



End Violence Against Women Coalition

**Guide for responding to the Relationships,
Sex, and Health Education (RSHE)
consultation**

June 2024

INFORMATION FOR RESPONDENTS:

- The Department of Education (DfE) are conducting a [public consultation](#) on a [draft update of the Relationship, Sex and Health Education \(RSHE\) statutory guidance](#).
- The deadline for the consultation is **11th July 2024**.
- You can submit your response via an [online form](#) or [download the consultation questions](#), and contact the DfE via email - rsheguidance.consultation@education.gov.uk.
- ERAW have outlined below a draft response to the questions in the consultation relevant to preventing violence against women and girls (VAWG), and summary bullet points with suggestions on what answers could cover to support organisations in drafting their response. **We encourage organisations to draft their response in their own words and include evidence from their service** to ensure the DfE take every submission into account, and receive the widest evidence base in the hope that the next government will act on this evidence base and ensure next steps will protect and improve RSHE for children and young people.
- We have included additional text from the DfE consultation paper to provide necessary context to the questions – DfE text is in *italics*. ERAW's suggestions and draft responses are in coloured text boxes or highlighted in yellow.
- This consultation process is taking place over the General Election period and means the responses will be analysed by a new government and creates a great deal of uncertainty around what will happen next. **However, we believe it is critical that the next government is fully informed of the significant risks this proposed guidance poses to the safety and wellbeing of children and young people, and any commitment to preventing VAWG. We therefore encourage members to respond to the consultation if they are able, and thank you for taking the time to do so.**
- Respondents may also find the following documents useful:
 - [ERAW statement](#) on the draft update of the RSHE statutory guidance.
 - [Joint briefing on VAWG](#) and the RSHE statutory guidance.
 - ERAW's [About Time Report: a Whole Schools Approach to VAWG](#).
 - Other RSHE consultation guides: [Sex Education Forum](#) and [Brook](#).

CONSULTATION QUESTIONS:
Responder/ Organisational Details
Q1-10

- Provide organisational information.

Review timetable

11. Do you agree that we move away from a rigid commitment to review the guidance every three years?

Yes

No

Structure of the guidance

12. Do you agree that the changes to length and style of the guide make the guidance easier to understand and follow?

Yes

No

Schools' relationships and sex education policies

All primary schools are required to have a policy for relationships education, and secondary schools are required to have a policy for relationships and sex education. We have made some changes to the guidance on schools' policies for relationships and sex education, including asking schools:

- *to differentiate between relationships and sex education (if they teach sex education) so that parents are clear about the content they can request withdrawal from.*
- *to explain how they will handle questions from pupils in relation to content that is restricted to older children, that relates to topics in primary sex education that the school doesn't cover, or relates to sex education from which the pupil has been withdrawn.*
- *to explain how parents can view curriculum materials.*

13. Do you agree that these changes will do enough to ensure that schools are transparent with parents and that parents have sufficient control regarding what their child is learning?

Yes

No

EVAW suggests:

- Not answering question 13 as its leading nature implies agreement that there is a significant issue with transparency and control for parents.

14. If you would like to explain your answer, please do so here. Please try to limit your response to under 250 words. Please do not add any details which may easily identify you or your organisation.

EVAW suggests including:

- Evidence and examples that challenge the idea that there is a significant issue with transparency with parents.
- Evidence of why it's important to foster a positive relationship between schools and parents to tackle VAWG, and concerns about how this guidance is not likely to support this.
- Evidence which highlights the important role of parents in tackling VAWG and delivering effective RSHE, alongside a need to trust in teachers and specialist VAWG organisations in the delivery of RSHE, with examples of best practise locally.
- Examples of the risks of parental control over the curriculum.
- Any concerns about the resource and practical implications around the proposed transparency measures in the guidance.

EVAW's draft response:

We challenge the idea put forward, and heavily weighted, in this guidance that there is a significant issue with transparency and parental control, especially considering the very real and pressing issues RSHE needs to tackle, including violence against women and girls (VAWG). When this review was announced, EVAW, with over 50 experts and organisations tackling VAWG, wrote to the then Secretary of State for Education, Gillian Keegan MP¹, calling for this vital education to not be politicised, and to ensure RSHE guidance is driven by what young people want and need.

Parents are a crucial part of the school community. Working in partnership is essential to children's education, wellbeing, and the functioning of a Whole School Approach to VAWG.² We've long called for schools to have more resourcing and support to deliver this education in partnership with parents, the wider community and specialist services. However, instead of championing RSHE, and cultivating the necessary positive relationship between parents and schools in this regard (and providing adequate resourcing for this); we're concerned this guidance frames the relationship between parents and schools as adversarial, undermining support for this vital education. Our specialist members report that parents are overwhelmingly supportive of RSHE when efforts are made to engage them, contrary to the provisions this guidance focuses on.

¹ EVAW (2023). [Don't politicise Relationships, Sex & Health Education, 50+ VAWG experts warn](#)

² EVAW (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#)

In addition, it is important to note there are a great many children for whom home is not a safe place, and ERAW remains concerned with provisions which allow parents to pull their children from vital RSHE education without this being an indicator of risk.³ School must be somewhere children are safe, free to disclose violence and abuse to a trusted adult, and supported to explore their worries and concerns. Teachers should be trained and supported to identify signs of abuse, as they are frequently the trusted adult that a child feels able to confide in. This must not be put in jeopardy.

Openness with parents

Parents are the first teachers of their children. It is vital that they know what their children are being taught and are reassured that the resources used are factual and appropriate. The Secretary of State has already written to schools setting out her expectations about how schools share RSHE materials with parents and the revised guidance is clear that:

- *There is a strong public interest in parents being able to see all materials used to teach RSHE, if they would like to, and schools should not agree to contractual restrictions which prevent this.*
- *Contractual clauses which seek to prevent schools sharing resources with parents at all are void, given the public interest in parents being able to see all RSHE material.*
- *Schools should comply with any applicable copyright law when sharing materials with parents, and this may be through a parent portal or a presentation, but might include parents being given copies of material to take home.*

15. Do you agree with our proposed approach to increased transparency on RSHE material?

Yes

No

16. If you would like to offer any comments to explain your answer, please do so here.

ERAW suggests including:

- Please see suggestions for question 14.

ERAW's draft response:

Please see our response to question 14. It is important to note that any proposals to improve engagement with parents on RSHE should be focused on building a supportive and collaborative community to tackle issues such as VAWG (a vital part of a whole-schools approach⁴) - driven by what children and young people say they need from such vital

³ ERAW (2018). [Call for evidence on developing Relationships and Sex Education guidance](#)

⁴ ERAW (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#)

education.⁵ As outlined in our response to question 14, we are concerned that the current approach does not support a positive dynamic between parents and schools, and that the way in which the guidance has framed the 'protection of children' and parental rights, will actually undermine children's rights to safety and education, and any commitments to tackling VAWG.

