

Consultation on draft Statutory Guidance on the Delivery of Relationships, Sexual Health and Parenthood (RSHP) Education in Scottish Schools

Zero Tolerance Response, November 2023

Question 1: Introduction

Is the draft introduction clear on the status and application of the guidance? Are there further additions required?

Zero Tolerance is Scotland's expert organisation on preventing and eradicating men's violence against women and girls. We work to tackle the root cause: gender inequality. We have a range of work focused on children and young people, including co-chairing the Scottish Government's Gender Based Violence in Schools working group, being a member of the Gender Equality Taskforce on Education and Learning, contributing to the Key Messages for Young People on Healthy Relationships and Consent, and training youth workers on how to discuss healthy relationships, consent and gender equality with young people.

We are pleased to see updated guidance for teachers on RSHP. It is hugely encouraging to see progress towards inclusive guidance which will help children and young people have more effective and equitable RSHP. Children, young people, parents and teachers have been calling for these changes, and the creation of this guidance represents a step towards the kind of RSHP which is so desperately needed.

Scotland's children and young people are in dire need of a more gender-sensitive, preventative approach. We know that girls and young women are at particularly high risk of experiencing VAWG, and that boys and men are more likely to perpetrate it (Plan,

2020; Girlguiding, 2021: 5; Agenda Alliance, 2022; Scottish Government, 2018; NHS Health Scotland, 2018; Police Scotland, 2023). Evidence shows that gender inequality is the root cause of VAWG, and gender transformative education is a key lever for VAWG eradication (Tutty, 2014: 45). This comes in the context of much discussion about levels of violence in Scottish schools, with harmful ideas of masculinity being a contributing factor here too. Therefore, a gender-sensitive and gender transformative approach to the RSHP guidance and its implementation is vital. A gender transformative approach means addressing the root causes of gender-based inequities and considering ways to transform harmful gender norms, roles and relations (Neuens and Hutchison, 2024).

Currently, the guidance is high-level across all topics, including gender equality. It does not clearly state what practitioners should teach, when, or how. It assumes a level of understanding on equalities issues – including gender – which may not be held by all teachers in Scotland. The guidance must, therefore, be supported by training. We make a number of recommendations throughout this response on how it can be clarified and strengthened.

Firstly, the introduction does not sufficiently emphasise the gendered nature of RSHP curriculums overall. Many topics included in the [RSHP national resource](#) are highly gendered. Family dynamics (parenthood, relationships, domestic abuse), safety, sex (sexuality, consent, pleasure, sexual violence, STIs), reproductive rights, and commercial sexual exploitation (prostitution and pornography) are all vastly different experiences for children of different genders in today's world. In each of these topics, there are gender stereotypes which promote the idea that boys and girls should behave in certain ways. For example, victim blaming women based on their clothing, excusing men's violence with the idea that 'boys will be boys,' or pressure boys face to consume violent pornography. Having a comprehensive gender transformative programme is a vital preventative measure in ending men's violence against women and girls by encouraging young people to question gender norms and stereotypes and develop gender equitable attitudes (Tutty, 2014). Therefore, we recommend adding a point in the introduction that

recognises the importance of a gender sensitive approach to RSHP education and promotes a gender transformative curriculum.

The guidance ensures that experiences of different sexualities, genders and communities are valued in building RSHP curriculums. Therefore, the guidance should acknowledge that each of these characteristics overlap intersectionally to influence people's experiences of RSHP. This is important so that young people can understand themselves better in the world where they are influenced by a range of factors and practitioners can be adequately informed to respond to a range of experiences.

Furthermore, point 1.6 in the introduction should be clarified to state the equal importance of a child's right to education as the parent or carer's right to withdrawal. Article 28 of UNCRC states that all children have the right to an education. Despite this right, boys and girls have different experiences of education in terms of the opportunities they are encouraged to pursue and attitudes they develop later in life. Girls in Scotland face barriers to accessing both education and reproductive healthcare (Nevens and Hutchison, 2024). Therefore, it is necessary that they are provided with safe spaces to learn about the importance of sexual health, safety and healthy relationships. Whilst it is important for parents to have a voice in this decision, we recommend clarification that illuminates the equal importance of child's right to education for their personal development.

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Question 2: Relationships, Sexual Health and Parenthood Education

How clear is the purpose of the RSHP education section?

We are pleased to see the emphasis on whole school approaches. It is well evidenced that cultural change is key for ending men's violence against women and girls, with children and young people learning most from the environments and behaviour of

adults around them, not what they are directly taught (Nevens et al., 2021). Whole school approaches are best practice for primary prevention of men's violence against women and girls.

