

**Cara-Friend, HERe NI &  
The Rainbow Project  
Belfast LGBT Centre  
23 - 31 Waring Street  
Belfast  
BT1 2DX**



**Date: 24/11/2023**

**Re: Consultation on legislation which provides for a parent/carer to request to have their child excused from age-appropriate, comprehensive and scientifically accurate education on sexual and reproductive health and rights, covering prevention of early pregnancy and access to abortion**

To whom it may concern,

As a collective of organisations, we have an extensive history in collaborative partnership to widen access to, enhance the delivery of services to be more inclusive of, and responsive of the needs of LGBTQIA+ people and their families, we respectfully submit this consultation response.

**Cara-Friend** was founded in 1974 as a voluntary support service for the LGBT community in Northern Ireland and is one of the oldest LGBT organisations specialising in youth work and education in the United Kingdom, Ireland, and Northern Ireland.

**The Rainbow Project** was founded in 1994 in response to the HIV and Aids epidemic. Since then, the organisation has developed into a leading LGBTQIA+ organisation working across Northern Ireland. We provide support services to mitigate the impacts of inequality and work to deliver full social and legal equality for LGBTQIA+ people.

**HERe NI (previously LASI)**, established informally in 2000 and formally constituted as a Company Limited by Guarantee in 2004, is a regional organisation that works across all areas of Northern Ireland (NI) and the boarder counties. We advocate for and support LGBTQIA+ women and their families and improve the lives of LGBTQIA+ women across NI. HERe NI is the only women focused organisation within the NI LGBTQIA+ sector.

We trust that this consultation will serve as a platform for thoughtful and respectful discourse, ensuring that all considerations are considered when implementing The Relationships and Sexuality Education (Northern Ireland) (Amendment) Regulations 2023. We are committed to participating in this process with openness and a dedication to the welfare of all members of our community, and the communities they themselves are also part of.

Sincerely,

**Lee Cullen**  
Cara-Friend  
Operations Director

**Sophie Nelson**  
HERe NI  
Policy Development Officer

**Nuala Devenny**  
The Rainbow Project  
Deputy Director



Agree

Statement 1: **The content of teaching and learning resources for Learning for Life and Work developed by CCEA** should be factual and contain age-appropriate, comprehensive and scientifically accurate education on sexual and reproductive health and rights, covering prevention of early pregnancy and access to abortion and these resources should **not advocate, or oppose, a particular view on the moral and ethical considerations of abortion or contraception.**

#### Comment:

Cara-Friend, HereNI and The Rainbow Project agree with the principle that educational resources in Learning for Life and Work, especially on sexual and reproductive health, should present factual and age-appropriate information. This education should provide clear, scientific knowledge on topics like preventing early pregnancy and understanding abortion without promoting or condemning any specific moral or ethical viewpoints on these issues.

It is crucial that Relationship and Sexuality Education (RSE) be impartial and factual, steering clear of personal or institutional biases that could skew the information. The primary goal of RSE should be to equip young people with the knowledge they need to make informed decisions regarding their reproductive health, upholding the principles of bodily autonomy and personal rights.

We believe that including moral or ethical stance as part of the delivery of comprehensive relationships and sexual health education is counterproductive to the provision, particularly as it relates to the education to marginalised groups. Recognising the need for sex education for marginalised groups the Gillen Review<sup>1</sup> (May 2019) recommended the need to *'include in the school curriculum for disabled children, children with sensory disability and those who are members of marginalised communities' sex education designed in a culturally sensitive manner on matters such as consent, personal space, boundaries, appropriate behaviour, relationships, fears of homophobia and transphobia, gender identity and sexuality.'*

Teachers are in a prime position to provide this education due to their sustained contact with young people during their schooling years, their expertise in educational methods, and the trust students often place in them as reliable sources of information and advice.

A report on Sexual and Reproductive Health in Northern Ireland published by The Northern Ireland Abortion and Contraception Taskgroup<sup>2</sup> in March 2021 also recognised the need for a broad range of sexual health programme delivery incorporating school-based programmes, youth friendly health services and non-school based youth friendly services. This was acknowledged as particularly important for marginalised groups and would have the greatest impact, especially as the teaching and learning resources provided by CCEA would be adaptable to any form of formal, informal or non-formal education.

Previously young people have stated that relationship and sexual health education in schools is 'poor' and called for *'the delivery of a wider and more consistent curriculum.'*<sup>3</sup> Further research conducted by Belfast Youth Forum in 2019<sup>4</sup> found that the relationship and sexuality education

<sup>1</sup> Gillen Review - Report into the law and procedures in serious sexual offences in Northern Ireland May 2019 [gillen-report-may-2019.pdf \(justice-ni.gov.uk\)](https://www.justice-ni.gov.uk/gillen-report-may-2019.pdf)

<sup>2</sup> [NIACT\\_Report\\_s.pdf](#)

<sup>3</sup> Inquiry into Child Sexual Exploitation in Northern Ireland Nov 2014 <https://www.cjini.org/getattachment/f094f421-6ae0-4ebd-9cd7-aec04a2cbafa/Child-Sexual-Exploitation-in-Northern-Ireland.aspx>

<sup>4</sup> Belfast Youth Forum - Any Use Report <https://www.belfastcity.gov.uk/Documents/youth-forum/Any-use-report>

they received was *basic, unhelpful, useless and biased*. They recommended that Government and policy makers should;

- Adopt a rights-based and proactive approach to relationships and sexuality education
- Co-produce a curriculum programme and relevant interventions with young people and include the following;
  - Personal relationships
  - Sexual rights and behaviours
  - Gender equality and diversity
  - Responsible parenthood
  - Violence prevention
  - Preventing unintended pregnancy and sexually transmitted infections
- Provide specialist staff to deliver relationships and sexuality education

In developing and implementing RSE, Cara Friend, HERe NI and the Rainbow Project strongly support involving children and young people in shaping the curriculum. This approach helps foster their self-governance and emotional resilience. Ultimately, we want to empower young people to make informed, respectful, and confident decisions about their sexual and reproductive health, including providing them with practical guidance on how to access reproductive and contraceptive healthcare services in Northern Ireland.

Cara Friend, HERe NI and the Rainbow Project held an LGBTQIA+ consultation focus group to help formulate this response. The twenty young people who took part identified the need for subject expertise to teach elements of the RSE curriculum and suggested that healthcare professionals should be involved in teaching subjects around health for example. Many of the young people involved in our LGBTQIA+ consultation focus group understood that teachers are often best placed to provide RSE, given their sustained contact with pupils. However, there was agreement that they must teach a standardised curriculum that covers all areas of RSE and not 'pick and choose' which topics to include.

As such, all the young people in our focus group agreed with this statement (what statement? Good to reinforce what question it is), as they felt that inclusion of a facilitator's biases could result in the teaching of misinformation, and the young people/pupils not being able or confident enough to form their own opinions and trust the teacher. The focus group then drew attention to a weakness in the current curriculum under the Minimum Content Order which states that 'topics should include but are not limited to'. Cara Friend, HERe NI and the Rainbow Project support a change in the phrasing to "must include".



Statement 2: **Parents/carers should be informed about the specific nature and content** of the age-appropriate, comprehensive, and scientifically accurate education on sexual and reproductive health and rights, covering prevention of early pregnancy and access to abortion.

**Neither  
Agree  
nor  
Disagree**

**Comment:**

Young people in our focus group were evenly split between ‘neither agree or disagree’, and ‘disagree’. Between both standpoints, young people raised that parents are not informed of the curriculum or subject matter for approval for other subjects, and - while the information can be empirically proven to reduce poor health outcomes for young people - it can cause parents to have a moral panic and lead to the child being removed from these classes.

These concerns were compounded in the ‘disagree’ standpoint, with some young people speaking about their own personal experiences identifying as LGBTQIA+ and having their identity discussed openly within the classroom setting. Overall, they felt within this group that if correct and relevant information is not provided to them, they would go looking for it themselves, on the internet, where they may get the wrong or misleading information. This led to young people identifying that, should they be removed from classes their peers are attending, they can still discover the same information from a third-party, which presents a risk of the information being distorted.

Frequently, RSE programmes may involve challenging myths and misconceptions that hold no basis in fact as it relates to such areas as the transmission of STIs, conception through non-penetrative sex, and other pieces of misinformation that could lead to inadvertently harmful sexual practices being seen as harm reductive, or positive, by pupils in later life. In addition to the overall negative impact to their sexual and reproductive health if they have no information due to withdrawal or factually incorrect information by third-party, the young people raised they may be bullied by their peers for having ‘helicopter parents’, and talked about feeling left behind socially as a detriment.

However, in the ‘neither agree nor disagree’ standpoint, young people recognised the inherent value in the support from a parent or carer should they have follow-up questions of a more personal nature. The young people also identified a clear generational divide, particularly in relation to the use of technology and social media in interpersonal relationships.

Relationships and sexuality education is included in the revised curriculum<sup>5</sup> and is now a statutory component of personal development and home economics, as well as the biological aspects of the science curriculum. Cara Friend, HERe NI and the Rainbow Project have identified Learning for Life and Work as a core subject that the full RSE curriculum should be delivered through comprehensive guidance, such as those issued in 2019<sup>6</sup>, recognising that all young people have the right to high quality relationships and sexuality education that is relevant to their lives today. This updated guidance has a number of key themes including ‘delivering inclusive relationships and sexuality education’ focusing on sexual orientation and gender identity. The guidance aims to get schools to reflect on their existing provision and update as appropriate to ensure it is relevant to young peoples’ lives today.

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<sup>5</sup> Northern Ireland Curriculum – The Statutory Curriculum at Key Stage 3 ([PDF](https://www.ccea.org.uk/PDF/StatutoryCurriculumforKeyStage3.pdf)) [Statutory Curriculum for Key Stage 3 \(ccea.org.uk\)](https://www.ccea.org.uk)

<sup>6</sup> Relationships and Sexuality Education Guidance - An Update for Post-Primary Schools 2019 CCEA Relationships and Sexuality Education Guidance An Update for Post-Primary Schools.pdf ([ccea.org.uk](https://www.ccea.org.uk))

To meet the significant concerns of the focus groups, Cara-Friend, HEReNI and The Rainbow Project would neither disagree nor agree with this statement. We feel that, in addition to the concerns from our focus group, the information in regard to CRSE (comprehensive relationships and sexual education) may be quite challenging for parents and carers to totally understand if they have not undergone it themselves.

According to United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2018), CRSE is comprehensive in that it provides opportunities to acquire comprehensive, accurate, evidence-informed and age-appropriate information on sexuality as part of a continuing education process. This includes a wide array of topics, from anatomy and physiology to reproductive health, contraception, and the prevention and treatment of sexually transmitted infections (STIs), including HIV and AIDS. Beyond just the physical aspects of reproduction, CSE also covers the social and emotional dimensions of sexuality. It aims to promote responsible sexual behaviours and emphasize the value of healthy, equitable relationships built upon human rights and gender equality principles.

In acknowledgement of that the level of information may be confusing and inaccessible for many parents/carers, we would recommend that the CCEA make concerted efforts to ensure these educational resources about sexual and reproductive health are as accessible and comprehensible to parents and carers and they are thorough and fact-based for students in order to satisfy the requirements as set out in The Relationships and Sexuality Education (Northern Ireland) (Amendment) Regulations 2023.



Disagree

Statement 3: **The United Nations Convention on the Rights of the Child**<sup>7</sup> includes at Articles 1-3 and 12 the rights of the child to ‘**express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously**’ and at Article 5 ‘**the rights and responsibilities of parents and carers to provide guidance and direction to their child as they grow up so that they fully enjoy their rights. This must be done in a way that recognises the child’s increasing capacity to make their own choices.**’ The Department’s guidance, when developed, should consider in such instances how schools balance the rights of both children and parents/carers in implementing the regulations.

**Comment:**

Sexual and reproductive health rights are rights for all people, regardless of age, gender and other characteristics, to make choices regarding their own sexuality and reproduction, provided that they respect the rights of others. It includes the right to access information and services to support these choices and promote sexual and reproductive health. The United Nations Convention on the Rights of the Child<sup>8</sup> (Article 17) states: ‘*Each child (should have) access to information and material from a diversity of national and international sources, especially those aimed at the promotion of his or her social, spiritual and moral wellbeing and physical and mental health.*’

The right to sexual and reproductive health is an integral part of the right to health and a particular focus in the UNCRC General Comment No. 20 on the implementation of the rights of the child during adolescence (CRC/GC/20), which states, “*All adolescents should have access to free, confidential, adolescent-responsive and non-discriminatory sexual and reproductive health services, information and education.*’ (X159)”

Given this, it is important to clarify that while the UNCRC recognises parents’ roles in guiding and directing their children’s development, this should evolve in recognition of children’s growing abilities to make their own informed decisions. There is no indication within the UNCRC that suggests a child’s right to access sexual and reproductive health care and information should be diminished or subject to parental consent. Rather, the emphasis is on providing age-appropriate education that respects the child’s increasing capacity for autonomy. This was reflected in our focus group, with young people asserting that the education they are undertaking is their own, to prepare them for their own life as autonomous adults.

When developing departmental guidance, it is essential to balance the rights of children to obtain full and age-appropriate education on sexual and reproductive health with the parents’ responsibility to guide their children’s growth. This balance should facilitate the empowerment of children to exercise their rights with an understanding of their personal and family values. As such, schools’ implementation of these regulations should ensure that children’s rights to access information are upheld, while also maintaining open communication with parents and caregivers about the curriculum and available resources. This approach respects the complementary roles of both schools and families in educating and supporting children as they mature. The focus group asserted their belief that such balancing would be inherently flawed, as schools and teachers will default to the parents’ rights because they are adults with the life experience, without equivalent value on a child’s current perspective.

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<sup>7</sup> [UNCRC summary-1.pdf \(unicef.org.uk\)](https://www.unicef.org/uk/uncrc/summary-1.pdf) Articles 1-3 and 12

<sup>8</sup> [United Nations Human Rights https://www.ohchr.org/EN/professionalinterest/pages/crc.aspx](https://www.ohchr.org/EN/professionalinterest/pages/crc.aspx)

It should be made clear that while parents and carers have the responsibility to guide their children, this does not extend to withholding factual and necessary health education, which is a fundamental right of the child. Schools should, therefore, ensure that their RSE content is in compliance with the UNCRC provisions, providing comprehensive and appropriate education while recognising the progressive autonomy of children.



Statement 4: Pupils and parents/carers should have access to an overview of their school's RSE policy and planned RSE programme.

**Comment:**

**Agree**

The common ground shared by both students and adults is the universal experience of childhood and adolescence. Yet, the context in which young people grow up today is profoundly shaped by technological advances, social media, and instant access to information, creating a distinct generational gap. The widespread presence of technology in the lives of modern children and adolescents requires that best practices for educational programmes, including Relationships and Sexuality Education (RSE), adapt to stay relevant.

While adults can reflect on their past experiences as children or adolescents, today's youth interpret the world through their immediate, contemporary viewpoint, which may differ significantly from past generations. This difference in perspective is crucial to acknowledge in developing and communicating a school's RSE policy and programming.

To ensure that RSE policies and programmes are both relevant and effective, schools should make their RSE policy easily accessible to pupils and parents/carers, providing a clear overview of the curriculum. This transparency allows for informed understanding and engagement with the educational material and helps bridge the gap between generational experiences. Furthermore, offering insight into the RSE program ensures that parents/carers are equipped to support their children's learning and address any questions or concerns that may arise from the RSE content. This was echoed in our focus group, with young people strongly asserting the need to be transparent with what children are learning on comprehensively and scientifically accurate RSE curriculum to avoid the spread of misinformation and lobby groups that may wilfully take advantage of parents and carers' well-meaning interest in their child's education.

Cara Friend, HERE NI and the Rainbow Project appreciate that if parents do have issues with the schools RSE policy and planned RSE programme that they should be able to voice these concerns. However, this should not impact the teaching of an inclusive and standardised curriculum to their child. Instead, schools should work with parents to increase awareness that the RSE curriculum is factual and scientifically accurate and does advocate, or oppose, a moral or ethical view on abortion to contraception. Rather the role of RSE is to provide knowledge so the child can make informed choices.

In moving forward, schools must also recognise the dynamic and evolving landscape in which their students live. This involves regular updates to RSE content to reflect current realities and the inclusion of digital literacy as part of the curriculum to address the influence of technology on sexual and reproductive health. It is imperative for educators to remain responsive to the changing needs of their students, ensuring that RSE not only delivers accurate and comprehensive information but also equips young people with the skills and knowledge to navigate the digital world safely and responsibly.