Furthermore, whilst we fully support the need for parental engagement with RSHE, proposals must be workable for an already overworked and pressurised school workforce.⁶ As outlined in our '#AboutTime – A Whole School Approach to Ending Violence Against Women and Girls' report,⁷ teachers need more support and resourcing to deliver effective RSHE. And, although we defer to the expertise of our colleagues in the education sector, we question if the additional demands calling on teachers to make available to parents all materials ahead of delivery (beyond an overview of the year's curriculum) is realistic. This approach would likely require lesson plans and materials to be ready perhaps a year in advance, which is a significant leap from how other lessons are often planned in schools and would be out of sync on the demands for other subjects.

We also note the critical role of the specialist VAWG sector in the development of high quality RSHE resources, and provision of expert facilitation of RSHE education in schools.⁸ The specialist VAWG sector is chronically underfunded, especially in the field of prevention, so if the government is seeking to put additional demands on their partnership work with schools to enable improved parental engagement - these demands must be realistic for an already overstretched sector, and must come with much needed resourcing and funding.

Age limits on teaching certain subjects

The age limits were developed taking into account the advice from the independent panel, and seek to ensure that, as content is presented to prepare young people to stay safe and keep others safe, children are not introduced too early to concepts that they may not have the maturity to grasp, or which may be distressing. Age limits are focused on topics which, even when presented in a careful and well-intentioned way, may inadvertently give the message to young people that they could or should be engaging in or exploring adult activities rather than enjoying childhood.

The panel focused on five areas where they felt pupils, parents and teachers would most benefit from additional clarity: the changing adolescent body, sexual harassment and sexual violence, sexual relationships and sexual health, pornography and sexual orientation. The panel considered a range of evidence to inform their advice, including conversations with parents and faith groups.

⁵Sex Education Forum (2024). [Young people's RSE poll 2024](#)

⁶National Education Union: [Workload and working hours](#)

⁷ EVAW (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#)

⁸ Please see examples of best practise in EVAW (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#)

The independent panel made a series of helpful recommendations, which have been central to our considerations. As well as making recommendations on age limits, the panel recommended that schools take a mastery approach to teaching topics within RSHE, building knowledge sequentially, and offered some advice on how topics might be sequenced. For example, if you consider the topic of being safe, children start to learn about privacy and boundaries in primary school, and build on this throughout their education, but they are not taught about the explicit details of sexual violence until they are much older.

The tables in the guidance reflect this approach.

The age limits we are consulting on are summarised below for reference, but you have the opportunity to comment on them under each relevant topic in this document. They are also marked clearly in the curriculum tables in the draft guidance.

| Topic | Age limit |
|---|--------------------------|
| <i>The risks relating to online gaming, video game monetisation, scams, fraud and other financial harms, and that gaming can become addictive. Why social media, some apps, computer games and online gaming, including gambling sites, are age restricted.</i> | <i>Not before year 3</i> |
| <i>Growth, change and the changing adolescent body. This topic should include the human lifecycle. Puberty should be mentioned as a stage in this process, including the key facts about the menstrual cycle, including physical and emotional changes.</i> | <i>Not before year 4</i> |
| <i>Sex education topics taught in primary, which should be in line with what pupils learn about conception and birth as part of the national curriculum for science.</i> | <i>Not before year 5</i> |

| Topic | Age limit |
|---|--------------------------|
| <i>What constitutes harmful sexual behaviour, including sexual harassment and the concepts and laws relating to it, including revenge porn, upskirting and taking intimate sexual photos without consent, public sexual</i> | <i>Not before year 7</i> |

| | |
|---|---------------------------------|
| <p><i>harassment, and unsolicited sexual language / attention / touching.</i></p> <p><i>The concepts and laws relating to sexual exploitation and abuse, grooming, stalking, and forced marriage.</i></p> <p><i>Circulating images and information and how to safely report to trusted adults the non-consensual creation or distribution of an intimate image.</i></p> <p><i>The risks of inappropriate online content, including pornographic content, without discussing the details of sexual acts.</i></p> | |
| <p><i>Direct references to suicide (as part of teaching about health and wellbeing).</i></p> | <p><i>Not before year 8</i></p> |
| <p><i>Discussing the details of sexually explicit materials, in the context of learning about the risks of inappropriate online content, including pornographic content.</i></p> <p><i>Discussing the explicit details of violent abuse, including the detail of topics such as rape, sexual assault, female genital mutilation (FGM), virginity testing and hymenoplasty</i></p> <p><i>Discussing the explicit details of violent abuse when discussing the concepts and laws relating to domestic abuse including coercive control, emotional, sexual, economic or physical abuse, and violent or threatening behaviour</i></p> | <p><i>Not before year 9</i></p> |
| <p><i>Explicit discussion of the details of sexual acts, in the context of teaching about intimate and sexual relationships, including in relation to contraception and STIs.</i></p> | <p><i>Not before year 9</i></p> |

Please comment on these age limits in the relevant sections below.

Flexibility for age limits

While setting out age restrictions on when sensitive topics should be taught, we have also allowed schools a degree of flexibility to allow schools to respond promptly to issues which pose an imminent safeguarding risk to their pupils. This means that in certain circumstances, schools may decide to teach age-limited topics earlier, provided it is necessary to do so in order to safeguard pupils and provided that teaching is limited to the essential facts, without going into unnecessary details. For example, if a primary school becomes aware that pupils are sharing pornographic materials, the guidance allows schools to address this appropriately with younger pupils without going into details of the sexual acts viewed. Note this question is not about the age limits themselves.

17. Do you think this flexibility will help to ensure that pupils are adequately safeguarded?

Yes

No

18. Do you think this flexibility is warranted?

Yes

No

19. If you would like to explain your answer to questions 17 or 18, please do so here

EVAW suggests including:

- Evidence which highlights how teachers and the specialist VAWG sector have been delivering age-appropriate RSHE within existing framework and guidance, and their expertise to do so.
- Evidence which stresses the importance of being child-led and responding to realities of their lives.
- Evidence of need to teach about gender stereotypes, consent and respect from an early age.
- Evidence of the realities of children's lives regarding VAWG e.g. prevalence of different forms of VAWG, access to violent pornography etc.
- The risks of enforcing rigid age restrictions, with an emphasis on the evidence base relating to the prevention of VAWG and specific restrictions noted on VAWG related topics.
- Evidence of the importance of open dialogue and skill development for children and young people.
- Any concerns about the practical implementation of the guidance for those delivering RSHE.

