



Childnet Response to the Department for Education consultation on Relationships education, relationships and sex education, and health education.

### **Person responding**

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### **About Childnet**

[Childnet](#) is a children's charity with a mission to help make the internet a great and safe place for children and young people. Since 1995 Childnet has delivered a positive impact with its empowering, youth-led, evidence-based and collaborative approach to empower children and young people to use the internet safely and positively.

From its [innovative resources](#) for 3-18s, parents, carers and teachers, to its [pupil powered e-safety](#) programmes, Childnet has stayed at the cutting edge of the latest tech trends by speaking to thousands of children and young people face-to-face each year.

As one of three charities in the [UK Safer Internet Centre \(UKSIC\)](#), Childnet coordinates [Safer Internet Day](#), which reaches millions of UK children every year.

It achieves a wider impact through giving young people a voice and influencing best practice and policy, both in the UK and internationally, sitting on Facebook's Safety Advisory Board, Twitter's Trust and Safety Council and the Executive Board of the UK Council for Child Internet Safety.

We are also a member of the [Sex Education Forum](#).

For more information, visit [www.childnet.com](http://www.childnet.com) and [www.saferinternet.org.uk](http://www.saferinternet.org.uk).

### **Q10. Do you agree that the content of Relationships Education in paragraphs 50-57 of the guidance is age-appropriate for primary school pupils?**

All the content outlined is appropriate for primary school pupils.

It is important that the guidance also impresses the importance of early Relationships Education for **all** primary school children. Our work in schools demonstrate the importance of early education to ensure children develop healthy relationships online and offline.

Childnet work in schools across the country, including with Early Years, Key Stage 1 and Key Stage 2.

For EY/KS1, the main areas are **Friendship** - what makes a good friend, respect, kindness, and ensuring this is understood in all situations (whether you are communicating with your friends face

to face or using technology), - and also **Safety**, knowing that you can and should tell an adult if someone or something upsets you.

For KS2, we continue with online **friendship, kindness and respect**, but expand the key rules for **keeping yourself safe online**. We use the [SMART rules](#), which cover a range of areas, including keeping personal information safe as well as critical thinking, and online friends, including not arranging to meet up with anyone you have only met online. These messages are an age-appropriate way of talking around some topic areas that are more fully covered in secondary. Thinking about what images and personal information you share is important, even if you are not talking about sexting specifically. Many under 13s do use social media services, despite the services age restrictions. We want to ensure we are equipping children with the skills they need for social media, without endorsing the use of age-inappropriate services.

**Q11. Do you agree that the content of Relationships Education as set out in paragraphs 50-57 of the guidance will provide primary school pupils with sufficient knowledge to help them have positive relationships?**

In order to have positive relationships and how to be a good friend online, we believe that children need to develop practical skills. It would be helpful to advise teachers to ‘practice knowledge’ by providing scenarios. In an online context this could be asking young people how they would actively ask permission before adding someone to a chat on a game, or say no if they didn’t want a photo of them shared.

We also recommend that the guidance does not refer to ‘virtue’ in regards to positive relationships. We recognise the values referred to in Paragraph 56, such as kindness, generosity and a sense of justice. We would recommend adding empathy and compassion. These values reflect the likelihood of problems or difficulties or even failure in relationships. The word ‘virtue’ has very different connotations and doesn’t reflect the complexities that children will experience in their friendships and relationships. Values such as equality, respect and relationships based on consent would be seen to be more beneficial for children to have positive relationships. This removes emphasis on the individual character traits of children and focuses instead on their actions which is easier for children to understand and enact.

We also have a few specific recommendations regarding paragraphs 50-57.

**Paragraph 52:**

*“Respect for others should be taught in an age-appropriate way, in terms of understanding one’s own and others’ boundaries in play, in negotiations about space, toys, resources and so on.”*

We would recommend including an online example of how to negotiate boundaries for example taking photos on someone’s phone. It is important to make clear as early as possible that online experiences are a key element here.

