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**Response to:
Draft relationships and sexuality education guidance 2018**

March 2019

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**MAE POB PLENTYNDOD WERTH BRWYDRO DROS
EVERY CHILDHOOD IS WORTH FIGHTING FOR**

About the NSPCC

We're leading the fight against child abuse in the UK and Channel Islands. We help children who've been abused to rebuild their lives, we protect children at risk, and we find the best ways of preventing child abuse from ever happening. Learning about what works in the fight against abuse and neglect is central to what we do. We are committed to carrying out research and evaluation to make sure the approaches we're taking are the right ones and we share what we have learnt with partners. Abuse ruins childhood, but it can be prevented. That's why we're here. That's what drives all our work, and that's why – as long as there's abuse – we will fight for every childhood.

Draft relationships and sexuality education guidance 2018

Consultation response form

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Responses should be returned by 1st 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

Overview comments

NSPCC Cymru/Wales has long campaigned for the implementation of mandatory sex and relationships education as part of a statutory entitlement to Personal and Social Education (PSE) for all children and young people. NSPCC Cymru/Wales believes that Relationships and Sexuality Education (RSE), and learning about keeping safe, healthy bodies and healthy relationships is a core entitlement all children should receive, and is best delivered as part of a whole school approach where it is embedded across the curriculum and in wider school policies, ethos, behaviours and communications

NSPCC Cymru/Wales therefore welcomed the announcement by the Cabinet Secretary for Education in May 2018 that Relationship and Sexuality Education would become statutory from age 5 to 16 in the new curriculum in Wales, by 2022. We therefore welcome and have already responded to the proposals set out in the recently published consultation document 'Our National Mission: A Transformational Curriculum. Proposals for a new legislative framework. We particularly welcome the proposal that age and developmentally appropriate RSE should be made compulsory for 3-16 year-olds in Wales. We would however like to see this extended to young people up until 18 years-old.

Our core recommendations set out in response to the consultation questions below reflect our concerns that in its current form the draft guidance does not provide sufficient clarity or content to support high quality provision on the full spectrum of relationships and sexualities. We believe this is will be crucial in order to ensure RSE fulfils its potential to contribute to keeping children safe, both on and offline. The implementation of RSE should also lead to positive outcomes for helping children speak out and adults taking action about all forms of child abuse. Good quality RSE should be seen as part of a holistic approach to safeguarding children.

Summary of recommendations

- **Welsh Government's RSE Guidance needs to be more closely aligned and make clear its role in supporting schools to moving towards the vision and architecture required for RSE set out in the Expert Panel report and recommendations of 'The future of the Sex and Relationships Education Curriculum in Wales'.**
- **Terminology used throughout the guidance needs to be clearly introduced, explained and underpinned by internationally recognised definitions (such as WHO definitions). Terminology should be used consistently and supported by a glossary of key terms and concepts to support consistency of provision across Wales.**
- **There needs to be further guidance and clear reference through to existing guidance on how to practically embed Whole School Approach to RSE which encompasses the six core principles which were agreed by the Expert Panel to guide the delivery of the new RSE curriculum.**
- **There needs to be a greater emphasis on keeping children safe reflected in objectives for RSE throughout the draft guidance.**
- **Children and young people should be explicitly taught about all areas of maltreatment, including bullying, child abuse, domestic abuse, sexual abuse, and neglect, in an age and developmentally appropriate way**
- **RSE teaching should be co-produced with children and young people to ensure it is relevant to the challenges they face in their everyday lives**
- **Schools should actively engage with parents and learners and communities when designing and delivering their RSE curriculum through workshops, open sessions, consultations and community representations. It needs to be clear this is a core part of a Whole School Approach.**
- **Statutory Guidance on RSE should include appropriate language and example answers to common tricky questions that are relevant to the challenges children and young people face. The guidance should include examples of evidence-based resources on RSE**
- **Welsh Government should ensure that there are necessary resources available for funded CPD training to equip teachers with the knowledge and confidence for them to expertly deliver RSE. In accordance with the recommendation made by the RSE Expert Panel it is vitally important that provision is made for a designated and trained RSE lead practitioner in every school to develop and deliver the RSE curriculum and embed RSE in the whole school approach.**
- **Teacher training should also make sure teachers are trauma informed and equipped to sensitively and appropriately respond to disclosures of abuse and interact with a child who is disclosing abuse.**

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?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

NSPCC Cymru/Wales is strongly supportive of the vision which underpins the development of RSE guidance for schools. However, we are concerned that in its current form, the draft guidance does not provide sufficient clarity or content to support provision on the full spectrum of relationships and sexualities which we see as crucial in order to keep children safe, both on and offline.

We welcome the intention behind the shift in terminology from Sex to Sexuality but we are concerned that the introduction to the guidance does not provide teachers with a clear definition of either term or the rationale for their use (use of WHO definitions as recommended and set out in the SRE Expert Panel report and recommendations would be helpful). Terms are also used interchangeably which risks confusion.

