



Tender's response to the RSHE Consultation

A public consultation on the Government's draft RSGE guidance ran from 16 May to 11 July 2024, providing an important opportunity for everyone to respond and help shape the final guidance.

Tender's responses to questions 11 – 39 and question 51 of the consultation are set out below. Please note that this document does not include the whole consultation, which can be accessed [here](#). The draft guidance can be accessed [here](#).

Introductory sections (Questions 1 – 10)

The first sections ask questions about the respondent, which we have not included here.

Review timetable (Question 11)

Q.11 Do you agree that we move away from a rigid commitment to review the guidance every three years? Yes/No

No.

Structure of the guidance (question 12)

Q12. Do you agree that the changes to length and style of the guide make the guidance easier to understand and follow? Yes/No

No.

Schools' relationships and sex education (RSE) policies (question 13 - 14)

Q13. 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?

We have not selected yes or no for the reasons in Question 14 below.

Q14. If you would like to explain your answer, please do so here.

We have not selected yes or no because we do not believe these changes are necessary to ensure transparency. The proposals invite parents to be a part of the conversation about relationship education and how it is taught, which in principle is a welcome approach to ensuring RSE and promoting healthy relationships is a whole community endeavour. Many schools are already doing this, so the enforced nature of these proposals feels redundant and burdens already overstretched school staff with the impossible task of preparing for an infinite number of questions that may never be asked by parents.



Not all parents have a basic understanding of the need for, or benefit of, inclusive, comprehensive RSE. Many adults did not receive this education themselves, so have no practical perspective of what quality RSE should look like. This may lead to uninformed opinions and baseless claims of 'age inappropriateness', risking vital content not being received by children, just because of a lack of understanding and awareness from parents. We cannot assume that all young people have home environments in which this safe exploration of challenging content can take place. The proposal may leave children with a harmful gap in their knowledge of what they should expect and deserve from their relationships.

Openness with parents (questions 15 - 16)

Q.15 Do you agree with our proposed approach to increased transparency on RSHE material? Yes/No.

No.

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

Parents can already request to see all materials used to teach RSHE. Rather than suggesting (without providing examples) that schools and parents are in disagreement about this subject, or that anyone is using contractual clauses to restrict parents' access, it would be helpful if the guidance could demonstrate how resources can be shared to facilitate openness and engagement from parents/carers.

Many third party organisations supporting schools with RSE, using their own resources, do so within the context of a workshop or project which is delivered by specialist, trained staff. Resources alone do not provide the full story of what is being taught, and it is the direct delivery in the room that ensures that conversations are held safely, appropriately and contextually. Where resources are shared with parents, we should not omit this context, as this would also be a missed opportunity to engage parents/carers in this important stream of education.

Much of the content taught within RSE is sensitive and complex. Having the space to explore this content safely, facilitated by a specialist, trained member of staff is arguably more important than any individual resources used to do so. Out of context, resources may be used to scaremonger rather than understand, suggesting to parents/carers that their children are in age-inappropriate relationships that may be unhealthy or dangerous even if this is not the case. Simply presenting resources to parents/carers out of context may create fears of there being issues which require immediate safeguarding intervention, and therefore unnecessarily panicking parents, rather than highlighting what is often the true purpose of RSE education: preventing harm before it occurs.

Questions 17 - 44 relate to age limits on teaching certain topics, separated out into a number of sections.



Flexibility for age limits (questions 17 - 19)

Q.17 Do you think this flexibility will help to ensure that pupils are adequately safeguarded? Yes/No.

No.

Q.18 Do you think this flexibility is warranted? Yes/No.

No.

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

The flexibility proposed here is framed as a reactive exception to otherwise strict age limits, rather than taking a proactive, preventative approach to these topics.

We know that these age limits do not reflect the lived experience of children: we cannot mandate when they will or will not encounter these topics and arbitrary age limits will not change that. If schools cannot provide guidance and support, without the fear of breaching arbitrary age limit restrictions in the guidance, we know that children will seek answers from unregulated sources (such as the internet).

Safeguarding children is about prevention of harm; the age limits proposed do the very opposite of this. Conversations about challenging topics need to happen early so that children know how to think critically about content they see, know how to report inappropriate content and know how to seek support from professionals. Leaving schools to decide when/if they should exercise flexibility leaves the potential for much of this to be left unexplored with children until it is too late.