However, the guidance does not specify why or how to embed a whole school approach, which limits its clarity. Therefore, Zero Tolerance recommends adding an additional point which states:

'In order to prevent gender-based violence, it is necessary to embed a whole school approach to equality for women and girls. Children and young people learn most from the environments and behaviour of adults around them, not from what they are directly taught. Without a whole school approach to equality, messages about respect and consent taught in RSHP will be undermined.'

Relatedly, we are concerned to see such over-emphasis on bystander approaches in point 2.4. Bystander approaches can be useful in empowering people to take action when an incident of violence is happening. However, they are not 'preventative.' They focus on what to do when the violence is already happening, not stopping it in the first place (Kerr-Wilson et al. 2020: v).

This is proven by recent research, which found that popular bystander approaches which work with young people '[do] not seem to contribute to a more positive development for the group of students whose knowledge and attitudes are furthest from the programme's target assumptions' and '[seem] to have limited potential to change the specific group with low levels of knowledge about violence and most problematic attitudes towards violent behaviour' (Lindberg and Billevik, 2023).

Therefore, Zero Tolerance recommends rephrasing point 2.4. It should instead read:

'The Scottish Government considers that RSHP education complements other aspects of a child and young person's learning and makes an important contribution to their development. This helps fulfil their right to learn about their growing bodies,

relationships (including online relationships), sexuality, sexual health and parenthood, as set out in paragraph 4.7 below. It supports learning and understanding of healthy relationships, develops personal resilience and can encourage a bystander approach, where individuals are empowered to active bystanders who can intervene when their peers share harmful attitudes and when gender-based violence happens. Whilst not themselves preventative, bystander approaches can complement broader, whole-school approaches to violence prevention and embedding equality.'

Finally, we are pleased to see the emphasis in this section on children and young people's right to learn about their bodies, relationships, sexuality, sexual health and parenthood. This right is absolutely core, and we hope to see it implemented effectively.

References

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Question 3: Parental engagement and ability to withdraw from RSHP learning

Is the guidance sufficiently clear in relation to the rights of parents and carers; is the process for withdrawing a pupil sufficiently clear?

This guidance is clear in terms of the rights of parents and the process for withdrawing a pupil. However, children's rights are not sufficiently embedded in this section, and it is not clear how to balance children's and parents' rights during the withdrawal process. Children's right to learn about topics covered in RSHP is just as important as parents' right to withdraw their child.

Indeed, the UN advises that a children's rights-based approach to RSHP is essential:

'Providing young people with equal access to [comprehensive sexuality education] respects their right to the highest attainable standard of health, including safe, responsible and respectful sexual choices free of coercion and violence, as well as their right to access the information that young people need for effective self-care' (UNESCO, 2018: 16).

Girls in Scotland face barriers to realising their rights to both education and reproductive healthcare (Nevens and Hutchison, 2024). Indeed, disabled girls are also often denied access to RSHP (Engender, 2018). This means that multiply marginalised girls, who are at particularly high risk of VAWG (Nevens and Hutchison, 2024), are often not accessing vital information about consent, their bodies, and their rights. This makes them even more vulnerable to men and boys who may take advantage of this lack of knowledge.

Therefore, Zero Tolerance recommends adding a step to the process laid out on page 9. This step should advise practitioners to meet 1:1 with the pupil in question to discuss their needs, and their right to learn. Then, practitioners should work together with the parents and the child to realise their right to information, either in mainstream RSHP or in another way. The pupil may need additional support to feel safe to express a different view from their parents, and guidance on how to provide this should also be included.

References

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Question 4: Embedding RSHP Education as a Whole School Approach

How effective is the guidance in explaining the key issues to be highlighted to teachers in delivering RSHP education? How does this help bring consistency to learning?

As aforementioned, Zero Tolerance is pleased to see the inclusion of a whole-school approach. However, as with the previous section, more detail is needed in this section to guide practitioners on *how* to embed equality in the everyday practice of schools.

Practitioners require clear, tangible actions. They also require training to allow them to develop the skills and knowledge necessary to deliver gender equal education. This is key to bringing a consistent approach, as the messages of RSHP will be diluted if they are not consistent with the actions and behaviours children and young people see and experience at school each day. Consistency is essential for effective prevention of VAWG.

Question 5: Consent and healthy relationships

Is the guidance sufficiently clear in supporting consent and healthy relationships having a greater focus in RSHP education?

Overall, the guidance provides clear high-level statements. It is, however, very non-specific. It does not tell practitioners what to teach, at what age, or how. This limits its clarity.

