

Consultation on the Curriculum and Assessment (Wales) Bill

Evidence submitted to the [Children, Young People and Education Committee](#) for Stage 1 scrutiny of the Curriculum and Assessment (Wales) Bill.

About you

Organisation: FTWW: Fair Treatment for the Women of Wales

1. The Bill's general principles

1.1 Do you support the principles of the [Curriculum and Assessment \(Wales\) Bill](#)?

Partly

1.2 Please outline your reasons for your answer to question 1.1

(we would be grateful if you could keep your answer to around 1500 words)

FTWW is concerned at the absence of compulsory elements of the Health & Wellbeing AoLE. Given that this is an entirely new topic area, with multifarious elements and with teaching personnel unlikely to have completed medical training, we are concerned at the lack of guidance issued, with no topics considered essential and therefore little support on how to deliver them. As a women's health organisation, we are particularly concerned by the decision not to make menstrual wellbeing education mandatory, in line with England from September 2020.

A 2018 study by Plan International UK (<https://plan-uk.org/file/plan-uk-break-the-barriers-report-032018pdf/download?token=Fs-HYP3v>) revealed that almost half of all pupils who menstruate will miss school as a consequence of their periods, whether that be pain, bleeding, or associated symptoms; one quarter didn't know what to do to manage their periods, and 80% would currently feel unable to ask their teachers for help or advice on the topic. A 2020 study, 'The Prevalence and Educational Impact of Pelvic and Menstrual Pain in Australia' ([https://www.jpagonline.org/article/S1083-3188\(20\)30244-8/pdf](https://www.jpagonline.org/article/S1083-3188(20)30244-8/pdf)) found that 77% of pupils who menstruate felt that their concentration in class was impacted by their periods. Clearly, therefore, the decision not to mandatorily include this topic will

perpetuate the barriers many pupils already encounter in attending or fulfilling their potential in school.

Menstrual health affects all female / those assigned female at birth pupils in Wales, approximately 52% of the classroom and the population at large. Indirectly, menstrual health will also affect other genders, as they can be expected to have relationships with family members, friends, and loved ones who have / had periods.

Most girls are starting their periods at the same time they start secondary school. In the UK, periods can commence anywhere between the ages of 10 and 15 years of age. We believe that Menstrual Wellbeing Education in schools is vital in order to teach the huge numbers of young people affected what to expect from periods, what is and isn't normal, and when to seek medical help.

The decision to leave topics within this particular AoLE entirely up to the discretion of teachers / schools will undoubtedly see variation in what is delivered; it runs the risk of potential misinformation being disseminated, perpetuating existing health inequalities. Further, as a policy, it potentially creates indirect discrimination against those affected - primarily girls and young women - whose access to education, health, and long-term prospects are being negatively impacted by the decision not to mandate provision of information on the topic.

1.3 Do you think there is a need for legislation to deliver what this Bill is trying to achieve?

(we would be grateful if you could keep your answer to around 500 words)

-

2. The Bill's implementation

2.1 Do you have any comments about any potential barriers to implementing the Bill? If no, go to question 3.1

(we would be grateful if you could keep your answer to around 500 words)

In its current form, FTWW feels that the Bill is potentially in breach of certain UN conventions and existing UK and Wales legislation. It is FTWW's belief that to not make Menstrual Wellbeing Education mandatory will result in severe detriment to the

attainment, health, fertility, and prospects of a significant number of young people in Wales and does not appear to be in line with the following:

UN Convention on the Rights of the Child (CRC), Articles 3, 24, 28

UN Convention for the Elimination of all forms of Discrimination Against Women (CEDAW), Articles 2, 3, 10, 12

Equality Act 2010, Indirect Discrimination

Wellbeing of Future Generations Act (Wales) 2015, Health Inequalities, Prevention, Adverse Childhood Experiences

Social Services & Wellbeing Act (Wales) 2014, Voice and Control.

We would ask that the Committee considers the Bill in terms of enabling children / young people to attend school, access education on their health, preventative healthcare (including family planning).

We would ask that the Committee considers how far the omission of Menstrual Wellbeing Education creates and perpetuates existing discrimination against women as it allows existing taboos and misconceptions around menstruation to go unchallenged, prolonging diagnostic delays for menstrual-related medical conditions, and impacting negatively on women's future health, fertility, employment, and wellbeing.

We believe that the decision to allow such a vital subject to be optional builds inequality into the educational system, both in terms of sex discrimination against young women and also between schools themselves, with some providing information and others not. It is important to acknowledge that taboos around menstruation and related issues affect not just pupils but teachers too. Consequently, it is not inconceivable that many teachers will decide not to tackle the subject.

Making Menstrual Wellbeing Education mandatory will require schools to invest in additional training, resources, and / or external specialist support to ensure consistent, accurate information be delivered. In the absence of this, there will be no measures in place to ensure that all pupils in Wales will receive the same accurate, evidence-based teaching on the topic, further exacerbating inequalities.

We would like the Committee to consider how far the failure to include mandatory menstrual wellbeing education may perpetuate indirect discrimination, with the policy disadvantaging a group of people who share a protected characteristic, ie being female.

We would ask the Committee to consider the Bill in respect of Wales-based legislation which asks public bodies in Wales to consider the long-term impact of their decisions, particularly with the aim of preventing persistent problems such as health inequalities.

