

Feedback on Flourishing for All: Anti-bullying Guidance for Church Schools

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Background

Sex Matters

Sex Matters is a human rights charity (registered charity number 1207701) which campaigns to establish that sex matters in rules, laws, policies, language and culture. We recognise that there are two sexes and that human beings cannot change sex, and [we believe](#) that the rule of law, and the underpinning human rights, are crucial to protect people whatever they believe about sex and gender.

We have published analysis, commentary and [guidance](#) on how schools should approach issues of transgender identity in schools, and on the DfE guidance. We have welcomed [the DfE guidance](#) and [the Cass report](#). We have based these publications on the [the legal framework](#) that:

1. Schools have a purpose: to educate children and keep them safe.
2. Schools have a duty of care and must act in the best interests of all pupils.
3. Schools have a range of existing statutory duties they must discharge, including recording all children's sex accurately, having due regard for the statutory safeguarding framework and complying with statutory responsibilities in relation to children with special needs.
4. Each school must ensure that any policy or practice that it adopts is consistent with its duties and not unlawfully discriminatory under the Equality Act 2010.
5. When taking decisions that are within its discretion in relation to an individual child, a school must always act in the child's best interests.

This framework leads us to conclude that it is not possible to treat any child as if they are a member of the opposite sex in a school or college environment. A [clear analysis of the steps involved](#) in social transition reveals that doing so will inevitably expose the child to unacceptable safeguarding risks and infringe on other pupils' rights.

This is a submission to the Church of England in response to its consultation on its new guidance, [Flourishing for All: Anti-bullying Guidance for Church of England Schools](#).

Valuing All God's Children

The Church of England supports 4,600 schools, educating some 1.1 million pupils, including those from Christian backgrounds (both believers and cultural Christians), other religions and no religion.

In 2014, following the passage of The Marriage (Same Sex Couples) Act, it published [Valuing All God's Children: Guidance for Church of England Schools on Challenging Homophobic Bullying](#) (VAGC). This aimed to address the "complexity of combatting homophobic bullying

whilst explaining traditional Anglican teachings about the sanctity of marriage and same-sex relationships”.

In 2017 the DfE undertook a [£3 million programme](#) to tackle “homophobic, biphobic and transphobic (HBT) bullying” by giving money to LGBT organisations and recommending them as advisors to schools. Stonewall began working with [faith schools](#) as part of this.

In 2017 the scope of VAGC was expanded to “[homophobic, biphobic and transphobic discrimination](#)” and a new edition was published. This included a glossary of terms that claimed that sex is “assigned at birth”; people are transgender, cisgender or non-binary; someone “assigned female at birth” may be a man and someone “assigned male at birth” may be a woman; and sexual orientation and pronouns relate to a person’s gender, not to their sex.

Under advice for primary schools, the guidance said:

“In creating a school environment that promotes dignity for all and a call to live fulfilled lives as uniquely gifted individuals, pupils will be equipped to accept difference of all varieties and be **supported to accept their own gender identity or sexual orientation and that of others.**” *[Emphasis added]*

Thus schools were told to conceive of being a girl or a boy as a “gender identity”.

The guidance was written by Religious Education (RE) teacher Katy Staples. The acknowledgements mentioned Stonewall staff members Dominic Arnall (head of projects from 2015 and 2018) and Sidonie Bertrand-Shelton (head of education programmes from 2016 to 2022). It was distributed with a grant from Stonewall.

The 2017 version of VAGC and the 2019 update both wrongly advised schools that the law does not require them to consider the rights of pupils with other protected characteristics when accommodating those who identify as transgender. It said:

“Schools must not discriminate (either directly or indirectly) against a pupil because of their trans status [...] The protected characteristic of gender reassignment only works one way – not being transgender is not a protected characteristic. **Consequently schools can make adjustments to meet the needs of a trans pupil without being accused of discriminating against non-trans pupils.**” *[Emphasis added]*

This misunderstanding (which was drawn from a resource produced by [Intercom Trust and Devon and Cornwall Police](#)) led to schools adopting policies such as allowing trans-identifying pupils to use opposite-sex facilities that discriminate against other pupils on the basis of sex and religion or belief, and which undermine safeguarding and schools’ duty of care for all children.

VAGC was recklessly casual about children taking the life-changing step of identifying as the opposite sex. It said that people can transition by “telling friends and family, dressing differently and changing official documents” and that “Trans young people may require specific support in order to feel comfortable at school, for example, schools may need to make changes to toilet facilities or a trans young person might require support to change their name or the pronoun by which they are referred to by staff and classmates.”

It defined homophobic, biphobic or transphobic bullying as:

“behaviour or language which makes a person feel unwelcome or marginalised because of their sexual orientation or gender identity, whether actual or perceived, or because of their association with people who are, or are perceived to be, lesbian, gay, bisexual or transgender.”

According to VAGC, a teacher or a child who recognises that a boy is not a girl or tells that boy not to use the girls’ toilets, changing rooms or showers could be classified as “unwelcoming”, “marginalising” and “transphobic”.

The section on safeguarding and confidentiality said that schools should:

“make it clear that [a] pupil coming out as lesbian, gay, bisexual or trans does not constitute a safeguarding risk and the information should be treated as confidential.”

It told schools to state in their policies:

“that disclosing someone’s sexual orientation or gender identity, whether they are staff or pupils, without their consent is a breach of confidentiality. This includes disclosures to a pupil’s parents or carers.”

This advice on confidentiality went against the basic principle of safeguarding that staff should never promise a child that they will not tell anyone about a concern.

This wording about safeguarding predates the addition of similar wording later inserted into statutory safeguarding guidance *Keeping Children Safe in Education 2022*, for which Nancy Kelley, at the time Stonewall’s CEO, has taken credit.¹

The guidance is challenged

VAGC was challenged in court and criticised in the media and by campaigning groups.

Parents [Sally and Nigel Rowe complained](#) in 2017 when their child’s Church of England school allowed a six-year-old child in their sons’ schools to “socially transition”. They said their sons were distressed and upset by being told that they “must refer to their friends

¹ https://x.com/Nancy_M_K/status/1678389660383338496

according to their adopted gender”. They were also concerned about the harmful impact on the children who were allowed to socially transition and the impact on all the other children in the school. The school rejected their complaint, warning them that it would view “inability to believe a transgender person is actually a ‘real’ female or male” or refusal to “acknowledge a transgendered person’s true gender e.g. by failing to use their adopted name or using gender inappropriate pronouns” as [transphobic behaviour](#).

The school also said that it believed that under the Equality Act 2010 it was “legally bound to accept the wishes of the pupil and parents involved”.

The Rows brought a judicial review against the Department for Education, calling for it to step in. The [DfE settled the case](#) and committed to reform, saying:

“guidance for schools on transgender issues is being developed by the Department in conjunction with the Equality and Human Rights Commission, with a view to undertaking a public consultation on draft guidance in Autumn 2022, to which the Claimants will have the opportunity to respond.”

In 2023 this [guidance was published in draft](#). A public consultation on it closed in March 2024. The new government is due to publish the consultation response and to finalise the guidance.

In April an [independent review](#) by Dr Hilary Cass of the treatment of gender-questioning children in the NHS was published. It made clear that it is a significant intervention to treat children who are experiencing gender dysphoria, or who are seeking to identify as the opposite sex, as if they really were the opposite sex. The review found no evidence to support such an intervention, and significant downsides if the child later proceeded to medication.

The church defends its guidance

The Cass Review concerns the treatment of gender-distressed children in the NHS. But its findings are [also relevant for schools](#). It makes clear that clinicians, along with everyone else, have no idea which trans-identifying children will continue to identify as trans when they grow up. This removes the justification for the extraordinary step of offering “transition” for gender-distressed children and young people. Dr Cass also highlights the way that as soon as gender was raised, professionals at every level forgot everything they should have known about safeguarding. Dr Cass described how safeguarding issues became overshadowed or confused, and major sources of risk were overlooked. These included bullying, breakdown in relationships with families, online grooming and social, cultural and religious pressures.

Following the publication of the Cass Review, the Church of England [issued a statement](#) saying:

“We agree with Dr Cass’s conclusions that, as far as any form of social transitioning is concerned, a very cautious approach is necessary, and should involve full collaboration and consultation with parents and medical professionals. Something we have always maintained.”

It [described claims](#) that its guidance had said that “children as young as five should be affirmed if they want to identify as the opposite gender” as “simply false”, saying that:

“The Church of England’s Education Office guidance does not go beyond the law, but rather gives a practical advisory framework, underpinned by our Christian theological conviction, to be a resource for schools.”

It said that:

“Valuing All God’s Children does not say that children as young as five should be affirmed if they want to identify as the opposite gender. It doesn’t use the language of affirmation at all, anywhere.”

While it is true that the guidance did not use the word “affirmation”, it adopted concepts such as “gender identity”, “cisgender” and “transphobia” that resulted in schools affirming children as members of the opposite sex and requiring other children to do so too (as in the case of the Rowes). VAGC nowhere mentioned a “cautious” approach and set no age limits on its application. Rather, in practice it prescribed an affirmative approach that was no different from those promoted by Stonewall, Mermaids and other organisations supporting child transition.

The church withdraws its guidance

In July 2024 the Church published [Flourishing for All: Anti-bullying Guidance for Church of England Schools](#) as a draft for consultation. This will replace *Valuing All God’s Children*.

It says that VAGC was never a document “setting out the Church’s teaching on gender”, but had rather been intended as a resource to help schools address homophobic, biphobic and transphobic bullying.

This is false. The guidance included specific instructions to keep information confidential from parents, to call trans-identifying boys “she” and trans-identifying girls “he”, and to accommodate those children as if they really were members of the opposite sex without regard for discriminatory impacts on other children. It set out an approach that was motivated by compassion for children experiencing gender distress, but which was misguided. The advice has been contradicted by Dr Cass and **is not in line with the law**.

The new guidance makes no acknowledgement that the previous guidance was wrong. Instead it says:

“the debate about human sexuality and especially gender has frequently been toxic and polarised, which does nothing to help the young people caught in the middle and whose wellbeing should be our first priority.”

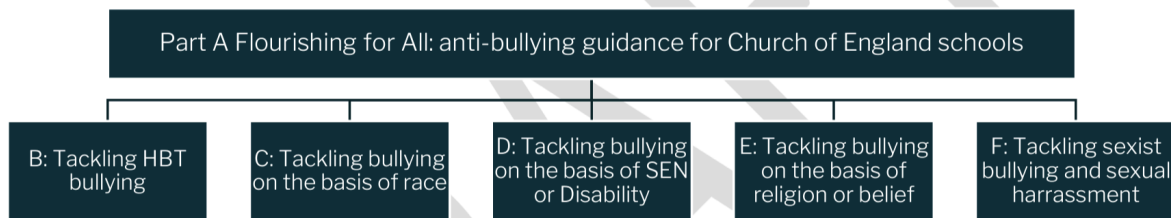
And that schools:

“have sometimes found themselves caught up in an ideological battleground and a debate that has far reaching and often legal consequences.”

The Church of England welcomed the Cass Report and the draft guidance on gender-questioning children from the DfE. It says:

“All schools should now have regard to that guidance and refer to it to enable clarity for children and parents and to ensure that all the children, young people and adults in their school communities are honoured and treated consistently and fairly.”

It is now replacing VAGC with a broader suite of documents that includes an introduction and a series of sections concerning specific types of bullying. These include homophobic, biphobic and transgender bullying; bullying on the basis of race, disability, special educational needs or religion or belief; and sexual harassment.



The church has so far published Parts A and B. Part B “deals specifically with how to protect from harm children and young people who are (or perceived to be) lesbian, gay or bisexual as well as those who are gender questioning and those who may have already socially transitioned”.

Comments on Flourishing for All (FFA)

Flourishing for All: Anti-bullying Guidance for Church of England Schools explicitly endorses the DfE guidance on gender-questioning children. It also omits some of the most egregious material in VAGC. But that material has been replaced with vague guidance that sidesteps the problems caused by the previous approach, and which continues to encourage child transition, promote gender ideology and stigmatise opponents of both as “bullies”.

Overall the guidance is trying to do too much. It combines an anti-bullying policy with advice on equality and accessibility issues, and with trying to solve a contentious theological issue.

The guidance is long and impractical

Parts A and B of the guidance amount to 58 pages, with four more sections promised.

“Whilst each section looks at a different protected characteristic on its own, since there are particularities to each type of bullying which need addressing specifically, the intention is that the combined suite of guidance will enable schools to think more holistically about how different protected characteristics overlap and combine.”

The final document will be long, unwieldy and impractical, creating burdens for teachers and school leaders.

Part B already contains much general advice, for example that schools must challenge remarks which are derogatory and dehumanising, and must draw the line between jokes and hurtful behaviour. It includes a framework for how the Church of England’s *Vision for Education* can inform a school’s work in tackling bullying, and a Challenge/ Support/ Report framework for anti-bullying.

This general advice will need to be repeated in each of the four promised additional sections if the final guidance is not to be restructured.

Developing, consulting on and redeveloping each section separately as a part-work is a recipe for incoherence. The Church of England should halt this process and start over with the aim of producing a shorter, simpler, more practical document.

The approach to protected characteristics is unhelpful

Section 3.3 introduces “**The legal framework for tackling bullying towards those with protected characteristics**”. This suggests that there are some children with protected characteristics and some without, or that there is a hierarchy of characteristics. In fact all children and their relatives have several protected characteristics. These will always include sex, age, race and belief (or lack of belief).

It is correct that schools must avoid discrimination and harassment based on relevant protected characteristics. But this does not mean that a school's anti-bullying policy should be structured around these characteristics. Rather, it should be clear that no child should be bullied. Children should be able to learn without fear. Schools' culture, policy and practices should ensure that all children are protected against bullying regardless of protected characteristics.

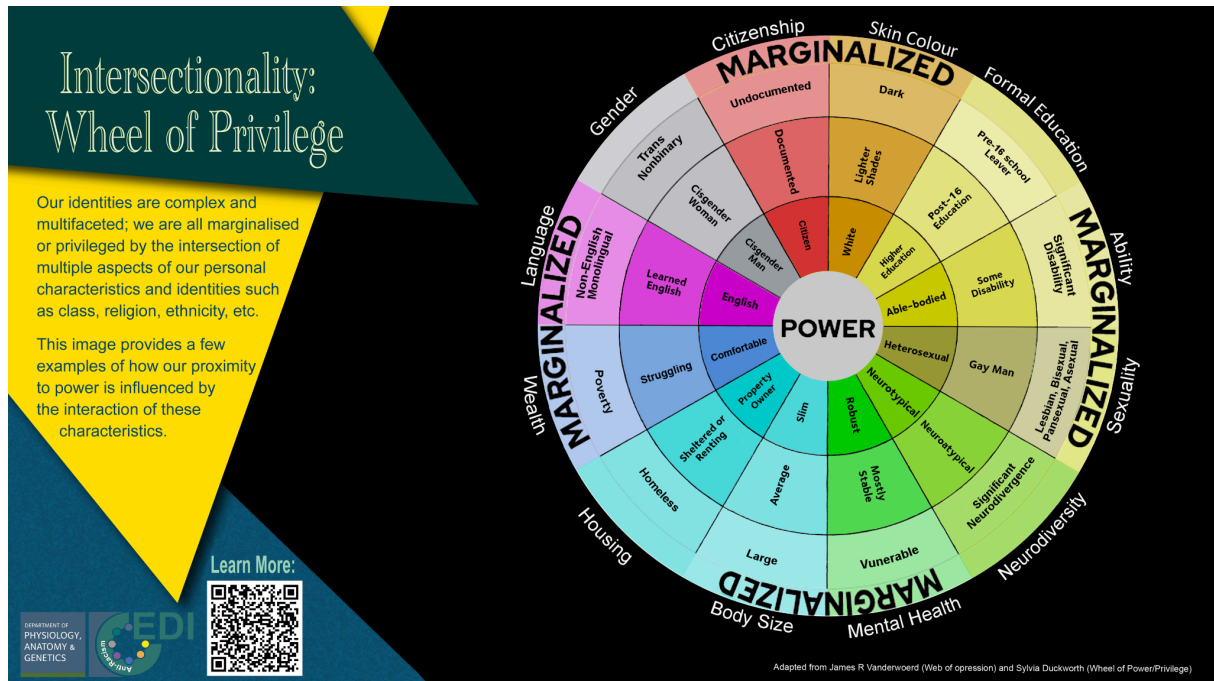
Schools will also have to consider vulnerabilities that are not covered by the Equality Act. Children in care or who are care-experienced, young carers, socio-economically disadvantaged children, children with parents in the criminal justice system, refugees and high achievers are just some of those at elevated risk of bullying. Appearance-based bullying is also common.²

The approach of publishing and consulting on each of the sections sequentially means failing to consider how protected characteristics interact. For example, there is no consideration of whether imposing gender-identity beliefs to prevent "HBT" bullying is belief discrimination. Instead the material currently out for consultation uses a simplistic "intersectionality" analysis based on a "layering or cumulation of identities".

"Where a young person has more than one characteristic on the basis of which they can experience discrimination and exclusion, they are more likely to be bullied. For example, a lesbian young person who is also of South Asian heritage is more likely to be exposed to more occurrences of bullying behaviour."

This intersectional approach of adding up marginalisation and privilege points is sometimes illustrated as a ladder or a wheel, as [linked to in the guidance](#).

² <https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/at-risk-groups>



The guidance says:

“Schools must be proactive in creating an environment where those who are most likely to be disempowered via intersectionality are given special attention and are proactively protected from bullying.”

This approach is inimical to fairness and equality. Although positive-action provisions in the Equality Act allow schools to target measures to alleviate disadvantages or meet the particular needs of people who share one or more protected characteristics, such measures must be a proportionate way of supporting the relevant aim, which must be legitimate.

The approach of predicting which children are most likely to be bullied based on a cumulation of marginalisation points and targeting them for special attention and proactive protection is unlikely to be effective. It may exacerbate tensions between groups, undermine belonging and be perceived as unfair by children. If the approach cannot be justified as a proportionate means to a legitimate aim, it will be unlawful.

The guidance overemphasises hate and harm

The guidance redefines homophobic, biphobic and transphobic bullying as

“bullying which is motivated by prejudice, intolerance or hate of people who are (or perceived to be) LGBT+.”

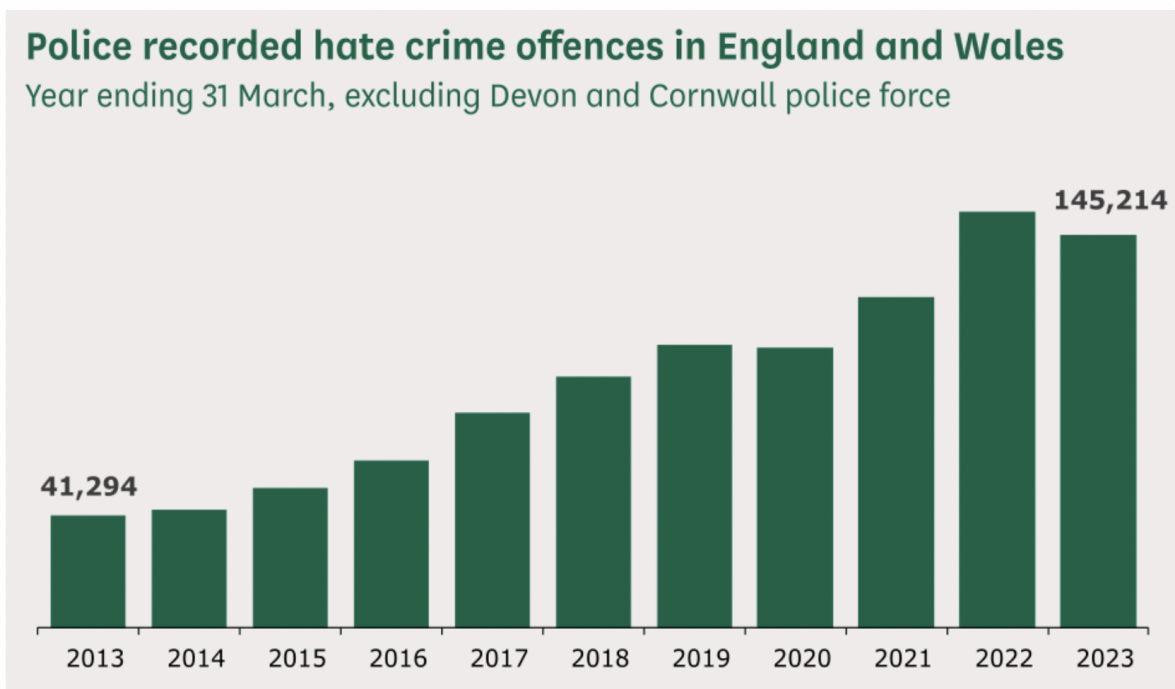
It introduces (at page 14) the concept of “hate crime” without making clear that these are crimes where the offender has demonstrated or been motivated by hostility based on race,

religion, disability, sexual orientation or transgender identity. In other words, there must be an underlying crime, and the characteristics are not the same as the Equality Act protected characteristics (for example there is no hate crime based on sex, sexism or misogyny).

Many risk factors associated with bullying (such as appearance-based bullying and sexual harassment) do not have associated hate-crime aggravators.

In most instances of bullying at school no crime will have been committed. Confusion about the protected characteristics in the Equality Act, the concept of hate crime, and the ideas of “hate” and “tolerance” as understood by children can lead to a perception that playground incidents and conflicts between children are hate crimes and that recognising a person’s sex is prejudice and hateful.

FFA falsely states that hate crime has risen “exponentially” over the last 10 years. In fact, though reported hate crime has risen, it has not risen “exponentially” and the increase has partly been attributed to changed recording methods and greater awareness in reporting.³



The new guidances highlights an increase in reported incidents of “transgender hate crime” and says:

³ <https://researchbriefings.files.parliament.uk/documents/CBP-8537/CBP-8537.pdf>

“it is therefore important for all pupils growing up in a society where harm towards people who are transgender is increasing, to be supported by their school to be respectful to those who are questioning their gender, and to those who have transitioned.”

FFA does not spell out what “respectful” means, but seems to assume that it involves ignoring a child’s or adult’s actual sex and treating them as the opposite sex (which it labels gender). It ignores the safeguarding implications of doing this.

This approach means giving children and young people the unrealistic idea that it is possible for them to change sex and that other people will accept this. It encourages them and their families to view people who continue to recognise the unchangeable reality of sex as “hateful” and “harmful”. This does not prepare children to live happy, resilient and flourishing lives.

Flourishing for all encourages unlawful belief discrimination

The guidance says:

“It is vital that [gender-questioning and trans-identified children and adults] are treated with the utmost dignity and respect, and are protected decisively from harm. This protection includes ensuring that they are kept safe from polarised debates about the care or place of gender questioning children and transgender people in society. This is absolutely essential in order to uphold and preserve the psychological safety of this highly at risk group.”

And:

“it is critical that viewpoints which are homophobic, biphobic or transphobic are not presented since to do so would be harmful to both pupils and adults.”

And:

“Policies for visiting speakers should also be in place, setting out how they can talk about their beliefs in ways which are not discriminatory or harmful to pupils and staff.”

It likens views that it says “denigrate or harm LGBT+ people” to racism. The guidance is not clear that simply believing that sex is immutable (and rejecting the idea of gender identity) is not transphobic. It is both possible and lawful to believe that people are the sex that God (and/or evolution) made them, but still to be respectful, courteous and compassionate to those who struggle with their gender identity for whatever reason. Indeed, many would argue that this is the approach best aligned with the church’s traditional teachings.

FFA also stigmatises people who express ordinary, factual views about sex (that human beings are born male or female; that boys grow up to be men and girls grow up to be women;

and that individuals cannot change sex) as “toxic”, “polarising”, “discriminatory”, “harmful” and “transphobic”. It says that people with transgender identities must be “kept safe” from people who hold these lawful beliefs for their “psychological safety”. This advice goes well beyond ordinary anti-bullying provisions. It creates a new form of blasphemy and will lead to discrimination.

Similar expectations have led to Edinburgh Rape Crisis Centre, the Open University, Social Work England, Westminster City Council, Arts Council England, Garden Court Chambers and the Centre for Global Development to take action against people who hold such “gender-critical” beliefs. In all these cases, [organisations were held liable in the Employment Tribunal for their actions](#), which were found to constitute unlawful discrimination.

By stigmatising gender-critical (also called sex-realist) beliefs – which may be faith-based or secular – FFA encourages schools to ignore the public-sector equality duty when it comes to those with the protected characteristic of religion or belief. By making it difficult to understand and communicate sex-based categories, it promotes sex discrimination, for instance by allowing pupils to use the toilet facilities of the opposite sex, thereby failing to respect the dignity of other users and stigmatising those who wish to preserve their privacy as bullies and transphobes.

If the Church of England adopts FFA it will be setting up schools, itself and the DfE to face claims of belief and sex discrimination. It should scrap this guidance and start again.

The approach appeases extremism

FFA seems to be attempting to be all things to all people. It explicitly endorses the DfE guidance (which the Church of England [has said it largely agrees with](#)), but simultaneously says that pupils with gender-identity issues should be shielded from viewpoints that contradict the idea that children can be born in the wrong body. It is not clear why doing this would be in the best interests of any pupil.

Stonewall, which advised the Church of England on VAGC, has called the DfE guidance “[actively dangerous](#)”. Other LGBT organisations that were involved in the original “HBT bullying” programme [have advised schools not to follow the DfE guidance](#).

Stonewall’s response to the DfE guidance highlights the divide the Church of England guidance is trying to straddle. Stonewall says:

“If implemented [the DfE guidance] would inevitably lead to real harm being caused to trans children and young people across England.

“While non-statutory, it has the potential to have a chilling effect akin to Section 28, leaving children and young people who are trans or questioning their gender exposed to bullying and harassment.

“It is evident from reading through the detail of the draft guidance that it has been compiled from a very narrow ideological perspective. It presents trans children as a 'contested belief', and there has been no attempt to understand the needs or lived experiences of trans children, or to draw from best practice from inclusive educators across the country.

“Instead, it flies in the face of the UN Convention Rights of the Child and the Equality Act 2010, suggesting that trans children are not worthy of respect or protection from harassment, and as such treats them as an inherent risk to other children and as a threat that is to be contained. Exclusion is its starting point, and it actively looks to find ways to legitimise bullying and social exclusion of trans children and young people.”

[Some LGBT campaign groups](#) have also accused Dr Hilary Cass of transphobia and harming “trans kids”.



Although the Church of England has distanced FFA from third-party organisations, it does not address the fact that these organisations are actively advising schools to flout the DfE’s guidance when it is finalised.

Instead, the Church of England appears to be seeking to appease these radical organisations by underplaying key messages from the DfE draft guidance, for instance that gender identity is a contested belief. It brushes previous errors and safeguarding breaches under the carpet and continues to stigmatise anyone who refuses to pretend that boys can be girls and girls can be boys.

FFA encourages schools to create “safe spaces” for those who are (or perceived to be) LGBT+ where they can meet with peers with similar identities. The experience of such [“LGBT+ clubs”](#) is that despite good intentions they can become places where children are encouraged to develop dysphoria, and which promote the harmful LGBTQ politics spread on social media and by external organisations and activist teachers (or by teachers who are simply out of their depth).

The approach to “HBT bullying” continues to encourage child transition, to promote gender ideology and to undermine safeguarding

FFA says that schools must challenge derogatory remarks and outdated terms “which no longer have a place in our vocabulary”. The glossary, which presents definitions based on gender-identity ideology, makes clear that this includes factual, sex-based remarks and terms. It says that where such terms are used accidentally, “the school has a clear role to play in educating the children, young people and adults who use them. Where this is intentional and repeated, this must be addressed as it can be extremely harmful.”

It combines sexual orientation and transgenderism into “LGBT+”. **What is covered by the “plus” is never made clear.**

It says that a primary school’s strategy for combating bullying towards people who are (or are perceived to be) LGBT+ should not focus on any aspect of differing sexual practices or bodies.

“An exploration of differing sexual activity would go against a primary school’s responsibility to safeguard the latency of childhood.”

This makes sense in relation to sexual orientation, where age-appropriate information should focus on variations in families. It makes no sense when it comes to gender identity and transgenderism, since it means giving children false explanations of what it means to be a man or a woman and teaching them an approach to consent and boundaries that undermines their safety.

It is sexist and dangerous to claim that a man who dresses in women's clothing (who may be acting on a sexual paraphilia) is actually a woman. Men commit 98% of sex crimes. Men with sexual paraphilias are more likely than other men to perpetrate such crimes. Making changes to clothing or pronouns or undergoing cosmetic surgery does not alter the risk that a male person poses to women or children.

Telling children and adults that it is "extremely harmful" to tell the truth in respectful language undermines teaching and learning, respect for self and others, and safeguarding.

Vague admonitions against "discriminatory, dehumanising and offensive language" are likely to be interpreted as covering statements of fact such as "he is a man", "she is a girl", "he is male", "boys should not use the girls' changing rooms" and "gender dysphoria is a mental-health issue".

FFA also warns against the "sharing of private information without permission". It talks of "children and young people in school who have already socially transitioned and are now presenting as a different gender to their biological sex" as well as transgender adults among staff or parents and carers. The idea that honestly stating a trans-identifying child's or an adult's actual sex is taboo and should be treated as bullying undermines safeguarding, health and safety and child welfare. Such simple statements of fact are not the same as bullying trans-identifying people for their hairstyle, choice of clothing or masculine/feminine demeanour.

FFA is incoherent. It starts by saying that schools should follow the DfE guidance (which says, for example, that schools should maintain single-sex toilets and sports), and should make explicit to all stakeholders what is and isn't acceptable. But it goes on to present confusing language about the two sexes, to tell schools to pretend that people can change sex (or can be of neither sex) and to stigmatise and punish the use of accurate sex-based language and categories as "transphobic" bullying.

The DfE guidance says: "**Not all requests made to schools or colleges [in relation to "social transition] will comply with legal duties to safeguard children.**" *FFA* omits this crucial point and simply talks about "children who have already transitioned". This sidesteps all breaches of safeguarding that schools may already have committed by following *VAGC*.

It is a breach of schools' and education professionals' safeguarding and professional duties to tell children that a man is a woman; that a child can grow up to be the opposite sex; that it is "bullying" to tell the truth about the two sexes; that they must keep secrets with adults (including with adult men who act in inappropriate ways); or that they must not express discomfort about these dangerous ideas, which they may be too young to understand.

The Church of England has already made the mistake of promoting contested views about gender identity. It has already recommended dangerous practices in the name of

“anti-bullying” that undermine safeguarding. Now that it has withdrawn VAGC and endorsed the Cass Review and the DfE’s draft guidance, it should avoid repeating this mistake.

Recommendations

Recommendation for the Church of England

FFA is not fit for purpose, and puts the Church of England, church schools and the DfE at risk of legal challenge. It should be scrapped and this work should start over.

The Church of England should undertake an honest and thorough review of the problems with VAGC in order to avoid repeating the same mistakes.

Recommendation for the Department for Education

FFA demonstrates the need for the government to provide absolute clarity about expectations based on the need to respect everybody's rights and to put safeguarding first.

The DfE should issue a model policy on sex-based rules that is suitable for use by both faith and secular schools.

The Church of England rightly highlights concern for children and young people who have already identified themselves as “transgender” prior to the issuing of the DfE guidance. It calls for specific guidance on how they should be treated from this point on. The DfE should produce such guidance for consultation.