Scope and context of RSE- NSPCC Cymru/Wales was a member and is fully supportive of the recommendations of the SRE Expert Panel established to support the development of this new area of the curriculum, these should be included in this guidance. A glossary was also produced by the Expert Panel, such a reference resource for teachers should be included particularly as Relationships and Sexuality covers a wide range of complex and often highly personal issues which are constantly evolving. Agreed definitions and terminology are necessary to achieve consistency and shared understandings to underpin high quality provision across Wales.

Evidence should also be provided to support schools in recognising the wider impact that high quality RSE can play in supporting and improving children's outcomes overall. The Estyn thematic review¹ provides a useful section on pupil outcomes (p.24)

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?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

¹ Estyn: A review of healthy relationships education, June 2017, <https://www.estyn.gov.wales/sites/default/files/documents/A%20review%20of%20healthy%20relationships%20education.pdf>

NSPCC Cymru/Wales welcomes the definition of the Whole School Approach (p.3). However, the guidance should go further, provision of an illustrative overview of what this would look like for the delivery of RSE at both primary and secondary level would be helpful. Welsh Government's existing 'Good Practice Guide: A Whole Education Approach to Violence against Women, Domestic Abuse and Sexual Violence in Wales' (2015)² is only referenced towards the end of the document (p.13) and we would suggest this document needs refreshing to fill a series of gaps. In its current form the document focuses on recognising unhealthy teenage relationships but we are concerned about the lack of reference to children witnessing DA between adults in their home. These gaps need to be addressed so that children who are distressed by the behaviour of adults in their home are appropriately signposted. It should be more integral to supporting explanation of how a Whole School Approach would be embedded as part of RSE provision. Supporting or even requiring schools to carry out a Whole School Approach audit before they begin would be helpful. Guidance is also needed about how often this should be refreshed to ensure it stays up to date and relevant to children's lived experience. Thought should also be given to guiding and providing training to support teachers to take an ACEs aware³ and trauma informed approach to the development of their whole school approach, integrating such awareness throughout a school's RSE provision would be welcome.

We welcome the inclusion of the six core principles agreed by the SRE Expert Panel. However, there is little guidance on how to apply them in practice. There needs to be more introduction and explanation of the origins of the principles and evidence base to ground them in the expert knowledge that underpins them. The draft guidance does not provide sufficient clarity about how these principles fit in with and support the sort of Whole School Approach advocated by the guidance.

More broadly, the guidance is lacking clear content, which makes it challenging for schools to see how to reinforce and operationalise messages core to a Whole School Approach (see Question 6).

² Good Practice Guide: A Whole Education Approach to Violence against Women, Domestic Abuse and Sexual Violence in Wales, Welsh Government, 2015

³ <http://www.wales.nhs.uk/sitesplus/888/page/88524>

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?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

The Annexes are confusing. The content needs to be further developed.

The section on the legal obligations surrounding sex education is unclear as is the accompanying **Annex A**. The guidance does not make clear the longer-term vision that with the introduction of the new curriculum, age and developmentally appropriate RSE will be compulsory for 3-16 year-olds in Wales from 2022. We understand that this draft guidance is envisaged to bridge the period up until the full roll out of the new curriculum by 2026. However the guidance needs to be clearer about how schools should be planning and enhancing provision to lay the foundations for the future expectation to deliver compulsory RSE.

Annex C. We welcome the inclusion of the NSPCC helpline number as a supportive resource. However we are concerned that the guidance provides no mention of Childline and other NSPCC resources that could support schools with RSE provision (see Question 6). **We can provide appropriate text to support drafting of relevant content.**

Annex D is a welcome intention, and the NSPCC is very supportive of providing case studies to promote the sharing of best practice, inform provision and to spark imagination amongst teachers. However, Annex D is not as user friendly as it could be. Providing a static list of case studies will date quickly. In addition many of these case studies are single issue and do not provide an overview of how a holistic approach to provision of SRE could work in practice (see Question 6).

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 checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

No. Information needs to be much more closely interwoven into the body of the guidance rather than appended at the end of the document. We believe the guidance needs to strike a balance between allowing flexibility and responsiveness of schools to respond to and shape provision around the needs of

their pupils, with providing adequate guidance and steer on where to begin providing quality and age-appropriate RSE lessons.

The signposting section is underdeveloped. Directing schools and teachers to high quality resources on RSE will be vital to supporting provision. It is also crucial that the guidance and additional training equips teachers with the knowledge and skills to identify the difference between good evidence-based resources on RSE and those of dubious quality. A detailed list of reputable health and third sector organisations which provide resources that are evidence-based and medically accurate should be provided. Examples include: NSPCC, Brook, PSHE Association, Welsh Women's Aid, Stonewall, Gendered Intelligence, Childline, ChildNet, Parent Zone, Great Man Initiative, RAP Project and Internet Matters. This is particularly important given that resources with inaccurate, misleading or graphic content can cause harm to children, including vicarious trauma and distress. In the interim period while relevant training and upskilling of the teaching workforce is being put in place, similar information is required about external providers that can support expert provision in schools.