EVAW's draft response:

EVAW members have long delivered quality and age appropriate RSHE⁹, and helped schools respond to children's needs and lived realities. Those doing this vital work know how to talk to young people in age-appropriate ways – teachers and the specialist VAWG sector are already doing it, and have been for some time. This guidance does not reflect the knowledge and expertise of those whose work is informed directly by young people's needs and experiences. We are deeply concerned by the introduction of set age limits and the prescriptive approach taken in this guidance. We do not believe this approach is evidence based, it will put children at greater risk of harm, and severely undermines the government's commitment to prevent violence against women and girls.

Although the flexibility noted is essential if this approach to age limits is taken forward, we reject the overall proposal regarding age limits. Furthermore, these proposals represent a significant risk to rolling back government commitments to prevent VAWG through RHSE (a key strand of the 2021 Tackling VAWG Strategy¹⁰) - only providing support and responses after the harm is done is not prevention, and violates children's rights to a safe childhood, free from abuse.

Decades of research shows that teaching children about harmful gender stereotypes, consent, respect and healthy peer relationships from the earliest stages of school are key to preventing VAWG and intersecting forms of violence.¹¹ As noted by the government's own minister for safeguarding, education on such key topics should be happening earlier, not later: "We need to improve education [to prevent the escalation of VAWG]...We do not do enough at that very early stage...There needs to be a bit more consistency in education, and I would start it really young." - Laura Farris MP, Minister for Victims and Safeguarding - oral evidence to the Women and Equalities Committee on preventing the escalation of violence against women and girls.¹²

The needs highlighted by young people¹³ are at odds with the RSHE review's focus on age restrictions within the curriculum. Any debates on what is age-appropriate cannot take place outside of the reality of what children are facing and encountering online, and with their peers. Rather than arbitrary age caps on what can or cannot be discussed, children need the space to talk about their experiences and opportunity to develop the skills to stay safe in the world they live in. For example, we know that 10% of children are watching pornography from as young as 9, and most commonly from 13.¹⁴ Children in primary schools are already on TikTok, YouTube and other platforms the adults in their lives may not have even heard of. We know

⁹ Brook. [What is Age-Appropriate RSHE](#)

¹⁰ Home Office (2021). [Tackling violence against women and girls strategy](#)

¹¹ End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).

¹² Women and Equalities Committee (2024). [The escalation of violence against women and girls - Oral evidence](#). UK Parliament.

¹³ Sex Education Forum (2024). [Young people's RSE poll 2024](#)

¹⁴ Children's Commissioner (2023). ['A lot of it is actually just abuse' - Young people and pornography](#).

they are viewing harmful content,¹⁵ which is directed onto their feeds by algorithms driven predominantly by revenue-generation, so it is imperative to create and protect spaces for open, honest and educational conversations from a younger age, if we are to see a sea change in the societal attitudes that tolerate and normalise violence against women and girls. The approach proposed in this draft guidance will shut down conversations and make it more challenging for children to be able to identify unhealthy relationships, push sexual abuse into the shadows and leave children less able to find help if they need it.

Furthermore, the guidance provides very little information or support for teachers in how to 'respond to difficult questions', noting the very real risk that children may turn to inappropriate sources of information should these needs not be met. Introducing age restrictions would not enable schools to meet the diverse and changing needs of the children and families they serve, nor would it reflect effective curriculum design or pedagogy.

There is also an overall lack of coherence in what can be taught, and when. While pornography, image-based sexual abuse and sexual harassment can be taught from year 7, sexual acts, sexual violence and domestic abuse cannot be taught until year 9. Given image-based sexual abuse is a form of sexual violence, and it is impossible to teach about pornography without being able to reference sexual acts - we are concerned that these new age restrictions are not only incoherent and confusing for teachers and their pupils, they may deter schools from teaching these topics at all. It is also important to note that this arbitrary and inaccurate differentiation and sequencing is likely to have an especially detrimental impact for children with special education needs (who are also disproportionately at risk of being subjected to abuse), as the proposed guidance inhibits teachers' ability to be clear and simply address the links, patterns and root causes of gender-based violence.

RSHE must meet the needs of all children and young people, and advance efforts to prevent and tackle VAWG. This means guaranteeing children and young people the information and skills they need to be safe, free and empowered, as opposed to moving towards age restrictions which are bound to make teachers feel wary about answering questions that children bring to the classroom. In light of emerging evidence about the extent to which young people are being exposed to misogynistic influencers online and increasingly looking to pornography to fill the gaps in sex education, teachers must be enabled and equipped with the much-needed support and resources to hold space for young people to openly discuss these themes. The evidence indicates that open conversations are key to effective RSHE¹⁶, and is also what children and young people say they need more of.¹⁷¹⁸ We cannot afford the cost to these young people, and for wider society, of shutting these conversations down.

¹⁵ Ibid

¹⁶ Setty, E. Ringrose, J. and Hunt, J. (2024). [Policing harmful sexual behaviour among young people in schools](#). University of Surrey, UCL, University of Bedfordshire and Economic and Social Research Council

¹⁷ Boyson, L. & Taylor-Gee, C. (2022). ['I love it – but wish it were taken more seriously': An exploration of relationships and sex education in English secondary school settings](#). SafeLives.

¹⁸ Sex Education Forum (2023) [Young People's RSE Poll 2022](#)

Sexual orientation

We have streamlined the section on teaching Lesbian, Gay, Bisexual and Transgender topics, so that relevant content is in one place. This includes additional content on gender reassignment and gender identity, which is discussed in the section below. We have also clarified that primary schools have discretion over whether to discuss sexual orientation or families with same-sex parents.

20. Do you agree with changes to the lesbian, gay and bisexual content in the LGBT section (note that the next section provides an opportunity to comment on text about gender identity and gender reassignment)?

Yes

No

21. If you have any comments to explain your answer, please do so here. Please try to limit your response to under 250 words

EVAW suggests including:

- Concern about the guidance’s approach to LGBT+ education and rights.
- Evidence of what children and young people want to see in regard to LGBT+ education.
- Evidence of the potential impact of the proposed changes for LGBT+ young people.
- The links between protecting LGBT+ rights and education, and the prevention of gender-based violence and universal human rights.

