

Consultation on Relationships education, relationships and sex education, and health education November 2018

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

Agree

1. As part of our consultation engagement, Terrence Higgins Trust, in partnership with Brook, organised three workshops with young people aged 15 – 24 to gather feedback on the draft Relationships Education and Relationships & Sex Education guidance. Events were held in London and Birkenhead and allowed young people to share their experience of sex education classes in school. The workshops focused on what an ideal Relationships Education and RSE lesson would look like, including the age in when topics should be introduced and the role of external agencies, such local sexual health services, in providing information. Discussions were also shaped around the key questions contained within this consultation and we have included a number of anonymous quote from participants to support our response. Participants represented a broad range of gender identities, age, sexualities and education status.

2. Terrence Higgins Trust strongly believes that introducing children to the concept of relationships at a basic level, for example making references to family and friends, is of vital importance to understand what a healthy relationship looks like. Ensuring that children have an understanding of consent and the need for communication is a crucial foundation to further develop ideas around consent within a relationship that can be taught in later years.

3. We support the Department's focus on the concept of age appropriate learning and call for further detail to be provided on this within the guidance. This should be a breakdown of either age ranges or school years at which a child should learn about key ideas. We believe this would strengthen the focus on age appropriate learning and provide milestones in which a child should have obtained specific areas of knowledge. At present, all knowledge that children are expected to have is presented as needing to be met by end of primary school. Whilst acknowledging the importance of providing schools with flexibility to have a curriculum that is tailored to the needs of their pupils, the UNESCO International Technical Guidance provides learning objectives and outcomes for 5-8 years old and 9-12 years. We believe the Department should replicate this approach in the guidance.

11. 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?

Disagree

4. We acknowledge but do not support the Children & Social Work Act (2017) making sex education optional within primary schools, we believe that the benefits of primary schools providing sex education should be made more explicit within the Relationships Education Guidance. At present, the guidance places greater focus on the right of primary schools to opt-out of sex education lessons, rather than explaining the advantages of delivering sex education. The guidance unnecessarily places the word "*not*" in bold in reference to primary schools not having to deliver sex education lessons.

5. We welcome the recognition by the Department that *"all primary schools should have a sex education programme tailored to the age and the physical and the emotional maturity"* but this should be within the opening paragraph of the section relating to sex education in primary schools and not placed in the third paragraph. International best practice on sex education lessons by UNESCO [http://unesdoc.unesco.org/images/0026/002607/260770e.pdf], recommends that primary schools should provide information on key functions of the body that contribute to reproduction, for example sperm production. Citing this international best practice would strengthen the Department's recommendation for all primary schools to be delivering sex education. Moreover, the importance of ensuring that all children have the same level of knowledge and are therefore prepared for Relationships & Sex Education lessons at secondary school, should be highlighted as another key benefit to delivering sex education in primary school.

6. For those primary schools that opt-out of delivering sex education lessons, clarity must be provided on what is classified as sex education and what is not. For example, it is unclear whether the information on the menstrual cycle or the correct names for body parts would be classified as sex education lessons and therefore not required to be taught in primary schools. We note the guidance makes reference to the National Science Curriculum in regards to teaching about body parts, however this does not apply to independent schools or academy schools. This would result in pupils who do not attend maintained schools potentially missing out on key information. We would strongly recommend the Department removes the ambiguity regarding this and also set out what must be taught in Relationships Education lessons.

7. At a minimum, Terrence Higgins Trust believes all primary schools should ensure that children can identify the correct names for body parts and have an understanding of the menstrual cycle – both of which are fundamental to the development of pupils.

8. We are very concerned that there is no reference to LGBT relationships within paragraphs 50-57. It is recommended that schools discuss different types of families but the only examples given are regarding *"looked after children or young carers"*. Terrence Higgins Trust believes that there must be an LGBT-inclusive approach to Relationships Education in order to ensure children have a baseline understanding of different relationships and sexual identities, in order for further development at secondary school when these issues are explored in more detail, including in relation to sexual health.

9. "Sexuality doesn't need to be taught to children like it's a big deal, it can just be part of life which they just accept the same as everything, before they've been conditioned to think heteronormatively". 16 years old transwoman.

10. Terrence Higgins Trust welcomes the focus on ensuring that children should have the knowledge to form positive relationships. We believe paragraph 52 would be strengthened by including the word "*consent*" so children understand this concept at a young age. This can be used as a foundation for further learning about intimate relationships in later years. One young person told us: "*It's not just about consent in the sexual content its about consent in everyday life which is relevant to all ages*" 20 years old, agender.

11. "Being able to set your own boundaries and understand that other people have boundaries is needed for basic social skills, and so this needs to be taught at a young age, as soon as people start school". 24 years old, cis female.

12. Young people also recommend Relationships Education includes a focus on gender as a means to address gender stereotyping which can have an impact on relationships at a later age.

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

Disagree

13. As set out above, Terrence Higgins Trust strongly believes that all primary schools should be delivering age appropriate sex education lessons, however we recognise that the legislation does not mandate this. We agree with the Department that a key component of Relationships Education should be on the *"fundamental building blocks and characteristics of positive relationships"* but

stronger focus should be provided on the benefits of primary schools delivering sex education lessons. Introducing pupils to these subject areas within sex education lessons in the later stages of primary school would "*support pupils*" *ongoing emotional and physical development effectively*" as written in the proposed Relationships Education guidance. Moreover, there is no clear definition on what is and is not classified as sex education.

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

Agree

14. Terrence Higgins Trust welcomes the focus on age appropriate learning for RSE lessons. Ensuring young people can receive information in a granular approach on sometimes complex issues is very important to build knowledge throughout secondary school. As stated above, we would recommend the Department provides a breakdown of age or school year in which pupils should learn about the key outcomes listed in the guidance. The UNESCO International Technical Guidance provides a breakdown of learning objectives and outcomes for 12-15 years old and 15-18 years. Without providing such a breakdown, we are concerned that secondary schools may choose to deliver certain subjects contained within the guidance – for example information on sexual health and LGBT-relationships – in the later years and not take a granular approach to all subject areas across the whole period of secondary schooling.

15. We do not support schools opting to deliver RSE lessons through 'drop-down days' which can result in some pupils missing out information due to absence and do not provide adequate time to discuss topics. In our report, *Shh... No Talking*, [https://www.tht.org.uk/sites/default/files/2018-

07/Shh%20No%20talking%20LGBT%20inclusive%20SRE%20in%20the%20UK. pdf] 61% of young people we surveyed said they only received RSE lessons once a year or less. Fundamentally, we believe drop-down days undermine the importance of RSE lessons, which must have a regular fixed time in the school timetable, in order to have maximum impact on young people.

16. For certain subject areas, we believe they must be taught in the early years of secondary school in order to ensure pupils have information that they need at key stages of their development. For example, pupils must be provided with information about sexual health, including HIV prevention and where to access sexual health clinics, ahead of the age of consent in order for them to make informed choices about relationships.

17. "If you have the information before you start having sex you can know more about what you want out of a sexual relationship, you can make an informed choice" .18 years old, cis female. 18. Young people also expressed their preference for secondary schools to introduce all topics listed in the RSE guidance by the age of 14 or 15 at the latest. Moreover, they recommended that pupils should have the opportunity to use a peer-education approach, that would allow pupils to lead discussions on the topics in RSE in later years at school.

14. 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?

Disagree

19. Young people continue to experience poor sexual health outcomes, accounting for the biggest proportion of new STI diagnoses and one HIV diagnoses every day. As such, there must be a stronger focus on both sexual health and HIV prevention within the guidance.

20. We would urge the Department to include a more holistic focus regarding HIV prevention on page 23. An average of one young person aged 15-24 is diagnosed with HIV every day and therefore education plays a crucial role in informing and empowering young people to minimise their risk of HIV, but also to challenge stigmatising attitudes towards the virus. Schools should be providing a 21st century approach to HIV, through accurate information on the availability of HIV Pre-Exposure Prophylaxis which can prevent HIV, the fact that people on effective treatment cannot pass on the virus and the ways people can get tested for HIV, including home testing kits. The current draft guidance remains weak on HIV. As an additional line, we would recommend that the guidance states: "How HIV is transmitted, the different ways in which HIV can be prevented and different ways to test for the virus".

21. Terrence Higgins Trust welcomes the focus on ensuring that young people know where to get further advice regarding sexual health. However 2000 guidance states SRE lessons should: "*Enabling them (pupils) to become effective users of services that help prevent/treat STIs and HIV.*" We would urge the Department to use this wording, or similar, to highlight the need for RSE lessons to ensure young people are empowered to take control of their sexual health. Moreover, this information must also reflect the broad options for accessing sexual health services, including physical clinics, home testing kits, and crucially how to go about using these services. Public Health England published research in December 2017 showing that young people struggle to discuss sexual health, with 56% of men and 43% of women stating that it is difficult to talk about STIs with friends. We support the recognition that lessons should be "*non-judgemental, factual way and allow scope for young people to ask questions in a safe environment*" – this is important to normalise discussions regarding sexual health and address any stigmatising attitudes that young people

may develop. We also believe lessons should focus on pleasure when exploring themes of healthy relationships.

22. We welcome the recognition for pupils to learn about sex, sexuality, sexual health and gender identity in an inclusive way. Moreover we support the need for lessons to teach about sexual orientation or gender identify in a "sensitive and respectful manner". Our 2016 report found that 95% of young people did not receive LGBT-inclusive lessons. However in order to strengthen the commitment on LGBT-inclusivity, we urge the Department to include wording in the guidance that LGBT-inclusive RSE lessons are required throughout secondary school and not only raised during the senior years. In order for all schools to meet the requirements contained within the Equality Act, Terrence Higgins Trust recommends that the guidance states that all schools must be required to include wording on LGBT-inclusivity within their individual RSE policies.

23. "If it isn't spoken about it makes it seem like being part of the LGBTQ+ community isn't normal. Even though you are not saying it, it implies that it is wrong so you don't want to talk about it." 15 year old, gender fluid.

24. Warning about the consequences of not delivering LGBT-inclusive RSE lessons from the start of secondary school, one young person told us: "otherwise people who aren't heterosexual feel isolated and that they haven't been taught anything relevant to their needs." (15 yrs old, androgynous (not assigned at birth), white Brit, homosexual)

25. We do not support the use of "*stable*" to describe same-sex relationships as is in paragraph 71, the same wording is not used in reference to heterosexual relationships, and could therefore be interpreted as being stigmatising towards same-sex relationships. Given how integral RSE lessons are to ensuring people can form healthy relationships and become empowered to make informed decisions on their own sexual health, we do not believe schools should have the ability to provide a moral perspective within RSE lessons themselves. We would recommend that paragraph 73 is strengthened by explicitly stating that any faith or other perspectives should not be given in RSE lessons.

15.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?

Disagree

26. Terrence Higgins Trust strongly believes that all young people have a right to access RSE lessons, including content on sexual health. Our *Shh…No Talking* report found that 99% of young people want to receive these lessons. Moreover, Article 17 of the United Nations Convention on the Rights of the Child states that

children have the right to information that is important to their health and wellbeing.

27. We recognise the importance of ensuring that parents are informed about the information their children will receive at school. For RSE lessons, we would recommend that schools provide an overview on topics that will be discussed in RSE lessons and make available any additional resources that would assist with questions young people may have when at home, for example websites that offer support and advice for teenagers.

28. For parents who wish to remove their children from sex education lessons, we believe schools should be in a position to provide a robust explanation of the benefits of providing this information to pupils and address any misconceptions. We would also urge schools to ensure that the views of the child are listened to during these discussions. Should this not deliver a satisfactory outcome, we would recommend schools provide parents with resources that will be used in RSE lessons in order to share this information with their child at home. In the 2000 guidance, it states that the Department will provide schools with a "standard pack of information for parents who withdraw their children from sex and relationship education". We would recommend that schools are expected to provide a similar pack of information to ensure children can access a standardised resource if they are removed from lessons.

29. "The child will hear the information [about sexual relationships] either way, but it can either be in a lesson by a trained person where they ask questions, or they will hear the playground talk afterwards which might not be true." 18 years old, cis female.

30. We welcome the proposal for pupils to have the right to opt-in to sex education lessons before they turn 16. However, the wording "*up until three terms before the child turns 16*" as stated in paragraph 43, should be amended to school year rather than age. We recommend allowing young people to opt-in to sex education lessons at the start of Year 10 (when pupils will either be 14 or 15 as this would ensure that pupils learn at the same pace as each other as opposed to a young person joining lessons at a random point throughout the school year.

16. 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?

No comment.

This concerns health interventions such as brushing teeth and healthy eating that are outside the remit of THT.

17.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?

No comment. As above.

18.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?

No comment. As above.

19.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?

No comment. As above.

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

Disagree

31. As detailed in the answer to question 15, Terrence Higgins Trust believes that the opinions of young people must be recognised in any discussions on withdrawal from sex education lessons. The importance of engaging with pupils was unanimous during Terrence Higgins Trust's engagement workshops to inform our response. Young people highlighted that their experiences and views must also be taken into consideration when designing lesson plans and topic areas.

21.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?

Disagree.

32. Terrence Higgins Trust acknowledges and supports the right of schools to tailor lessons to meet the needs of pupils. However, we believe this flexibility

must not erode the responsibility of schools to deliver all topics contained in the guidance, consistently and in an age appropriate manner. We would therefore recommend the guidance contains a clear and succinct definition of what Relationships Education and RSE is, including the purpose of lessons. This definition should be included within individual schools policies regarding these subject areas.

33. We note the recognition for schools to respond to local public health issues, citing the prevalence of STIs as being one indicator. We have significant concerns about schools potentially diverging on the teaching of STI testing and treatment and basing this on local prevalence. Moreover, we have concerns that the same could be applied to the teaching of HIV, which continues to have the highest diagnosis rates in larger cities and could be viewed to be not relevant for schools outside of these areas of high prevalence. It's vital all young people, regardless of where in the country they attend school, receive a comprehensive education about HIV.

22. 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?

No comment as this is outside the remit of Terrence Higgins Trust

23. Do you agree that 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?

No comment as this is outside the remit of Terrence Higgins Trust

24. 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 schools are clear? Please include this information in the text box below.

34. Terrence Higgins Trust believes in comparison to the 2000 SRE guidance, the updated guidance does not provide as clear a focus on the expectations of schools. For example, the 2000 guidance outlines suggested teaching approaches and the need to work with external agencies when delivering lessons. We believe the involvement of sexual health professionals, for example, is crucial in upskilling school staff to be able to provide information about services and feel confident about discussing sexual health. This in turn will enable young people to become empowered to access services at a point when needed.

35. "Children don't really know what the NHS is, or what is available, they don't know about confidentiality etc. Having some one from the NHS come in and

explain the services and how to use them, what to expect, would be really useful." 17 years old, cis female.

36. The role of Ofsted will underpin the success of new lessons. However, a report by the British Humanist Association found that fewer than 1% of Ofsted inspections conducted in 2016 made a reference to sex education [https://humanism.org.uk/2017/01/27/major-new-bha-report-school-inspections-almost-totally-neglect-pshe-and-sre/]. In order to meet the requirements contained in the Children & Social Work Act, for all schools to be delivering Relationships Education and Relationships & Sex Education, robust processes must be put in place to ensure every school complies with this. Paragraph 118 notes that "*key aspects*" of lessons are within the scope for Ofsted inspections, we would recommend the Department set out these aspects that schools will be measured against, for example LGBT-inclusivity.

37. A key theme from our consultation workshops was the importance of involving young people in the evaluation of lessons. Young people are at the forefront of the very issues that lessons will be covering and may have greater direct experience than that of their teacher, for example on issues such as sexting. However, there is no recognition of the value young people can provide through feedback of the quality and content of lessons. We would urge the Department to include wording in this regard.

38. Whilst acknowledging Health Education will not feature a sex education element, we would recommend that the focus on skills that young people are expected to gain through these lessons, for example understanding the importance of oral hygiene, should also be applied to the sex education component of RSE lessons. This would provide a stronger emphasis on the skills young people should gain through RSE lessons, such as being able to identify symptoms of an STI and know what treatment options are available.

39. There is also no information regarding how "*early adopter*" schools will operate in terms of engaging with other schools and what mechanisms will be made available to do this. We therefore urge the Department to provide clarity on how these schools will operate and crucially what resources will be provided to facilitate the teaching of lessons. We expect the "*early adopter*" schools will likely be those already delivering quality Sex & Education lessons. The Department must therefore be proactive in supporting all schools to deliver new lessons as soon as possible, as to avoid variations in schools going live with the new subjects.

25. 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?

Disagree

40. Terrence Higgins Trust believes all primary schools must be properly resourced in order to effectively deliver Relationships Education. As previously stated, we believe lessons must be LGBT-inclusive and as such resources should be inclusive and accurate. We also believe teaching staff must have ongoing opportunities for training and professional development in order to deliver lessons effectively. Given the additional requirements Relationships Education will place on primary schools, we would strongly anticipate that new resources will need to be made available to enable schools to teach the new subjects.

26. 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?

Disagree

41. Terrence Higgins Trust believes all secondary schools must be properly resourced in order to effectively deliver Relationships & Sex Education lessons. Our report and recent engagement workshops with young people found that the confidence of teaching staff has a fundamental impact on the quality of lessons. We therefore urge the Department to make funding available for schools to provide ongoing training and professional development opportunities. In reflecting the constant changes in HIV and sexual health, for example testing and prevention options, ongoing training for teachers is absolutely crucial to ensure that young people are provided with up to date and accurate information they need to both minimise their risk of HIV and achieve good sexual health.

42. The teaching of LGBT-inclusive RSE lessons is crucial to meet the needs of all learners. However we know this is not being consistently applied across schools. Research by Stonewall in 2014 found that three in ten teachers do not know if they are allowed to teach lesbian, gay and bisexual issues in schools. Therefore it is crucial that teachers have the confidence, including knowing correct terminology and having access to resources, in order to deliver inclusive lessons.

43. An independent review of sex education lessons in Wales, published in December 2017, noted: "*High quality school-based SRE depends upon having a well-trained and confident workforce. Without specialist training schools may either avoid covering perceived sensitive or challenging topics altogether or deliver SRE in a way that fails to adequately safeguard children and young people*." Furthermore, the review recommended the Welsh Government develops national SRE training and development pathways for teaching staff. Terrence Higgins Trust has welcomed the subsequent commitment by the Welsh

Government to implement this recommendation and urge the Department to use the experience in Wales and include such proposals to support schools to deliver RSE lessons.

27. 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?

