



WRITTEN EVIDENCE TO DEPARTMENT for EDUCATION'S CONSULTATION ON RELATIONSHIPS EDUCATION, RELATIONSHIPS AND SEX EDUCATION (RSE) AND HEALTH EDUCATION

November 2018

Introduction

1. Muslim Women's Network UK (MWN UK) is a national Muslim women's organisation in Britain (www.mwnuk.co.uk) that has been advancing equality and connecting voices for change for the last 15 years. We are a small national charity (no. 1155092) that works to improve the social justice and equality for Muslim women and girls. Our membership also includes women of other faiths or of no faith and men who support our work. We find out about the experiences of Muslim women and girls through research and helpline enquiries. We identify policy and practice gaps and use this information to inform decision makers in government as well as informing our community campaigns at a grassroots level.
2. We also develop resources and train women so they are better aware of their rights. We have a separate website for our national helpline (www.mwnhelpline.co.uk) that provides advice and support on a range of issues including: domestic abuse, forced marriage, honour based violence, sexual exploitation and abuse, female genital mutilation, divorce, discrimination, mental health etc.
3. In 2017, 37 of the cases dealt with by our MWN Helpline involved under 16 year olds and involved a range of issues including: forced marriage, self-harming, sexual abuse, relationships, sexuality and spirituality. Mental health matters were relevant in each of these cases. Further information and statistics can be obtained from our 2017 Helpline Evaluation: http://www.mwnuk.co.uk/go_files/resources/460507-MWN%20Helpline%20Report%202017.pdf
4. Given the very real issues faced by young girls (and of course, all children generally), we were pleased to hear that the Children and Social Work Act 2017 has placed a duty on the Secretary of State for Education to make new subjects of Relationship Education at primary school, and Relationships & Sex Education at secondary school, compulsory. We feel that this is an excellent opportunity to empower young children through education and develop their critical thinking skills which we believe will ultimately lead to the eradication of harmful practices and behaviours across societies, including violence against women and girls, and racism.

5. As such, we felt it was necessary to provide evidence to the Department of Education in respect of its Consultation on Relationships Education (RE), Relationships and Sex Education (RSE) and Health Education (HE) in a bid to assist in the development of these subjects, in the hope that once implemented these subjects will go towards addressing many of the issues affecting children and young adults today, and ultimately leading to the promotion of equality and human rights.
6. We are also aware of the concerns that will undoubtedly be raised in respect of the introduction of these subjects by some sections of the Muslim community (though of course not limited to this community) who will argue that the innocence of children will be somehow taken away through exposure to topics pertaining to sex and relationships. We feel that RE/RSE/HE subjects are especially important for pupils, especially secondary school pupils, precisely for these reasons. There seems to be a denial of the realities of young British Muslims (and British Asians more broadly), with assumptions made by parents that simply because of their faith or culture (or the faith or culture of their families), that children will not be entering into relationships (sexual or otherwise). This is of course a very naïve view and ample research is available to highlight evidence to the contrary. Please see for example the following research:
https://www.nhs.uk/sexualhealthprofessional/Documents/South_Asian_Sexual_Health_FINAL_REPORT_09.07.08.pdf Please note in particular the comment at paragraph 4 of the Summary of Findings, "pre-marital sex is more acceptable as long as this is discreet. Whilst this is a 2008 study, what is apparent is that the image and views that parents may have of their children may not necessarily confirm to the realities of their children.
7. What is apparent therefore is that such parents will not be ones who will discuss topics relating to healthy and unhealthy relationships, consent, choice, abortions or sexually transmitted infections. Nor are they likely to be the ones to discuss sexual exploitation or revenge-porn. This makes RE/RSE/HE that much more crucial for children because this may be the only opportunity to provide them with the requisite knowledge, information and advice to allow them to grow as individuals and remain protected from harm and abuse. It is therefore important to keep the best interests of the children at heart and ignore any such misguided concerns, as otherwise it can not only lead to disparities in the provision of health (for example, due to a lack of education and understanding relating to STIs) but can be a contributing factor in the continued prevalence of online grooming and sexual exploitation, as well as other forms of violence and abuse. Quite frankly, we feel that any parent truly wishing to protect their child from harm and promote their well-being would support the introduction of RE/RSE/HE in schools and would take the opportunity to become more involved and work with schools to provide their children with all the necessary support, information and advice.
8. Although we work predominantly with Muslim/BME women and girls and where relevant will focus on the experiences of young Muslim/BME girls within our Evidence, the points we raise may equally apply to boys and non-Muslim/non-BME children generally.
9. As required, we have submitted our responses to the questions of the Consultation via its online survey but have also made our responses available through this document in