EVAW’s draft response:

We are deeply concerned by the approach taken to LGBT+ education and rights in the draft guidance, and the wider government narrative in the media which has accompanied the review. There is a deeply worrying denial of LGBT+ lives and realities, reminiscent of section 28. Allowing primary schools, the option not to include same-sex parents when discussing families and banning any discussion of gender identity for all young people, is not only harmful to some of the most marginalised children, but it is illogical given it does not reflect the world around us – in our homes, communities, and wider culture – and many children’s lived realities. We are concerned that this guidance will work contrary to the government’s responsibilities and duty of care for all young people. It is essential that government guidance does not fuel the marginalisation of certain lives and restrict the ability for schools to reflect their communities and hold space for difference.

We know that LGBT+ young people are at increased risk of violence in school, and homophobic bullying is common as a way to police conformity to gendered expectations, even in primary schools¹⁹ - highlighting how this guidance will not only fail to keep children safe but

¹⁹ Girlguiding (2023). [Girls Attitudes Survey 2023](#)

worsen the situation for many young people. Furthermore, these edits to the guidance go against what children and young people say they need and want to see more of, which includes more LGBT+ education.²⁰²¹

We strongly oppose this regression in the protection of LGBT+ rights in the draft guidance. As an intersectional feminist organisation, we know that any attack on the principle of universal human rights undermines our work to end violence against women and girls, and harms us all.²² We are concerned that the review process has not been driven by meeting the needs of young people, and instead has reacted to contested claims about inappropriate curriculum resources - concerns we raised [with over 50 experts and organisations tackling VAWG, when we wrote to the Secretary of State for Education, Gillian Keegan MP](#), calling for this vital education to not be politicised, and to ensure RSHE guidance is driven by what young people want and need.

Gender reassignment

The new guidance states that pupils should know the world around them, and understand the law on equality and the protected characteristics, including gender reassignment. However, the guidance is clear that schools should not teach pupils about the contested concept of gender identity. Along with other factors, discussing such theories with pupils could prompt some pupils to start to question their gender. The new content is informed by the outcome of the Cass Review and the principles that underpin the draft guidance for schools and colleges on gender questioning pupils (gender questioning guidance), both of which advocate for a cautious approach. We consulted on the draft gender questioning guidance separately, from 19 December to 12 March, and are currently considering the outcomes, so the content of that guidance is not within the scope of this consultation.

The new guidance states that:

- *Schools should teach about the protected characteristics, including gender reassignment.*
- *Schools should be clear that an individual must be over 18 before they can legally reassign their gender. This means that a child's legal sex will always be the same as their biological sex and that, at school, boys cannot be legally classified as girls or vice versa.*
- *Schools should not teach about the concept of "gender identity" which is a highly contested and complex concept.*
- *If asked about the topic of gender identity, schools should teach the facts about biological sex and not use any materials that present contested views as fact, including the view that gender is a spectrum.*

²⁰ Boyson, L. & Taylor-Gee, C. (2022). [‘I love it – but wish it were taken more seriously’: An exploration of relationships and sex education in English secondary school settings](#). SafeLives

²¹ Sex Education Forum (2023) [Young People's RSE Poll 2022](#)

²² EVAW (2022). [How the Bill of Rights harms the fight to end violence against women](#)

- Schools should not use materials that use cartoons or diagrams that oversimplify this complex concept or that could be interpreted as aimed at younger children.
- Schools should consult parents on the content of external resources on this topic in advance and make all materials available to them on request.

22. Do you agree with the proposed changes related to gender identity and gender reassignment in the guidance?

Yes

No

23. If you have any comments to explain your answer, please do so here:

EVAW suggests including:

- Reference points made to question 21.
- Any concerns about the practical implementation of the guidance for those delivering RSHE in light of the inconsistencies on teaching about gender reassignment (as a protected characteristic) alongside a ban on teaching about gender identity.
- Any concerns that this draft guidance is based on principles from the DfE's *Gender questioning children guidance* which is also still in draft form.

EVAW's draft response:

Please see our response to question 21 for an outline of our grave concerns about the approach to LGBT+ education and rights in the guidance. Additionally, we note the inconsistencies in the guidance regarding teaching about gender reassignment (as a protected characteristic) alongside a ban on teaching about gender identity. This is likely to throw up significant challenges for teachers trying to navigate conversations and questions from young people about LGBT+ lives, as well as gender stereotypes, and we are deeply concerned that fear to hold such conversations (as a result of the ban, and the wider rhetoric from politicians and the media) is likely to mean that teachers shut down conversations that children and young people desperately need and want. It is also important to note that this guidance refers to the 'gender questioning children guidance' and the principles which underpin it. However, that guidance is still in draft form and we are yet to see the government's response to the public consultation on this. To base the RSHE guidance on principles not yet reviewed following a public consultation is indicative of a concerning lack of due process. This does not allow for sufficient scrutiny of the evidence base for these far reaching and impactful plans which will affect some of the most marginalised young people.

Addressing prejudice, harassment and sexual violence

We have included a new section in the guidance specifically on addressing prejudice, harassment and sexual violence and harmful sexual behaviours, in light of evidence of the prevalence of sexual harassment in some schools. The section includes new content on

addressing the harmful behaviours that pupils may be exposed to, including online, which may normalise harmful or violent sexual behaviours - for example, by giving pupils the opportunity to identify positive male role models. This new section also highlights the role of staff in avoiding language that might perpetuate harmful stereotypes or suggest that victims are to blame for abusive behaviour.

We have also included new content relating to sexual harassment and sexual violence in the curriculum, including by adding fixated and obsessive behaviours, such as stalking, to the secondary Respectful Relationships topic, and offering clearer guidance on teaching about image-based sexual abuse in the secondary Online and Media topic.

The secondary Being Safe topic has been strengthened to include more of the detail on communicating and recognising consent, to be clear that this is a key plank in pupils' learning to keep others safe. The Being Safe topic also now lists specific forms of sexual harassment that may otherwise be neglected, including revenge porn, upskirting, public sexual harassment, and unsolicited sexual language / attention / touching.

24. Do you agree that the revised content on addressing prejudice, harassment and sexual violence is a helpful response to evidence of the prevalence of sexual abuse in schools?

Yes

No

25. If you would like to explain your answer, please do so here. Please limit response to 250 words

EVAW suggests including:

- Evidence that highlights the importance of covering VAWG and gender equality in the RSHE guidance.
- Welcome the new additions relevant to the prevention of VAWG, however raising concerns with piecemeal approach.
- Evidence which outlines best practise and pedagogical approach to teaching RSHE.
- Evidence the need for well sequenced curriculum to build understanding of the societal factors which underpin VAWG, linking discussions about gender and intersecting forms of inequality, gender stereotypes, and discussions about power and abuse dynamics etc.
- Evidence the importance of skill development and open dialogue for children and young people.
- Stress the importance of ensuring the guidance meets the needs of marginalised children and young people and provide any relevant examples and evidence.
- Note any key outstanding gaps in regard to VAWG.