Disagree

44. As outlined throughout our response, Terrence Higgins Trust believes all the above lessons should take an LGBT-inclusive approach to delivering lessons, where applicable. In Section 80A paragraph 2a, we don't believe the wording is strong enough to ensure lessons are LGBT-inclusive – we would recommend amending (iii) to state "The characteristics of *different types of* healthy relationships, *including LGBT*". We also believe there must be recognition of the importance of pupils learning about sexual health as a means to forming such healthy relationships. As such we would propose adding a separate line about sexual health: "*the importance of attaining good sexual health*" 41. We welcome the recognition that schools should consult with parents in forming policies linked to the above subjects, but as highlighted throughout this response, we believe pupils must have a meaningful role in shaping the content of lessons in order to ensure they meet the needs of learners. As such, we propose adding "*and pays due regard to the views of pupils*" in Section 12, 2A, line e.

45. In Section 12, paragraph 2, we note there is no recognition of the right of pupils to opt-in to sex education lessons once they reach a certain age (we support the start of Year 10 as previously stated). This must be included in the regulations in order to ensure all schools meet this new requirement.

28. We are required to set out in the regulations the circumstances in which a pupil (or a pupil below a specified age) is to be excused from receiving RSE or specified elements of it. 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?

Disagree

46. We welcome the greater clarity given on the process that must be undertaken in order to facilitate a request to opt-out a child from sex education lessons. A

decision to remove a child from these lessons should not be taken lightly. As set out above, we believe every young person has the right to access sex education and this is enshrined in the United Convention on the Rights of the Child (Article 17: access to information). As such, young people must be included in discussions regarding an opt-out request. There is no recognition of the right of pupils to opt-in to sex education lessons once they reach a certain age (we support the start of Year 10 as previously stated). This must be included in the regulations in order to ensure all schools meet this new requirement.

29. Do you have any other views on the draft regulations that you would like to share with the department? Please include this information in the text box below.

47. In Section 80A, paragraph 4, it stated "*The Secretary of State must review the guidance under this section from time to time*." We strongly recommend this is amended to give timescales on when the guidance will be reviewed and what that process will entail. The current guidance has not been updated since 2000 due to there being no requirement for an official update. Terrence Higgins Trust would recommend the guidance being reviewed and updated if required, every three years, with schools and pupils having an opportunity to review and shape the contents.

30. Tables (6-8) in section F of the draft assessment set out the assumptions we have made in estimating the cost burden for schools to implement the new requirements.

Do you agree with our assumptions and the estimated additional costs to schools?

Disagree

48. Terrence Higgins Trust believes in order for lessons to have the maximum impact on pupils, there must be regular training and development opportunities for teaching professionals. We welcome the recognition of the need for schools to be delivering *"high quality of teaching of the new subjects"*. However we note with concern that the level of preparation required to deliver the new subjects is based on Ofsted schools inspection ratings. As previously stated, only 1% of Ofsted inspections in 2016 referenced sex education lessons, therefore Ofsted marking criteria is not a robust mechanism to determine how well schools are currently delivering existing Sex & Relationships lessons. In addition, it's assumed the new subjects would not represent a "significant burden" to state maintained schools as they are already required to teach Sex & Relationships education, however our 2016 report found that one in seven young people did not receive any SRE lessons at all (of which a proportion attended state maintained schools).

31. Are there any other cost burdens on schools, which you believe should be included in the regulatory impact assessment?

49. We note that the assessment assumes all costs associated with the implementation of lessons will be in the first year of roll-out. Terrence Higgins Trust believes there should be regular training and development opportunities for teaching staff, reflecting both potential changes to the guidance in the future and to reflect any changes in teaching staff at individual schools. Moreover, this reflects the reality that HIV and sexual health changes and schools must provide young people with the most up to date information. There is a commitment for the Secretary of State to review the guidance "from time to time" – although we believe this should be done at least every three years – therefore costings should be factored in for schools to adopt any changes through training or additional resources.

50. Terrence Higgins Trust recommends costing the time for pupil feedback on the quality of lessons in schools. This should be done at regular stages throughout the school year and will allow schools to ensure they are meeting the needs of pupils within these lessons.