Guidance on RSE should also include examples of appropriate language and example answers to common tricky questions that are relevant to the challenges children and young people face.

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"/>
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Supporting comments (no more than 250 words)

No. The guidance needs to provide much more practical information and support to schools in where to begin in delivering RSE. RSE is a vast, complex and broad topic, a comprehensive guide to support teachers in delivering high quality age-appropriate lessons is required. This needs to be available bilingually. As set out in the Expert Panel's recommendations, thought should be given to the development of guidance specific to the Foundation Phase, Primary and Secondary schools providing an understanding of how provision can be underpinned by the core principles as set out in the report's recommendations.

The structure and flow of the guidance document is confusing and unclear. It does not provide the sort of user-friendly guide that will be helpful to time and resource poor teachers and we do not believe it is sufficient to support provision in this complex area.

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?

Gaps in information:

1) Recommendations of the SRE Expert Panel: NSPCC Cymru/Wales would emphasise that the recommendations developed by the SRE Expert Panel provide information about each of the core components necessary for supporting teachers to address some of the key challenges surrounding current provision as identified the Estyn thematic review⁴. Being able to achieve the changes necessary relies on each of the recommendations being progressed. Whilst we recognise ‘The future of the Sex and Relationships Education Curriculum in Wales report’⁵ sets out a longer-term vision we believe this is a process that needs to start now to build towards the new curriculum, it will take a number of years for the architecture for the vision to be put in place. We believe the draft guidance would be greatly strengthened by addressing each of these areas (even if it is to make clear that there will be a staged approach to some elements) and providing detail and guidance on how they will be implemented and the timeframes within this will happen. This will allow the new RSE guidance to move away from an interim and bridging document to form part of an overarching vision and set out tangible steps schools could be taking to build the basis for and progress towards the vision for compulsory RSE set out in the new curriculum.

2) Resources and Case Study examples - HWB Zone interactive online space: Reflecting further on one of the recommendations of the Expert Panel we believe there is significant potential for the development of a SRE HWB zone on the existing website which already has high levels of engagement from staff, school pupils and external organisations. This could also be supported by an SRE research, practice and training network. There is also an opportunity for such an interactive hub to become a dialogue between schools allowing them to capture and share best practice and resources that have helped them in delivery. A website could host a range of resources and signposts to external organisations which could be regularly refreshed and updated. It also offers an opportunity to track engagement and work towards a consistency in a minimum standard of provision across Wales. We would recommend that a better approach to case studies would be to provide them through this space and encourage schools to update and populate this as they develop their RSE provision. This could and should be co-produced with young people.

3) Content - it is difficult to provide detailed feedback on content as the draft guidance does not provide the level of information we would see as necessary across a range of key topics. There is little practical steer to schools or teachers about what sorts of topics should be covered or how they should be approached in

⁴ Estyn: A review of healthy relationships education, June 2017,

<https://www.estyn.gov.wales/sites/default/files/documents/A%20review%20of%20healthy%20relationships%20education.pdf>

⁵ The Future of Sex and Relationships Education Curriculum in Wales, Welsh Government, December 2017:

<https://beta.gov.wales/sites/default/files/publications/2018-03/the-future-of-the-sex-and-relationships-education-curriculum-in-wales.pdf>

an age-appropriate way. We note that the guidance states that schools are currently “*supported in providing sex education through non-statutory guidance; these are the Personal and Social Education Framework for 7-19 year olds in Wales (2008) and the Sex and Relationships in Schools guidance (2010)*” and that this guidance is designed to replace these documents and provide updated and ‘practical support to build high quality provision of Relationships and Sexuality Education’. However, it is confusing at p.7 when the guidance directs teachers back to the 2008 non-statutory PSE framework to plan RSE provision. While existing guidance provides detail to teachers and schools on *what* to cover at each level, what has been missing so far (as evidenced by the findings of the Estyn thematic review) is sufficient guidance on *how* these topics should be delivered in a way that is experience-near and age appropriate. Furthermore the existing 2008 and 2010 guidance are both almost a decade old, indicating that content needs to be refreshed and updated to reflect the realities of children and young people’s experience.

We note the stated intention that this guidance is more succinct than its predecessors but we would question the rationale for this. We believe there needs to be a balance struck between, keeping the guidance concise and manageable for teachers to engage with but this should not be at the expense of ensuring adequate, practical content to support high quality, consistent and age-appropriate provision for children in all parts of Wales. As the draft guidance stands, there are multiple and significant gaps meaning teachers do not receive information about the sorts of topics and minimum standards that are appropriate and necessary for both primary and secondary age pupils. NSPCC Cymru/Wales believes that the SRE guidance should provide much greater support to teachers in knowing what topics could and should be provided at each Key Stage and be provided with guidance and evidence-based resources on how to support this provision, this needs to be accompanied by funded programme of training and upskilling to boost teachers’ knowledge and confidence in delivery. What follows is by no means an exhaustive list but would be some core areas that the NSPCC would see as vital for inclusion.