We would also ask the Committee to consider the implications of a policy which may well see large numbers of pupils without recourse to the information and skills that would empower them to challenge myths and seek support / medical help, and particularly whether the policy facilitates young people having the voice and control they need to achieve well-being and an appropriate level of independence.

2.2 Do you think the Bill takes account of these potential barriers?

(we would be grateful if you could keep your answer to around 500 words)

-

3. Unintended consequences

3.1 Do you think there are there any unintended consequences arising from the Bill? If no, go to question 4.1

(we would be grateful if you could keep your answer to around 500 words)

In its present form, the new curriculum for Wales has the potential to see Menstrual Wellbeing overlooked, leaving young people without the information they need to know what a normal menstrual cycle is, and when to seek medical help.

Menstrual health conditions affect a significant proportion of people, including heavy menstrual bleeding (20%), fibroids (20%), endometriosis (10%), polycystic ovary syndrome (10%), and premenstrual dysphoric disorder (5%). Menopause will affect all of those who menstruate at some point and, yet, the cessation of periods and what to expect from that process isn't covered at all in an educational context in Wales. Menopause aside, most of these conditions will begin to cause troublesome symptoms during puberty, around the time of the onset of periods. In the UK, the average age of menarche is 12-13 years. The result is that many young people suffer silently with symptoms for the majority of their school lives, resulting in frequent absences from school, missed exams, and lower educational attainment. The potentially devastating impact menstrual health conditions

can have on someone's education, future career, and their physical and mental health must not be under-estimated.

To overcome taboos and reduce health inequalities in Wales, all young people need access to reliable, accurate information about menstrual wellbeing. This is so that the topic can be openly and unashamedly discussed, myths debunked, and individuals sufficiently empowered with the knowledge they need to seek medical advice when appropriate.

Whilst the concept of teacher autonomy and professional expertise is to be respected, most notably within their own subject specialisms, the problem with not mandating certain topics within the Health and Wellbeing AoLE is that pre-existing taboos will likely influence both teachers and pupils, with both parties reluctant to open up discussion and teachers ill-equipped to answer impromptu questions about health issues which are frequently – and erroneously – normalised, such as pelvic pain and heavy bleeding.

We believe it is vital that all schools are sufficiently prepared and resourced to cover menstrual well-being in the classroom, as it cannot be assumed that young people feel comfortable and confident discussing menstruation and related issues with a parent, carer, or vice versa. Many face additional cultural barriers to talking about menstrual wellbeing in the home, whilst those in non-traditional family units, care, or boarding school are all examples of pupils who may not necessarily have ability to discuss the topic with parents;

Whilst it is clear that the Welsh Government wishes to equip pupils with the knowledge to 'overcome barriers to learning and achieve full potential'

(<https://hwb.gov.wales/curriculum-for-wales/summary-of-proposed-legislation/>) the decision not to explicitly include menstrual wellbeing education actually perpetuates such barriers. FTWW believes it is vital to provide students with the information they need to recognise indicators of mental or physical problems, the ability to communicate these, and the means to seek support. Given the evidence demonstrating the extent and impact of menstrual-related issues on the school population, failure to act in this regard seems to contravene all pupils' right to receive an education.

Welsh Government's Department of Health has already recognised the vital importance of compulsory menstrual wellbeing education. The report, Endometriosis Care in Wales, commissioned by the Welsh Government in 2018 and supported by the Health Minister, Vaughan Gething, concluded that menstrual wellbeing education should be compulsory in Wales in order to de-normalise pelvic pain, heavy bleeding, and associated symptoms, speed-up help-seeking, reduce diagnostic delay, and improve patient outcomes. We

therefore ask that the Welsh Government maintains its commitment to this stance by amending the draft Curriculum accordingly.

Compulsory menstrual wellbeing education will be on the school curriculum in England from September 2020; failure to follow suit in Wales will compound existing inequalities, as evidenced by the year-longer diagnostic delay for endometriosis patients in Wales and data showing that young women in Wales were more likely to fail to complete their education or maintain employment due to symptoms / disease progression than their counterparts in the rest of the UK.

We would call upon the Committee to recommend that Welsh Government makes the necessary amendments to its Curriculum and Assessment (Wales) Bill to guarantee all pupils in Wales receive the same high-quality, evidence-based material, delivered by those with specialist training, and with dedicated teaching time.

Without a compulsory course of this nature, pupils in Wales won't have equal and timely access to accurate information; menstrual health will remain an uncomfortable subject rarely discussed openly, and the cycle of misinformation and delayed help-seeking will continue, impacting unfairly on the rights of young people – and future generations of adults – in Wales.

4. Financial implications

4.1 Do you have any comments on the financial implications of the Bill (as set out in Part 2 of the [Explanatory Memorandum](#))? If no, go to question 5.1

(we would be grateful if you could keep your answer to around 500 words)

-

5. Powers to make subordinate legislation

5.1 Do you have any comments on the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the [Explanatory Memorandum](#)). If no, go to question 6.1.

(we would be grateful if you could keep your answer to around 500 words)

-

6. Other considerations

6.1 Do you have any other points you wish to raise about this Bill?

(we would be grateful if you could keep your answer to around 1000 words)

-