**Paragraph 54:**

*“The principles of positive relationships apply as much online as they do offline especially as, by the end of primary school, many children will already be negotiating relationships seamlessly online and offline. When teaching relationships content, teachers should address online safety and appropriate behaviour in a way that is relevant to pupil’s lives. Teachers should include content on how information and data is shared and used online, for example sharing pictures, understanding that*

*many websites are businesses and how sites may use information provided by users in ways they might not expect.”*

It is important that Relationships Education on online content includes practical ways in which children can ask, give and receive permission online, with a focus on their interpersonal relationships. The example of *‘how information and data is shared and used online, for example sharing pictures, understanding that many websites are businesses and how sites may use information provided by users in ways they might not expect’* is an unusual one covering the relationship with service providers rather than with who young people interact with online. We would recommend using an example of the latter. Primary school children should be able to understand what happens to their information online, not just with regards to websites or platforms but also their peers, family and wider community networks. It should be made clear to schools that RE should cover the more social parts of children’s digital experience such as developing positive relationships online, including Fear of Missing Out (FOMO) and also key issues around consent, respect and peer pressure.

**‘Being safe’ section in table:** *“That each person’s body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact.”*

We would recommend that unsafe digital contact is also explicitly stated. IWF annual report on child sexual abuse imagery found that 55% featured images/video of children 0-10 years old. <sup>1</sup> It is vital that schools are aware of online sexual abuse and exploitation.

We are pleased to see that in the table it includes that children should be able to “ask for advice or help for self and for others, and to keep trying until they are heard, including having the vocabulary and confidence to report concerns or abuse”.

With regards to safeguarding children online we believe that children should be taught the correct terminology for genitalia so that there is more consistent knowledge of vocabulary should they need to seek help with abuse. IWF research found that 28% of children who had livestreamed themselves in a sexually explicit way were under 10 years of age. As younger children have access to technology, across multiple devices, it is imperative they are informed on their bodies and what is appropriate or inappropriate in terms of requests and online contact. This is also vital so that even if the child itself is not able to report, that peers will be using the same language and be more easily able to identify if something inappropriate is taking place. The NSPCC [Underwear Rule](#) is a key piece of learning here, and these rules apply online too.

For example in paragraph 57, it can be included that “To ensure that all children have a consistent vocabulary that they can use to communicate about their bodies and to get help if they need to it is essential that schools use correct terms for genitalia and other parts of the body and that euphemisms to do with sex and relationships are avoided.”

#### **Q12. Do you agree that paragraphs 61-64 clearly set out the requirements on primary schools who choose to teach sex education?**

We would recommend that the guidance clearly provides a definition of sex education and of relationships education to make it clearer for schools. In order to emphasise the value of age appropriate and tailored sex education for all primary school pupils we would recommend this section begin with the statement currently in Paragraph 63 of the guidance *‘The Department continues to recommend therefore that all primary schools should have a sex and relationship*

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<sup>1</sup> Annual Report 2017, Internet Watch Foundation, 8 April 2018 <<https://annualreport.iwf.org.uk/>>

*education programme tailored to the age and the physical and emotional maturity of the children’.* We feel that it being in paragraph 63 does not emphasise this clearly enough and implies that it only should be done in the final year of primary. As stated earlier in our consultation response, our work shows that early education is important especially due to the fact that young children have access to the internet and possibly to sexual or explicit content, or are engaging in creating sexual content themselves (for example taking nude photos/videos of themselves).

Furthermore, Paragraph 63 states that schools should consult with parents before the final year of primary school, we would encourage that the guidance states that schools should consult with parents from the start of primary and teaching should be mapped across the primary years. By taking a whole school community approach, the school should engage parents as they develop their policy and explain the importance of the education they are delivering. Strategies to effectively engage parents could be through:

- using the children to talk about some of the issues relating to the online lives of young people and sharing key information and advice. Sharing resources that are used with (or planned to be used with) with pupils can be a great way of ensuring parental support, but also their reinforcement of the learning in school.
- polling pupils, and sharing the results with parents for example, can highlight issues that need to be covered in education/parents sessions.