- **Role of RSE in keeping learners safe.** If delivered effectively, RSE can play an important role in helping children to develop the skills and be provided with the information to understand and recognise what constitutes abuse, how to keep safe from abuse, and from whom and where to seek support. Effective RSE assists governments to implement Article 19 of the UNCRC, the responsibility to protect children from violence, abuse and neglect. The core principle of a ‘protective and preventative’ RSE as stated in the draft guidance is welcome. However, NSPCC Cymru/Wales feels that while an enhanced focus on recognising abusive relationships, violence and issues regarding consent, is welcome, this content alone will not provide children and young people with sufficient knowledge about how to recognise all forms of child abuse and neglect. Many children are unable to recognise abusive behaviour and they may not know how and where to seek help. **To ensure that all children are kept safe, NSPCC Cymru/Wales recommends that all children and young people should be explicitly taught about all areas of maltreatment, including bullying, child abuse, domestic abuse, sexual abuse, and neglect, in an age and**

developmentally appropriate way. This must also be delivered in a trauma-informed way with a structured and clear consideration of how sessions may be received by children who have experienced abuse or could be triggered by any of the issues covered. This will require specific training and professionals to feel equipped to follow safeguarding procedures should any concerns arise, and with signposting to additional ongoing support for affected CYP.

- **Supporting children to speak out about abuse.** In addition to helping children and young people develop the skills and attributes to recognise what constitutes abuse, RSE should support young people to speak out about abuse earlier and give them the confidence to report it as well as recognise that perpetrators can use various intimidation tactics to keep their victims silent. NSPCC research shows that many children face multiple and complex barriers to disclosing and may lack the communicative skills, confidence and knowledge to seek help if they are abused⁶. A recent evaluation of our Speak out Stay Safe showed evidence that children who had received the service reported knowing more about bullying, abuse and neglect. Speak out Stay safe was also shown to be effective in helping to identify safeguarding concerns amongst the children who participated in this evaluation⁷. Children and young people often find it very difficult to speak out about their experiences of abuse and neglect and many delay telling someone what has happened to them⁸. Young people need support from adults to speak out about abuse. Research has shown that when children and young people do speak out about abuse, adults don't always recognise, understand or react appropriately when a child or young person starts to tell them about experiences of abuse.⁹ This can mean that the child doesn't get the support they need. It is vital that adults who work with children are equipped with tools to help spot signs and symptoms of abuse, engage in purposive conversations, and are confident taking action and supporting children through the disclosure journey and ensuring a child is safe. It is also important to recognise that the onus should not be exclusively on the victim to report what has happened to them (this can be intensely challenging due to the impact of trauma, coercion and unequal power dynamics) but that supportive adults should be equipped and supported to recognise and respond effectively to signs of abuse as well as to scaffold and create the environment and circumstances that can facilitate a child to speak out if they are in need of help.
- Throughout 2018 the NSPCC consulted with a wide range of professionals across a range of sectors who work directly with children to ask out how they can be better supported to respond to disclosures of abuse. Adults told the NSPCC that they aren't always confident about knowing what to say and do if a child starts to disclose. In response, the NSPCC has created an evidence-informed [bilingual poster](#) (appendix 1) to help adults ensure

⁶ Radford, L., Corral, S., Bradley, C., Fisher, H., Bassett, C., Howat, N. and Collishaw, S. (2011). *Child Abuse and Neglect in the UK Today*. London: NSPCC.

⁷ Full evaluation and further details on the finding can be accessed at: <https://learning.nspcc.org.uk/research-resources/2018/understanding-childrens-teachers-views-speak-out-stay-safe/>

⁸ Allnock, D. and Miller, P. (2013) *No one noticed, no one heard: a study of disclosures of childhood abuse*. London: NSPCC.

⁹ Ibid.

children always feel listened to. Its visual and memorable and designed to help professionals remember some key interpersonal skills make it clear they are listening and taking a child seriously. The poster can be downloaded for free and displayed around schools. It is vital that children and young people see RSE as a safe space to raise any issues and teachers should be trained in how to sensitively and appropriately respond to disclosures and interact with a child who is disclosing.

- **Age-appropriate provision** - It is concerning that there is no specific attention given to how to design and provide SRE in an age-appropriate way across Primary and Secondary education and the specificities of provision at each level. NSPCC Cymru/Wales strongly believes that much more guidance on the minimum standards and core topics that need to be covered at each Key Stage is required by schools.
- Relationships and Sexuality Education (RSE), and learning about abuse and neglect, healthy bodies and healthy relationships is a core entitlement all children should receive, and is best delivered as part of a whole school approach where it is embedded across the curriculum and in wider school policies, ethos, behaviours and communications. **Healthy bodies:** children should learn to identify body parts; to understand the physical and emotional changes that occur through puberty and growing up; to understand how they can make safe and informed choices at the right time for them; to understand about pregnancy and infections and to learn about where to go for information and support. **RSE is a vital tool to ensure children are empowered with the language and accurate anatomical terms they need to report any concerns or to accurately articulate and describe abusive experiences.**
- **Healthy relationships:** children should learn about respect and tolerance; boundaries and consent (including sexting and other online activities); diverse relationships including LGBT relationships; the harmful effects of pornography; and factors which can affect relationships (including domestic abuse and substance abuse).

