



Llywodraeth Cymru  
Welsh Government

# Draft Curriculum for Wales 2022

## guidance: feedback

### Introduction

We welcome your feedback on the draft Curriculum for Wales 2022 guidance.

The feedback period is open from 30 April and closes on 19 July 2019. We will review the feedback we have received and respond to the themes of the feedback following this time.

We will use this information to help us further refine draft Curriculum for Wales 2022 guidance ahead of making it available in January 2020.

There are both general and more detailed questions which you can feedback upon.

If you work in or support the delivery of education, you may wish to respond to more detailed questions around the new curriculum and assessment arrangements, and professional learning. These questions start broad and become more specific the further you progress.

#### **We recommend you read the following before you respond:**

- [A guide to Curriculum for Wales 2022](#)
- [The area\(s\) of learning and experience you want to feedback upon](#)
- [Assessment proposals to inform the development of statutory guidance](#)

If you complete this survey online you can save your feedback and return to complete it at any time. You will need to provide a name and email address for this purpose only. All published feedback will be kept anonymous. Keeping your personal information safe is important to us. Our website [privacy policy](#) explains how we use your information.

If you need assistance with this survey please e-mail  
[CurriculumForWales2022@gov.wales](mailto:CurriculumForWales2022@gov.wales)

## General Data Protection Regulation (GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation.

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

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Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer: Welsh Government Cathays Park Cardiff CF10 3NQ  e-mail: Data.ProtectionOfficer@gov.wales	The contact details for the Information Commissioner's Office are: Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Tel: 01625 545 745 or 0303 123 1113 Website: <a href="https://ico.org.uk/">https://ico.org.uk/</a>
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## Audience

The following questions help us to understand your relationship to the draft Curriculum for Wales 2022 guidance.

### Do you work in or support the delivery of education?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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### If yes, what is your organisation? (if no continue below)

Welsh-medium school (Primary)	<input type="checkbox"/>	Higher education institution	<input type="checkbox"/>
Welsh-medium school (Secondary)	<input type="checkbox"/>	Diocesan authorities	<input type="checkbox"/>
Welsh-medium school (Special)	<input type="checkbox"/>	Regional consortia	<input type="checkbox"/>
English-medium school (Primary)	<input type="checkbox"/>	Local authority	<input type="checkbox"/>
English-medium school (Secondary)	<input type="checkbox"/>	Private training provider	<input type="checkbox"/>
English-medium school (Special)	<input type="checkbox"/>	Third sector	<input type="checkbox"/>
Bilingual school (Primary)	<input type="checkbox"/>	Government	<input type="checkbox"/>
Bilingual school (Secondary)	<input type="checkbox"/>	Adult community learning	<input type="checkbox"/>
Welsh-medium middle school	<input type="checkbox"/>	Awarding organisation	<input type="checkbox"/>
English-medium middle school	<input type="checkbox"/>	Teaching union	<input type="checkbox"/>
Pupil referral unit (PRU)	<input type="checkbox"/>	Regulatory body (includes Inspectorate)	<input type="checkbox"/>
Special school	<input type="checkbox"/>	Governing body	<input type="checkbox"/>
Funded non-maintained setting	<input type="checkbox"/>	Other (please specify):	<input type="checkbox"/>
Further education college	<input type="checkbox"/>		<input type="checkbox"/>

### What is your primary role?

Headteacher	<input type="checkbox"/>	Chancellor/Vice-chancellor	<input type="checkbox"/>
Teacher	<input type="checkbox"/>	Lecturer	<input type="checkbox"/>
Practitioner	<input type="checkbox"/>	Pioneer	<input type="checkbox"/>
Newly qualified teacher	<input type="checkbox"/>	Governor	<input type="checkbox"/>
Teaching assistant	<input type="checkbox"/>	Challenge Advisor	<input type="checkbox"/>
Senior leader	<input type="checkbox"/>	School improvement officer	<input type="checkbox"/>
Supply teacher	<input type="checkbox"/>	Inspector	<input type="checkbox"/>
Principal/Vice-principal	<input type="checkbox"/>	Other (please specify):	<input type="checkbox"/>