Bullet point one of the guidance states:

‘By providing safe spaces to foster honest and open discussions about healthy relationships, schools can help facilitate sensitive discussions on topics that can sometimes impact healthy relationships, such as gender-based violence, sexual harassment or LGBT relationships in the context of equality of status and rights.’

Firstly, part of this should be rephrased. Zero Tolerance does not believe that gender-based violence ‘sometimes [impacts] healthy relationships.’ No healthy relationship is violent. Additionally, it would be apt to acknowledge the relative safety of these conversations for different pupils. Girls are far more likely to experience gender-based violence than boys (Plan, 2020; Girlguiding, 2021: 5; Agenda Alliance, 2022; Scottish Government, 2018; NHS Health Scotland, 2018; Police Scotland, 2023) and are therefore more likely to find these discussions upsetting, no matter how ‘safe’ the space is. Zero Tolerance recommends rephrasing this bullet point to read:

‘By providing safe spaces to foster honest and open discussions about healthy relationships, schools can help facilitate sensitive discussions on topics such as gender-based violence, sexual harassment or LGBT relationships in the context of equality of status and rights. Practitioners should note that pupils who are specifically impacted by these themes, including girls and LGBT children and young people, may find these conversations more upsetting regardless of how ‘safe’ the space is. They should, therefore, be given additional support.’

The second bullet point of guidance acknowledges that inequality puts marginalised children and young people at greater risk of experiencing violence. However, the way this is phrased is non-specific. It does not recognise who is most at risk, nor that most

GBV is perpetrated by men and boys. We would recommend adding a sentence which reads:

‘Girls and young women, especially those who are additionally marginalised by racism, ableism, homophobia, and/or transphobia alongside sexism, are at the highest risk of experiencing gender-based violence. The vast majority of GBV is perpetrated by men and boys.’

Effective RSHP will challenge the harmful ideas about masculinity which contribute to VAWG. This will benefit women and girls, but also reduce the pressure on boys to conform to certain sexual scripts, such as expressing an interest in violent pornography or having a high number of sexual partners. The guidance must explicitly state the necessity of challenging harmful masculinity.

References

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Question 6: Faith, belief and RSHP education

Is the guidance sufficiently clear in ensuring faith and belief is accurately captured in RSHP education?

Zero Tolerance is pleased to see an acknowledgement of the variety of views held across cultures and ethnicities regarding RSHP. It is necessary to acknowledge the intersection between faith, belief and gender to adequately tackle the specific forms of violence against women that emerge within different communities in order to tailor preventative education (Ellis, 2014: 21).

Within a broader context of cultural sensitivity, there should be adequate guidance for practitioners to interrogate harmful gender stereotypes, attitudes and practices without a fear of being seen as 'culturally insensitive'. The Scottish Government is clear that practices such as forced marriage and honour-based abuse are VAWG. These acts of violence and the harmful attitudes about gender which cause them cannot be excused as cultural beliefs. The guidance must empower practitioners to take action without fear when they witness harmful views and behaviour which put women and girls at risk. Likewise, this must be balanced with the necessity of not essentialising any faith or community; all communities have the potential to both perpetuate and combat VAWG. RSHP must be taught in a way which is inclusive of all faiths.

Practitioners can often sideline gender when discussing RSHP within different faith and belief communities, in apprehension of being 'racist' or 'not understanding the culture' if they challenge gender stereotypes and harmful attitudes of other cultures (Scottish Government, 2017). Nyla Khan, Scottish survivor of forced marriage and founder of Universal Truth, discusses the phenomenon of 'race anxiety,' which is the fear professionals have of being called 'racist' when challenging what are seen as 'cultural practices' (Khan, 2023). Research by the Scottish Government (2017: 30) shows many professionals report unease when dealing with issues relating to race and culture, including honour-based abuse and forced marriage.

One participant from Zero Tolerance's Future Tales project envisioning a Scotland free of VAWG clearly echoed this sentiment and expressed the importance of carefully interrogating harmful practices, such as forced marriage, without essentialising communities. She said, "Identifying harmful practices doesn't make you prejudiced, but assuming we all are abused because of our religion does" (Zero Tolerance, 2022: 19). Her statement summarises our recommendation that practitioners should be adequately trained to confidently deliver RSHP education that does not excuse harmful gender attitudes, practices and stereotypes, without essentialising communities of specific faiths and beliefs as 'backwards'.