NSPCC Cymru/Wales believes that how children are taught is as important as what they are taught. It is vital that the teaching of RSE (and specifically the importance of keeping safe, healthy bodies and healthy relationships) is introduced in an evidence-based, age and developmentally appropriate way from primary school onwards. **Learning should be delivered through a spiral curriculum where a child's learning is developed and built on over time, in a way that reflects their increasing independence, physical and social awareness, and experiences of the world.** To achieve this reflexivity across primary and secondary level there needs to be much more comprehensive guidance about the expected content and minimum standards of provision at each stage of a child's education.

NSPCC resources such as the [Keeping Safe](#) innovative programme, show how it is possible to cover any topic if it is approached in an age-appropriate way. Keeping Safe is an evidence-based preventative education

programme that aims to teach every child from 4-11 years messages to around bullying, neglect, physical, emotional, sexual and domestic abuse. It also demonstrates how messages around sensitive topics can be delivered to young children. Keeping Safe is currently being used in 62 primary schools in Northern Ireland in the world's largest RCT on abuse prevention programmes. The RCT is running over two years and the interim evaluation findings after the first 12 months show statistically significant impacts of Keeping Safe on recognising inappropriate touch (in general and in familial relationships); appropriate refusal; as well as knowledge on how to get away, tell and report abuse. The programme recognises that teachers and other school staff have developed expertise in teaching children and it utilises this expertise to teach the most sensitive messages to children they know, in the safe and supportive environment of the classroom. (See appendix 2 for further detail about the Keeping Safe Programme). **NSPCC Cymru/Wales would be happy to speak to Welsh Government about a pilot of Keeping Safe in a small number of Welsh Primary Schools to support progression towards compulsory SRE at primary level.**

Keeping Safe can be used alongside our other primary school support materials such as the [PANTS resource](#), our [Speak Out Stay Safe](#) resource, [Share Aware](#) and [Net Aware](#). The messages covered by these resources are essential to give children the skills to stay safe at home, at school, with friends and online. A whole range of resources are now available and freely downloadable from the new NSPCC Learning Website <https://learning.nspcc.org.uk/>

- **Online issues**

It is concerning that there is little cross-reference between other relevant Welsh Government guidance or strategy documents, particularly the Welsh Government's Online Safety Action Plan or reference to the upcoming refresh of Keeping Learner's Safe. Whilst we recognise that there is a separate requirement on schools to provide online safety lessons we also believe that given the ubiquity of the internet and social media to how children play out their relationships specific issues related to how children conduct relationships online need to be covered and core to RSE provision. It is particularly important that children and young people are supported to recognise inappropriate or harmful online contact, for instance it's important the curriculum cover issues such as patterns of online grooming which can be more difficult to identify. For example, students should be supported to recognise that predators can use likes and shares of posts online to gain the trust of children prior to abusing them.

The guidance also lacks clarity or clear cross-reference to existing guidance and policies on how schools should approach challenges such as sexting or pornography. Topics such as sexting and pornography also need to be included as core elements of any RSE provision.

4) Engaging with young people

The vision and intention that schools have greater flexibility in how and what they teach is welcome. This has the potential to allow RSE to be provided in an agile, reflexive and flexible way to respond effectively to a wide range of issues in that may arise in the lived experience of children and young people at various ages and stages in their development. However, a commitment to flexibility shouldn't result in a lack of content and guidance. Indeed, to ensure that teaching around RSE reflects the realities of children and young people's lives, young people should be regularly consulted on the issues they're most impacted by and what kind of language and expression is most useful for supporting them to navigate current dilemmas in their daily lives. This information should be gathered at a school level and used to inform the design of RSE provision. This consultation process needs to be regularly refreshed to remain relevant to the issues children and young people are facing. The Welsh Government part-funded [AGENDA toolkit](#), is Wales' first national guidance for young people on how they can safely and creatively make positive relationships matter. It is surprising that this resource is not signposted within the draft guidance document. Created jointly by Cardiff University, NSPCC, the Children's Commissioner for Wales and Welsh Women's Aid, it is a bilingual online resource that safely and creatively supports children and young people from primary level through to secondary to identify issues that matter to them in relation to a range of relationships and sexuality issues. This co-creation approach should actively encouraged and could be used in schools to identify the key issues that children and young people face, and allow the coproduction of RSE teachings around these realities. [Primary AGENDA](#) was launched in March 2019. These resources should be clearly signposted within the guidance. Welsh Government should also consider funding to be made available for the development and delivery of training in using the resource for all schools in Wales.

