDASV prevention.⁴ This, or a similar model, should be applied in respect of the whole RSE curriculum. The current definition in the glossary is not clear enough and is likely to encourage various interpretations of what constitutes a WSA.

⁴ Welsh Government (2015) *Good Practice Guide: A Whole Education Approach to Violence against Women, Domestic Abuse & Sexual Violence in Wales*. Available online: <https://gov.wales/sites/default/files/publications/2019-06/good-practice-guide-whole-education-approach-to-violence-against-women-domestic-abuse-and-sexual-violence.pdf>

We recommend that the Guidance clearly defines a ‘whole school approach’ in terms of its core elements (education for pupil, staff, and parents/carers; active participation of pupils and staff; community engagement; healthy school culture, supported by policies; partnerships with local specialist services /experts; ensuring high quality information, advice and support is available and accessible to all; and mechanisms for monitoring impact and informing change). It should be made clear that all these aspects, together, constitute a whole school approach.

Second, we are pleased to see recognition of the crucial role that specialists will have to play in ensuring the success of the new curriculum. However, we believe that the guidance falls short in this respect of explaining in what capacity specialist expertise will be needed. The link between the two parts of the statement “Effective RSE requires specialist expertise, time and resources” and “This will ensure a supportive environment is created to ensure learners and practitioners are safe to discuss and learn about issues which may be sensitive or challenging” only makes sense if specialists are invited into education settings to deliver their areas of expertise. Even then, the receptiveness of the class teacher to the education will also have a significant impact on how supportive the environment feels. The guidance is not clear about the level of training that should be expected for school staff to ensure that young people do feel safe and supported: for example, should all staff be required to complete Ask and Act in addition to the standard safeguarding training?

Third (and linked to the above), we welcome the principle which states that “professional learning is a key requirement for delivery of high quality RSE. Schools and settings should enable all practitioners to access learning that can support them to develop confidence and knowledge regarding RSE.” However, we are concerned that the Welsh Government has, to date, failed to make clear how this is going to be made possible. Schools will require funds to release staff for training (e.g. to pay supply teachers), and to date, we are not aware that any national fund has been earmarked for RSE professional learning.

Also linked to this is specialist services’ role in providing support to children and young people who are affected by VAWDASV. We believe that the principles should include a commitment to ensuring that specialist support, as well as the support from the school, should be offered to all children who are affected by VAWDASV, and in timely manner.

We recommend that the principles are edited to explicitly identify the role of specialist services in (a) providing training for staff on specialist issues and (b) delivering sessions on specialist topics, especially concerning forms of VAWDASV, and (c) providing specialist support to pupils (and staff) who want it. The benefit of (a) and (b) in ensuring that those who are affected can easily request / access specialist support should be highlighted.

Fourth, we welcome the principle that RSE “should be delivered in a way that is inclusive” and which seeks to “value difference and diversity as a source of strength”. However, we do not believe the guidance is clear enough about explaining how this should be ensured, nor what exactly “diversity” and “inclusive” encompass.

Fifth, we welcome the principle that “The teaching of RSE should respond to and be respectful of the lived experiences of learners.” However, we believe the guidance would benefit from examples of best practice to illustrate what this means in practice.

Sixth, we are puzzled by the following principle: “As learners progress, they should build on previous learning: consolidating and strengthening the same dispositions...”. Three further references are made to these “dispositions” in the document (in the Code). It is not made clear what dispositions are being referred to.

Overall, the groups whom we consulted showed support for many of the principles but felt that there is a lack of instruction in the guidance about how to put these principles into practice.

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

Strongly disagree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input checked="" type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Overall, we believe that the structure of the guidance is clear. Our views on the content of the guidance form part of our response to Question 7.

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?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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Question 5 – Do you agree that the RSE code section of the guidance is clear and appropriate?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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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?

Strongly disagree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input checked="" type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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We have chosen to respond to the above three questions together, starting with a few general comments about the Code, and then a few specific comments about what we believe is missing

from the Code. To reiterate, we limit our focus to those aspects of the Code which are directly relevant to VAWDASV.

Structuring the Code – It remains unclear to us why the RSE Code has abandoned the six thematic areas included in the Curriculum for Wales Guidance (rights and equality; relationships; sex, gender and sexuality; bodies and body image; sexual health and wellbeing; and violence, safety and support) in favour of the three overarching strands which now attempt to organise the core content. Each of the original six thematic areas contain a substantive set of themes (and topics) which are of relevance to all children at all developmental stages (though of course differing in type and level of detail). There is a sense in which the current Code recognises this as it does not do away with the six thematic areas altogether, but rather retains them as aspects that might feed into one or more of the three strands.