EVAW's draft response:

Violence against women and girls is endemic in our society, and in our schools²³. In an increasingly online world lived via apps and social media, young people are exposed to a greater risk of harm than ever before. Access to violent pornography (often depicting sexual offences) has never been easier, sex offenders can access and manipulate children online, and young people are among those most affected by cyberflashing and image-based sexual abuse (so-called 'revenge porn'). This crisis is deepened with the increasing popularity of misogynistic influencers who are negatively shaping attitudes to sex and consent²⁴ - undoubtedly contributing to a worrying regression in young people's views.²⁵

Schools are a critical site for the protection of children and young people and present the best collective opportunity to challenge attitudes which condone abuse and transform the long-term likelihood of abuse in adult relationships. We therefore particularly welcome the additional references to tackling misogyny and sexism, and how to engage boys in such discussions; wider discussion on gender, racial, ableist, and homophobic stereotypes; the inclusion of pornography; reference to the normalisation of sexual abuse online; the importance and recognition of the culture within school to enable or inhibit VAWG; and all other references to forms of VAWG and the societal factors which underpin it.

However, despite these welcome additions, overall, the guidance lacks a considered, coherent and comprehensive approach to preventing and tackling VAWG. It is essential that the guidance situates the different forms of abuse noted within the continuum of VAWG,²⁶ and approaches the topic with a gendered understanding, and a human rights framework that is centred on equality, with an understanding of intersecting inequalities (e.g. the compounding impact of sexism, racism, ableism, homophobia) - rather than the current piecemeal approach. The guidance should set out a well sequenced curriculum to build understanding of the societal factors which underpin VAWG, linking discussions about gender and intersecting forms of inequality, gender stereotypes, and discussions about power and abuse dynamics (which are notably absent). This approach would also enable students to make links between different forms of VAWG, more easily encompassing new and emerging forms of VAWG, and remedy some of the gaps regarding what forms of VAWG are covered and to what extent.

We welcome the reference for the need to acknowledge the impact of stereotypes, including racial stereotypes. However, for the guidance to truly address the specific ways Black and

²³ Ofsted (2021). [Review of sexual abuse in schools and colleges](#). Department for Education.

²⁴ YouGov (2023). [One in six boys aged 6-15 have a positive view of Andrew Tate](#).

²⁵ Crown Prosecution Service and Equally Ours (2024). [Public understanding of rape and serious sexual offences](#)

²⁶ VAWG is commonly experienced as a continuum of violence often across women's lifetimes, that cannot be properly understood without acknowledging the inter-connected instances and impacts. (Kelly, L. (1988) *Surviving sexual violence*).

minoritised girls are subjected to racialised sexual harassment, violence and abuse,²⁷ and the disproportionate punishments meted out to Black children,²⁸²⁹ the guidance needs to outline to teachers what an intersectional approach to RSHE looks like. There is an overall absence of analysis of inequality and discrimination and the ways in which these intersect and impact children's experiences. This not only fails to reflect Black and minoritised children's daily realities but also presents a missed opportunity to inform and protect those who are disproportionately subjected to violence and abuse and face the greatest barriers to support and justice.

As mentioned in the response to 19, there is an incoherence to the sequencing of topics within the different age limitations regarding topics related to VAWG. For example, while pornography, image-based sexual abuse and sexual harassment can be taught from year 7, sexual acts, sexual violence and domestic abuse cannot be taught until year 9. Given image-based sexual abuse is a form of sexual violence, and it is therefore impossible to teach about pornography without being able to reference sexual acts, we question how teachers would be able to follow the proposed guidance and provide the education needed on these key topics. Attempting to separate forms of gender-based violence in this way would mean teachers are unable to show how these acts are all connected, and to address the links, patterns and root causes of gender-based violence.

There is also a notable absence of the needs of children with special education needs in the guidance. Children with special educational needs and disabilities (SEND) often receive poorer quality RSHE and disabled students report being infantilised by teachers when talking about issues of sexuality.³⁰³¹ Furthermore, as noted earlier, we are particularly concerned about the impact of the incoherent sequencing of some of the age restricted VAWG topics for SEND children, and the subsequent lack of clarity in which these topics could then be taught.

What is critically lacking is an approach which seeks to teach children and young people the skills they need to navigate relationships in the world they live in. The guidance is, in many places, quite limited in its focus on teaching principally about the law, and its reference to good/ bad character traits, rather than giving children the skills to navigate the challenging realities of their lives. Education which narrowly focuses on telling children 'wrong from right' is shown to be ineffective - children and young people can often identify what they are meant to say in the classroom under these filtered conditions, but this does not translate into real life

²⁷ Sundaram, V., Jessop, N., Bell, B. & Jackson, E. (2022). [Everything is racialised on top: Black and minoritised girls' and young women's experiences of public sexual harassment in the UK](#). Plan International UK.

²⁸ Wilmot, J. M., Migliarini, V., & Ancy Annamma, S. (2021). Policy as Punishment and Distraction: The Double Helix of Racialized Sexual Harassment of Black Girls. *Educational Policy*, 35(2), 347–367.

²⁹ End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).

³⁰ Boyson, L. & Taylor-Gee, C. (2022). ['I love it – but wish it were taken more seriously': An exploration of relationships and sex education in English secondary school settings](#). SafeLives.

³¹ Sex Education Forum (2023) [Young People's RSE Poll 2022](#)

experiences and interactions.³² This is why it is so important to invest in the delivery of meaningful and effective RSHE which can enable honest and open conversations, rather than shutting them down, which this guidance will in effect do. Children and young people tell us that that is what they want - safe space to talk about these topics with trusted adults³³³⁴ - we must listen to them.

The revised content also needs to be further strengthened, especially with the ever expanding realities of the online world, technology, and VAWG; and greater recognition of school as a possible site of harm and the realities of peer on peer sexual abuse.³⁵ We appreciate that due to the length of the guidance it would be impossible to include everything, which is why guidance which sets out a framework for teaching about VAWG based on the continuum of abuse, with a gendered understanding, and a human rights framework that is centred on equality, and with an understanding of intersecting inequalities (e.g. sexism, racism, ableism, homophobia); would be an effective and helpful approach for teachers. We would also call for this statutory guidance to be accompanied by further guidance for teachers on some of the key issues e.g. online and tech enabled VAWG, and peer on peer sexual abuse; and note that we are still awaiting the long over-due guidance from Department of Education on sexual harassment and abuse, and the accompanying research, conducted by Brook on behalf of the department. We also note a concern with the inclusion of reference to mandatory reporting on child sexual abuse, and the potential for spreading misinformation when the details of this scheme have not yet been worked through or passed in primary legislation.