5) Diversity in families and relationships

It is welcome that specific mention is made that *'in addition to fostering a positive and respectful attitude to diversity, schools should also ensure that learners who may identify as lesbian, gay, bi-sexual, trans and queer (LGBTQ+) have access to RSE provision that is relevant factual, and supportive'*. However NSPCC Cymru/Wales believes that much clearer guidance, detailed information and high quality resources need to be provided for teachers on *how* to develop high quality provision in this area. We also find the language used concerning, we believe that this holistic approach to the full range of relationships and diversity in families, needs to be at the very centre of RSE provision just ensuring that learners 'have access to' provision that reflects their own situation does not go far enough.

It is critical that RSE recognises and supports the full spectrum of relationships and sexualities and that this is at the heart of RSE provision. The way that the paragraph regarding family life on p.2 is currently worded is problematic. While some attempt is made to recognise that there are strong and mutually supportive relationships outside of marriage is made, expression is awkward and risks confusion. There is no mention of sensitivities around different family forms and structures of support, with no acknowledgement or specific mention of young carers and looked after children. This risks stigmatisation. In addition LGBTQ families aren't acknowledged at this point in the guidance. Care needs to be taken

to ensure there is no stigmatisation of diverse family situations, and to ensure this is the case, they should be explicitly recognised.

6) Right to Withdrawal

It is welcome that the draft guidance attempts to address the issue of the right to withdrawal, while it includes basic information for schools on the legal requirements there is insufficient guidance on how this will work in practice. In general NSPCC Cymru/Wales has long opposed the right to withdraw from RSE, as we believe that relationships and sexuality education, and learning about keeping safe is a core entitlement that all children should receive. NSPCC Cymru/Wales regards RSE taught through a whole school approach, as an essential measure in preventing abuse, keeping children safe, and teaching them who to talk to, and where to seek support. Not only is this learning an entitlement that every child should receive, but trying to isolate and separate out different strands of the approach to relationships and sexual education will be difficult to manage in practice and will work against the sort of holistic and reinforcing approach that we would like to see provided. This will be particularly complicated with the roll out of the new curriculum where Areas of Learning and Experience are envisaged to be integrated across all subjects, meaning that discussions about relationships and sexuality could run through subjects as diverse as literature, history and geography. Trying to unpick RSE teaching so that children and young people could be withdrawn, would be extremely difficult. Indeed if these subjects are being taught effectively, they will be interwoven in such a way that it would be impossible to withdraw pupils from only the 'sex' aspects of these lessons. The practicalities of this have significant implications for young people who may miss out on vital relationship learning that they are entitled to receive. We would argue that retaining the ability to withdraw children from lessons undermines a child rights-based approach to policy development and we would be interested to review how this issue has been covered in the relevant CRIA accompanying this guidance. As previously mentioned, parents should be meaningfully engaged with RSE and supported to understand its place within a whole-school approach to safeguarding.

However, if due to the current legislative position it is decided that the right to withdraw needs to be retained, the guidance must better support teachers to navigate this. Best practice would include discussions with the parent and child regarding withdrawal, but there is no guidance on managing challenging situations and parental worries. As set out earlier in this response, parents should be meaningfully engaged with RSE and supported to understand its place within a whole-school approach to safeguarding. In order to assuage parents' fears regarding inappropriate sex education, the guidance must provide teachers with clear evidence of the crucial role RSE plays in safeguarding. Any discussions on withdrawing a child must be grounded in the evidence base. Teachers and schools require additional guidance to support these discussions with parents.

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?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

Yes this is crucial but we do not believe the approach as set out in the draft section is sufficient. In addition to co-producing RSE content with children and young people, NSPCC Cymru/Wales, feels that schools should actively engage with parents/ carers when designing and delivering their RSE curriculum. This is core to a whole school approach as set out in earlier Welsh Government guidance. However, the wording of this question is confusing, is this about consulting parents/carers/community in planning and developing RSE *policies* or the school’s delivery of a school’s RSE *programme*?

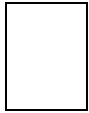
Working closely with parents to openly discuss concerns but also to allow them to be educated and become invested in their child’s learning in this area is an important step to ensuring that learning in school can be reinforced at home. Good communication between schools and parents can help to ensure that parents understand that RSE plays a key role in informing CYP about the signs of abuse, in encouraging bystander interventions and to encourage help-seeking behaviour. Supporting parents to share this learning with their child and engaging with parents/carers is vital when effectively embedding a whole school approach to RSE. However, while this vision is captured as one of the six principles and this is very welcome we believe further guidance and inspiration for how this should work in practice is required. It is not made clear that this approach is a vital component of a whole school approach. The guidance or accompanying resources need to include practical examples about how to do this in practice (e.g. via workshops, consultations, open sessions, homework/resources to support discussion at home).

Question 8 – Do you feel the guidance gives you the information you need to engage meaningfully with your learners to plan your RSE provision?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

N/A



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

Estyn's thematic review of Healthy Relationships Education in Wales¹⁰ found that teachers in Wales lacked the confidence and knowledge to effectively respond to the needs of learners. This emphasises the need for comprehensive and user-friendly guidance in this area. In addition for teachers who don't specialise in these subjects, it will be very difficult to adapt a curriculum without a base level of knowledge of subject material; what is age-appropriate; and what is the most accessible language for classroom delivery. There is too much onus on teachers to get this right, without sufficient support. Some teachers will have no experience of teaching these subjects and may feel uncomfortable discussing the material. The ability to choose what content is and isn't covered, and without a concerted effort to upskill and build the confidence of teachers, risks more difficult topics not being covered as we know is often the case at the moment.

