



**End Violence Against Women Coalition**

**Government Review of the Relationships,  
Sex and Health Education (RSHE) statutory  
guidance Consultation:**

**End Violence Against Women Coalition  
(EVAW) submission**

**July 2024**

## Organisational Details

**1. Are you responding to this consultation as an: Organisation, for example, a charity, school/college or think tank, or individual?**

Organisation.

The End Violence Against Women Coalition (EVAW) is a leading coalition of more than 160 specialist women's support services, researchers, NGOs and other experts working to end violence against women and girls (VAWG) in all its forms. Established in 2005, we campaign for every level of government to adopt better, more joined up approaches to ending and preventing violence against women and girls, and we challenge the wider cultural attitudes that tolerate and condone this abuse.

[www.endviolenceagainstwomen.org.uk](http://www.endviolenceagainstwomen.org.uk)

**2. If you are responding as part of an organisation, would you prefer your response was kept confidential?**

No

**3. If you are responding as an individual, are you responding as (please select all that apply):**

N/A

**4. If you are responding to this consultation as an organisation, are you responding as:**

A charity

**5. Are you responding to the consultation with an interest in: Please tick all that apply**

All (Primary schools; Secondary schools; Faith schools; Alternative provision/special schools; School sixth forms; FE college; Sixth form college; Designated institutions.)

**6. If you want all, or any part, of your response to be treated confidentially in response to a freedom of information request, please explain why you consider it to be confidential.**

N/A

**7. If you are responding as an individual, are you:**

N/A

**8. What is your sex?**

N/A

**9. Is the gender you identify with the same as your sex registered at birth?**

N/A

**10. Where are you based?**

England

## Review timetable

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

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?**

No

## Schools' relationships and sex education policies

**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?**

N/A - leading question.

**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.**

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 MP,<sup>1</sup> 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.<sup>2</sup> 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.

However, despite the important role parents can play in their children's education, it is important to recognise that for many children, parents are not a source of information on sex and relationships, nor do many parents feel equipped to play this role. For example, recent research by Advance found that only 17% of participants

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

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

learn about sex and relationships from their parents.<sup>3</sup> And even more critically, 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.<sup>4</sup> 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

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

No

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

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 approach<sup>5</sup>) - driven by what children and young people say they need from such vital education.<sup>6</sup> 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.<sup>7</sup> As outlined in our '#AboutTime – A Whole School Approach to Ending Violence Against Women and Girls' report,<sup>8</sup> 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

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<sup>3</sup> Advance (2020). A [space to learn about relationships: The social factors influencing early sexual relationships among young women who have been involved in the criminal justice system and the health impacts.](#)

<sup>4</sup> ERAW (2018). [Call for evidence on developing Relationships and Sex Education guidance](#)

<sup>5</sup> ERAW (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#)

<sup>6</sup> Sex Education Forum (2024). [Young people's RSE poll 2024](#)

<sup>7</sup> National Education Union: [Workload and working hours](#)

<sup>8</sup> ERAW (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#)

high quality RSHE resources, and provision of expert facilitation of RSHE education in schools.<sup>9</sup> 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**

### **Flexibility for age limits**

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

No

**18. Do you think this flexibility is warranted?**

Yes

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

EVAW members have long delivered quality and age appropriate RSHE<sup>10</sup>, 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 Strategy<sup>11</sup>) - 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. This lack of a preventative approach also contradicts other government guidance such as Keeping Children Safe in Education (KCSIE).

Decades of research shows that teaching children about harmful gender stereotypes, consent, respect and healthy peer relationships from the earliest stages of school are

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<sup>9</sup> Please see examples of best practise in EVAW (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#)

<sup>10</sup> Please see examples of best practise in EVAW (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#)

<sup>11</sup> Home Office (2021). [Tackling violence against women and girls strategy](#)

key to preventing VAWG and intersecting forms of violence.<sup>12</sup> As noted by the last government's 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.<sup>13</sup>