Therefore, we recommend addressing the intersection of faith, belief, gender and RHSP within the guidelines. The Scottish Government should give practitioners the necessary tools to be able to deliver RSHP across different faith and belief communities without essentialising their experiences nor fearing 'race anxiety'. Where possible, the guidance should encourage bringing in external organisations to facilitate discussions as it has been proven effective (Bhardwaj and Siddiqui, 2014).

References

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Question 7: Gender Inclusive Education

Is the guidance sufficiently clear in ensuring gender inclusive language is used to deliver RSHP education?

Zero Tolerance is very pleased to see a specific section which pays close attention to the role of gender in RSHP. This is vital given the close relationship between RSHP and preventing men's violence against women and girls. It is encouraging to see explicit discussion of gender stereotypes, and the lack of inherent difference between children and young people of different genders.

Despite point 3.10 noting the strength and ubiquity of gender stereotypes, the first bullet point of guidance states that 'All children and young people should be treated in the same way.' While well intended, this guidance could have harmful consequences. It is important to give children of different genders equal opportunities, as explained in the rest of the bullet point. However, gender neutrality is not impactful enough to counteract the powerful hold gender stereotypes have on children from the rest of society.

Therefore, a gender transformative approach is necessary to counteract stereotypes.

This means not always treating children the same way but intervening to actively counteract stereotypes when necessary. Therefore, the line should instead read:

'All children and young people should be treated equally, and one group should not be favoured over another. As far as possible, you can actively intervene to counter gender stereotypes which children and young people are absorbing from media and wider society. If they are given jobs to do in the classroom, decide carefully who does what; for example, ensure tasks such as heavier lifting type jobs and tidying up are shared equally and explicitly state that people of all genders can do different jobs.'

The second bullet point of guidance is not sufficiently clear and would benefit from an example.

The guidance given on embedding gender equality across the whole school is useful and should remain in the document. However, the document does not currently guide practitioners on *how* to deliver RSHP in a way which is gender inclusive or [transformative](#). Many topics included in the [RSHP national resource](#) are highly gendered. Family dynamics (parenthood, relationships, domestic abuse), safety, sex (sexuality, consent, pleasure, sexual violence, STIs), reproductive rights, and commercial sexual exploitation (prostitution and pornography) are all vastly different experiences for children of different genders in today's world.

Girls in Scotland simply do not feel safe, at home, at school, or in public spaces (Girlguiding, 2022). Thinking about safety will feel very different for them, and practitioners must acknowledge the systemic issues which cause them to feel unsafe,

and consciously ensure that girls are not asked to change their behaviour to 'ensure their safety.' The guidance must acknowledge that the majority of violence is perpetrated by men and boys. Thus, discussion must focus on changing the attitudes of men and boys who make girls feel unsafe. Effective RSHP will challenge harmful ideas about masculinity which contribute to VAWG and pressure boys to conform to limiting notions of their role in sex and relationships.

Girls are far more likely than boys to be subjected to gender-based violence, including domestic abuse and sexual violence; boys and men are far more likely to perpetrate gender-based violence, including against other men and boys (Plan, 2020; Girlguiding, 2021: 5; Agenda Alliance, 2022; Scottish Government, 2018; NHS Health Scotland, 2018; Police Scotland, 2023). Messaging about consent and healthy relationships must engage with this.

Indeed, even within healthy relationships, domestic labour and parenting is still not consistently split equally between partners (Engender, 2023), and content about parenting and families must work to counter act this. Structural inequality between men and women also contributes to VAWG, and RSHP can play a role in tackling this.

We must change the way we teach about sex, so that consent is not seen as something for men to obtain as a means to their own sexual pleasure. Conversations must explain consent as being informed, enthusiastic, freely given, ongoing and mutual, and women's pleasure as an equally important part of sex. This interlinks with any discussions about pornography, which sends harmful messages about the roles of men and women in sex.

A global evidence review by the UN came to a clear conclusion on the importance of gender transformative sex and relationships education:

'Gender-focused programmes are substantially more effective than 'gender-blind' programmes at achieving health outcomes such as reducing rates of unintended pregnancy or STIs. This is as a result of the inclusion of transformative content and teaching methods that support students to question social and cultural norms around

gender and to develop gender equitable attitudes (Haberland and Rogow, 2015)' (UNESCO, 2018: 29)

Discussing these topics will bring different things up for children of different genders, and lessons will need to counter-act the gendered messaging children receive about these topics specifically from media, social media and wider society. Gender sensitive and gender transformative teaching of these topics is vital, and practitioners need guidance and training on how to do this. Zero Tolerance strongly recommends adding guidance on how to teach gender sensitive and gender transformative RSHP to this section. We are happy to support with the development of this. We also recommend that this guidance be supported by training for those delivering RSHP.