Detailed and comprehensive Statutory Guidance on RSE alone is therefore not sufficient for ensuring high-quality and consistency in teaching of these subjects. Effective learning is dependent on a highly skilled, well-trained workforce, and Welsh Government must commit resources to ensure ongoing support and training. This needs to be done now to prepare for compulsory provision under the new curriculum to be rolled out from 2022.

- **In accordance with the recommendation made by the SRE Expert Panel it is vitally important that provision is made for a designated and trained RSE lead practitioner in every school to develop and deliver the RSE curriculum and embed RSE in the whole school approach.**
- To ensure the delivery of high quality RSE, it is imperative that teachers receive regular training on RSE to feel confident in what they are delivering.
- Reflecting the recommendations of the Expert Panel, Welsh Government should allocate necessary resources for funded CPD training to equip teachers with the knowledge and confidence for them to expertly deliver RSE and a detailed programme of training needs to be developed and signposted within the guidance.
- **Failing to provide adequate training for teachers on RSE jeopardises a school's ability to deliver these subjects effectively.**

As already stated, initial and ongoing teacher training should include how to sensitively and appropriately respond to disclosures of abuse and interact with a child who is disclosing.

¹⁰ Estyn: A review of healthy relationships education, June 2017, <https://www.estyn.gov.wales/sites/default/files/documents/A%20review%20of%20healthy%20relationships%20education.pdf>

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?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Supporting comments (no more than 250 words)

N/A

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

It is important for Welsh Government to acknowledge that there remain very few bilingual resources to support provision of SRE. In tandem with provision within the guidance of a much more detailed, exhaustive and regularly updated directory of key resources and partner organisations that can support delivery in schools, Welsh Government should provide translation of key books, resources and website to support the Welsh language to be used equally in the provision of SRE. This could be a wider project to support the Welsh Government's Cymraeg 2050 ambitions.

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

See above

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.

The current central emphasis on provision being developmentally appropriate risks diluting a rights-based approach which recognises that adequate SRE provision is a fundamental entitlement for children at every age of their development. As we have set out throughout this response it is possible to approach all topics in a developmentally appropriate way and we have cited a number of examples of how this can and is being done in practice with significant results. NSPCC Cymru/Wales believes that it is crucial that SRE is provided as a spiral and constantly reinforcing curriculum that builds through a child's development and journey through education. Schools and teachers need guidance and support and the leadership from Welsh Government to support them to embed this across every stage of a child's learning.

We are pleased to see a specific section considering RSE for learners with special educational needs or additional learning needs. However we believe the Welsh Government needs to carry out and publish a full equality impact assessment to ensure that learners with a protected characteristic are not negatively impacted. Disabled children are over three times more likely to be abused than non-disabled children. It is imperative that this cohort of children do not miss out on the opportunity to develop the knowledge and skills to recognise and speak out about abuse. Schools should strive to adapt resources to make sure they are accessible and should be supported to do so by Welsh Government. The NSPCC and partners have developed a short film series [Love Life](#) to help young people with Special Educational Needs or additional learning needs to explore feelings and help them identify strategies to stay safe from abuse when they develop friendships, independence and relationships. The resources will be available to access free of charge from the new NSPCC Learning Website this Autumn. This is a further resource that could be signposted within the RSE Guidance.

As we have set out in this response, NSPCC Cymru/Wales strongly believes that this guidance requires much more content or signposting to a suite of evidence-based resources and quality-checked external providers before it will be able to successfully realise the commendable vision and ambition that this draft guidance represents.

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:

Appendix 1

Let children know you're listening

A **safeguarding resource** to help you show children and young people that, whatever they want to share, you're ready to listen. There are three simple directions to remember...

Show you care, help them **OPEN UP**

Give them your full attention and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases like 'you've shown such courage today' help.

Take your time, **SLOW DOWN**

Respect pauses and don't interrupt them – let them go at their own pace. Recognise and respond to their body language. And remember that it may take several conversations for them to share what's happened to them.

Show you understand, **REFLECT BACK**

Make it clear you're interested in what they're telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.



NSPCC Learning

For more training and resources to help protect children visit learning.nspcc.org.uk

NSPCC Learning is a registered charity. NSPCC Learning is a registered charity. NSPCC Learning is a registered charity.

Appendix 2

Prevention education for primary schools: Keeping Safe

Keeping Safe is an innovative education programme commissioned by the Department of Education NI. This is the first whole school/ organisational development programme across the UK and Europe that seeks to embed the teaching of sensitive Keeping Safe messages into the schools safeguarding provision and all aspects of school life, impacting on the ethos and culture of the school organisation. It aims to teach every child in Primary 1 to Primary 7 class groups (age 4-11 yrs.) messages to keep them safe from bullying, neglect, physical, emotional, sexual, and domestic abuse. Recognised as a key component of the Department of Education Northern Ireland's child protection agenda, it was launched at Stormont by the Minister for Education Peter Weir on September 21st 2016. The programme recognises that teachers and other school staff have a developed expertise in teaching children and utilises this expertise to teach the most sensitive messages to children they know, in the safe and supportive environment of the classroom.