Primary sex education

The new guidance is clear that where primary schools choose to teach sex education, its purpose is not to prepare pupils for sexual activity in later life, but to focus on giving pupils the information they need to understand human reproduction and for their own safety. Primary schools should take account of the age restrictions in the secondary RSHE curriculum tables.

The new guidance continues to recommend that primary schools have a sex education programme but restricts this to no earlier than years 5 or 6, and is clear that if a primary school teaches sex education, it should draw on the knowledge pupils are developing about the human life cycle, as set out in the national curriculum for science.

26. Do you agree with the restriction on teaching sex education only in years 5 or 6?

³² Setty, E. Ringrose, J. and Hunt, J. (2024). [Policing harmful sexual behaviour among young people in schools](#). University of Surrey, UCL, University of Bedfordshire and Economic and Social Research Council

³³ Boyson, L. & Taylor-Gee, C. (2022). [‘I love it – but wish it were taken more seriously’: An exploration of relationships and sex education in English secondary school settings](#). SafeLives.

³⁴ Sex Education Forum (2023) [Young People’s RSE Poll 2022](#)

³⁵ National Policing Vulnerability Knowledge and Practice Programme (2023). [National Analysis of Police-Recorded Child Sexual Abuse and Exploitation \(CSAE\) Crimes Report 2022](#).

Yes

No

27. If you would like to make any comments to explain your answer, please do so here. It would be helpful if you could share your own views on appropriate age limits for this topic, for example if you think they are too low or too high.

EVAW suggests including:

- Reference response to question 19 regarding concerns of an approach within the guidance for prescriptive and rigid age limitations.

EVAW draft response:

Please see our answer to question 19 for an outline of our significant concerns and rejection of the approach within the guidance for prescriptive and rigid age limitations - noting our concerns this approach will shut down vital conversations needed to ensure children's safety and wellbeing, and the need to trust in the expertise of teachers and specialist organisations to deliver age-appropriate education.

Secondary topics: Online and Media, Respectful Relationships, including friendships, and Being Safe

28. We have placed an age limit on the following content in the secondary Respectful Relationships, including Friendships topic: What constitutes harmful sexual behaviour and why, and that such behaviour is unacceptable, emphasising that it is never the fault of the person experiencing it. This should not be taught before year 7. Do you agree with this age limit?

Yes

No

29. We have placed an age limit on the following content in the secondary Respectful Relationships, including Friendships topic: That some types of behaviour, including within relationships, are criminal, including violent behaviour and emotional abuse, such as controlling or coercive behaviour. Schools should not, however, teach about the details of violent abuse before Y9 as it is important that pupils are not introduced to distressing concepts when they are too young to understand them. Do you agree with this age limit?

Yes

No

30. We have placed an age limit on the following content in the secondary Online and Media topic: About circulating images and information and how to safely report to trusted adults the non-consensual creation or distribution of an intimate image. Pupils should understand that

*making, keeping or sending naked or sexual images of someone under 18 is a crime, even if the photo is of themselves or of someone who has consented, and even if the image was created by the child and/or using AI generated imagery. Pupils should understand the potentially serious consequences of asking for naked, semi-naked or sexual images, including the potential for criminal charges and severe penalties including imprisonment. This topic should not be taught before year 7. **Do you agree with this age limit?***

Yes

No

31. *We have placed an age limit on the following content in the secondary Online and Media topic: The impact of viewing harmful content, including pornography, that presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others, and can negatively affect how they behave towards sexual partners. This can affect pupils who see pornographic content accidentally as well as those who see it deliberately. The risks of inappropriate online content can be discussed in an age-appropriate way from year 7, however, the details of sexual acts should not be discussed before year 9. **Do you agree with this age limit?***

Yes

No

32. *We have placed an age limit on the following content in the secondary Being Safe topic: The concepts and laws relating to harmful sexual behaviour, including sexual harassment, revenge porn, upskirting and taking/sharing intimate sexual photographs without consent, public sexual harassment, and unsolicited sexual language / attention / touching. This should not be taught before year 7. **Do you agree with this age limit?***

Yes

No

33. *We have placed an age limit on the following content in the secondary Being Safe topic: The concepts and laws relating to sexual exploitation, grooming, stalking, and forced marriage. This should not be taught before year 7. **Do you agree with this age limit?***

Yes

No

34. *We have placed an age limit on the following content in the secondary Being Safe topic: The concept and laws relating to sexual violence, including rape and sexual assault. Whilst it's important for pupils to understand the key principles around sexual offences and violence, for example the importance of understanding what consent means, schools should not teach about this in any sexually explicit way before year 9. **Do you agree with this age limit?***

Yes

No

35. *We have placed an age limit on the following content in the secondary Being Safe topic: The physical and emotional damage which can be caused by female genital mutilation (FGM),*

virginity testing and hymenoplasty, where to find support, and the law around these areas. This should include that it is a criminal offence to perform or assist in the performance of FGM, virginity testing or hymenoplasty, or fail to protect a person under 16 for whom someone is responsible from FGM, or to take girls who are UK nationals abroad for FGM, regardless of whether it is lawful in that country. This should not be taught before year 9, except for where schools have identified a greater risk of FGM at an earlier age or have pupils who have been affected by FGM and need support. **Do you agree with this age limit?**

Yes

No

36. We have placed an age limit on the following content in the secondary Being Safe topic: The concepts and laws relating to domestic abuse including controlling or coercive behaviour, emotional, sexual, economic or physical abuse, and violent or threatening behaviour¹. Schools should not teach about the details of violent abuse before year 9 as it is important that pupils are not introduced to distressing concepts when they are too young to understand them. Do you agree with this age limit?

Yes

No

37. If you would like to offer any comments about the age restrictions in the secondary Online and Media, Respectful Relationships, including Friendships, and Being Safe topics please do so here. It would be helpful if you could share your own views on appropriate age limits for these topics, for example if you think they are too low or too high. Please try to limit your response to under 250 words.

EVAW suggests including:

- Reference response to question 19 regarding concerns of an approach within the guidance for prescriptive and rigid age limitations.

EVAW's draft response:

Please see our answer to question 19 for an outline of our significant concerns and rejection of the approach within the guidance for prescriptive and rigid age limitations - noting our concerns this approach will shut down vital conversations needed to ensure children's safety and wellbeing, and the need to trust in the expertise of teachers and specialist organisations to deliver age-appropriate education.