### If you do not work in or support the delivery of education, in what capacity would you like to provide feedback?

Parent or carer	<input type="checkbox"/>	Employer	<input type="checkbox"/>
Adult 18+ (not a parent or carer)	<input type="checkbox"/>	Apprentice	<input type="checkbox"/>
Child or young person (under 18)	<input type="checkbox"/>	Other (please specify):	<input checked="" type="checkbox"/>
Student/academic	<input type="checkbox"/>	<b>Third Sector</b>	<input type="checkbox"/>

### Are you providing feedback on behalf of an organisation or group?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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If 'yes' please specify

#### **NSPCC Cymru/Wales**

NSPCC is 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.

NSPCC Cymru/Wales is pleased to have the opportunity to respond to the Welsh Government '*Draft Curriculum for Wales 2022*'. NSPCC Cymru/Wales has chosen to answer questions **A1**, **A2**, **A3**, and **C1** and **C5** and our comments only relate to the **Draft Statutory Guidance around the *Health and Well-being Area of Learning and Experience***, as this is the area most relevant to our work as the UK's leading charity specialising in children protection and the prevention of cruelty to children.

## Section A – General questions

**A1. To what extent do you agree that the [draft Curriculum for Wales 2022 guidance](#) will help children and young people to become:**

- **ambitious, capable learners**
- **healthy, confident individuals**
- **ethical, informed citizens**
- **enterprising, creative contributors?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
	<b>x</b>			

## Comments:

We want all children to grow up healthy, happy, and safe. NSPCC Cymru/Wales welcomes the vision in the new curriculum for children and young people to become ambitious and capable learners, enterprising and creative, ethical and informed citizens and healthy and confident. We strongly supported the proposals in 'Successful Futures' for the new Health and Wellbeing Area and recognition that *'Children and young people need to experience social, emotional and physical wellbeing to engage successfully with their education.'* NSPCC Cymru/Wales strongly welcomes the introduction of mandatory sex and relationships education 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. We believe it 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.

If delivered effectively, RSE can play an important role in providing information and helping children to develop the knowledge and skills 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 implementation of RSE should also lead to positive outcomes by helping children speak out and adults taking action to prevent and stop abuse. Good quality RSE should be seen as part of a holistic approach to safeguarding children.

Additionally, there is strong evidence about how a 'wellbeing' approach supports better attainment; this has been clearly demonstrated by three large scale reviews of research on the impact of social and emotional learning (SEL) programmes on elementary and middle-school students in the United States. This research shows that *"SEL programmes improved students' social-emotional skills, attitudes about self and others, connection to school, positive social behaviour and academic performance (...) SEL programming improved students' achievement test scores by 11 to 17 percentile points, indicating that they offer students a practical educational benefit."*<sup>1</sup>

In the Health and Wellbeing area of learning and experience, we welcome the section on 'violence and staying safe', especially how to recognise and seek support for unhealthy relationships. However, NSPCC Cymru/Wales feels that these areas are not sufficient to keep children safe from abuse and neglect. Neglect, is the most common form of maltreatment, which research shows 1 in 10 children experience<sup>2</sup>. It is vital that children understand that not being loved, physically cared for and taken to medical appointments is neglect of their needs. Public Health Wales research into adverse childhood experiences (ACEs) identifies ten forms of child maltreatment and harmful household environments that can affect child development and outcomes<sup>3</sup>. It is important that children and young people are taught to recognise all these forms of abuse, physical, emotional, sexual and neglect which are mainly perpetrated by members of the family's trusted network. It is also important that children recognise harmful household environments such as domestic abuse, when they may be living in constant fear of the perpetrator. Children and young people need not just to be able to recognise maltreatment, but also be able to speak out so that abuse and neglect can be prevented and stopped. Then the process of recovery and

improving wellbeing can start so they can focus on their learning and academic performance.