In our view, the three ‘overarching strands’ which are proposed in the Code take away from, rather than add to, the clarity of the RSE curriculum. Especially in relation to VAWDASV, and the ability to recognise all forms of abuse and discrimination, the subsuming of “violence, safety and support” into the overarching strand of “Fostering safety and respect, being valued and supported” risks giving too much leeway for schools to pick and choose what is and is not taught under this broad umbrella. This challenges the main purpose of the Code, which is to bring consistency to what is taught across all education settings so that all young people can access high quality RSE.

Timeliness / developmental stages: we welcome the expectation for RSE to be delivered according to developmental stages rather than strictly by chronological age. The young people who participated in the consultation could not recall any school-based RSE prior to year 6, and this was limited to a lesson on puberty. The earliest education on relationships they could recall was in year 8, for one young person, and year 10 for the others. This would have been ‘too little, too late’ for many learners. While this has been addressed to a large extent in the Code, we agree with the Child Support Workers that the transition for some areas appear to be too rigid – for example, it can be important to talk about issues around consent at a younger age than 8 years (e.g. asking permission, understanding that no means no).

Additional Learning Needs – We welcome and support the Welsh Government’s intention for the new curriculum, including RSE, to be a curriculum for everybody. However, we would question whether certain specified outcomes such as “An understanding of laws that are in place to protect us from all forms of discrimination, violence, abuse and neglect” is inclusive for all children and young people.

We recommend that the Welsh Government undertakes further consultative exercises with children and young people to ask their views about what they consider to be ‘developmentally appropriate’, the points at which they believe the different aspects of the curriculum should be introduced, as well as their views more broadly on whether the ‘content’ in the Code is sufficient.

Monitoring delivery – Both adult groups who were consulted raised the issue of monitoring: there is nothing in the Code about how the delivery of this core content will be monitored (or even whether it will be monitored). Monitoring of educational institutions responses to VAWDASV is a

principle within the Welsh Government 'whole education approach' to VAWDASV prevention.⁵ As well as within the VAWDASV (Wales) Act 2015.⁶

VAWDASV – Both adult groups felt that the Code was not clear enough about teaching on VAWDASV and what this means. While we welcome the reference to the VAWDASV (Wales) Act 2015, we are concerned that the only way in which VAWDASV is recognised in the Code is in connection with legal provisions. These legal provisions are, of course, of great importance, but does little to help education settings to understand the broader context of VAWDASV and the various forms of VAWDASV. Some Child Support Workers stated that, in their experience, schools are often reluctant to teach (or facilitate lessons by specialists) about domestic abuse, or any form of VAWDASV. Equally, the adult survivors felt that forms of VAWDASV need to be explicitly labelled in the Code – they emphasise that it is not just about talking about what constitutes healthy relationships, but looking at abusive relationships and the different ways they manifest (e.g. domestic abuse, FGM, forced marriage, sexual exploitation and abuse). Some survivors felt that by being overly focused on “positivity” and failing to identify different forms of abuse, the curriculum might overlook important, difficult topics. In so doing, it would fail to empower learners to recognise and seek support for experiences of harassment and abuse, and could unwittingly lead to an over-emphasis on physical abuse to the detriment of other forms of emotional, psychological, and sexual abuse.

There was also broad agreement that the link between gender norms and stereotypes and the perpetration/prevention of VAWDASV was not clearly made. For example, there is no mention of pornography and the fact that sex in pornography often abusive and the 'enjoyment' performed. Additionally, given how women's sexual health / pleasure has traditionally been neglected / denied, some respondents felt that the need for RSE to be taught within the framework of gender equality is not adequately emphasised in the Code.

Additional comments – there was support for the inclusion of self-regulation in the Code and the idea that children need to be supported to take responsibility for their own actions and behaviour if it harms others. Others thought that examples of harmful behaviour needed to be given, and that this should be focused not just on individual children but on the wider school practices / environment: for example, to challenge sexist practices and sexual harassment.

We recommend that the Code explicitly identifies *all forms* of VAWDASV, including sexual harassment, and includes in the Code the aim of understanding the link between the impact of sexist practices, norms and stereotypes on the perpetration / prevention of VAWDASV.