The needs highlighted by young people<sup>14</sup> 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. Many of the age restrictions placed in this guidance are far too late in this regard. For example, we know from members that harmful sexual behaviours between peers – including inappropriate touching and comments – are reported in primary school.<sup>15</sup> Whilst year 9 is far too late to only begin conversations on violence and abuse when we know 55% of survivors of abuse state that their abuse started before the age of 11 (and 30% before the age of 9)<sup>16</sup>; and how such conversations must be building on discussions on topics such as consent from a very early age. Similarly, waiting until year 7 to discuss sending and receiving sexual images despite evidence from Internet Watch Foundation of an increase in 'self-generated' child sexual abuse imagery featuring 7-10 year olds in 2023.<sup>17</sup> Furthermore, it is completely counter to the evidence to only teach about female genital mutilation (FGM) from year 9 when the NHS notes that 'FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts'.<sup>18</sup> This is not to say that these topics do not need to be taught sensitively and with age-appropriate language, but to ban their discussion until said ages is dangerous and puts children at greater risk of harm. For example, a teacher in primary school teaching about inappropriate touching will not describe this as harmful sexual behaviour, but it is essential they understand it as such and situate this teaching within a well-sequenced curriculum to prevent and tackle VAWG throughout school.

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.<sup>19</sup> 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 they are viewing harmful content,<sup>20</sup>

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<sup>12</sup> As referenced in End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).

<sup>13</sup> Women and Equalities Committee (2024). [The escalation of violence against women and girls - Oral evidence](#). UK Parliament.

<sup>14</sup> Sex Education Forum (2024). [Young people's RSE poll 2024](#)

<sup>15</sup> Centre of expertise on child sexual abuse. (2023). [Key messages from research on children and young people who display harmful sexual behaviour](#).

<sup>16</sup> Office of National Statistics (2019). [Child sexual abuse](#)

<sup>17</sup> Internet Watch Foundation (2023) ['Self-generated' child sexual abuse](#)

<sup>18</sup> NHS. [Overview-Female genital mutilation \(FGM\)](#)

<sup>19</sup> Children's Commissioner (2023). ['A lot of it is actually just abuse' - Young people and pornography](#).

<sup>20</sup> Ibid



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 an overall lack of coherence in what can be taught, and when – counter to the concept of a well sequenced curriculum, where learning is revisited and built on from year to year, the importance of which is often stated by DfE and Ofsted. For example, 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 RSHE<sup>21</sup>, and is also what children and young people say they need more of.<sup>2223</sup> We cannot afford the cost

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<sup>21</sup> 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

<sup>22</sup> 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.

<sup>23</sup> Sex Education Forum (2023) [Young People's RSE Poll 2022](#)

to these young people, and for wider society, of shutting these conversations down.

## Sexual orientation

**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)?**

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**

We are deeply concerned by the approach taken to LGBT+ education and rights in the draft guidance, and the wider (previous) 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 schools<sup>24</sup> - highlighting how this guidance will not only fail to keep children safe but worsen the situation for many young people. We also know that home is not a safe place for many LGBT+ young people – with research from the LGBT anti-abuse charity Galop finding that 29% of LGBT+ people surveyed had experienced abuse from a family members or members, and of those 63% of LGBT+ people surveyed were under 18 when they first experienced abuse from their family<sup>25</sup> - illustrating why the guidance instructing teachers to signpost children to their parents for answers may be unsafe. This guidance also further increases the potential for harm in its failure to support LGBT+ young people to spot abuse outside of heterosexual relationships. 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.<sup>26 27</sup>

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

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<sup>24</sup> Girlguiding (2023). [Girls Attitudes Survey 2023](#)

<sup>25</sup> Galop (2022). [LGBT+ Experiences of Abuse from Family Members.](#)

<sup>26</sup> 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

<sup>27</sup> Sex Education Forum (2023) [Young People’s RSE Poll 2022](#)



women and girls, and harms us all.<sup>28</sup> 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 former Secretary of State for Education, Gillian Keegan MP,<sup>29</sup> 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

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

No

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

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

**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

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

Violence against women and girls is endemic in our society, and in our schools.<sup>30</sup> In

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<sup>28</sup> EAW (2022). [How the Bill of Rights harms the fight to end violence against women](#)

<sup>29</sup> EAW (2023). [Don't politicise Relationships, Sex & Health Education, 50+ VAWG experts warn](#)

<sup>30</sup> Ofsted (2021). [Review of sexual abuse in schools and colleges](#). Department for Education.