**Q13. Do you agree that the content of RSE in paragraphs 65-77 of the guidance is age-appropriate for secondary school pupils?**

All of the content that is listed is appropriate for secondary school pupils.

We recommend that due to the fact that the guidance is not demarcated by Key Stage, that it is emphasised that RSE is delivered early and teaching is mapped across all school years. The nature of online relationships and sexual interactions will change significantly from Year 7 to Year 13. Regular and timely education is key to ensure that young people develop healthy online relationships and are able to access support should they need it.

**Q14. Do you agree that the content of RSE as set out in paragraphs 65-77 of the guidance will provide secondary school pupils with sufficient knowledge to help them have positive relationships?**

We recommend that the guidance advises schools to provide pupils with real-life scenarios so they can practice negotiating relationships and boundaries. This can include how to resist friendship peer pressure, flirt safely online, how to ask for consent online, how to say no to online pressures from intimate partners, how to stand up and take action if they see inappropriate or harassing behaviour online and how to explore their sexuality or sexual identity online in a safe and positive way.

We would also recommend removing all reference to virtues in the guidance. For example if a young person is being coerced or abused they may believe that to be ‘virtuous’ is to forgive, or because they did not have enough ‘self-control’, rather than seek help. Our research in Project deSHAME<sup>2</sup> found that one of the barriers to young people reporting online sexual harassment from peers was due to the fact that they would not think it was serious enough as well as that they would be blamed. Instead of focusing on individual character traits or ‘virtues’, we would recommend the

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<sup>2</sup> ‘Young people’s experiences of online sexual harassment’, Project deSHAME, Dec 2017, <[https://www.childnet.com/ufiles/Project\\_deSHAME\\_Dec\\_2017\\_Report.pdf](https://www.childnet.com/ufiles/Project_deSHAME_Dec_2017_Report.pdf)>

guidance focuses on the actions taking place and whether they are carried out consensually, with respect, equality and justice.

**We also have specific recommendations regarding the following paragraphs:**

**Paragraph 65:**

We would recommend online relationships being included in this paragraph after the first sentence: “The aim of RSE is to give young people the information they need to help them develop healthy, nurturing relationships of all kinds, not just intimate relationships. **This should include both offline and online relationships.**” This is because it is critical to ensure that schools understand right at the beginning that this relates to online as well as offline.

We also recommend that referencing “resisting pressure to have sex (and not applying pressure)” this should be edited to “**resisting pressure to sexual activity both offline and online**”. This will reflect the importance of educating young people on all sexual activity and for example resisting pressure to send nude images or videos “sexting”.

The pressures that young people face within relationships and friendships are not just sexual. Therefore, this paragraph should also refer to all types of pressures. For example our ‘Digital Friendships’ research found that 73% think it’s important for their friends to reply to their messages once they’ve seen them, with more than two in five (43%) thinking it’s important for their friends to ignore people that they don’t like.<sup>3</sup> Technology has a significant impact on young people’s relationships and the fast nature of change of technology is reflected in this.

**Paragraph 74:**

Education should also cover other aspects of the law such as the Equality Act 2010 to encourage positive healthy interactions. It should also cover the creation, possession and distribution of indecent images of children. It is important the law is not used to scare young people and that they feel that they can still access support. This is especially important with regards to cases of “sexting” so that young people do not feel that they will be blamed if their images are shared non-consensually, even if they took the initial image themselves.

**Paragraph 76 and 77:**

It is unclear why the inclusion of personal data is included in Relationships and Sex Education rather than in a broader PSHE curriculum. We recommend that RSE should focus on interpersonal relationships between peers, partners, family and the wider community. Paragraph 76 and 77 should mirror what is outlined in the table under ‘Online and the media’.

Online safety in RSE should include education on how young people can have positive and healthy relationships online with those they know and also those they don’t. With a majority of secondary school children having social media and gaming profiles, it is recognised that many of them will be interacting within their peer group online as well as others that they do not know offline.

Healthy relationships education has to cover issues such as consent, sexting, online sexual harassment, peer pressure, password sharing and relationships, but also this education has to keep pace with technology. We discovered in our recent ‘Digital Friendships’ research that young people (8-17s) needed 73 days in a Snapstreak to show you are a good friend. It also needs to outline what

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<sup>3</sup> ‘Digital Friendships: the role of technology in young people’s relationships’, UK Safer Internet Centre, Feb 2018, <<https://www.saferinternet.org.uk/digital-friendships>>

is appropriate and inappropriate behaviour, that, for example, online sexual harassment is unacceptable, what forms this can take, and what can be done in response to it when it happens. Our recent Project deSHAME research found that 1 in 10 13-17s in the UK had received rape threats from their peers online.

It is also essential that the guidance refers to how young people could experience a range of different risks from viewing pornographic images and videos as they can portray and harmful, stereotypical and heteronormative notions of gender roles and identities and unrealistic expectations of body image and sexual activity or performance. Young people's largest online concern is pornographic content<sup>4</sup>. In our work, children have told us about the need to focus on the overlapping topics of **online pornography, healthy relationships** and **body image**.

We would recommend a specific statement on encouraging gender equality and LGBT+ equality throughout the teaching of RSE. For example, our findings in Project deSHAME show that girls are significantly more likely to be judged than boys if their nude photo was shared. 12% of UK teens had been bullied online using homophobic or transphobic language, showing the importance of addressing harmful stereotypes and discrimination.

#### **Respectful relationships, including friendships (table):**

- what constitutes sexual harassment and sexual violence and why these are always unacceptable should include that this can happen **in a peer-to-peer context**
- "That specifically sexually explicit material" should make it is clear that this is pornography so that schools feel confident to addressing 'pornography' – **"that specifically sexually explicit material such as pornography..."**
- "that they have a choice to delay sex or to enjoy intimacy without sex" **should be edited to "That they should not feel pressured to engage in sexual activity (offline or online), and have the right to enjoy intimacy without sexual interaction should they choose to.** By only emphasising delaying sex, it implies that those young people who have had sex no longer have the same choices. It is also important to broaden it out to all sexual activity (offline and online) rather than what may be taken to mean only penetrative sexual intercourse.

#### **15. Do you agree that paragraphs 36-46 on the right to withdraw provide sufficient clarity and advice to schools in order for them to meet the legal requirements?**

We believe that paragraph 45 conflicts with the advice given in other paragraphs (41-43). It is not clear that headteachers should automatically grant a request for a child to be excused from sex education. We believe in a primary school setting the headteacher should also take the steps outlined in paragraphs 41-43 including having a conversation with parents about why they want to excuse their child, so that they can address any misunderstandings, explain more about the benefits of sex education and of learning this with peers. Our work also tells us that for many children who do not learn about sex from parents or schools, they can easily look to the internet for answers which may provide them with problematic or incorrect information. It is beneficial for headteachers to discuss this with parents first rather than grant them automatic right to withdraw. It would also be helpful to emphasise to schools that by having early and regular communication with parents throughout the primary school years, there will be increased confidence in the school to deliver appropriate and useful Sex Education to their child.

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<sup>4</sup> 'Children's online activities, risks and safety, A literature review by the UKCCIS Evidence Group' Prof Livingstone, Prof Davidson, Dr Bryce et al, p22.

## Physical Health and Wellbeing

**Q16. Do you agree that the content of physical health and wellbeing education in paragraphs 86-92 of the guidance is age-appropriate for primary schools pupils?**

Yes strongly agree.

**Q17. Do you agree that the content of physical health and wellbeing education as set out in paragraphs 86-92 of the guidance will provide primary school pupils with sufficient knowledge to help them lead a healthy lifestyle?**

To promote wellbeing, it is important that Health Education emphasises the practical application of fostering positive mental health and not just focusing on when young people encounter problems. It is also crucial education should cover the variety of places where young people can seek help and provide them with practical strategies and vocabulary on how to ask for support or help for either themselves or others.

**Paragraph 91:** Maintaining a healthy balance online should not just focus on how much time is spent but the quality of the time spent online. It is also important that children understand the impact of their online behaviour on others and their wellbeing and be able to develop digital empathy.

We would also recommend that Internet Safety and Harms to be renamed as ‘Internet harms and online wellbeing’ to be in line with the other titles and emphasise how to promote positive online lives.

**Q18. Do you agree that the content of physical health and wellbeing education in paragraphs 93-99 of the guidance is age-appropriate for secondary school pupils?**

Yes strongly agree.

**Q19. Do you agree that the content of physical health and wellbeing education as set out in paragraphs 93-99 of the guidance will provide secondary school pupils with sufficient knowledge to help them lead a healthy lifestyle?**

We strongly recommend that there is a paragraph that is focused on online issues and wellbeing, similar to how it is structured for primary education. This should reflect what is listed in the table ‘Internet safety and harms’. We would also recommend that Internet Safety and Harms to be renamed as ‘Internet harms and online wellbeing’ to be in line with the other titles and emphasise how to promote positive online lives.

The table which lists ‘Internet Safety and harms’ should also cover the benefits of maintaining a healthy balance online. This should not just be focus on how much time is spent but the quality of the time spent online. Young people’s wellbeing can be improved by seeking support and friendships online for example. This may be especially true for groups of children who may be more socially isolated in their peer network or being bullied. For example our ‘Digital Friendships’ report found that over half of 8-17s (53%) said they would feel isolated if they couldn’t talk to their friends via technology. Almost 9 in 10 young people (89%) said they had felt happy in the last week because of something online.

We are pleased that the table includes covering pressures online which can make young people feel excluded, isolated or have low self-esteem. For example, insecurities about body image or feelings that their lives don't live up to the standard presented online. Over a third (36%) of young people think that other people's lives look more exciting than theirs on social media with girls more likely to feel this in comparison to boys. This should be mentioned in paragraphs 93-99.

Young people should also be taught about how their behaviour online impacts on the good and poor mental health of others.

**Q20. Do you agree with the approach outlined in paragraphs 36-46 on how schools should engage with parents on the subjects?**

We recommend that paragraph 36 is amended to read: "To role of parents in the development of their children's understanding about relationships **and sex** is vital." Parents should be supported to have these conversations with their children, especially if they are encountering sexually explicit content online.

**Q21. Paragraphs 108-109 in the guidance describe the flexibility that schools would have to determine how they teach the content of their Relationships Education/RSE/Health Education. Do you agree with the outlined approach?**

We would advise that schools also consult their student body as well as parents and the local community. This is especially important in regards to online issues as adults may not know of issues that young people are facing.

**Q22. Do you agree that paragraph 44 of the guidance provides clear advice on how headteachers in the exceptional circumstances will want to take the child's SEND into account when making this decision?**

It would be helpful for the guidance to give examples on these 'exceptional circumstances' as this is not clear. We would emphasise the importance of SEND pupils receiving RSE education, including how to have healthy relationships. They also may be more vulnerable to experiencing bullying, sexual abuse or harassment or have difficulties in communicating problems they encounter.

**Q23. Do you agree that paragraphs 30-32 of the guidance provide sufficient detail about how schools can adapt the teaching and design of the subjects to make them accessible for those with SEND?**

We believe more training and examples need to be given to demonstrate how to adapt education for SEND pupils. Further resources targeting those with SEND is also required. Childnet has done some work in this area, for example, our Star Toolkit which provides practical advice and teaching activities to help educators explore online safety with autistic young people.

**Q24. Do you have any further views on the draft statutory guidance that you would like to share with the department? Do you think that the expectations of schools are clear? Please include this information in the text box below.**

We welcome the statutory guidance to support schools to deliver Relationships Education, Sex Education and Relationships and Sex Education. It is important that schools are empowered to be able to deliver this practically and are given resources and training to be able to do so.