If the proposed age limitations are instated, then it is imperative that schools are given the autonomy to decide whether to be flexible if they deem there to be an appropriate need. We strongly advise against the age limitations proposed, as they risk serious and irreversible harm to the lives of children and young people.

High quality relationships education should be consistent and not subject to a postcode lottery where some pupils receive more comprehensive education than others based on where they live, the personal views of their parents or the political context of their schools.

Sexual orientation (questions 20 - 21)

Q.20 Do you agree with changes to the lesbian, gay and bisexual content in the LGBT section? Yes/No.

No.

Q.21 If you have any comments to explain your answer, please do so here

The proposals are regressive and harmful, setting back the progress made in fighting discrimination against the LGBT community. Allowing primary schools to have discretion over whether to acknowledge the existence of same-sex families or individuals is non-



sensical: we cannot simply pretend that LGBT people do not exist. Primary age pupils growing up with LGBT parents, friends or family, if denied the opportunity to be taught LGBT topics, will face a gap in their knowledge, which is likely to lead to misinformation, intolerance and prejudice filling the void. They will not see their own family and friends represented among the range of families discussed in school. Children who are aware of their own sexual orientation from a young age will be further confused and isolated through an avoidance of discussion of the topic. If the government is serious about properly educating young people about LGBT families, rather than giving primary schools the discretion to even acknowledge them, the government should be requiring that LGBT history, and the history of oppression faced by the community, is taught from a young age.

The guidance refers to an expectation that the “majority of primary schools teach about healthy loving relationships”. In our view, it would be unacceptable for any primary school not to teach this (particularly considering that relationships education is mandatory for all primary schools) and to do so consistently and regularly across all primary school years.

Gender reassignment (questions 22 - 23)

Q.22 Do you agree with the proposed changes related to gender identity and gender reassignment in the guidance? Yes/No.

No.

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

This is a regressive proposal which will not prevent children and young people questioning their gender identity, but it will put gender questioning children and young people’s lives at risk. The proposals will shut down conversations on gender identity, further stigmatizing and isolating not only gender questioning young people, but other members of the community (including teachers and family members) who identify as trans, non-binary and other gender identities.

Schools can be a vital place for a gender questioning child or young person to seek support and refuge, and if removed, children and young people will be forced to seek support from other sources and/or will not receive support at all. As already noted in previous answers, young people will seek this information online, making young trans people more susceptible to accessing misinformation or age-inappropriate content.

The guidance also seems unworkable even on its face: schools can teach about gender reassignment, but not gender identity. However, it would not be possible to talk about one without the other. In addition, the exception for teaching of biology (which the guidance allows for) does not address how intersex people will be discussed. The combined effect is to narrow what young people learn, rather than expanding their knowledge and equipping them with the support and tools to explore these topics in a safe environment.



The guidance advises schools to refer to the guidance for schools and colleges on gender questioning pupils, but this is non-statutory guidance and still in draft (and, that guidance is also, in itself, harmful and regressive).

Addressing prejudice, harassment and sexual violence (questions 24 - 25)

Q.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.

No.

Q.25 If you would like to explain your answer, please do so here.

Our experience has shown that children even in primary schools have questions about abuse, harassment, prejudice and sexual violence. Many children of primary age have direct experience of it either at home or in their own relationships. Schools may be unaware of this, meaning they may deem this to not be an appropriate use of the flexibility clauses mentioned earlier in the guidance. Being unable to talk about these issues safely and openly will cause immeasurable harm as many children will not know how to identify unsafe behaviour in relationships (including friendships) and may not seek support.

It is unclear how schools can carry out the guidance in points 51-56 if they are not allowed to discuss harassment, harmful sexual behaviour and harmful online content until year 7 and other abuse until year 9. This will result in school staff feeling disempowered and worried about what they can or cannot say instead of focusing on the wellbeing and safeguarding of students. Further guidance and support needs to be given to schools on how to communicate about these challenging issues and how to embed them in the curriculum and school culture. Placing the onus on schools to research and do this themselves will lead to inconsistency and increase the possibility of misinformation being shared.

Primary sex education (questions 26 - 27)

Q.26. Do you agree with the restriction on teaching sex education only in years 5 or 6? Yes/No.

No.

Q.27. If you would like to make any comments to explain your answer, please do so here.

It is difficult to see how schools can teach about the biology of reproduction without mentioning sexual activity. The implication in the guidance is that, at this age, children should only learn that sex is for reproduction. Given the information that is accessible to children from other sources, such as the internet and their peers, it is highly likely that children at this age will have questions about sex which are not related to reproduction.



