



THE COUNTESS

Who We Are

The Countess Advocacy CLG (The Countess) is a group of progressive women from all walks of life including doctors, lawyers, and students. We are volunteer-led, self-funded and not affiliated with any political party or religion. The Countess has members all over Ireland, and in some EU member states. Since the launch of The Countess in September 2020, we have gained 15,000 followers across social media, hosted webinars to live audiences of a thousand, and been instrumental in shifting the discourse in Ireland. We advocate for, and centre women and children in our work. We have working groups on prisons, sport, legislation, and schools & safeguarding. Since launching our campaign to preserve single sex toilets in Irish schools we have received a wave of approaches and support from parents and concerned citizens who used our template letters to make their voices heard. They do not agree with the raft of radical laws and policies being pushed through at the behest of gender identity politics. As such, we represent a growing constituency of people waking up to the impact of such measures (loosely terms 'inclusivity') on women and children. We are not interested in changing anyone's beliefs around transgender identity. We are simply calling for a wider lens when it comes to examining the impact of these laws and policies on society. We are part of a growing number of people and grassroots groups worldwide, who are working together to raise awareness.

Our position on the teaching of RSE/SPHE

The Countess supports truthful, transparent, and age-appropriate teaching in sex education and social personal and health education. The teaching aims of RSE/SPHE must be to deliver objective, honest and rational information that does not elevate or promote any one religious or ideological belief over another. We support the promotion of RSE/SPHE resources and teaching that reduces any type of bullying and harassment.

Summary of our assessment of the Background paper and brief for the redevelopment of Senior Cycle SPHE

The Countess has undertaken a close reading of the information provided in the [background paper](#). We have also examined the [interim toolkit's section on gender](#), recommended by the NCCA (produced by the University of Limerick and TENI, the Transgender Equality Network Ireland). We believe the NCCA will seek to develop an RSE/SPHE curriculum that is driven ideologically by Gender Identity Theory and Queer Theory. The NCCA has presupposed that every child has a gender identity, that heteronormativity is an oppressive construct and that the 'affirmative' model of care is the best and only model of care to be adopted to meet the health and emotional welfare needs of gender non-conforming students. These ideological commitments are apparent from the tenor of the background document, the choice of international case studies from jurisdictions that have enshrined gender identity and gender expression in law (Ontario and New Zealand) and from the

contents of the gender section of the interim toolkit produced by the University of Limerick and TENI.

Our Main Points of Concern

1. If the NCCA succeeds in merging the RSE/SPHE short courses into one compulsory subject and remains committed to promoting Gender Identity Theory and Queer Theory within the curriculum it will be difficult for the state to vindicate the rights of parents as set out in Articles 42.1 and 42.2 of the constitution. These Articles recognise parents as the primary source of religious, moral, and social education for their children. It will be logistically impossible for parents to remove their child from subjects that promote Gender Identity Theory and Queer Theory because they will be 'baked in' to every subject.

We believe the NCCA and Department of Education and Skills are ill equipped to recognise the ideological takeover of the curriculum by proponents of Gender Identity Theory and Queer Theory. These theories are intellectually dishonest. They diminish the human experience by forcing individuals to define themselves as members of ever smaller, restrictive identity groups rather than recognising and celebrating our common humanity. These theories undermine the rights of the child/student to accurate and honest information:

- about their bodies, by claiming they can change sex.
- about the nature of sexuality, by stating sexual orientation is based on same gender attraction rather than same sex attraction.

Queer Theory argues that childhood innocence is an adult concept, a myth that deprives children of agency. We are deeply worried by the possible incursion of this line of thinking into the curriculum because it seeks to erode the necessary boundaries that exist between children and adults.

Merging RSE and SPHE facilitates embedding Gender Identity Theory in the curriculum

Gender identity is defined by the UL/ TENI toolkit promoted by the NCCA as *"a person's deeply-felt identification as male, female, or some other gender. This may or may not correspond to the sex they were assigned at birth"*. The toolkit also encourages the use of the term cisgender as this *"acknowledges that everyone has a gender identity."*

The NCCA SPHE Senior Cycle background and briefing paper states that;

The timetabling of SPHE across senior cycle education is not mandatory, although schools are required to provide a minimum of six lessons per annum in Relationship and Sexuality Education (RSE). For this reason, provision of SPHE for senior cycle students varies greatly within and between schools. pg. 12. (Sections underlined for emphasis by The Countess)

The document highlights that between Transition Year and 6th Year only 17.5% - 22% of schools offer SPHE at senior cycle level. And that just over half of principals who responded to the NCCA survey about RSE and SPHE provision are providing six or more lessons in RSE to 5th and 6th year students.