#### **Include why RSE is important**

We think it would be helpful to include a statement about the importance of leadership to support teachers to deliver high quality RSE. Language throughout the guidance should be in a positive tone to encourage schools to look at the opportunities such an education can deliver. It may be helpful to include why effective RSE is important and beneficial for the school community. This could include:

- Early identification and possible interventions in safeguarding concerns and child protection
- Young people having healthier, more consensual relationships based on their informed consent and choice
- Supported by a majority of parents and strengthens home school partnership
- Ensures that young people know about the law and how it applies to them so they can take responsibility, recognise abuse and seek help if their own, or someone else's, safety or wellbeing is threatened.

As one 17 year old girl says in a Project deSHAME focus group, “[We need to learn what] ‘sexual harassment’ really is – in regard to being online. Everyone gets comments about being ‘hot’ and what would be classed as sexual comments, but no one really knows where the limit is; no one is aware of what classes as harassment – comments, photos – revolving around sexualising bodies. Then once we can identify it, we can then be taught how to deal with it.”

#### **Support for staff to deliver high quality RSE**

It is also vital that all leadership provide school staff with the space and time to discuss approaches, areas of concern or lack of knowledge. This is essential to ensure consistency. This could be included in Paragraph 105. Our Project deSHAME research on online sexual harassment found that teachers expressed uncertainty on how to teach age appropriate educational messages on these issues. As this guidance does not give direct guidance for each age group, it is vital that teachers are provided with high quality training and resources to feel confident to deliver high quality RSE, especially with regards to the digital world. Whilst 88% of young people 13-17 we surveyed said they had learnt about digital behaviours that are okay or not okay in relationships, less than half of them (49%) said that they had found it helpful. Similarly 86% had learnt about ‘sexting’ but only half found it helpful.

To further inform our resource development, we carried out a survey of teachers and school leaders to capture their views and good practice for the teaching of online safety within RSE, PSHE and healthy relationships. We had support from Twitter to carry out this work, and the survey was carried out in November-December 2017. We had 103 responses, mostly from England, from both primary and secondary schools, and from SLT, Designated Safeguarding Leads, and teachers (including for PSHE/pastoral teachers and Computing). The responses also cover identified areas for improvement, the challenges teachers face when delivering and embedding online safety within RSE and PSHE, confidence levels in teaching particular topics, as well as what support they need.

Teaching resources and teacher training, for example, are specifically highlighted as responses that would help, and online pornography is the topic teachers feel least confident in teaching around.

Teachers must be given practical and easy-to use resources to deliver effective, high quality RSE education.

### **Involving young people**

We are also very keen that the guidance encourages schools to consult and engage with their student body and not just parents. It is essential that schools are aware of the concerns, worries and issues young people are facing. Young people are passionate and enthusiastic about learning about healthy relationships offline and online, it is vital that they have a voice in how this education is delivered. They are also at the forefront of understanding the changes in technology and how this impacts their friendships and relationships. In order to address these issues effectively, their experiences should be taken into account.

### **Equality**

It is important that the guidance addresses inequalities that affect those children with protected characteristics. For example, there is no mention of homophobic, biphobic and transphobic bullying in the guidance. It is also important that effective RSE, Relationships Education and Health Education fosters gender equality and addresses harmful stereotypes that may be created and perpetuated by online media and content. We would recommend that references to 'virtue' are removed so that schools do not focus on the individual but on the actions that they carry out. This will promote values of equality, respect and justice in the wider school community.

### **Q26. The department believes that primary schools should be able to access appropriate resources and training in order to teach effectively. Do you agree that the resources and support currently available to primary schools will be sufficient to enable them to teach the new subjects?**

Whilst there are many resources about online issues available to primary schools, we believe that schools need more support to be able to judge the quality of these resources. This can be achieved through training of school staff. We also believe there needs to be more resources that are tailored to the different age groups. It is not just a question of the provision of resources, the resources need to be easy to use, practical and recognise that teachers will often have low levels of confidence to teach around some of these subjects, and be able to address that.

### **Q27. The department believes that secondary schools should be able to access appropriate resources and training in order to teach effectively. Do you agree that the resources and support currently available to secondary schools will be sufficient to enable them to teach the new subjects?**

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