the interests of transparency and for information purposes. We have responded to the questions of the Consultation as follows:

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

10. On the face of it, we agree that the content is age-appropriate for primary school pupils. However, we feel it is also important to recognise that different pupils will be at different stages of learning and development (which we can see has been noted at paragraph 60 of the Guidance) and as such the appropriateness of the content will also depend on its delivery and the teacher's ability to provide all pupils with the requisite information and the time and attention to address their questions.
11. We also feel that the Guidance could go further in some aspects, which we discuss in further detail below.

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?

12. Whilst we generally agree, we also feel that the content could be extended further in order to truly provide pupils with the necessary knowledge to allow them to develop positive relationships. For example, whilst we appreciate that such topics would need to be introduced in an appropriate and sensitive manner, we feel there is scope to include issues such as forced marriage and FGM within the content even at primary school level. We appreciate that the wording of the Guidance does allow for these topics to be explored from the perspective of 'being safe' or in relation to discussions of 'respectful relationships' but we feel that the Guidance should specifically refer to violence against women and girls and provide further information on how these can be discussed in an appropriate manner. It is crucial to remember that not only could the pupils be at risk themselves of such abuse but they could be observing the same in their homes. The 10 year old pupil could for example be the bridesmaid at her elder sister's forced marriage. We also know that perpetrators of sexual exploitation can target siblings over a period of years; they may for example target the older sibling first and then use the sibling to then target and exploit the younger sibling. Whilst we appreciate these are very difficult topics to address, we do not believe that it is impossible to have some form of age-appropriate discussions on this issues by which information necessary for the safety and wellbeing of the pupil cannot be included.
13. Leading on from the above, whilst we note that emphasis is being placed on allowing children to develop an understanding of what are caring, positive relationships, we feel there should be specific references made to unhealthy relationships too so that pupils can develop an understanding of toxic behaviours which may even be prevalent in their own homes.
14. We understand the intentions behind paragraph 55 but we feel further examples should be provided of different family structures. We are surprised for example that specific reference has not been made to LGBT families or families involving single parents (and co-parents). In some instances a child may know that they are adopted and may have questions in this respect (or indeed their friends at school), whilst

another child in the same classroom may not be aware that they are adopted; in each case the topic will need to be handled in a sensitive manner. It is also important to consider the variations in family structures across communities. One key example would be the children of polygamous marriages, where the father may have two wives in separate households and divides his time between his two families. A further point to consider is that children may be a part of an extended family where grandparents and uncles/aunts also live in the same household. The parents of the child could also be related (cousins). It is important to ensure teachers are aware of and can effectively discuss the different dynamics that may be involved, so that no pupil is left feeling confused or worse, disenfranchised.

15. In respect of the table at page 16 and 17, whilst we understand the intentions behind the comments relating to showing respect to those in positions of authority, we are concerned that this could in fact lead to the silencing and disempowering of victims. Perpetrators of abuse come from all walks of life and can sadly include parents and teachers and other persons of authority. We are concerned that by teaching pupils to respect those in authority, they may be essentially taught to comply with their abusers. It is vital that pupils are also taught that even those in positions of authority must act in an appropriate manner and that there is absolutely nothing wrong in disagreeing or challenging those in authority if their behaviour or actions are unacceptable or feel unacceptable. Pupils should also be given different examples of who they can approach for assistance, to ensure that they are not somehow being referred back to their abuser.

Do you agree that paragraphs 61 – 64 clearly set out the requirements on primary schools who choose to teach sex education?