When given the choice schools focus on the delivery of RSE rather than on the delivery of SPHE. This may be because RSE can be taught as part of another subject (e.g., Religious Education or Biology) and therefore takes less time from an already busy timetable.

If the SPHE element of the new curriculum is developed as envisaged by this background document and is merged with RSE it would be impossible to coherently teach many subjects. For example, how can an empirical, fact-based biology curriculum that states human reproduction requires male sperm

and female ova be taught alongside an SPHE module that includes the gender identity theory that posits that all humans can change sex? It would be an act of profound intellectual dishonesty to make such a claim. Teachers have an obligation as set out in Section 2.1 of the [Teaching Council's](#) code of conduct *'to act with honesty and integrity in all aspects of their work'*. To teach anything other than fact is a professional dereliction of duty.

How can teachers uphold their professional duty to *'take all reasonable steps in relation to the care of pupils/students under their supervision, so as to ensure their safety and welfare'* (Section 3.1 of the Teaching Council's Code of Conduct) while also teaching that sex is on a spectrum as opposed to binary and immutable. Such a claim has profound implications for the coherent teaching of safe sex and the avoidance of unplanned pregnancy. What measure of protection from pregnancy does being non-binary afford a female student? Is a non-binary boy unable to impregnate a female partner depending on where he locates himself on the 'sex spectrum'? The incoherence is obvious once critically evaluated.

The interim [toolkit](#) offers a link to a [video](#) by Dr. Karissa Sanbonmatsu. In the video Dr. Sanbonmatsu refers to the ['mosaic brain'](#) theory to explain why he believes he has a 'female' brain. The mosaic brain theory claims that the human brain is a mosaic of masculinised and feminised regions but does not claim that there are 'male' and 'female' brains. Dr. Sanbonmatsu relies on this theory to argue contradictory positions simultaneously. That on the one hand brains are a MIX of masculinised and feminised regions BUT his brain is female. To quote evolutionary biologist Colin Wright;

*A "female brain" is any brain that has developed in a female body. A "male brain" is any brain that has developed in a male body. It is impossible for a female to have a male brain, and vice versa. To suggest otherwise is complete pseudoscience. This doesn't mean there are no measurable *average* differences between the brains of males and females. There are, but there is tremendous overlap and these average differences at the population level don't define the sex of individual brains. Brains don't have a sex.'*

It will be a dereliction of the professional duty of the NCCA and the development group responsible for the creation of the new RSE/SPHE curriculum if they promote this view of biology. It promotes sexism. Women have struggled against the stereotypes that women could not excel in certain areas of study e.g., STEM because they had 'lady brains.'

It is our contention, based on the available interim resources and tone of the background paper and briefing document, that if RSE and SPHE are merged gender identity theory will undermine fact-based teaching about sex and reproduction. It will promote sexist stereotypes and elevate pseudoscience above facts.

The erosion of parental rights

If the NCCA succeeds in merging the RSE/SPHE short courses into one compulsory subject and remains committed to promoting gender identity theory within the curriculum it will be difficult for the state to vindicate the rights of parents as set out in Articles 42.1 and 42.2 of the constitution.

Article 42.1 of the Constitution obliges the state to respect the rights of parents in relation to the religious, moral, and social education of their children.

Article 42.4 of the Constitution obliges the state to have due regard to the rights of parents in relation to religious and moral formation of their children.

It will be logistically impossible to remove students who do not believe in gender identity from classes because the theory will be 'baked into' every lesson and possibly every subject. This is already recommended in Section 9/Curriculum of the interim [toolkit](#) that states:

Ensure that gender identity and gender expression are incorporated across the curriculum.

The curriculum section of the toolkit offers suggestions for ways of incorporating Gender Identity and Gender Expression into a range of subjects, including history where teachers are asked to consider a response to a question posed by a student that Joan of Arc was transgender. There is a heavy reliance on UK based organisations such as Stonewall and Celebrate and Educate for information. Many of the links to Stonewall are broken but the intention is clear; to promote Gender Identity within the curriculum. If a parent does not believe in Gender Identity theory, how can they assert their rights as the principal educator of their children and remove them from the influence of that teaching if Gender Identity theory permeates every subject?

Queering the curriculum

The background and briefing document, and interim toolkit promotes the introduction of Queer Theory into the curriculum via SPHE/RSE.

Queer Theory is intent of breaking down norms and boundaries. Society needs 'norms' to be successful. Let us be very clear, 'norms' and 'normative' behaviour are not arbitrary, they are not political or ideological. They are based on behaviours that result in the most successful outcomes for the majority.