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

⁵ Welsh Government (2015) *Good Practice Guide: A Whole Education Approach to Violence against Women, Domestic Abuse & Sexual Violence in Wales*. Available online: <https://gov.wales/sites/default/files/publications/2019-06/good-practice-guide-whole-education-approach-to-violence-against-women-domestic-abuse-and-sexual-violence.pdf>

⁶ <https://www.legislation.gov.uk/anaw/2015/3/section/9/enacted>

Strongly disagree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Strongly agree	<input type="checkbox"/>
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In addition to the comments made in response to previous questions, we think the guidance falls short of offering practitioners the support they require when designing their RSE curriculum.

Pupil Voice / Engagement: The active participation of pupils in shaping and informing the school's RSE curriculum is underemphasised in the guidance. Pupils should be given regular opportunities to identify issues that are affecting them and/or about which they want information, and the curriculum should be responsive to these.

We recommend that the guidance includes a section about seeking pupil voice to inform the content and sequencing of the curriculum in a way that is responsive to their developing needs, and recommends effective mechanisms for pupil engagement (tried and tested' resources – see, for example, creative audits⁷).

Parents: Some respondents were concerned by the lack of attention given to engagement with parents. As previously mentioned, it is important to engage with parents to promote their support for the curriculum. We welcome the part of the Guidance which recommends that schools develop an RSE policy, and the accompanying recommendations about what the policy should include. Such transparency will be crucial to engaging parents. However, we are concerned that this is only a recommendation, not a requirement (unlike the requirement to have a 'sex education policy' under s. 404 of the Education Act 1996). Moreover, we are concerned that there is an over-emphasis of the role of this policy and its accessibility for "inspection" by parents or carers, while neglecting the importance of meaningful and proactive engagement with parents and carers. Further, while it is right that the RSE policy should "describe how school policies on confidentiality, safeguarding, child protection and the VAWDASV (Wales) Act 2015 relate to RSE", we believe that this is something that should be made explicit in this national Guidance – currently, we do not believe the guidance achieves this.

We recommend that the guidance is edited to state that all PRUs and maintained schools, primary, secondary and special, *must* (not should) have an up-to-date written RSE policy to replace the 'sex education policy'. We further recommend that the guidance elaborates on the importance of proactively engaging with parents and carers. Finally, on this issue, we recommend that the guidance contains an appendix in which a template RSE policy is provided, which sets out clearly how policies on confidentiality, safeguarding, child protection, and VAWDASV relate to RSE.

No provision for dedicated RSE Lead - It is expected that there will be a lead on each of the six Areas of Learning and Experience. Given that the *Curriculum and Assessment (Wales) Act 2021* makes clear that RSE is intended to cut across all six AoLEs and will require a high level of co-ordination, investigation, preparation, investment, and new knowledge, it is difficult to understand why no recommendation is made in the guidance for each setting to have a dedicated RSE lead. This

⁷ Renold, Ashton and McGeeney (2021) 'What if?: becoming response-able with the making and mattering of a new relationships and sexuality education curriculum', *Professional Development in Education*, vol. 47(2-3), pp.538-555.

would be in accordance with the recommendation made by the SRE Expert Panel Report (2017) – a recommendation which the former Minister for Education accepted in principle, and the current Minister for Education and the Welsh Language reiterated, in response to the recent reports of sexual harassment and abuse of girls in schools. We believe that having a dedicated RSE lead will be of utmost importance in ensuring the success of the curriculum.

We recommend that the guidance recommends that all education settings employs a dedicated RSE lead to lead on the development and implementation of the RSE curriculum.

Safeguarding – as mentioned in connection with the part about RSE Policy, the guidance fails to make adequate connection between RSE and safeguarding (yet expects schools to make this connection in their individual policy). Safeguarding must be central to RSE – and will be especially crucial in planning for sessions relating to VAWDASV as it is likely there will be some learners as well as staff and parents who are affected and need support.

Resource bank – one of the main concerns across both adult groups was: what resources will schools be using to deliver the curriculum? It seems clear to us that such a specialist area requires resources developed by specialists. However, we are also aware that school settings will not necessarily know who the specialists are, nor how to distinguish between good resources and bad ones. Often, very subtle differences in phrasing can have a profound impact on how information is received – there is a lot of published material which has victim-blaming undertones, for example. We believe it is imperative that the Welsh Government consults with specialists across the breadth of RSE specialisms to produce a list of approved, quality-assured, factual and objective resources.