16. We neither agree nor disagree with this point. Whilst we of course understand the contents of paragraphs 61 – 64 and the approach that the Guidance seeks to achieve, we feel that the paragraphs are lacking in further detail. It would have been useful to have examples as to when it would be or wouldn't be deemed appropriate to cover additional content. As such we cannot agree that the guidance is clear in setting out the requirements

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

17. Generally we agree that the content is age-appropriate but once again feel that the content could (and should) go further and include additional topics.

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?

18. We disagree. We are particularly disappointed with the contents of paragraph 75 which leaves the teaching of issues such as FGM at the discretion of the school when in fact we feel that discussing abuse such as FGM, forced marriage, honour based violence and sexual exploitation should be compulsory at secondary school level. It is also important to take into account faith and cultural elements involved so as to truly educate the pupils and allow them to understand and recognise harmful and abusive

behaviours. We know from our research for example, that perpetrators of sexual exploitation are more likely to use the older-boyfriend model when targeting Asian victims and will entrap them through promises of love and marriage. For further details of our research, please see the following link: http://www.mwnuk.co.uk/go_files/resources/UnheardVoices.pdf

19. Leading on from this point, we are surprised that 'revenge-porn' is not being referred to under the 'being safe' section of the table at page 22. Given the rise in such forms of abuse and exploitation, surely these issues should be included as a priority?
20. We also feel emphasis needs to be placed on concepts of equality, equity and human rights so as to place topics such as violence against women and girls or body-shaming in the wider context of patriarchy and misogyny and allow pupils to develop an understanding of (and feel able to challenge) these issues effectively. We also hope that it is made clear that FGM is a form of violence against women and girls.
21. We would also like to highlight the wide-ranging impact on victims of for example forced marriage and sexual exploitation; particularly Asian and Muslim victims. These can include: mental health issues; suicidal tendencies and self-harming; PTSD; living in constant fear; gynaecological problems due to STIs and brutal rapes; health problems associated with drug and alcohol addictions; pregnancy; forced marriage; forcible hymen repair surgery; abuse by family; disownment; isolation from family, friends and wider community. We feel that any discussions on topics such as sexual exploitation must include a discussion of these additional factors too.
22. MWNUK have been providing training to individuals and organisations in relation to various forms of violence against women and girls and which involve Muslim and/or BME victims so as to ensure that specific vulnerabilities and individualities can be identified and appropriate support and preventative measures can be provided. We would be happy to provide further information and advice in this respect.

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?

23. Generally we agree that the paragraphs provide the relevant clarity and advice for schools to meet their legal requirements. However, as explained below, we are concerned by the approach taken in this regard and feel that the current right to withdraw process may be counter-productive and contradictory to the aims of introducing these subjects in the first place.

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?

24. We neither agree nor disagree that the content as shown in paragraphs 86 – 92 of the guidance is age-appropriate for primary school pupils. Our reasoning is based on our concerns with the appropriateness of the content generally for any individual irrespective of their age. Whilst we appreciate the intentions in wanting to cultivate strength and resilience in students, we feel that some of the wording contained in

these paragraphs would be confusing, contradictory and counter-productive to the aims of introducing the topics in the first place.

25. We explain our thoughts further in our response to the following question.

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?

26. We disagree.

27. According to paragraph 80 of the Guidance:

"the aim of teaching pupils about physical health and mental wellbeing is to give them the information that they need to make good decisions about their own health and wellbeing, recognise issues in themselves and others, and when issues arise, seek support as early as possible from appropriate sources".

28. The above aim is to be welcomed and we certainly agree that physical and mental wellbeing are interlinked. We also appreciate the intentions in wanted to increase the self-confidence in pupils so as to enable them to preserve through setbacks and difficulties. We understand for example that allowing pupils to see their problems in perspective is one means by which to aid their development and critical thinking skills. However, from the perspective of this Guidance, we are concerned by the use of words such as 'self-control' and 'self-regulate' as such usage can provide the impression that the burdens are being placed on the pupils to address and overcome any issues or feelings which they may be experiencing and to do so is counter-productive if the aims are to encourage pupils to seek support when needed.