Queer Theory and Gender Identity Theory are anarchistic theories, originating from philosophy, not biology, or science or child development. Queer Theory aims to break down society's norms, without considering that societal norms develop because they promote wellbeing and safety.

The toolkit refers teachers to two discredited organisations, Stonewall UK and [Celebrate and Educate](#), a UK based LGBT+ education charity. Stonewall UK have been found to have deliberately misrepresent the Equality Act and their CEO Nancy Kelly described lesbians as '[sexual racists](#)' if they did not accept men who claim to be women into their dating pool. Neither organisation are suitable or reliable sources of information for the teaching of SPHE/RSE.

The inclusion of Celebrate and Educate on as a resource provider is a cause for concern. On February 8th, 2020 by Dr. Elly Barnes, CEO of Educate and Celebrate, addressed an INTO [Equality Conference](#). Ms Barnes advised schools when embarking on LBGTQ+ education **"don't send a letter home...[or] hold a parents meeting... we've had to have parent consultations, and the only advice I can give you around that is, don't send a letter home to say you're about to embark on this work.....That's the worst thing you can do."** Educate and Celebrate list controversial figure [Peter Tatchell](#) as a patron. Mr Tatchell has stated that 'not all sex involving children is unwanted, abusive or harmful.'

Tatchell on sex with children

ROS Coward (Why Dares to Speak says nothing useful, June 23) thinks it is "shocking" that Gay Men's Press has published a book, *Dares To Speak*, which challenges the assumption that all sex involving children and adults is abusive. I think it is courageous.

The distinguished psychologists and anthropologists cited in this book deserve to be heard. Offering a rational, informed perspective on sexual relations between younger and older people, they document examples of societies where consenting inter-generational sex is considered normal, beneficial and enjoyable by old and young alike.

Prof Gilbert Herdt points to the Sambia tribe of Papua New Guinea, where all young boys have sex with older warriors as part of their initiation into manhood. Far from being harmed, Prof Herdt says the boys grow up to be happy, well-adjusted husbands and fathers.

The positive nature of some child-adult sexual relationships is not confined to non-

Western cultures. Several of my friends – gay and straight, male and female – had sex with adults from the ages of nine to 13. None feel they were abused. All say it was their conscious choice and gave them great joy.

While it may be impossible to condone paedophilia, it is time society acknowledged the truth that not all sex involving children is unwanted, abusive and harmful.

Peter Tatchell.
Rockingham Street,
London SE1.

Family values

IN the past, Conservatives have been very vocal in stating that children need fathers. Now Cecil Parkinson is chairman of the Conservative Party. What will the party think of a father who never sees his child (When's World, June 25)?

David Baxter.
22 Balmoral Close,
Billericay, Essex CM11 2LL.

Figure 1 Letter from Peter Tatchell to The Guardian newspaper

Journalist Julie Bindel reported that "In 1997, Tatchell wrote to the *Guardian* in support of a book, [Dares to Speak](#), a favourable exploration of [child sexual abuse](#), stressing the "positive nature" of some adult male/boy child sexual relationships. When the journalist Ros Coward reviewed *Dares to Speak* in the *Guardian* she was unequivocal: "The book refuses to take seriously sexual abuse and its consequences."

The NCCA background document refers to one survey comment regarding '**the heteronormative lens through which SPHE is taught**'. The concepts of normative behaviour or norms are under constant attack from queer theorists. Elly Barnes CEO of Celebrate and Educate has declared her organisations wish to '[smash heteronormativity](#)'. What does this mean? Why do norms or normative behaviour need to be smashed or queried or Queered? To quote feminist philosopher Jane Claire Jones;

The basic point is this: some things are norms because, as well as culture and language and discourse, or whatever we want to put in the box marked 'ideas' or 'immaterial', there are also things like nature and biology and basic human needs – which are both biological and psychic- and whatever else we want to put in the box labelled 'material'. And some of our norms – eat vegetables, try to exercise, don't sexually abuse children- are norms because they have something to do with promoting wellbeing or avoiding harm.

There is an indisputable link between [Queer Theory and paedophilia](#) as demonstrated by the prominent queer theorists including Michel Foucault who argued for the lowering of the age of consent down to and including infants, Gayle Rubin who compared pedophilia to a preference for spicy food, Pat Califia who said paedophiles should be more, not less, invested in children's lives and Judith Butler who claims that there may be some forms of incest that are not necessarily traumatic.

