

National Institute for Health and Clinical Excellence

PUBLIC HEALTH GUIDANCE– PERSONAL SOCIAL HEALTH AND ECONOMIC EDUCATION FOCUSING ON SEX AND RELATIONSHIPS AND ALCOHOL Consultation on the Draft Guidance from 17 June – 15 July 2010. Comments to be received no later than 5pm on Thursday 15 July 2010

Stakeholder Comments

Please use this form for submitting your comments to the Institute.

1. Please put each new comment in a new row.
2. Please insert the **section number** in the 1st column. If your comment relates to the document as a whole, please put '**general**' in this column
3. **Please note - Comments forms with attachments such as research articles, letters or leaflets. If comments forms do have attachments they will be returned without being read. If the stakeholder resubmits the form without attachments, it must be by the consultation deadline.**

Name:		Naomi Phillips, Head of Public Affairs
Organisation:		British Humanist Association
Section number	Page Number	Comments
Indicate section number or ' general ' if your comment relates to the whole document		Please insert each new comment in a new row.
'general'		<p><i>As the BHA has no formal policy on alcohol education, we refer only to those sections of the guidance related to sex and relationships education.</i></p> <p>The BHA welcomes the draft guidance as an important contribution to the evidence base on sex and relationships education.</p> <p>The BHA is committed to encouraging informed and responsible choice. Therefore, we believe that all children should be entitled to full and accurate age appropriate SRE, including unbiased information on contraception, STDs, abortion, sexual orientation, and the many forms of family relationship conducive to individual fulfilment and the stability of society. The guidance provides further support and evidence for our position.</p> <p>We hope that the guidance will help to persuade the new government of the need for statutory PSHE as part of its curriculum review.</p> <p>Generally we would like "religion or belief" (which is the term used in equalities legislation) or "religious or non-religious beliefs" (which is the term used in Department for Education documents on Religious Education and Community Cohesion) to replace "faith" within the guidance. Using the word "faith" automatically excludes the non-religious from consideration.</p> <p>It is vital that the full range of beliefs are acknowledged, particularly when the guidance recommends consulting with external organisations. There is a risk that Humanist and other non-religious views are sidelined as they are less "visible" than religious perspectives.</p> <p>We would also like to have seen specific guidance related to the delivery of PSHE in "faith schools", with which the BHA has longstanding concerns.</p>

Please return the comments form to: pshe@nice.org.uk

NB: The Institute reserves the absolute right to edit, summarise or remove comments received on during consultation on draft guidance where, in the reasonable opinion of the Institute, they may conflict with the law, are voluminous or are otherwise considered inappropriate.

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1	10 and 12	<p>The guidance recommends that SRE should be "consistent with the school's ethos and values". We are concerned that this could lead to poor quality SRE in "faith schools", who are likely to interpret this guidance as justification for delivering SRE based on religious tenets rather than objective evidence.</p> <p>This recommendation also threatens to contradict the very sound guidance on page 12, which states that SRE should be "factually accurate, unbiased and non-judgmental" and that teaching should help pupils to "distinguish between facts and opinions".</p>
	10	<p>We welcome the recommendation that education about sex and relationships should begin in primary school.</p> <p>However, whilst we firmly believe that all education should be inclusive, we are concerned by the recommendation that this education is "sensitive to faith ... perspectives". The BHA believes that SRE is a right of all pupils, regardless of their parents' beliefs, and that over-sensitivity to religion may lead to young people being denied that right.</p>

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	14	<p>The BHA supports the involvement of external visitors in the teaching of PSHE education.</p> <p>However, we would again ask that "religion or belief organisations" replaces "faith or cultural organisations" and would support the explicit inclusion of Humanist groups in this part of the guidance. Humanists have always been willing to work for the common good alongside the many representatives of religious communities who also take this position, on the basis of our shared values. They also have a long history of support for good sex and relationships education.</p> <p>We do feel that without further clarification there is a risk that "faith schools" may invite religious groups with extreme views on certain aspects of sex and relationships education (e.g. abortion) to speak to pupils and students.</p>

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