Schools should be empowered and supported to address these questions to support children to develop healthy approaches to intimate relationships. If the purpose is to prevent children engaging in sexual activity before they are ready, the best approach would be a preventative approach, with a sequenced curriculum which equips children not only to understand the biology of reproduction, but also the context of sexual relationships.

We can safely talk about sex with children without exposing them to harmful content: conversations about consent and safe/unsafe touch are imperative for children of any age. Children should know about appropriate touch and feel empowered to speak out if they feel their boundaries have been crossed. This will support children to learn about healthy and unhealthy behaviours in intimate relationships, and understand that concepts such as choice and consent are also an essential element of intimate relationships.

Secondary topics: Online and Media, Respectful Relationships, including friendships, and Being Safe (questions 28 - 37)

This section does not include space for explanations on responses to Q28 – 36. We have included our explanations here for information.

Q.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.

No. We work with children in primary schools on a daily basis and often receive disclosures of harmful sexual behaviour from their peers or adults. These are corroborated by numerous research reports and polls which highlight its devastating prevalence in the lives of primary-age children, meaning there are likely many more who are experiencing it, but staying silent. Teachers attending our training courses also regularly ask about how to respond to instances or disclosures of harmful sexual behaviour which concern primary-age children.

An inability to recognise and talk about these issues safely and considerately will not only fail to protect children when they are at primary school, but will also mean that they enter secondary school unaware of what constitutes harmful sexual behaviour. This heightens their vulnerability to experiencing or enacting it as they seek to form new connections, and navigate new environments populated with older children.

Our programmes have proven that is possible and positive to educate children about these topics in a way which is safe and suitable for their age and understanding. The NSPCC has also shown this through the success of their Underwear/PANTS rule, which provides children as young as five with a clear and non-explicit framework through which to recognise and report unwanted and unsafe touch. This topic can be introduced at primary-age level within a spiral curriculum – where concepts are repeated throughout a



child's development, with increased layers of complexity as they develop – by discussing safe/unsafe touch, personal space and boundaries.

Q.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.

No. It is not a fact that children younger than Year 9 age are too young to understand these concepts, and it is possible to teach them comprehensively in ways which are appropriate and protective of young people's wellbeing. We know that Independent Domestic Violence Advisors (IDVAs) work with children and young people from the age of 13, and children of significantly younger ages are often exposed to these issues – in their homes, from peers and online – without the safety of an informed and safeguarded educational context.

It is vital that young people are given a clear understanding of the different types of abuse – e.g. emotional, physical – why these are unacceptable/criminal and how to recognise the early warning signs of these behaviours. This does not have to be graphic or sensational to be thorough, and many behaviours (e.g. coercion, hitting) will already be familiar to young people through adjacent topics such as bullying and peer pressure, which are routinely taught in younger year groups.

It is a higher priority to ensure that teachers are appropriately trained to understand and create safe, trauma-informed environments in which to teach about these topics with care. Pupils should also have space to discuss and rehearse healthy alternatives to unhealthy behaviour, in order to understand that these issues are not inevitable. We regularly deliver this work with Year 7 and Year 8 pupils without issue due to careful choices regarding structure, content, vocabulary and the needs/experiences of individual pupils.

Q.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.

No. We often receive requests from schools to cover this topic with children in primary schools - sometimes as young as Year 4 - as more children have access to devices and



online platforms, and more teachers navigate the safeguarding concerns which accompany this. This includes children sending explicit images to their peers or to adult perpetrators.

Young people are digital natives and are routinely accessing social media and online spaces outside of the platforms' age restrictions. The Online Safety Act is yet to prove successful in placing accountability on online platforms to safeguard children and it is irresponsible to assume that children younger than Year 7 are not accessing or at risk in these online spaces. In 2023, The Internet Watch Foundation reported that, since 2019, it had seen a 1,058 per cent increase in the number of webpages showing sexual abuse images and videos of children aged 7-10 who had been recorded via an internet connected device, often by a perpetrator who had contacted them online.

If children are not taught how to be safe online, including that sending, keeping or making sexual/nude images is illegal, then some children will do so unaware of the risks and consequences. As noted in our response regarding harmful sexual behaviour, it is possible to teach this topic with primary-age children without reference to sexual activity: such as using the framework of the NSPCC's PANTS rule, discussing and debunking pressure and coercion, and emphasising avenues of support.

Q.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.