29. Our concern is exacerbated by the wording in paragraph 87 of the Guidance referring to the "normal range of emotions that everyone experiences" and to encourage pupils to "judge whether what they are feeling and how they are behaving is appropriate and proportionate for the situations that they experience". We would first like to stress the point that when it comes to mental health matters, all emotions are 'normal'. Each individual and their circumstances are different and it is counter-productive to suggest that there is a bandwidth of feelings that are appropriate or inappropriate depending on the situation being faced. It also ignores the impact of anxiety, depression or even a phobia or OCD which may be a factor.

30. The starting point of the Guidance should be to acknowledge that everyone can react differently to a situation and that all their feelings are valid; that it is 'normal' to feel anxious or that phobias are a 'normal' occurrence that many individuals suffer from. If a pupil injured themselves during football would we ask them to assess whether their reaction is proportionate to the pain being experienced? We wouldn't and therefore if a pupil is suffering from anxiety because of an unassessed presentation, it would also not be appropriate to suggest that their feelings of anxiety are not proportionate to the situation at hand. We would be grateful if the Guidance could be duly amended.

31. The Guidance should also stress that seeking help is always acceptable and at any stage; you do not have to wait for matters to reach a certain (or critical) stage to do so. In fact it is better to seek help 'too soon', than when it is 'too late'.

32. Our further concern is with the possibility that any such 'assessment' may be based on only partial information provided by the pupils. For example, a pupil may be upset in school because they have been informed that their family are relocating abroad as one of the parents has been able to secure better employment in this other country. However, what the pupil may have omitted to mention is that this also means that the pupil will be taken out of education altogether once they are abroad and will be getting married instead. The circumstances in respect of the latter are naturally much more grave and it is important to make clear in the Guidance that not all pupils will share all the facts and if they are to be helped, care needs to be taken to ensure that their feelings and concerns about a given situation are not missed simply because the severity of the circumstances were not fully known.
33. We would also like the Guidance to discuss the point, and the steps to be taken, in respect of the faith and/or cultural elements which may be involved in forming a pupils understanding of mental health issues. Witchcraft, black magic and spirit possession are examples of the explanations given in some communities to dismiss or bury the existence of mental health issues in a family and assistance is sought from alleged exorcists or faith healers instead of seeking appropriate medical help and support. In fact, we are aware of a number of cases where such excuses have been used to hide physical and sexual abuse of both adults and young children. Moreover, whilst mental health stigma is an unfortunate reality across all communities and societies, it is important that teachers and other practitioners are aware of the different ways in which this stigma can manifest in some communities. For example, some Muslims link mental health issues with piety; that is, if you were a good Muslim then you would not be suffering as you do, which undoubtedly worsens the situation for an individual and their family. If the aims as stated at paragraph 83 of the Guidance are to be achieved then we feel that it is essential to therefore raise these topics as discussion points in an age-appropriate manner; faith and cultural factors must be taken into account if we truly want pupils to be able to gain knowledge and seek help and advice. We have created a booklet on the subject of mental health and Muslim communities which may assist the Department of Education in these considerations: http://www.mwnuk.co.uk/go_files/factsheets/143970-Mental%20Health%20+%20MC%20Leaflet_WEBFINAL.pdf
34. In respect of the table found at pages 26 and 27, we do not understand why the health and prevention section does not include teaching pupils to recognise the early signs of mental ill health; weight loss, insomnia and other physical changes could also be a sign of mental health related matters and pupils should be provided with this information too.
35. We would also be grateful for further clarification as to what will be specifically included in respect of the 'changing adolescent body' section. We of course agree that it is vitally important that children are provided with key facts about puberty and the changes that they will be experiencing but without further information we are unable to ascertain whether the key facts to be taught are even sufficient or whether it needs to go further to truly allow the pupils to develop their knowledge and understanding.

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?

36. We neither agree nor disagree that the content is age-appropriate for secondary school pupils and repeat our concerns in relation to primary school pupils.

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?

