1. **The Bill’s general principles**

1.1 **Do you support the principles of the Curriculum and Assessment (Wales) Bill?**

No

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)*

At present, the principles of the Bill are too vague, and allow teachers the flexibility to determine whether or not menstrual wellbeing will be taught in schools in Wales. These vague principles have the very real potential to see menstrual wellbeing overlooked, leaving young people uninformed and disempowered.

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 discussed, myths about the menstrual cycle debunked, and individuals sufficiently empowered with the knowledge they need to seek medical advice when appropriate.

It is vital that menstrual wellbeing becomes a compulsory component of the new curriculum. Failing to do will not only allow taboos about menstruation to continue, but will also mean that young people are not equipped with the knowledge or the confidence to seek help if required.

This is vital in schools as it cannot be assumed that these conversations will take place outside of the classroom. Many face additional cultural barriers in talking about menstrual wellbeing in the home, including those from BAME communities where conversations...
around menstruation are still largely considered a taboo and often not spoken about openly. Those in non-traditional family units, care, or boarding school are all examples of pupils who may not necessarily have the ability to discuss the topic at home.

Giving flexibility to teachers to determine whether or not to teach about menstrual wellbeing leaves schools with the opportunity to leave out vital information about menstrual wellbeing. This could result in further health inequalities across Wales, and mean that there are disparities in the level of education that young people receive on menstrual wellbeing.

For those who suffer from menstrual health conditions, which affect significant numbers of adolescents and women in the UK*, many will go years without accessing the support they need, because they believe what they are experiencing is normal. Without education in schools, these young people will continue to suffer in silence, which could have a devastating impact on their education and school life, exam results, future career and their mental health.

*In the UK:

- 20% of women have heavy menstrual bleeding
- 20% of women have fibroids
- 10% of women have endometriosis
- 10% of women have polycystic ovaries syndrome
- 5% of women have premenstrual dysphoric disorder

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)

Yes – however, there needs to be clearer legislation to give teachers the information and knowledge they need to deliver the curriculum.
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)

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 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)

Providing teachers and schools too much flexibility and not explicitly stating that menstrual wellbeing should be taught in schools, could lead to girls missing out on their education.

Using endometriosis as just one example of a menstrual wellbeing issue, the average time to diagnose endometriosis is 7.5 years. Many young people will suffer for the majority of their school life not knowing what they are experiencing is not ‘normal’, resulting in frequent absences from school and missed exams. The potentially devastating impact menstrual health conditions like endometriosis can have on someone’s education, future career, and their physical and mental health cannot be overstated.

A study by Plan International found that one in seven girls (14%) didn’t know what was happening when they started their period, whilst more than a quarter (26%) didn’t know what to do. The same study also found that 48% of girls in the UK feel embarrassed by their period, and 49% of girls in the UK have missed school because of their period.

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.

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)*

One financial implication is the financial cost of missed school days on schools and local authorities. When a student misses school, or exams, there is often a cost incurred for that student or their parent/carer. If a child is suffering from a menstrual health condition, they may require time off school. Conditions for menstrual health conditions often take a long time to diagnose, for example, endometriosis takes on average 7.5 years to diagnose, and therefore during this time, students will not have a named condition to give their symptoms to, impacting on their school attendance, education and mental health.

Without teaching about menstrual wellbeing, students will continue to suffer in silence, missing school, and not having access to the treatment they need to help manage their condition, having often a financial impact on schools, parents and local authorities. Teaching menstrual wellbeing would reduce diagnosis time, and thus empower students to access the support and treatment they need to manage their condition, which could result in better school attendance if the condition is managed.

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)*

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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)

We are requesting that under the section Science and Technology, p46 under Biological Process, the following to be added:

- Pupils should understand the key facts about puberty and the changing adolescent body.

- Pupils should understand the key facts about menstrual wellbeing, including the key facts about the menstrual cycle.

- Pupils should understand the main changes which take place during puberty and the implications for emotional and physical health.

In addition, under health and disease section also on page 46, we request that the below should also added:

- Pupils should understand what constitutes a “normal menstrual cycle” and how to spot warning signs of a menstrual condition.

- Pupils will be given the knowledge and the confidence of how to seek help if they are concerned they have a menstrual health condition.

Area of Learning and Experience, Health and Wellbeing

We are requesting that that under the section Health and Wellbeing, p17, under the section “The human body and development” that the following should be added:

- Pupils should understand the human body and development and respond to the impact of puberty on emotional-wellbeing.

- Pupils should understand the key facts about menstrual wellbeing, including the key facts about the menstrual cycle. As part of this, pupils will understand what constitutes as a “normal menstrual cycle” and how to spot the warning signs of a menstrual condition.

- Pupils should be taught about the variety of menstrual products available to them. We stress that “menstrual” rather than hygiene or sanitary products are discussed, as the words hygiene and sanitary infer that periods are dirty.
Content on menstrual wellbeing should discuss what constitutes a “normal menstrual cycle” and improve all pupils’ knowledge of symptoms that might be a warning sign of a menstrual condition such as abnormal pain or bleeding, and provide clear guidance on how and when to seek help. Pupils should be given the tools and confidence to know how to speak to somebody if they have a concern. As part of this, pupils need to be taught the correct names for organs so that they have the correct medical language to use with a healthcare practitioner when describing their symptoms. Without such knowledge, there will be a potential delay in diagnosis and access to treatment due to pupils not understanding what is and isn’t normal when it comes to their menstrual cycle.

The lessons as part of the curriculum should not specifically focus on a particular menstrual condition but instead cover common symptoms and issues for medical conditions and diseases including heavy menstrual bleeding, endometriosis, fibroids, polycystic ovarian syndrome (PCOS), premenstrual dysphoric disorder (PMDD), and more. This work will increase awareness on conditions that collectively affect thousands of people across Wales (for example, endometriosis affects 10% of women from puberty to menopause) and impact on school attendance and performance as well as relationships, families and careers.

Through the inclusion of menstrual wellbeing pupils will be able to have more open and honest conversations about the menstrual cycle; removing the taboos associated with the menstrual cycle and instilling the confidence that periods are a normal part of life from a young age, and an ability to recognise in themselves or others when to seek medical help.

We believe this work is vital as it cannot be assumed that young people feel comfortable and confident discussing this with the parent or carers or vice versa. Additionally, pupils in non-traditional family units, care, boarding are all examples of pupils who do not necessarily have ability to discuss this at home. To support we will include the generation of free to use menstrual wellbeing resources with little or no printing costs. These will include instructions, answer sheets and discussion points to support the delivery of the material.

The need

Whilst we acknowledge that menstruation is covered by schools across Wales already, the education system as it stands does not provide enough information on the full menstrual cycle and its potential impact to young adults to help them reach their full potential in later life. Period education tends to be fairly basic, and misses out key elements that are preventing children from being able to reach their full potential as they have not been provided with the necessary education to seek help when it is required. Shifting the
terminology from “periods” to “menstrual wellbeing” will also ensure that the whole menstrual cycle is understood rather than just menstruation itself.

The average age to start a period in the UK is 9-11 years old, although GPs have reported seeing girls as young as 7 who have started their periods. Menstrual related conditions affect a significant proportion of women, affecting their physical, psychological, physiological and social well-being.

We do not want children to be scared or mislead them about menstrual issues, however, it is vital that children have the knowledge of what is and isn’t normal when it comes to their cycle so they can spot the signs and understand the symptoms of such conditions. This would help overcome lengthy delays in seeking help and receiving treatment for a menstrual condition, thus reducing the impact this would have on a sufferer’s education.

Without this knowledge, children may be left confused and isolated in not understanding what is happening to their body and left unable to make educated decisions about their menstrual health. Many girls also report missing school because of their period. A recent survey conducted by Plan International found that two thirds of girls have missed a part day or full day of school because of their period – and menstrual wellbeing education must become compulsory for all primary and secondary pupils across Wales if the Welsh Assembly is to take these alarming statistics seriously.

Menstrual wellbeing education is key to:

- Breaking down the taboos about periods so that all children feel confident in talking about menstruation and the menstrual cycle;

- Ensuring all children name and refer to the correct body parts to remove the taboos around puberty and the human body;

- Teaching the facts about the menstrual cycle so that pupils understand what is and isn’t normal when it comes to their menstrual cycle, and in turn, ensuring pupils seek help when they understand something to not be normal with their menstrual health;

- Helping support early diagnosis of conditions like endometriosis, PCOS and heavy menstrual bleeding and early access to treatment;

- Giving children the correct language for talking about their body parts and explaining symptoms when seeking medical help;
• Shifting the language from “hygiene” and “sanitary” products to “menstrual products” to avoid the connotations of periods being “dirty”.

Alignment with Government Strategy

The Welsh Assembly has shown previous ambition and commitment in supporting women with menstrual conditions like endometriosis.

In October 2018, Cabinet Secretary for Health & Social Services, Vaughan Gething, published a report conducted by the Endometriosis Task and Finish Group which set out a series of recommendations on improving patient care. The report concluded that menstrual wellbeing should be taught in schools from primary level. The report stated that:

“School education programmes (starting at primary level) should inform children, in an age appropriate way, of what might constitute typical menstrual pain and bleeding and make aware of the early signs of pelvic pain, dysmenorrhea, abnormal menstrual bleeding. Equally, teachers need information on methods of empowering girls to talk about menstrual problems, if encountered, to their parents and GPs. This information and advice should be included in the curriculum so that all children receive this education. Boys too could benefit from the information about menstrual health to reduce a culture of normalising signs and symptoms of disease. Information needs to be delivered in a planned and managed way by trained educators; we do not want to scare girls (or boys) about periods. All schools and colleges need to have a confirmed pathway in place for girls to access the 'right person at the right time' to discuss issues of this nature. Estyn should be assessing this provision as part of its inspections related to health / well-being. School nurses, whilst not routinely available, should also be trained in symptom recognition and sign-posting.”

The Westminster Government announced in February 2019 as part of the Relationships and Sex Education curriculum that every child in England will be taught about menstrual wellbeing from 2020. Relationships education in all primary schools and relationships and sex education (RSE) in all secondary schools will be compulsory. As part of the education, all pupils, regardless of gender, will be taught the facts about menstrual wellbeing. Without the Welsh Government following suit, children in Wales will be unfairly left behind.

We recognise that teachers will need to be given the necessary resources and the confidence to teach about menstrual wellbeing, and we would welcome the opportunity to work with the Education Department to help develop resources further.