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 consent<sup>31</sup>- undoubtedly contributing to a worrying regression in young people's views.<sup>32</sup>

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, these references are inadequate to address the widespread nature of sexual harassment and sexual violence in schools as documented in the 2021 Ofsted report,<sup>33</sup> and the prevalence of VAWG across society. For example, the reference made to improving how we engage boys in conversations about preventing VAWG (page 14 in the guidance) is very limited, and to some extent veers into a 'few bad apples' narrative (as it states 'most boys and young men are respectful to girls and young women and each other'). Much more is needed, and we would be keen to see the government take up the recommendation made by the Women and Equalities Select Committee last year for a new government strategy for engaging with boys and young men in schools on sexual harassment and gender-based violence as part of the review of Relationships, Sex and Health Education review.<sup>34</sup>

Critically 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,<sup>35</sup> 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

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<sup>31</sup> YouGov (2023). [One in six boys aged 6-15 have a positive view of Andrew Tate](#).

<sup>32</sup> Crown Prosecution Service and Equally Ours (2024). [Public understanding of rape and serious sexual offences](#)

<sup>33</sup> Ofsted (2021). [Review of sexual abuse in schools and colleges](#). Department for Education.

<sup>34</sup> Women and Equalities Committee (2023). [Attitudes towards women and girls in educational settings – Report Summary](#). UK Parliament

<sup>35</sup> 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*).

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 minoritised girls are subjected to racialised sexual harassment, violence and abuse,<sup>36</sup> and the disproportionate punishments meted out to Black children,<sup>37,38</sup> 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.<sup>39,40</sup> 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

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<sup>36</sup> 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.

<sup>37</sup> 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.

<sup>38</sup> End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).

<sup>39</sup> 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

<sup>40</sup> Sex Education Forum (2023) [Young People's RSE Poll 2022](#)

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 experiences and interactions.<sup>41</sup> 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 adults<sup>4243</sup> - 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.<sup>44</sup> We appreciate that due to the length of the guidance it would be impossible to include everything, instead guidance should outline an appropriately sequenced developmental framework for the relevant concepts and topics – including 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). 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

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

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.**

Please see our answer to question 19 for an outline of our significant concerns and

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<sup>41</sup> 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

<sup>42</sup> 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.

<sup>43</sup> Sex Education Forum (2023) [Young People’s RSE Poll 2022](#)

<sup>44</sup> National Policing Vulnerability Knowledge and Practice Programme (2023). [National Analysis of Police-Recorded Child Sexual Abuse and Exploitation \(CSAE\) Crimes Report 2022](#).

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?***

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?***

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?***

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?***

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?***

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?***

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?***

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?***

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 behaviour<sup>1</sup>. 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?***

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.*

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**

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

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.**

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?**

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?**

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?**

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?**

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.**

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.

**44 – 47.**

No answer - outside EVAW's expertise.

## **Additional topics**

**49. Do you agree with this additional content?**

Yes

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

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**

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.<sup>45</sup> 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,<sup>46</sup> 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.

It is also essential that RSHE includes positive and hope-based messages for young people – painting a picture of the type of world we are trying to create through an RSHE based on equality and consent. However, this guidance frames sex almost solely around either reproduction or harm, and almost situates education as the 'harmful' factor over the actual abuse RSHE can help to prevent.

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 publication of the advice given by the panel appointed by the former 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

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<sup>45</sup> Council of Europe. [Istanbul Convention Action against violence against women and domestic violence](#)

<sup>46</sup> End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).

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 was since announced, meaning that any engagement with experts and young people by the DfE during this consultation period did not 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.***

Forms of sexual harassment and VAWG can lead to lower school engagement, anxiety, poor self-esteem, alienation from teachers, and poor academic achievement.<sup>47</sup> 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).<sup>48</sup> Schools, central government and other public bodies have legal

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<sup>47</sup> 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.

<sup>48</sup> United Nations (1989). [Convention on the Rights of the Child](#)

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).<sup>49</sup> 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.<sup>50</sup> 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 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 (former) 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, and in light of this, consideration of concerns about whether sections in the guidance violate pieces of legislation, such as the Equality Act, Public Sector Equality Duty, and the Education Act - must be given. 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,<sup>51</sup> and the disproportionate punishments meted out to Black children.<sup>52</sup><sup>53</sup> 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.

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<sup>49</sup> 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](#).

<sup>50</sup> End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).

<sup>51</sup> 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.

<sup>52</sup> 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.

<sup>53</sup> End Violence Against Women Coalition (2023). [It's #AboutTime: A Whole School Approach to Ending Violence Against Women & Girls](#).

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.