37. We disagree and repeat our concerns in relation to the content and its application to primary school pupils.
38. We would also like faith and cultural experiences to be taken into account in respect of the 'common' adverse childhood experiences which teachers are required to be aware of, as per paragraph 97 of the Guidance. Given the varied backgrounds and lifestyles of all pupils in multi-cultural Britain today, what precisely are 'common' problems? Will Female Genital Mutilation, forced marriages, sexual abuse, eating disorders, OCD, Islamophobia or Anti-Sikh prejudice be included in that list?

Do you agree with the approach outlined in paragraphs 36 – 46 on how schools should engage with parents on the subjects?

39. We neither agree nor disagree with this approach.
40. We agree that schools should work closely with parents when planning delivery of the subjects under consultation. We feel that a partnership approach between schools and parents will allow better development of knowledge, understanding and critical thinking skills in pupils and we certainly feel that parents should take a much more proactive role in this respect, whether this is in respect of becoming more involved in school and finding out how information will be presented to their children, or how they can continue discussions in a positive manner in the home environment and providing feedback (Was the talk with your child engaging or was it awkward? Were they confused by any of the information they were given in school? Should any other points have been raised? Were there any elements from your faith or culture that you had to explore further with your child?)
41. We also agree that it is appropriate to allow parents to have the right to request that their child be withdrawn from some or all of the proposed education to be delivered as part of statutory RSE. At the same time however, we hold reservations to the approach specified at paragraph 43 of the Guidance. In our opinion the purpose of the RE/RSE/HE subjects are to aid the development of children and to empower them through appropriate knowledge and understanding of the relevant issues. Further the reasoning behind making such education statutory is because it has been agreed that the knowledge and information to be provided is in the best interests of the children and vital for their growth and wellbeing. We feel that this is especially the case given that some of these children may be at risk of physical or sexual abuse or dealing with mental health issues and these subjects may be the crucial means by which to raise awareness of the issues, empower the pupils and provide them with support and advice as required.

42. It does not therefore make sense to us that a school is being told to respect the parents' request to withdraw the child from this subject (up to and until three terms before the child turns 16) and it is only in exceptional circumstances that a school can refuse to do so? Surely the approach should be reversed and whilst a parent can request the right to withdraw, this should only be granted in exceptional circumstances? We appreciate that there may be exceptional circumstances where a parent may have genuine reasons for the request for withdrawal but it is our opinion that such a parent will take the opportunity to not only enter into a discussion as per paragraph 42 but also consider any steps that the school can take by which to address their concerns (for example, ensuring that time is provided to pupils to process the information that has been provided if the concerns relate to such a point) and for a child to be withdrawn only if there are no other suitable means by which to allay their genuine concerns. In fact we feel having the discussion between the parents and headteachers as only 'good practice' (as opposed to a specific requirement) is counter-productive and dilutes the importance of RSE. Parents should not be able to withdraw their children from this subject without good reason and if it is not in the best interests of the child for them to do so; as such a conversation between the parent and the school should be compulsory before withdrawal is even considered.
43. We are also confused by the wording at paragraph 45 of the Guidance, which states headteachers will automatically grant a request to withdraw a pupil from any sex education delivered in primary schools. Are paragraphs 36 – 43 therefore only in relation to secondary school pupils? Or are you suggesting that as a discussion between headteacher and parent is only to be promoted as good practice, that a parent who refuses to engage with the school and simply demands their child is withdrawn from sex education is able to do so without question? Where are the best interests of the child in that case and what is the point of making this subject statutory?
44. We are also surprised to note that reference has not been made to the relevant FGM guidelines which refer to the withdrawal of sex education as a possible indicator of risk. In fact withdrawal could be an indicator of various other forms of abuse, including sexual abuse, and we feel this point should be specifically mentioned within the Guidance to avoid any confusion or contradiction.

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?