Secondary topic: Intimate and sexual relationships, including sexual health

This topic includes information about choices around sex, including about when and whether to have sex, about sexual consent, reproductive health, strategies for resisting sexual pressure,

facts about contraception, facts about pregnancy and choices around pregnancy, facts about STIs and reducing risks of transmission, facts about the impact of alcohol and drugs on sexual behaviour, and information about where to get help. Explicit discussion of the details of sexual acts should only take place in so far as it is necessary to teach these topics and should not be taught before year 9.

38. Do you agree with the age restriction on the secondary Intimate and sexual relationships, including sexual health topic?

Yes

No

39. If you would like to offer any comments about this age restriction, please do so here. It would be helpful if you could share your own views on appropriate age limits for these topics, for example if you think they are too low or too high. Please try to limit your response to under 250 words.

EVAW suggests including:

- Reference response to question 19 regarding concerns of an approach within the guidance for prescriptive and rigid age limitations.

EVAW's draft response:

Please see our answer to question 19 for an outline of our significant concerns and rejection of the approach within the guidance for prescriptive and rigid age limitations - noting our concerns this approach will shut down vital conversations needed to ensure children's safety and wellbeing, and the need to trust in the expertise of teachers and specialist organisations to deliver age-appropriate education.

Health and wellbeing

40. We have placed an age limit on the following content in the primary Online Safety and Harms topic within health education: why social media, some apps, computer games and online gaming, including gambling sites, are age restricted. This should not be taught before year 3.

Do you agree with this age limit?

Yes

No

41. We have placed an age limit on the following content in the primary Online Safety and Harms topic within health education: the risks relating to online gaming, video game monetisation, scams, fraud and other financial harms, and that gaming can become addictive. This should not be taught before year 3. Do you agree with this age limit?

Yes

No

42. We have placed an age restriction on the whole of the primary *Developing Bodies* topic within health education. This should not be taught before year 4. This covers:

- growth, change and the changing adolescent body. This topic should include the human lifecycle. Puberty should be mentioned as a stage in this process.
- The key facts about the menstrual cycle, including physical and emotional changes.

Do you agree with this age limit?

Yes

No

43. The secondary *Health and Wellbeing* topic is now clear that, given the sensitivity and complexity of content on suicide prevention, direct references to suicide should not be made before year 8. **Do you agree with this age limit?**

Yes

No

44. If you would like to offer any comments about these age restrictions, please do so here. It would be helpful if you could share your own views on appropriate age limits for these topics, for example if you think they are too low or too high.

EVAW suggests including:

- Reference response to question 19 regarding concerns of an approach within the guidance for prescriptive and rigid age limitations.

EVAW's draft response:

Please see our answer to question 19 for an outline of our significant concerns and rejection of the approach within the guidance for prescriptive and rigid age limitations - noting our concerns this approach will shut down vital conversations needed to ensure children's safety and wellbeing, and the need to trust in the expertise of teachers and specialist organisations to deliver age-appropriate education.

[Question 45-46 relate to Health and Wellbeing section - EVAW will not be suggesting template response to this section as outside area of expertise]

[Question 46-47 relate to Suicide Prevention - EVAW will not be suggesting template response to this section as outside area of expertise]

Additional topics

There are a number of additional areas that we propose adding to the statutory guidance following submissions from other government departments, stakeholders and experts. These include:

- *Loneliness*
- *New content on gambling*
- *Prevalence of 'deepfakes'*
- *Antimicrobial resistance*
- *Healthy behaviours during pregnancy*
- *Illegal online behaviours including drug and knife supply*
- *Personal safety, including road, railway and water safety*
- *Vaping*
- *Menstrual and gynaecological health including endometriosis, polycystic ovary syndrome (PCOS), heavy menstrual bleeding*
- *Parenting and early years brain development*
- *Virginity testing and hymenoplasty*
- *Bereavement.*

49. Do you agree with this additional content?

Yes

No

50. If you have any comments to explain your answer, please do so here

EVAW suggests including:

- Welcome any relevant additional content e.g. prevalence of deepfakes.
- Reiterate any concerns and evidence about the piecemeal approach taken in the guidance.

EVAW's draft response:

We particularly welcome the inclusion of education on deepfakes but worry the guidance will not provide teachers with the information they need to navigate this fast paced area and would want to see deepfakes linked to the sections relating to VAWG and image-based abuse. The approach to the additional content does appear to lack coherence, and a considered and comprehensive approach. There is just one mention of the Online Safety Act, noting teachers should ensure 'pupils should be made aware of the relevant legal provisions. Considering the complexities of the act, more support will undoubtedly be needed to support teachers to do this. Furthermore, we would again encourage the guidance to focus on the skills children need to navigate the online world, which will also aid the guidance to keep pace with the fast-moving realities of the online world i.e. media literacy and critical thinking.

General comments

51. Is there anything else in the draft statutory guidance that you would like to comment on? Please try to limit your response to under 250 words

EVAW suggests including:

- Evidence the importance of RSHE to the prevention of VAWG.
- Emphasise overall concerns about approach to the guidance, and risks this poses to children and young people, and commitments to prevent VAWG.
- Outline concerns with evidence base which has informed this draft guidance.
- Outline concerns with consultation process.
- Outline what you think needs to happen next e.g. that this draft iteration of the RSHE statutory guidance is rethought and what you want to see from any future review of the guidance.

EVAW draft response:

Violence against women and girls (VAWG) is endemic in society, and the need for inclusive, high-quality RSHE is more pressing than ever. Under Chapter III of the Istanbul Convention (of which the UK Government is signatory), the prevention of VAWG requires long-term changes in the attitudes and behaviours which can lead to, justify, trivialise and minimise the occurrence of such violence; and commits signatories to teaching about gender equality at all levels of education.³⁶ We are deeply troubled by the direction of travel this guidance signifies, which we believe is in opposition to these commitments.

What we need to see is enhanced political commitment and resourcing to a whole-schools approach to tackling VAWG, rather than the significant step backwards this guidance would bring about. A report published by EVAW,³⁷ highlighted a number of blockages to the successful roll out of RSHE and a Whole Schools Approach to tackling VAWG in our schools, alongside a series of recommendations. These blockages include a lack of political will and prioritisation; inadequate funding; lack of training, support and time for school staff; greater need to tackle gender inequality and other intersecting forms of oppression; the need to value the specialist VAWG sector, including 'by and for' organisations, and the importance of partnership work; and more investment in research and evaluation of prevention interventions.