No. Children are increasingly accessing or encountering pornography at younger ages, as demonstrated by numerous reports and sources. A 2023 report by the Children's Commissioner found that, by age nine, 10% of children had seen pornography, 27% had seen it by age 11 and half of children who had seen pornography had seen it by age 13. 79% had encountered violent pornography before the age of 18.

This report also noted that many children are seeing porn despite not seeking it out, including on Twitter, Instagram and Snapchat, and/or being shown it by older siblings and peers. It is therefore vital that inappropriate online content is discussed in an age-appropriate way in primary-schools - as outlined in our response above - with an emphasis on how to seek or access support, so that children can be safeguarded. Many children and young people who encounter this content may feel distress, alarm or shame, which can prohibit them from seeking help, so it is vital that we create spaces where children feel able to disclose such information. This starts with being proactive and realistic about the environments they are growing up in.



Mainstream pornography is also increasingly hardcore in content, meaning children who witness it are often observing content which presents a violent, risky or non-consensual picture of sex. If these aspects are not unpicked safely with age groups who we know are accessing pornography in significant numbers (e.g. 12+) this risks impacting their expectations of sexuality, gender and healthy relationships.

Q.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.

No. As outlined in our responses to the above questions, we know that children are unacceptably at risk of and experiencing these issues before they enter Year 7. It is also possible to introduce each concept – and the fact that these behaviours are against the law – in a safe, non-explicit way at primary school age, as part of a spiral curriculum which will introduce more detail as young people get older.

Without an awareness of these issues and the laws relating to them, pupils may be unaware that they are experiencing them, that this is not OK, or that they are entitled to support. It will similarly hamper staff from being able to appropriately support children of primary-school age who do disclose instances relating to these issues: particularly where the perpetrator is an adult.

Q.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.

No. As noted in our response to the question about the distribution of intimate imagery, we know that many children have access to smartphones and the internet in primary school, inevitably leaving them vulnerable to online harms such as sexual exploitation, grooming and stalking. We regularly receive comments from teachers citing online safety as an issue within their schools and have heard first-hand reports of children being victims of these crimes. Tender offers training on “online harms” which is requested regularly by primary schools, and post-training feedback shows that this content has been particularly useful for them in their practice, enabling them to understand how to broach these sensitive topics in a safe age-appropriate way.

Grooming, stalking and sexual exploitation are all issues that affect children of primary school age. By implementing this age limit, and not talking about these subjects at an early enough stage, we are leaving younger children even more vulnerable to sexual exploitation and grooming.

Additionally, forced marriage can happen as young as age 7, and the period of transition between primary school and secondary school – between year 6 and year 7 – is believed to be a particularly prevalent time. By not teaching the warning signs and where to seek



support at primary age we are leaving many children, particularly girls, vulnerable to forced marriage.

Q.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.

No. As detailed above, we believe it is absolutely vital that children and young people are taught about all types of abuse – including sexual violence – in order to recognise them, prevent them and seek support if they experience them. We know from decades of experience that it is possible to talk about these subjects without being sexually explicit, graphic or age-inappropriate; in our workshops we regularly explore concepts of sexual violence with Year 7 and 8 students safely, using carefully considered language and tried and tested activities. To support this, it is absolutely crucial that teachers are fully trained in how to explore these complex topics with students and are able to open up conversations in a safe, constructive way.

By putting an age limit on teaching about this subject in an ambiguously-described “sexually explicit way” we risk teachers not exploring these topics at all for fear of straying into forbidden territory, thereby potentially missing out on introducing absolutely crucial concepts such as consent at an early enough stage.

Q.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.

No. We are concerned that the proposed age limit would introduce the topic of FGM far too late, as we know that the majority of FGM happens to primary school age girls (evidence suggests that FGM is most likely to happen between Year 6 and Year 7, and almost exclusively to girls before the age of 15. Many victims may not know that what has been done to them is abusive, so may not disclose to teachers until they receive this education.

We are concerned that only allowing schools to teach this subject where they have identified a “greater risk” will encourage stereotyping and subjective judgement, putting the onus on teachers to make assumptions about when and if this teaching is appropriate.



It is important that all students are taught about this subject, regardless of perceived risk, as it affects society as a whole.

We know from experience that it is possible to teach about the subject of FGM at primary school, in a safe age-appropriate way, in line with safeguarding guidance.

Q.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.

There is no evidence to suggest pupils are too young to understand these concepts before year 9, and to delay discussing them before this age risks putting them at greater risk of harm. Recognition of these concepts is unlikely to be the cause of distress; the experience of them is.