45. Generally, we agree with this approach as we understand that a degree of flexibility is required in such subjects to ensure that crucial topics and information is being provided to pupils in an appropriate manner. However, we also feel that it is vital to ensure that certain topics are covered and cannot be disregarded in favour of others. For example, given the prevalence of grooming and sexual exploitation across the country, it would be disappointing (and potentially dangerous) to not discuss these matters in favour of discussing drugs or bullying simply because the school (rightly or wrongly) believes the latter are more prevalent issues at their school – or even because the school is uncomfortable with discussing a particular topic. For one, encouraging such assumptions is dangerous as it can lead to ignoring or silencing victims and for the other, it leaves gaps in the knowledge and awareness of the pupils

which goes against the aims of the Guidance and RE/RSE/HE in the first place. FGM is a clear example of both points; whilst this form of violence against women and girls may be prevalent in some communities more than others, it is dangerous to make presumptions as to its relevance simply based on stereotypes. It is also incumbent on all to combat this form of gender based violence together and this cannot happen if whether the topic is raised is at the discretion of the school. It is also important to take into account and consult those with specialist expertise on these issues, such as MWNUK.

46. Our concern is increased given the points being made at paragraph 20 of the Guidance. We understand providing flexibility to schools with a religious character so that a distinctive faith perspective can be taught. However combined with the general flexibility afforded by paragraphs 108 – 109 this can mean that the entire point of the RSE subject is completely missed. We also feel it is a missed opportunity to leave it to the discretion of the school as to whether different faith perspectives regarding different issues are considered or not; it is a missed opportunity because we feel doing so allows the further development of knowledge and understanding of other perspectives as well as to develop critical thinking skills therein. Thus whilst there should be a degree of flexibility, it should not be unfettered.

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?

47. We strongly disagree because we feel paragraph 44 is severely lacking in detail. We of course agree that the special education needs or disabilities of a pupil should not generally impact on their ability to participate in RSE and similarly that in some circumstances it may need to be taken into account. However we are not clear what the exceptional circumstances may be and further, whether the parents and/or school will be required to consider alternative measures which may be put in place to assist. We make this point having taken into account the content of paragraphs 30 – 32 of the Guidance. We would also like to make the point that time, costs or resources must never be used to justify not providing pupils with SEND (or any pupils for that matter) with appropriate teaching and support in respect of these subjects, and would in fact consider it discriminatory behaviour to not have measures in place to provide RE/RSE/HE to pupils with SEND. It could also be potentially dangerous as we are aware that individuals with SEND can be particularly vulnerable to abuse (including bullying, sexual abuse and hate crimes).

Do you agree that the 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?

48. We neither agree nor disagree as we feel information is lacking on how subjects will be made accessible for pupils with SEND.

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 the school are clear?

49. We feel that RE, RSE and HE can prove to be an invaluable means by which to educate and empower children and young adults. It can also be the stepping stone towards ending all forms of abuse, discrimination and injustice. The opportunity must be properly utilised to ensure that the proposed aims are duly met; that children are able to learn about key issues (such as violence against women and girls and mental health stigma) in a positive and safe environment which harnesses their understanding and critical thinking skills.
50. It is also necessary to keep in mind that as the issues to be explored in such lessons are very real and may be directly impacting the pupils being taught in that very classroom. It is important to ensure that appropriate time is allocated for any requisite de-briefing of the issues and also that adequate and appropriate support is available for any pupils who may make disclosures. It is important to ensure that any assistance and support provided is timely and that pupils are kept in a safe environment. Furthermore, it is vital that faith and culturally sensitive support and advice is made also available. It is not a coincidence that children under the age of 16 are calling our MWN Helpline on issues such as relationships and sexuality; they require a service that takes their faith, culture and all other individualities into account and provides them appropriate help, support and advice in a holistic manner.

Do you agree that more is required on financial education for post-16 pupils?

51. We feel any additional support and advice to develop the financial education of post-16 pupils is to be welcomed.

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?