**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, physical/ sexual/ emotional abuse, neglect, and persistent harmful household environments such as domestic and substance misuse in an age, developmentally appropriate and trauma informed way. It is essential that there is consideration about how sessions may be received by children experiencing abuse, that professionals are trained and supported to recognise disclosures and equipped to follow safeguarding procedures should any concerns arise with signposting to support for CYP involved. That school can play a significant mitigating role as a safe haven for children experiencing abuse and neglect in all its forms needs to be recognised. Consideration of how to build this recognition into SRE provision and the delivery of a Whole School Approach needs to be made more explicit.**

In addition to helping children and young people develop the skills and knowledge 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 abuse: they often lack the knowledge that what is happening to them is abuse and in addition the communicative skills and confidence to seek help<sup>4</sup>. 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 them<sup>5</sup>. 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.<sup>6</sup> 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 purposeful 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, inquire 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.

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<sup>1</sup> Durlak, J., Weissberg, R., Dymnicki, A., Taylor, R., Schellinger, K. (2011). *The Impact of Enhancing Student's Social and Emotional Learning: A Meta-Analysis of School-Based Universal Interventions*. *Child Development* 82:1, 405-432; Payton, J., Weissberg, R.P., Durlak, J.A., Dymnicki, A.B., Taylor, R.D., Schellinger, K.B., & Pachan, M. (2008). *The Positive Impact of Social and Emotional Learning for Kindergarten to Eighth Grade Students: Findings from Three Scientific Reviews*. Chicago, IL: Collaborative for Academic, Social and Emotional Learning.

<sup>2</sup> 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.

<sup>3</sup> <http://www.wales.nhs.uk/sitesplus/888/page/88504> (accessed 17/07/19)

<sup>4</sup> 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.

<sup>5</sup> Allnock, D. and Miller, P. (2013) *No one noticed, no one heard: a study of disclosures of childhood abuse*. London: NSPCC.

<sup>6</sup> Ibid.

Throughout 2018 the NSPCC consulted with a wide variety 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 children always feel listened to. Its visual and memorable and designed to help professionals remember some key interpersonal skills to make it clear they are listening and taking a child seriously. The poster can be downloaded free of charge 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. This will require specific training for professionals to feel equipped to follow safeguarding procedures should any concerns arise, and, with signposting to additional ongoing support for affected children and young people. Young people should be provided with up to date signposting to key organisations that can support them (reflecting a range of relationships and sexualities). This should include Childline and we recommend that schools display Childline posters and that RSE teachers refer children and young people to the continually updated Childline website for information and remind children and young people that they can call or message online for confidential support whatever the problem. <https://www.childline.org.uk/>

**A2. Looking at the *what matters statements*, to what extent do you agree that these sum up the priorities for children and young people's learning?**



Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
			<b>x</b>	

Comments:

Online safety needs to be interwoven through each what matters statement. We acknowledge it is mentioned in the introduction but we strongly believe that teachers need clear direction that online safety needs to be explicitly covered in each what matters statement. Technology is central to children's lives. In 2017, just over half of children aged 12 had at least one social media account, despite the minimum age requirements for many sites being 13. By age 13, that figure rises to nearly three quarters.<sup>7</sup> Today's children don't see the division between 'online' and 'offline' worlds. Social media is now a ubiquitous part of childhood but alongside wonderful opportunities it is important children are taught about the array of potential harms it can open up.<sup>8</sup>

NSPCC Cymru/Wales understands that the what matters statements are not meant to be exhaustive lists of issues, but rather are intended as lenses to inform the way children and young people are taught. However, we feel that there are some elements missing from the what matters statements, and that they should be clearer on a number of issues:

### **Developing physical health and well-being has lifelong benefits**

We are pleased that the planning for learning section acknowledges the interdependency of physical and mental health and emotional well-being. However, this section makes a suggestion that those different elements of learning could be considered together and we feel that the connection between physical and mental health and well-being needs to be made more explicit, and not something that is optional to consider.

### **How we process and respond to our experiences affects our mental health and emotional well-being**

We are pleased that the "experiences, knowledge and skills" section (p34) states that learners need to be able to communicate how they are feeling and ask for help when needed, but feel that this needs to be made clearer and stronger through the different progression steps.

We are concerned that this what matters statement and the achievement outcomes under each progression step place a strong emphasis on self-regulation, and would like to see much more focus on young people being supported to recognise when they need help and being able to speak out. Research has shown that young people take a long time to speak out about abuse and neglect, with one study citing 7.8 years as the average time it takes for young people to disclose.<sup>9</sup> It is therefore particularly important that children and young people are taught as early as possible that help is available if they need it, and that they should speak to a trusted adult if they experience abuse or neglect. This should be done in an age-appropriate way and the NSPCC has developed a number of resources which can support teachers to do this: our PANTS resource introduces the concept of inappropriate touch to primary school age children in an easy to understand, user-friendly way.<sup>10</sup> The PANTS resources are available bilingually. Our Speak Out Stay Safe service is also available to visit every primary school in Wales and equip children with the knowledge and understanding they need to stay safe from abuse and neglect. Through assemblies and workshops, children are taught to speak out if they are worried, either to a trusted adult or Childline.<sup>11</sup>

In the "planning for learning section" (p32), the healthy relationships heading should also include a bullet point on the importance of recognising abuse and neglect in

developing positive relationships. It is crucial that learners are able to recognise the signs of an unhealthy relationship and seek help to keep themselves safe.

The “experiences, knowledge and skills” section (p34) also needs to be strengthened by

- adding examples of support that learners can access to manage their mental health and emotional well-being. Childline and Meic should be included in those examples.
- By adding a bullet point under the learners need to know list: “how past experiences, such as abuse and neglect, impact on mental health and well-being”.

### **Our decision-making impacts on the quality of our lives and the lives of others**

We are pleased to see bullet points about identifying risks and unsafe actions under progression steps 2 and 3.

However, we would suggest that the planning for learning section (p39) is strengthened by adding a bullet point under the healthy relationships heading: “Be able to recognise abuse and neglect, speak out and access help and support”.

### **How we engage with different social influences shapes who we are and our health and well-being**

The healthy relationships heading under the planning for learning section (p46) needs to be strengthened by including examples of different relationships and cover LGBTQ+ issues. We are concerned that if these are not clearly mentioned, there is a possibility that some teachers could choose not to talk about them. Young people need to be taught about a range of different relationships.

### **Healthy relationships are fundamental to our sense of belonging and well-being**

We are very concerned that the “ability to communicate when I do not feel safe and respected” – is only introduced at progression step two. This is a skill which needs to be introduced from the Foundation Phase upwards, and, using a spiral curriculum should enable teachers to do so in a safe and age-appropriate way. As outlined earlier under the “how we process and respond to our experiences affects our mental health and emotional well-being” what matters statement, there are a number of resources, such as the NSPCC’s PANTS and Speak out Stay Safe service which teachers can draw upon to help introduce staying safe and speaking out skills as early as possible.

Under progression step 3 (p51), the point about recognising safe and unsafe situations should say specifically how learners should be able to do this, and outline sources of support such as Childline and Meic.

Under progression step 5 (p52), the point about recognising the characteristics of unhealthy relationships should also include where to seek help.

<sup>7</sup> Ofcom (2017) Children and parents: media use and attitudes report. London: Ofcom

<sup>8</sup> NSPCC (2018). How Safe Are Our Children: The most comprehensive review of child protection in the UK, 2018. London: NSPCC.

<sup>9</sup> Miller, P: No One Noticed, No One Heard, NSPCC (2013)

<sup>10</sup> <https://learning.nspcc.org.uk/research-resources/schools/pants-teaching/>

<sup>11</sup> <https://learning.nspcc.org.uk/services/speak-out-stay-safe/>

We are concerned by the wording used under the decision-making heading of the planning for learning section (p53): “ensure personal safety in relationships.” We feel that this places the onus on young people to stay safe, to communicate if they feel unsafe, and to seek safety. This is echoed by the very concerning wording used on p55 which states that “learners need to know how to protect themselves from unwanted sexual attention in relationships”.

Young people have a clear right to be safe under the UNCRC, and responsibility to keep children safe lies with adults, with teachers having the potential to be key in achieving this. This curriculum needs to be strengthened as outlined throughout our response to question A2 to give teachers the tools to do this.

The “links with other areas of learning and experience” section on p54 needs to be widened to include all sexual relationships under the science and technology heading. This will ensure that young people are taught about all relationships, including LGBTQ+ issues.

We would also like to see the last bullet point of the experiences, knowledge and skills section on p 55 reworded to read “recognise unhealthy or harmful relationships and seek help to stay safe”.

Finally, the glossary at the end of the document also needs to include definitions of:

- Gender
- Healthy relationships
- LGBTQ+ relationships
- Sexuality
- Sex

**A3. Do you think the [draft Curriculum for Wales 2022 guidance](#) could be improved?**

Yes	X	No	
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**If yes, how do you think it could be improved?**

NSPCC Cymru/Wales is strongly supportive of the vision which underpins the development of health and well-being and RSE guidance for schools. We are concerned that in its current form, the statutory guidance on RSE does not provide sufficient clarity or detailed content to support provision on the full spectrum of relationships and sexualities which we see as crucial in order to ensure that RSE fulfils its potential to contribute to keeping children safe, both on and offline. It is welcomed that schools have flexibility about how and what they teach, so that they can respond effectively to the range of needs and lived experiences of children and young people. However there is a tension between flexibility and prescription of curriculum content and we believe the opportunity must be seized to ensure that all children and young people in Wales are taught in a consistent and high quality way

about the full spectrum of relationships and sexualities to contribute to keeping them safe.

The guidance needs to provide much more practical information and support to schools to improve the delivery of RSE. RSE is a vast, complex and broad topic, so a comprehensive guide to support teachers in delivering high quality age-appropriate lessons is required. This needs to be available bilingually.

The list of potential areas that could be considered in relationships and sexuality education (p.16-17) is a useful starting point for thinking about provision, but the draft statutory guidance does not provide the level of information we would see as necessary across a range of key topics.

A number of additional areas should be included. Within the human body and development section, it is essential that children and young people learn about:

- **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 how to stay safe, 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).
- **Diverse relationships and sexualities:** NSPCC Cymru/Wales are extremely concerned that there is no explicit mention of LGBT+ relationships in any of the draft statutory guidance on health and wellbeing. 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. 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.
- **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 Learners 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. Online safety needs to be interwoven through each what matters statement.

One of NSPCC Cymru/Wales' key concerns is that there is no direction or clarity in the draft statutory guidance for teachers and schools about how to design and deliver **an age and developmentally appropriate** curriculum, in relation to RSE. NSPCC Cymru/Wales welcome the proposed changes to ensure RSE is provided in a way that is age and developmentally appropriate to children receiving it. 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 increasingly 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 's innovative Keeping Safe programme is an evidence-based preventative education programme that aims to teach every child from 4-11 years messages around bullying, neglect, physical, emotional, sexual and domestic abuse, demonstrates how messages around sensitive topics can be delivered to young children. The programme has been delivered to approx. 7000 children in mainstream primary and special schools across two academic years in Northern Ireland. 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. 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 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. NSPCC Cymru/Wales met with Welsh Government officials in June 2019 to explain more about the Keeping Safe programme. Please find attached a briefing on Keeping Safe in Appendix 2. This programme already has fully developed content, lesson plans and teacher training modules that could be easily adapted to use in Wales and we would welcome discussions on a possible pilot in some Welsh primary schools.

Keeping Safe can be used alongside our other primary school support materials such as the [PANTS resource](#), our [Speak Out Stay Safe](#) programme, and [Share Aware](#) and [Net Aware](#) resources. The messages covered by these resources are essential to give children the skills they need 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/>.

**A4. To what extent do the [assessment proposals](#) support settings and schools to identify a learner's strengths, achievements and areas for improvement so they can support a learner's progression by identifying next steps?**

Extremely supportive	Very supportive	Moderately supportive	Slightly supportive	Not at all supportive
Comments: N/A				

**A5. In relation to reporting to parents and carers, please tell us your views on:**

- the role of the learner in contributing to the reporting process
- the role of the parent/carer in the reporting process
- the information you would want to include.

N/A

## Section B – Detailed questions

**B1. How helpful would you find the [draft Curriculum for Wales 2022 guidance](#) in developing a curriculum for your learners?**

Extremely helpful	Very helpful	Moderately helpful	Slightly helpful	Not helpful at all
Comments: N/A				

**B2. How well do you think the [draft Curriculum for Wales 2022 guidance](#) allows for all children and young people to gain a broad range of learning experiences?**

**You may want to consider learning across the different disciplines and subjects which form part of an area of learning and experience.**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments: N/A				

**B3. How well do you think [draft Curriculum for Wales 2022 guidance](#) allows for all children and young people to specialise from age 14 in a particular discipline or subject?**



Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				
N/A				

**B4. The [draft Curriculum for Wales 2022 guidance](#) is intended to support practitioners and teachers to design a curriculum specific to children and young people. To what extent will practitioners and teachers have the flexibility and support to do this?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Comments:				
N/A				

**B5. How well do you think the [draft Curriculum for Wales 2022 guidance](#) supports learners to develop skills in the cross-curricular responsibilities (literacy, numeracy and digital competence) and other cross-cutting themes (e.g. Welsh dimension and international perspective, wider skills, careers and work-related experiences, relationships and sexuality education)?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				
N/A				

**B6. How could the *cross-curricular frameworks* ([National Literacy and Numeracy Framework](#) and [the Digital Competence Framework](#)) be refined to support the development of literacy, numeracy and digital competence across the new curriculum?**

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**B7. How well do you think the guidance for each [area of learning and experience](#) will support children during the Foundation Phase years?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments: N/A				

**B8. How well do you think the [draft Curriculum for Wales 2022 guidance](#) supports and enables learners to progress at an appropriate pace for their development within the area of learning and experience from ages 3 to 16?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments: N/A				

**B9. How well do you think the [draft Curriculum for Wales 2022 guidance](#) will provide a basis to help young people progress beyond the age of 16?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				
N/A				

**B10. Formative assessment should be given primacy in the new curriculum. How well do the [assessment proposals](#) promote this principle?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				
N/A				

**B11. [The assessment proposals](#) propose a broader approach to moderation – *supporting professional dialogue regarding the nature of progression, the selection of appropriate learning and assessment activities, as well as ensuring a shared understanding of what achievement looks like in the context of the achievement outcomes.***

**How would you envisage your setting /school putting this approach into practice? What further support do you think would be needed?**

N/A
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**B12. What practical issues for settings and schools do we need to be mindful of if the [assessment proposals](#) are to be made a reality?**

N/A

**B13. What implications do you see from the [draft Curriculum for Wales 2022 guidance](#) for you and your colleagues' [professional development](#) needs in respect of the:**

- impact on pedagogical practice
- implications of planning for a purpose-driven curriculum
- professional learning requirements linked to pedagogy
- developing in-school and cross-school collaboration
- specific areas of professional learning aligned to the areas of learning and experience
- opportunities for professional enquiry approaches support delivery of the new curriculum?

N/A

**B14. What are the professional learning challenges and opportunities to enact the principles in the [assessment proposals](#)?**

N/A

**Section C – Specific: Areas of learning and experience**

**C1. If you would like to provide specific feedback relating to one or more specific areas of learning and experience, please make a selection and add your comments below.**

Expressive Arts		Language, Literacy and Communication	
Health and Well-being		Mathematics and Numeracy	
Humanities		Science and Technology	

**Comments (if you choose more than one area of learning and experience please label each comment):**

N/A
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**C2. How well do the progression steps within the [Mathematics and Numeracy Area of Learning and Experience](#) articulate the proficiencies illustrated in the principles of progression?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all

Comments: N/A
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**C3. How well do the learning sections within the [Languages, Literacy and Communication Area of Learning and Experience](#) provide for learners to develop translinguaging skills?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all

Comments: N/A
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**C4. How well does the guidance within the Languages Literacy and Communication Area of Learning and Experience provide for the development of language acquisition and learning?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:  N/A				

**C5. How well does the Health and Well-being Area of Learning and Experience guidance support a whole-school approach to supporting health and well-being?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
				<b>x</b>
Comments:  <p>NSPCC Cymru/Wales believes that a whole school approach is fundamental to developing high quality health and well-being and RSE education. 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 they can talk to and obtain support. This in turn will improve the wellbeing of children to enable them to focus on learning and academic performance. NSPCC Cymru/Wales welcomes the brief description of a whole school approach (p.19) and the example given about healthy food is a useful insight onto how it can be embedded. However, the guidance should go further, providing a clear definition, and an illustrative overview of what this would look like for the delivery of RSE at both primary and secondary level. Practical examples of <b>how</b> this can be achieved in practice is essential. More examples are needed about how to ensure children and young people’s voices are at the heart of the curriculum design, how to effectively engage with parents/carers on RSE, clarity about useful resources and organisations to draw on and assurances around teacher training. Suggesting and supporting schools to carry out a Whole School Approach audit 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.</p> <p><b>Engaging with Children &amp; Young People</b>            The vision and intention that learning in the health and well-being area of learning and experience will be driven by the needs of learners, is welcomed. This has the potential for teaching to be flexible enough to respond effectively to a diverse range of issues that may arise in the lived experience of children and young</p>				

people at various ages and stages in their development. To do this, it is essential that relationships and sexuality education is co-produced with children and young people to ensure a relevant and responsive curriculum that encapsulates children's voice and agency. **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. They should be given the opportunity to identify their needs, comment on any policies and contribute to curriculum planning.** 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 (on a yearly basis) 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 statutory guidance for Health and Well-being. Created jointly by Cardiff University, NSPCC Cymru/Wales, 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 to identify issues that matter to them in relation to a range of relationships and sexuality issues. This co-creation approach should be 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, with activities relevant to primary school age. These resources should be clearly signposted within the guidance. Welsh Government should also consider making funding available for the development and delivery of training in using the resource for all schools in Wales.

### **Engaging with Parents and Carers**

Engaging with parents/carers is vital when effectively embedding a whole school approach to health and well-being and RSE. Working closely with parents/carers 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 and transparency between schools and parents/carers is essential in building trust and confidence in the teaching of RSE. It can also help to ensure that parents/carers understand that RSE plays a key role in informing children and young people about the signs of abuse and encourage help-seeking behaviour. While the importance of involving parents/carers in the school community is briefly mentioned (p.19), there is no emphasis on why this is so important, nor how schools can engage with parents/carers. It is not made clear that this is a vital component of a whole school approach. **The guidance needs to include practical examples of how to actively engage with parents/carers when designing and delivering RSE and the health and well-being curriculum.** This could include regular and accessible opportunities for parents/carers to attend workshops, open sessions, consultations, invitations to review teachings materials and sharing copies of RSE policies and practice, information sheets, or homework/resources to support discussions at home. For example, in June 2019 the Department of Education has published two guides for

parents on Relationships, Sex and Health Education for primary<sup>12</sup> and secondary<sup>13</sup> age pupils in England that schools can use to communicate with parents about the teaching of relationships, sex and health education. Similar guides for parents in Wales would help schools to communicate with parents what is being taught in RSE and the health and well-being area of the curriculum and the importance of this. Schools should also recognise that parents might need support and guidance in talking about relationships, sex and sexuality at home, and they should be provided with evidence based information resources to help foster discussions and support.

### **Resources**

There is a highly concerning lack of signposting to high quality resources on RSE and health and well-being. Directing schools and teachers to high quality resources on RSE will be vital in 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. 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.

NSPCC Cymru/Wales supports the recommendation from the Expert Panel about developing a RSE 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 RSE 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.

It is important for Welsh Government to acknowledge that there are very few bilingual resources to support provision of RSE. In tandem with provision within the guidance of a much more detailed, exhaustive and regularly updated directory of

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See: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/812593/RSE\\_primary\\_schools\\_guide\\_for\\_parents.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812593/RSE_primary_schools_guide_for_parents.pdf)

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/812594/RSE\\_secondary\\_schools\\_guide\\_for\\_parents.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812594/RSE_secondary_schools_guide_for_parents.pdf)



key resources and partner organisations that can support delivery in schools, Welsh Government should provide translation of key books, resources and websites to support the Welsh language to be used equally in the provision of RSE. This could be a wider project to support the Welsh Government's Cymraeg 2050 ambitions.