We have significant concerns about the evidence base that has informed the redrafting of this draft guidance, and the consultation process. In particular we want to note the lack of engagement with children and young people on what they want and need to see from revised guidance (an approach also absent in how the guidance suggests schools involve children and young people in the development of school policy etc). Furthermore, we are yet to see

³⁶ Council of Europe. [Istanbul Convention Action against violence against women and domestic violence](#)

³⁷ End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).

publication of the advice given by the panel appointed by the government to inform this review and note the absence of anyone with VAWG expertise on said panel. Although as noted in question 11, we support the need for a regular review process of the guidance to be in place, we also stress the importance of ensuring that these review processes are not politicised. It's important the guidance is accompanied by a robust review process which is informed by on-going monitoring and evaluation of RSHE delivery and impact, is evidence-based, and involves input from children and young people, teachers, the specialist VAWG sector and other relevant expert groups.

The consultation process was repeatedly delayed - first announced in March 2023 with suggestion it would conclude by end of that year, and finally published in May 2024, with a shortened consultation period of 8 weeks. This length of consultation period is a significant challenge for the VAWG sector which faces significant demand for its services, as well as for its expertise from different consultation processes. We would also note the limitations in the focus of the questions and the way in which many questions in this consultation document have been framed and are often leading. Furthermore, a general election has since been announced, meaning that any engagement with experts and young people by the DfE during this consultation period cannot go ahead. In contrast, the RSHE curriculum was made mandatory in 2017 with mass cross-party support, and the 2019 guidance that was informed and supported by evidence across health, education, safeguarding and faith groups.

Our strongly held view is that this draft iteration of the RSHE statutory guidance is rethought and any future guidance seeks to:

- avoid arbitrary age-restrictions based on idealised and ideological views of childhood, which put children at risk and severely limit our ability to prevent VAWG.
- centres the need to tackle the cultural norms which underpin the epidemic of VAWG we see today.
- values the expertise of the specialist VAWG sector, including in the development and delivery of curriculum materials.
- takes an intersectional approach to the development of guidance which should be holistic and inclusive in meeting the needs of all children (e.g. including teaching about LGBTQ+ experiences, recognising special educational needs, and disproportionality and discriminatory responses to Black and minoritised children).
- informed by research and evidence
- listens and responds to the views of children and young people, including marginalised young people.

Public Sector Equality Duty [PSED]

52. Do you have any comments regarding the potential impact of the guidance on those who share a protected characteristic under the Equality Act 2010, whether negative or

positive? How could any adverse impact be reduced and are there any other ways we could advance equality of opportunity or foster good relations between those who share a protected characteristic and those who do not? Please try to limit your response to under 250 words.

EVAW suggests including:

- How RSHE and the prevention of VAWG relates to equality and human rights.
- Evidence which highlights how VAWG, and therefore failures to prevent VAWG via RHSE, impacts girls disproportionately.
- Evidence the negative impacts the guidance is likely to have on LGBT+ children and young people.
- Evidence how the guidance fails to adequately address the specific ways Black and minoritised girls are impacted by VAWG, and their needs.
- Evidence how the guidance fails to address the needs of disabled children and young people.

EVAW's draft response:

Forms of sexual harassment and VAWG can lead to lower school engagement, anxiety, poor self-esteem, alienation from teachers, and poor academic achievement.³⁸ Fundamentally, violence against women and girls is a violation of girls' human rights and undermines their right to education. The UN Convention on the Rights of the Child (1988) states that children have the right to live free from violence (Article 19) and that they have the right to be heard on matters affecting them (Article 12).³⁹ Schools, central government and other public bodies have legal obligations to protect girls from sexual bullying, harassment and violence under the Human Rights Act and the Equality Act (EA), including the Public Sector Equality Duty (PSED).⁴⁰ This context underscores the need and legal obligations for government and schools to be actively involved in safeguarding pupils, for pupils to be widely consulted in the prevention of VAWG, and for a Whole School Approach to be adopted as part of a whole-society commitment to preventing VAWG.

Yet girls and young women are facing sexual harassment and assault on an alarming scale. Almost a third of girls surveyed by EVAW don't feel safe from sexual harassment in school, and 80% of girls think schools need to do more to tackle this, and support young people's sex and relationships education.⁴¹ In our view the Government is failing children and young people by a consistent failure to adequately prioritise and resource RSHE - a failing which will be further compounded if this draft of the guidance is taken forward due to our concerns outlined

³⁸ Gruber, J. E., Fineran, S. (2008). [Comparing the impact of bullying and sexual harassment victimization on the mental and physical health of adolescents](#). Sex Roles: A Journal of Research, 59(1-2), 1–13.

³⁹ United Nations (1989). [Convention on the Rights of the Child](#)

⁴⁰ End Violence Against Women Coalition (2016). ["All day, every day". Legal obligations on schools to prevent and respond to sexual harassment and violence against girls.](#)

⁴¹ End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls.](#)

in our consultation response, and these failures will disproportionately impact girls and young women.

Furthermore, as previously noted, we are deeply concerned by the approach taken to LGBT+ education and rights in the draft guidance, and the wider government narrative in the media which has accompanied the review. There is a deeply worrying denial of LGBT+ lives and realities, reminiscent of section 28. We strongly oppose the regression in the protection of LGBT+ rights in the draft guidance.

We have also previously noted how the guidance fails to adequately address the specific ways Black girls are subjected to racialised sexual harassment, violence and abuse,⁴² and the disproportionate punishments meted out to Black children.⁴³⁴⁴ There is an overall absence of analysis of inequality and discrimination and the ways in which these intersect and impact children's experiences. This not only fails to reflect Black children's daily realities but also presents a missed opportunity to inform and protect those who are disproportionately subjected to violence and abuse and face the greatest barriers to support and justice.

And finally, as noted previously, there is also an absence of considering the specific needs of children with special education needs in the guidance. Children with special educational needs and disabilities (SEND) often receive poorer quality RSHE. Furthermore, as noted in earlier, we are particularly concerned about the impact of the incoherent sequencing of some of the age restricted topics for SEND children, and the subsequent lack clarity in which these topics could then be taught.

⁴² Sundaram, V., Jessop, N., Bell, B. & Jackson, E. (2022). [Everything is racialised on top: Black and minoritised girls' and young women's experiences of public sexual harassment in the UK](#). Plan International UK.

⁴³ Wilmot, J. M., Migliarini, V., & Ancy Annamma, S. (2021). Policy as Punishment and Distraction: The Double Helix of Racialized Sexual Harassment of Black Girls. *Educational Policy*, 35(2), 347–367.

⁴⁴ End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).