52. As we are not specifically from the education sector, we neither agree nor disagree with this point as we feel this response is better addressed by those working within the field of education. However we would like to make the point that, having worked with various schools and having a membership which includes teachers and teaching assistants, it appears to us that much more can be done to provide schools and teachers with the time, training and resources needed to better aid the development of pupils. Many of those in the education sector are working long hours, with limited resources and on pay that does not reflect their hard work. On that basis therefore, we would argue that further resources and support should be made available to enable the teaching of the new subjects and additional support mechanisms put in place for pupils.
53. Moreover, we do feel that it is vital to ensure that all teachers and practitioners that will be involved in the teaching of subjects are provided with training, information and guidance on faith and culturally sensitive matters, including different interpretations of subjects. MWNUK for example follow Quranic interpretations from an Islamic feminist perspective but this may not be reflective of the experiences of some of their pupils; to allow development of their knowledge and understanding and to allow pupils to be able to evaluate and critique the information available to them, teachers need to be aware of the variations both between and within faiths and

cultures and disseminate this information in an age-appropriate manner. Such training is also important to allow open discussions and to deal with topics or questions that may arise; for example, a child who dismisses mental health topics on the basis that it is all to do with piety or spirit possession should not be simply ignored or reprimanded but rather a dialogue should be entered into with them (and the wider classroom) to discuss the inaccuracies using their own faith as a tool of education.

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?

54. We repeat our comments in respect of the resources and training available to primary schools (above).

Do you agree that the draft regulations clearly set out the requirements on schools to teach the new subjects of Relationships Education, RSE and Health Education?

55. We neither agree nor disagree.

56. In respect of section 80A of the Education Act 2002, we are surprised that no reference has been made to concepts of equality and human rights; we feel that these concepts form an essential part of relationships, sex and health education and would have expected reference to the same.

57. We also feel that section 80A(2)(a)(ii) should refer to 'positive' relationships rather than simply relationships.

The draft regulations provide that parents have a right to request that their child be withdrawn from sex education in RSE and that this request should be granted unless, or to the extent that the headteacher considers that it should not be. Taking into account the advice to schools on how headteachers should take this decision, in paragraphs 41 – 46 of the guidance, do you agree that this is an appropriate and workable option?

58. We feel that onus should be placed on the parents to show that it is in the best interests of the child that they should be withdrawn, rather than on the headteacher that the child should not be withdrawn. We repeat our comments stated above in respect of paragraphs 36 – 43.

Do you have any other views on the draft regulations that you would like to share with the department?

59. No further comments

The remaining questions of the Consultation relate to the Regulatory Impact Assessment and the cost burdens involved in implementing the new requirements.

60. We do not feel able to respond to these specific questions but would like to reiterate our comments in asking that a lack of time, costs or resources should not become reasons for why opportunities were missed in providing pupils with the necessary

knowledge and information in a safe environment and appropriate manner, to allow them to develop their critical thinking skills and aid their personal growth and most importantly, to keep them free of harm, abuse and discrimination.

61. We also wish to make the point that investing in RE/RSE/HE now so as to allow its implementation to a high standard will in our opinion prove to be a cost-saving measure for in the future as it will prevent future costs to the state and individual. These costs include the costs of treatment relating to mental health issues; the costs of surgery to alleviate symptoms caused by FGM; the costs of providing refuge to victims of domestic violence as well as the costs associated with police and social services involvement; the costs associated with assisting victims of abuse who may not be able to reach their full earning potential due to the abuse suffered by them. We believe that it therefore makes great economic sense (as well as legal, social and moral) to invest in RE/RSE/HE now and save both future money, and lives.

Final Comments

62. As a point of clarification, we must explain that where our comments and examples have been limited to Muslim and BME girls, this is due to the nature of our organisation and its work. As a national Muslim women's charity our work predominantly deals with Muslim and BME women and girls albeit we also work with individuals of other faiths and are therefore also aware of issues of relevance to other faith and non-faith communities. We are also aware that some of the issues experienced by Muslim and BME women and girls can also be experienced by non-Muslim, non-BME women and girls, as well as men and boys. In turn we wish to clarify that where we make any recommendations, we do so on behalf of all those within wider society who may be affected and who may benefit from such recommendations.
63. MWNUK would like to express its willingness to assist through research, training, support, information or advice or any other means which would assist in developing RE, RSE and HE subjects.
64. We would like to thank the Department of Education for holding this Consultation and thank you for providing us with the opportunity to give Evidence. We hope it proves to be useful in your considerations.

**On behalf of Muslim Women's Network UK,
Nazmin Akthar-Sheikh
Chair**

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