Children younger than year 9 may be being exposed to abusive behaviour at home or in their personal environments; if they are not taught about what constitutes coercive and abusive behaviour, they may not realise this is not acceptable and not normal. This bears the risk of extending their experience of abusive and dangerous behaviour for much longer than is necessary.

Q.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.

Rather than adding any clarity for teachers, the age limits simply ignore the lived reality of children and young people, and the challenges schools already face in supporting their students. Restricting when children learn about harmful sexual behaviour, criminal behaviour and violent abuse will not prevent these things happening, but will leave children with an inability to recognise and talk about these issues safely and considerately and could perpetuate harmful behaviours. If children are not taught how to be safe online, and that sending, keeping or making sexual/nude images is illegal, then some children will do so unaware of the risks and consequences. Children are increasingly accessing or encountering pornography at younger ages: a 2023 report by the Children's Commissioner found that, by age nine, 10% of children had seen pornography, 27% had seen it by age 11 and half of children who had seen pornography had seen it by age 13.

If these topics are not explored safely and early, their expectations of sexuality, gender and healthy relationships risk being impacted in the long term. Without an awareness of these issues and the laws relating to them, children may be unaware that they are experiencing them, that this is not OK, or that they are entitled to support. It will similarly hamper staff from being able to appropriately support children of primary school age who do disclose instances relating to these issues, particularly where the perpetrator is an adult.



It is not only possible, but imperative, to teach these topics safely from a young age, through a consistent, sequential curriculum which introduces the concepts early in primary school and then builds up knowledge sequentially throughout a child's journey through school. We know from decades of experience that it is possible to talk about these subjects without being sexually explicit, graphic or age-inappropriate: we regularly explore concepts of sexual violence with year 7 and 8 students safely, using carefully considered language and tried and tested activities.

To support this, it is absolutely crucial that teachers are fully trained in how to explore these complex topics with pupils and are able to open up conversations in a safe, constructive way. The proposed guidance has the opposite effect, risking teachers not exploring these topics at all for fear of straying into forbidden territory, and thereby putting children and young people at risk of harm.

Secondary topics: Intimate and sexual relationships, including sexual health (questions 38 - 39)

Q. 38 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. Do you agree with the age restriction on the secondary Intimate and sexual relationships, including sexual health topic? Yes/No.

No. Year 9 is already a common point at which these topics are discussed. However, it does not help to ignore that these topics may become relevant to some children at a younger age. Where they have questions on these topics earlier than Year 8 (and they often do, in our experience, even in primary school), if they are not addressed in school, children may remain ignorant, seek information from untrustworthy sources, or learn through mistakes. Once again, this age limit does not safeguard children, but merely exposes them to greater risks of engaging in behaviours which could have long-term impacts on their health and wellbeing.

Questions 40 – 50 relate to topics outside of Tender's expertise and we have therefore not responded to them.

General comments (question 51)

Q.51 Is there anything else in the draft statutory guidance that you would like to comment on?



The need for inclusive, high quality RSE is more important than ever, but we are deeply concerned that, rather than improving the quality of RSE, the draft guidance restricts preventative education and leaves children and young people at increased risk of both becoming victims but also perpetrators of domestic and sexual violence. We have a safeguarding obligation to ensure boys and young men are confident about healthy and consensual interactions that ensure they are not criminalised for behaviour that they were not properly educated about. We urge the government to abandon these proposals, revert to the 2019 guidance in the interim and undertake a more appropriate review in due course. This review must:

- Prioritise prevention, taking a whole school approach and putting in place a sequential curriculum to create a safe environment for young people to learn about healthy and unhealthy relationships, building their knowledge and confidence on these important topics across their school lives. It cannot be restricted to one-off sessions or specific educational stages, but should be a continuous process.
- Designate RSE a specialist subject which is grounded in evidence, research and best practice, with a dynamic feedback loop to ensure the curriculum remains relevant and that its effectiveness is properly monitored and evaluated. The curriculum must be inclusive of all young people, in particular those identifying as LGBTQ+, and informed by their views and experiences.
- Prioritise support and training for teachers and schools, rather than simply creating a climate of fear of open discussions. The confidence and competence of teachers in delivering high-quality RSE is pivotal to the effectiveness of provision and ensuring that it is consistently delivered and safe to teach. Schools must also be given the funding and support to engage third parties with specialist expertise to support their RSE education, and continually train their teachers through CPD and teacher training courses.