Developing Keeping Safe

Keeping Safe is a sustainable evidence based programme and as such has been shaped by the international research about effective school-based prevention programmes. This evidence tells us that programmes are most effective when they are whole school interventions, integrated across the curriculum, messages are age appropriate, presented incrementally and revisited, opportunities are provided to practice skills, and when parents are involved.

Keeping Safe has also been informed by a comprehensive needs assessment which was completed in 2011 by NSPCC on behalf of the Department of Education Northern Ireland. This work found significant gaps in children's knowledge and understanding in relation to keeping safe from sexual abuse and domestic abuse. Worryingly, children were unsure if they would be able to tell a trusted adult about domestic abuse or sexual abuse. Moreover, while teachers and parents recognised that children needed to be taught about keeping safe from abuse, they lacked the confidence to talk to children about these issues. They were unsure about the words to use and they didn't want to frighten children. They asked for training and suitable resources to build their skills and confidence to teach children about keeping safe from all forms of abuse. In the development of Keeping Safe we have worked with the Department of Education (NI) and other key statutory and voluntary agencies, schools, parents and children to promote a public health approach to preventative education.

The Keeping Safe programme

The programme is a whole school programme with 3 key components:

A suite of teaching and learning resources to build the capacity of school staff to teach and reinforce sensitive messages through the formal and informal curriculum. The classroom based materials have been developed across three themes; healthy relationships, my body and being safe. They include a wide range of materials including 63 lesson plans incorporating ten animations, eight animated stories and 24 interactive activities. The resources have been specifically designed for each age group and lessons

build on and extend prior learning. In practice 9 lessons (3 per term) will be delivered to each year group. Homework tasks have also been developed to engage and involve parents. Posters, wet break activities and 12 whole school/year or class assemblies have been developed to reinforce the messages being taught in class.

Training and ongoing support is available for all school staff; school leaders, teaching and non-teaching staff to build their capacity to teach the most sensitive keeping safe messages and embed the programme in all aspects of school life. This package includes three online modules concerned with introducing, embedding and delivering Keeping Safe in schools. Those leading the implementation of the programme in schools also receive one and a half days of face to face training to assist them in their role of embedding the programme in the ethos, policies, procedures and practice of their school. A further module, Adapting Keeping Safe has been developed for special sector schools. This module will help teachers in special schools adapt the programme to meet the needs of the children they teach. Communities of practice will be developed to provide further support to staff within and across schools as the programme is implemented.

Engagement with parents is built into the programme to ensure parents have a good understanding of the programme and have the knowledge, skills and confidence to reinforce messages that their children are receiving at school. Two workshops for parents based on NSPCC PANTS and the Share Aware materials have been developed and will be facilitated by NSPCC in schools. These have also been filmed and developed into video content for parents.

Evidence of effectiveness

The programme has been delivered to approx. 7000 children in mainstream primary and special schools across two academic years. A Randomised Control Trial was used to test programme effectiveness. Outcome data has been collected from children, parents and teachers 3 times between 2016 and 2018. The analysis has tracked change in the following outcomes across this 2 year period:

- Children's knowledge, understanding and skills to keep safe;
- Teachers' self-reported comfort and comfortableness in teaching keeping safe messages; and
- Parents' self-reported confidence to communicate with their child about keeping safe messages.

The last round of data collection was completed in June 2018. The preliminary analysis of the Children's data collected after 1 year of implementation has been completed and results so far are showing signs of positive significant differences in the knowledge and skills of children who have received the programme compared to those in the control group. The preliminary analysis of the teacher data indicates that teachers who have received the programme report significantly higher knowledge, comfort and confidence levels in teaching children Keeping Safe messages.

Alongside the RCT a small-scale process evaluation was undertaken to identify the key mechanisms and contextual factors that enable and support effective implementation of Keeping safe in the classroom and at the level of the whole school. Interim analysis of

the process evaluation data indicates that Keeping Safe has been very well received by, and is highly regarded by school level stakeholders including Governors, leadership, classroom teachers, learning assistants and parents. Moreover, children report responding positively to, and enjoying programme lessons, assemblies, and homeworks. Key enablers of early programme implementation include access to a structured prepared and well-resourced programme, school commitment to and ethos of safeguarding the welfare of their pupils, creation of a designated programme lead to champion the implementation of Keeping Safe in school, resourcing/prioritising of staff training through school development days and the availability of tailored NSPCC support to troubleshoot.

This evaluation will provide key learning for programme refinement, wider roll out and scale up. This pilot is one of the largest of its type in the world and has the potential to influence the education system in Northern Ireland, the United Kingdom and international good practice.