### **External Organisations**

In addition to signposting resources, external organisations should also be signposted to support and enhance teaching of SRE. It is important that a detailed list of reputable health and third sector organisations who provide evidence based SRE sessions, be provided. It would be helpful if this was organised into topics that schools could draw on. For example, NSPCC's '[Speak Out. Stay Safe](#)' service, is a free service available to all Primary School in the UK<sup>14</sup>, and the [Keeping Safe programme](#), which supports primary school age children to spot signs of abuse and know how to seek help from adults if they feel unsafe.

### **Professional Development for Teachers**

Key to a whole school approach is that RSE is taught by teachers who are trained, supported, knowledgeable and confident about the issues and challenges relevant to young people lives. To ensure the delivery of high quality RSE, it is imperative that teachers receive regular training on RSE to feel confident about what they are delivering. Estyn's thematic review of Healthy Relationships Education in Wales<sup>15</sup> found that teachers in Wales lacked the confidence and knowledge to effectively respond to the needs of learners. This emphasises the need for trained RSE specialist teachers and comprehensive and user-friendly guidance in this area.

Effective learning is dependent on a highly skilled, well-trained workforce, and Welsh Government must commit resources to ensure ongoing support and training:

- **In accordance with the recommendation made by the Sex and Relationships Education 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.**
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<sup>14</sup> Between April 2018 and February 2019, the Speak Out Stay Safe programme was delivered to 428 schools in Wales, and 73,811 children were taught about how to keep themselves safe. Since the NSPCC Schools Service first began in 2011, 85% of the 1,459 primary schools in Wales have been visited at least once by the Schools Service (NSPCC aims to visit every school every three years), and the NSPCC is working hard to reach the remaining 15% of schools to deliver this service.

<sup>15</sup> Estyn (2017) A review of healthy relationships education. Accessed via:

<https://www.estyn.gov.wales/sites/default/files/documents/A%20review%20of%20healthy%20relationships%20education.pdf> – 19/03/19

Trained RSE teachers will have a level of knowledge of subject material knowledge about what is age-appropriate and the most accessible language for classroom delivery. We would be concerned about the combination of the ability for schools to choose what content is and isn't covered and no concerted effort to upskill and build the confidence of teachers, would risk more important and difficult topics not being covered.

It is also essential that initial and ongoing **teacher training includes how to sensitively and appropriately respond to disclosures of abuse and interact with a child who is disclosing**. Recently, the NSPCC has worked with cross sector professionals who work with children to find out how they can be better supported to respond to disclosures of abuse<sup>16</sup>. 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](#) to help adults ensure 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. NSPCC has also developed an animation for professionals around responding to disclosures of abuse. It is available in [English](#) and [Welsh](#).

It is vital that children and young people see RSE 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. Thought should also be given to guiding and providing training to support teachers to take an ACE aware and trauma informed approach to the development of their whole school approach, integrating such awareness throughout a school's RSE provision would be welcome.

### **Is there anything else you would like to add or feedback on?**

NSPCC Cymru/ Wales has not commented on other elements of the new curriculum, but the importance of getting this Health and Wellbeing AoLE (and in particular RSE) right is crucial if we are to keep children safe and improve children's wellbeing and consequently academic performance. As we have set out in this response, NSPCC Cymru/Wales strongly believes that the draft statutory guidance on health and wellbeing requires much more detailed content, the upskilling and training of specialist teachers to ensure effective delivery of RSE and needs to be embedded into a whole school approach.

NSPCC offers all primary schools in Wales our Speak Out Stay Safe service to equip children with the knowledge and understanding they need to stay safe from abuse and neglect. We recommend that Welsh Government also signpost schools to a suite of evidence-based resources and quality-checked external providers, such as this NSPCC service, to assist schools to successfully realise the commendable vision and ambition that this draft guidance represents.

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<sup>16</sup> Baker, H. et al (2019) Let children know you're listening: the importance of an adult's interpersonal skills in helping to improve the child's experiences of disclosure. London: NSPCC.

**Return by 19 July 2019**

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