References

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Question 8: Understanding of Variations in Sex Characteristics (VSC) sometimes referred to as or Differences in Sex Development (DSD) or Intersex

Is the guidance sufficiently clear in explaining and including VSC/DSD/intersex people in RSHP education?

It is beyond the expertise of Zero Tolerance to answer this question.

Question 9: LGBT inclusive RSHP education

Is the guidance sufficiently clear in ensuring RSHP education is LGBT inclusive?

Overall, this section is sufficiently clear, but requires greater gender sensitivity.

It is useful that the guidance gives statistics of the disproportionate impact of domestic abuse on LGBT people. This section would benefit from adding statistics about the impact of gender-based violence on LGBT girls in particular. For example, 2020 research by LGBT Youth Scotland found that:

- 80% of young LGBT women report having experienced verbal abuse because they are a woman or a girl
- 31% of LGBT girls have experienced sexual violence, including unwanted touching, sexual assault and rape
- 20% have been stalked or harassed by a stranger
- 12% have experienced violent or controlling behaviour from a partner or ex-partner.

The bullet point on prejudice-based, homophobic and transphobic bullying would benefit from noting that much of this bullying is based on gender stereotypes, harmful ideas of masculinity and male sexuality, and exoticisation of queer people (Mittleman, 2022).

This means that a whole school approach to embedding gender equality is preventative of this sort of behaviour too, which should be referenced in this section of the guidelines.

Finally, the necessity of a child's right to education should be restated in this section.

This is because, for some parents, LGBT inclusion remains contentious, but evidence shows that the risk not sharing this information poses to children is high. Lack of information results in bullying, harassment, unsafe sex, and even mental illness (UNESCO, 2018: 28-29). Practitioners should be empowered by the guidelines to defend a child's right to access this information. Indeed, the guidelines should specifically

encourage them to engage openly on this topic with young people, including those from a range of religious and cultural backgrounds, so that no child is at greater risk of not having their right to education realised.

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Question 10: Pupils with Additional Support Needs

Is the guidance sufficiently clear in explaining the requirement for pupils with Additional Support Needs to have RSHP education?

Zero Tolerance is pleased to see specific explanation of the requirement for pupils with additional support needs to have RSHP education. Evidence shows that women with learning disabilities are at particularly high risk of 'severe, frequent and repeated' gender-based violence (SCLD, 2023: 88). Disabled girls are targeted by abusers because of specific vulnerabilities at the intersection of gender, disability and youth (Zero Tolerance, 2023). RSHP is cited by women with learning disabilities themselves as an essential preventative action (SCLD, 2023: 89 and Zero Tolerance, 2023).

Therefore, to strengthen this guidance, and improve its clarity, Zero Tolerance recommends adding the following sentence bullet point after point 4.4:

‘Disabled women and girls, especially those with learning disabilities, are at particularly high risk of “severe, frequent and repeated” gender-based violence (SCLD, 2023:88). Particular care must be taken to ensure they access the information they need about consent and healthy relationships, just like other children and young people, so that lack of knowledge does not leave them vulnerable to abuse.’

References

SCLD (2023) *UNEQUAL, UNHEARD, UNJUST: BUT NOT HIDDEN ANYMORE. Women with Learning Disabilities’ Experience of Gender-Based Violence in Scotland*. Available online: <https://www.sclد.org.uk/wp-content/uploads/2023/03/Unheard-Unequal-Unjust%E2%80%93But-not-Hidden.pdf> (Accessed 8 November 2023)

Zero Tolerance (2023) *Violence against disabled women and non-binary people*. (Forthcoming)

Question 11: RSHP: Policy, Guidance and Resources

Does the guidance provide sufficient resources and signposts to support teachers in delivery of RSHP education, if not, which resources do you think are missing?

The list of resources will be useful for teachers. However, as the [RSHP Resource](#) is the most comprehensive tool in Scotland – and the closest we have to an RSHP curriculum - it should be moved to the top of the list and teachers should be encouraged to use it first and foremost.

Under the ‘gender equality’ section, the [Gender 10 Toolkit](#) for primary schools should be added. This and Equally Safe at School should be listed above ‘Mentors in Violence Prevention’ as they focus on gender equality rather than bystander approaches.

Finally, whilst guidance and resources are helpful for teachers, they cannot replace comprehensive training on RSHP. We call on the Scottish Government to deliver training for all teachers who teach RSHP, created in collaboration with equalities experts.

For Further Information

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About Us

Zero Tolerance is a Scottish charity working to end all forms of men's violence against women by tackling its root cause: gender inequality.