Examples of best practice – The guidance would benefit from examples of best practice in relation to all different areas of RSE.

We recommend that the guidance is updated to include examples of best practice in relation to all areas of RSE, and that it contains a list of quality assured RSE resources developed and/or quality assured by specialists and signed off by the Welsh Government.

The role of specialist services – We have touched on this a few times in our response, but feel it is important to highlight the strength of feeling among respondents that RSE is a topic best delivered by specialists. The young people whom we consulted stated that this would be their preference, rather than a school teacher, mainly because it is 'less embarrassing'. Child Support Workers who already deliver sessions on healthy relationships and various aspects relating to VAWDASV stated that teachers are always grateful to them for delivering the sessions and have stated repeatedly that they would not feel comfortable delivering this themselves. Many of the adult survivors stated that they felt this would become a 'burden on teachers' and that schools should be encouraged to plan to invite specialists in regularly. This would also be of great benefit in ensuring that both learners and staff could turn to a specialist for support should they need / want to.

LGBTQ+ inclusivity – As mentioned before, we welcome recognition of the need for RSE to be inclusive of LGBTQ+ identities /orientation. As one respondent pointed out, it should also be clear that this is inclusive of asexuality. However, the document provides no guidance on implementing

this principle. Given that RSE has traditionally been (and remains in many places) heteronormative, we believe the Code/Guidance needs to give more detail about how this is to be addressed. There is also some clarity needed in relation to the following sentence:

“Gradually learners should be supported to understand how aspects of identity and individuality, including LGBTQ+ diversity, sex, gender and sexuality, develop and change over time.”

LGBTQ+ inclusion should be something that is reflected from beginning to end of the curriculum, not gradually introduced, if it is to properly reflect the lived experiences in our society. This could be achieved at younger ages through using family set-ups that are not heteronormative. Another aspect of the sentence that needs clarifying is the reference to “developing and changing LGBTQ+ identities”. It should be made clear that this should not be misconstrued along lines that undermine LGBTQ+ identities, e.g. that such identities are “just a phase” that learners will “grow out of”.

We recommend that the guidance is edited to ensure that there is no scope for misinterpreting the obligation of school settings to ensure that their curricula are inclusive of LGBTQ+ orientations / identities.

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

It is likely to have a positive impact on the Welsh language *if* there is a commitment to develop and mainstream RSE terminology and resources in Welsh. Currently, many RSE resources are produced only in English (although there are some resources which are available bilingually, e.g, Welsh Women’s Aid’s Safety, Trust and Respect prevention programme). This deficit is particularly the case in relation to film resources. The Welsh Government needs to make funding available for charities and other specialist RSE organisations to develop specialist resources bilingually.

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

Include a resource list of quality-assured bilingual teaching material, and ensure that the glossary in Welsh as well as English is maintained and updates as required to reflect developments in concepts and language.

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.

We feel we must mention our disappointment at the way in which the Welsh Government's consultation has failed to provide a meaningful opportunity for children and young people, and people with learning difficulties, to respond to the Code and Guidance. It is our view that, given this is a public consultation, the documents being consulted on should reflect the diversity of needs across the Welsh population. This is particularly pertinent given the recent exposure of sexual harassment and other forms of VAWDASV that girls have been experiencing within educational institutions in Wales, through the Everyone's Invited campaign. Welsh Women's Aid believes survivors voices should be central to preventing VAWDASV. By failing to publish a child friendly or easy read version, we feel that a vast proportion of Welsh society will have been deterred if not prevented from responding. Moreover, there was a general agreement across all three groups whom we consulted that the guidance as it stands was difficult to understand at times due to a lack of clarity or use of words whose meaning is opaque and could be interpreted in different ways.

We would also underline our concern that we still have not heard anything about the funds that are to be made available to support with professional learning; we have not heard anything about plans to influence teacher training so that RSE is built into their initial training rather than added on once they are in post; and we must emphasise that given the inevitable increase in disclosures of VAWDASV following the introduction of the curriculum, we urge the Welsh Government to ensure that specialist services are adequately funded to offer this specialist support, as well as supporting to implement the curriculum.

We recommend that the Welsh Government commits to provide ring-fenced funding for RSE professional development – both for current staff, but also to be embedded into future teacher training. We also recommend that the Welsh Government commits to increasing the funding available for specialist support for children and young people who experience VAWDASV.

END OF RESPONSE

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: