

The Policy Exchange Report on Gender and Safeguarding in Schools

A Summary for Parents

Summary of the Policy Exchange Schools Report

A detailed report by the Policy Exchange think-tank offers a useful overview of current school policies in relation to trans-identified students. [An Examination of Gender and Safeguarding in Schools](#) (published in March 2023) describes the existing statutory safeguarding framework, presents new data on current school practice, and makes recommendations for schools and government to address safeguarding deficiencies and tackle areas where policies deviate from statutory guidance and other legislation.

For parents of trans-identified children seeking support from their school, the report offers a practical summary of existing legal and safeguarding obligations. The report also reflects the findings of the [interim NHS Cass Review](#) and provides a basic introduction to the latest clinical understanding of youth gender distress, which may be particularly useful for education professionals with limited experience of this topic. Below, we have highlighted key sections of the report that parents can use to encourage compliance with safeguarding and other obligations while schools await publication of the Department for Education consultation on [transgender guidance](#).

Essential Reading

The following two sections of the Policy Exchange report are particularly relevant for parents of trans-identified children advocating for evidence-based school policies that prioritise safeguarding.

Executive summary (pages 10-13)

Parents can encourage busy school leaders to at least take on board the information presented in these pages (which include the report's final recommendations). Key concerns are a "safeguarding blind spot when it comes to the issue of sex and gender"; the influence of contested beliefs about gender identity on whole-school

policies and curriculum content; and the adoption of an “affirmative approach” (including enabling social transition) when the interim NHS Cass Review has highlighted clinical disagreement about the best solution for gender distress. The report emphasises that teachers do not have the requisite clinical expertise to deal with the complexity of gender dysphoria, nor to enable a child to take “major life decisions” without parental consent.

Section 8 (pages 55-63)

This section examines the implications of current school practice for trans-identified students and describes the ways in which standard safeguarding protocols may be disregarded when a student declares a trans identity.

As the report explains, “while social transition may appear to be a harmless and superficial expression of identity, the medical journey it sets so many children on is not”. A reminder is provided of the interim Cass Review finding that social transition “may have significant effects on the child or young person in terms of their psychological functioning.” Teachers do not always grasp the links between facilitating a child’s social transition, their overall mental health, the risk of overlooking other safeguarding issues for the child, and the likelihood of the child pursuing irrevocable and disputed medical interventions. The impact of current school policies on what is a vulnerable cohort of students can usefully be presented in conjunction with [Bayswater’s iceberg infographic](#), which illustrates the complex, multifactorial nature of gender dysphoria (see also **Section 6** of the report).

Section 8 describes in turn the implications of (8.1) the failure to understand that social transition is an active intervention (as per the [interim NHS Cass Review](#)); (8.2) the failure to correctly refer trans-identified children to external agencies with appropriate safeguarding and clinical expertise; (8.3) the failure to share information, e.g. with the designated safeguarding lead; (8.4) neglecting parental responsibility and even undermining parents (e.g. accusing them of being “unsupportive” due to a misunderstanding of best practice or inappropriate lobby group influence); (8.5) neglecting other children’s rights e.g. under the Human Rights Act and Equality Act 2010; (8.6) compromising sex-segregation (resulting in safeguarding risks and potentially unlawful discrimination).

Key data regarding current school practices

Section 7 of the report presents new data gathered from freedom of information requests sent to schools by Policy Exchange. This section may be most relevant to policymakers, although the results should also be understood by school leaders and staff with safeguarding and/or pastoral responsibilities. The findings reveal a troubling

lack of understanding in some schools when it comes to meeting their legal and safeguarding obligations. The statistics in the report are helpfully illustrated with examples taken from the written responses submitted by schools about their policies.

In summary:

- Only 28% of schools reliably inform parents when a pupil “expresses the wish to change gender”
- 33% of schools do not reliably inform the designated safeguarding lead or other relevant parties when a pupil “expresses the wish to change gender”
- 40% of schools operate self-ID for gender identity, another 25% do so with parental consent
- 28% of schools do not maintain single-sex toilets
- 19% of schools do not maintain single-sex changing rooms
- 60% of schools do not maintain single-sex sport
- 69% of schools require other children to participate in social transition (i.e. of their peers)
- 72% of schools teach the idea that people have a gender identity that may be different from their biological sex (a contested ideological belief)
- 30% of schools teach that a person should be treated as their self-identified gender in all circumstances (contrary to the Equality Act 2010)

Curriculum content and teaching materials

For anyone concerned about school curriculum content, **Section 9** (pages 64-65) sets out clearly and succinctly the ways in which materials may contravene current DfE guidance. Links to relevant government policies are provided, making it easier for parents and teachers to identify resources that might be non-compliant and back this up with a specific objection.

Teaching about gender identity is shown to be a particularly widespread problem that may in part be due to a lack of clarity from DfE. The statutory RSHE guidance requires schools to teach “the facts and the law about sex, sexuality, sexual health and gender identity in an age-appropriate and inclusive way”. As noted by the report, this government guidance “fails to elucidate that gender identity beliefs are beliefs not facts”. The research conducted for the report shows that “many schools are teaching gender identity beliefs as if they are facts”. The report notes that when teaching about the Equality Act, schools “should be presenting gender identity beliefs as beliefs, not facts” and, as part of this discussion, students must understand that the Equality Act also protects other beliefs, for example “gender critical beliefs and religious beliefs”.

More details about current statutory RSHE guidance are provided in **Section 3**, which covers political impartiality, parental rights and the use of external agencies. **Section 7.5** provides data relating to curriculum content plus examples of ideological teaching materials being used in schools. These include unevidenced claims about multiple genders, linking gender stereotypes to gender identity (in contravention of current DfE guidance), and promoting unscientific language about biological sex (contrary to the requirement for factual, non-partisan information). A list of the most common external RSHE providers is given in **Section 7.6**, and more detail about three providers — The Proud Trust, Rainbow Flag Award, Diversity Role Models — can be found in **Section 10** (pages 75-78).

The full report can be found at:

<https://policyexchange.org.uk/publication/asleep-at-the-wheel/>

Quick reference - an overview of other report sections

Section 1 documents the recent spike in trans identification among children and young people (and referrals to NHS gender services). It highlights the absence of advice for schools in this area (DfE guidance still pending) and the way this void has been filled by partisan lobby groups.

Section 2 covers the existing safeguarding framework for schools. Particularly useful for parents: **Section 2.5** on parental responsibility, which emphasises parental rights and sets out the duty to involve parents unless “compulsory intervention in family life is necessary”. **Section 2.6** covers specific safeguarding risks that could apply to trans-identified children and warns that schools are not equipped to diagnose mental health problems so should seek appropriate professional support.

Section 4 describes the “gender affirmative” approach (including social transition) that has been widely adopted in schools (and elsewhere) and explains why this can be the first step on a medical pathway, which schools are not equipped to facilitate.

Section 5 describes the “watchful waiting” approach and cites evidence for high rates of desistance for young children with gender dysphoria who are not socially transitioned. This section offers an excellent understanding of the fluidity and change that are a natural part of child and adolescent development and highlights the risks of cementing what might otherwise have been a transitory phase.

Section 6 describes the characteristics of the children referred to the NHS Gender Identity Development Service over the last decade: the overrepresentation of girls, looked after children, children with autism, children questioning their sexuality, children with other mental health issues. This helps teachers understand the complexity and vulnerability of this group (see also [Bayswater iceberg infographic](#)).

Section 10 is a historical analysis of “how we got here”, offering an interesting background on how well-intentioned anti-bullying policies and efforts to promote diversity and inclusion have contributed to the current safeguarding oversights. This section is not essential to understand how to remedy the current problems, but it may help parents and teachers identify educational materials and policies that could contravene safeguarding requirements and other statutory guidance.