Gayle Rubin, perhaps one of the most infamous proponents of Queer Theory bemoaned that ‘the law is especially ferocious in maintaining the boundary between childhood ‘innocence’ and ‘adult’ sexuality’. Surely that boundary is a good thing? Not in queer theory. Queer Theory seeks to promote the idea that ‘heteronormative/cis-normative’ society constrains and limits children by insisting that their innocence should be protected. It is incumbent upon the NCCA and the Department of Education and Skills to ensure that a counter view is represented at the discussion table. A view that does not view childhood innocence as an adult fantasy.

The NCCA and by extension the Department of Education and Skills, seems to be completely out of its depth and do not understand that the SPHE/RSE curriculum is being ‘Queered’ under its nose.

National Obligations and International Commitments

The briefing document states that some key 'government policy initiatives' and international commitments are relevant to the development of the senior cycle RSE/SPHE curriculum including:

- A. Zero Tolerance, the Third Strategy for Domestic, Sexual and Gender-Based Violence
- B. The Council of Europe Convention on Prevention and Combating Violence against Women and Domestic Violence, (Istanbul Convention)
- C. United Nations Agenda for Sustainable Development specifically Sustainable Development Goals (SDGs) including;

SDG 3 – to ensure healthy lives and promote wellbeing for all.

SDG 4 – to achieve gender equality and empower all women and girls.

SDG 16 – to promote peaceful and inclusive societies for sustainable development.

Commitments A to C are predicated on an understanding of women and girls as females, juvenile or adult. Should the NCCA include gender identity as a mandatory, uncontested theory within RSE/SPHE education and adopt language that conflates sex and gender it makes a mockery of the rights of women to protections based on their sex.

The draft paper refers to observations made by the UN committee on the Rights of the Child to the Irish State on 29th January 2016 where they expressed a ‘concern at the severe lack of access to sexual and reproductive health education’ and asked that Ireland would ‘adopt a comprehensive sexual and reproductive policy for adolescents and ensure that sexual and reproductive health education is part of the mandatory school curriculum (par 58)’. The NCCA has not included that in 2016, the UN Committee on the Rights of the Child also requested that State authorities (Department of Education and Skills) should collate specific information and data on bullying countrywide to determine the issues and solutions that were occurring in schools. The Committee recommend this in 2016 but by 2022 the Irish State has still not provided disaggregated data from about cases of bullying and harassment in schools, including sexual harassment, sexual assault and rape. If the NCCA seeks to rely on the requests of the UNCRC to promote a ‘comprehensive sexual and reproductive policy for adolescents’ surely it is incumbent upon them to address all requests from the UNCRC and provide disaggregated data on sexual crimes occurring in schools.

The background document references the WHO International Technical Guidance on Comprehensive Sexuality Education. This document is also ideologically committed to the gender identity theory. It states;

*Lesbian: a woman who experiences physical, emotional and/or sexual attraction to, and the capacity for an intimate relationship, **primarily**, with other women.*

This is untrue. Lesbians are females only attracted to other females.

Sexual orientation: Each person's capacity for profound emotional, affectional, and sexual attraction to, and intimate and sexual relations with, individuals of a different gender (heterosexual) or the same gender (homosexual) or more than one gender (bisexual or pansexual)'. The same document does define sex correctly but doesn't use that definition in when describing SEXUAL orientation. It chooses to use gender instead.

This definition is nonsensical as it conflates sex and gender.

The NCCA document refers to a 'rights based approach' used in Scotland. In Atheist Ireland's submission on the first draft of the Junior Cycle SPHE curriculum development they stated:

'The Draft Report gives no practical application to the right of all students to objective RSE based on human rights principles, despite the fact that it is the duty of the NCCA under Section 42 of the Irish Human Rights and Equality Commission Act 2014 to 'eliminate discrimination' and 'protect the human rights of the persons to whom it provides services'.

The NCCA seems to believe that its public sector duty does not oblige it to have regard to the practicalities on the ground of protecting human rights even though Section 41 (3)-(d) Education Act 1998 obliges the NCCA to have regard to the practicalities of any advice which it proposes to give to the Minister.'

This point regarding a 'rights-based approach' is relevant to the NCCA's insistence on promoting gender identity theory in the senior RSE/SPHE curriculum. A rights-based approach must protect ALL rights, including the right not to believe that people can change sex as well as protection from the interference of religious or other ideologically driven belief systems on education.

International 'best practice' exemplars are ideologically committed to the promotion of Gender Identity Theory.

The draft briefing and background document summarises three SPHE curricula offered in New Zealand, Ontario (Canada) and Scotland. It is not surprising, considering the tenor of this document that [New Zealand](#) and [Ontario](#) were chosen as RSE/SHPE exemplars as both have enshrined gender identity, and gender expression into law. Ireland has not, yet organisations such as [TENI](#), who co-authored the [gender toolkit](#), and [BelongTo](#), who are repeatedly referenced in the toolkit, misinterpret the Equal Status Acts 2000– 2015 and state that gender identity is a protected characteristic in law.

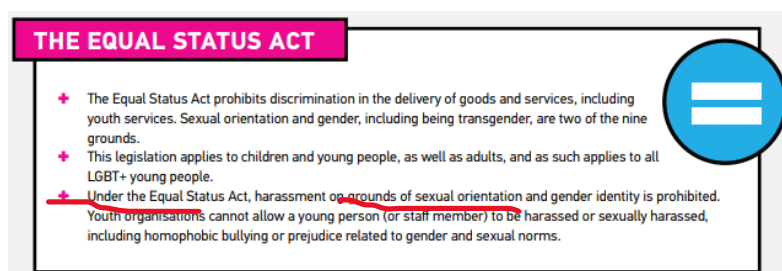


Figure 2 BeLongto schools' resources – gender identity is conflated with sexual orientation as a protected characteristic

The draft background and briefing paper fails to state that due to their devolved education systems, parents in [New Zealand](#) and [Ontario](#) have the option to remove their children from the ideologically driven RSE/SPHE programme. If the NCCA's intention to make RSE/SPHE compulsory is realised removing children from RSE/SPHE will not be an option for parents in the Irish system.

The promotion of 'affirmative model' with no reference to desisting or detransition.

The draft background and briefing document through its choice of international best practice curricula from New Zealand and Ontario and its promotion of the interim gender toolkit has elevated the 'affirmative model' of care above other models of intervention for gender non-conforming and gender confused adolescents. This is not a neutral position. Has the NCCA or the Department of Education and Skills given any consideration to the Cass Review and its implications for the treatment of gender dysphoric and gender confused adolescents? Why are there no references in the document or the online toolkit to rates of desistance and the strong likelihood that gender non-conforming children often [grow up to be gay](#). There is no reference to the fact that 'social transition', a key component of the 'affirmative model' is [iatrogenic](#). This means that the medical problem is caused by the treatment itself. Social affirmation is a self-fulfilling prophecy.

In the interest of balance and due diligence any RSE/SPHE programme that promotes social transition must explain that there are alternative models of care, e.g., 'watchful waiting' and refer to and explain the experience of desistance and detransition.

Discussion of suicide as it relates to gender distress must be accurate and responsible. As stated by Stats for Gender:

Every suicide is a tragedy, and one suicide is a suicide too many. With such a serious issue, accuracy is critical. A Swedish government-commissioned study found that 39 of 6334 gender dysphoric individuals — 0.6% — died by suicide. The UK's largest gender clinic, the Gender Identity Development Service, states that suicide is extremely rare. Talking about suicide is not the same as dying by suicide. While there is evidence that suicidal ideation is higher among gender-dysphoric youth than in the general population, an increase in suicidal ideation rates is not proof of an equal increase in suicide rates themselves. However, the way suicidality is reported can affect numbers of suicides. A significant body of academic research from across the world, known as the Werther Effect, has found links between certain types of reporting of suicides and increased suicide rates.

With this in mind it is shocking that the presenter of the [video](#) linked to the gender toolkit makes the FALSE claim that 40% of transgender people attempt suicide (at 11:30 minutes in the video). This statistic has been widely [debunked](#). It is unconscionable that the NCCA would promote this statistic to teachers within the RSE/SPHE interim teaching resource.

TENI co-authored the on line toolkit. This is a cause for concern as they promote the 'affirmative model' of care and promote the contested claim that puberty blockers are [reversible](#). The Cass Review has stated that the [long term consequences of puberty blockers is unknown](#). If TENI or any lobby group has influence during the development phase of the RSE/SPHE curriculum it must be balanced by an alternative view.

Any RSE/SPHE resource that discusses gender identity or social transition must invite other stakeholders to contribute. This includes organisations such as [Genspect](#) and the HSE National Gender Service.

The composition of the Development Group

The Countess believes that the composition of the curriculum Development Group does not afford adequate representation to those who do not believe in Gender Identity Theory. To that end the Development Group must be expanded to include those who hold different views on the subject.

Concluding remarks

The Countess is extremely concerned that the proposed RSE/SPHE senior curriculum will be driven ideologically by proponents of Gender Identity Theory and Queer Theory. We are concerned that the NCCA and Department of Education and Skills is facing ideological takeover of the curriculum by these negative, and ultimately, anti-social belief systems. RSE/SPHE must be grounded in science, truth, and respect for the child.

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