



THE COUNTESS

SUBMISSION TO THE DRAFT SPECIFICATION
FOR SENIOR CYCLE SPHE
NCCA Consultation
2023

NCCA CONSULTATION ON DRAFT SPECIFICATION FOR SENIOR CYCLE SPHE

The NCCA is currently updating the Social, Personal and Health Education (SPHE) curriculum and as part of this work an updated Senior Cycle SPHE curriculum is now available for consultation. A key part of the consultation is feedback from individuals and groups who are interested in this area of young people's education. The consultation on the draft Senior Cycle SPHE curriculum will remain open until October 18th. You can share your feedback by completing this template and sending it to:

SPHEdevelopments@ncca.ie.

Before completing the template, please read the draft Senior Cycle SPHE curriculum at this link: ncca.ie/en/senior-cycle/curriculum-developments/senior-cycle-social-personal-and-health-education-sphe/.

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SENIOR CYCLE SPHE – FEEDBACK

If you are contributing your views as **an individual**, please provide details below:

Name:	
Email address:	
Do you wish to be listed as a contributor to this consultation on the NCCA website?	Yes/No
Do you wish to have your written submission published on the NCCA website?	Yes/No

If you are contributing your views on behalf of **an organisation or group**, please provide details below:

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Name of organisation/group:	The Countess Advocacy CLG
Does your organisation wish to be listed as a contributor to this consultation on the NCCA website?	Yes
Does your organisation wish to have this written submission published on the NCCA website?	Yes

QUESTIONS TO CONSIDER

The Countess is a non-profit, volunteer-led organisation formed to promote the rights and interests of women and children in Ireland. Inspired by her significant contribution to Irish public life, we take our lead and our name from Countess Constance Georgine Markiewicz who, as Minister for Labour in the First Dáil, was the first female cabinet minister in Europe. Countess Markiewicz was at the vanguard of a social revolution that envisioned an Ireland that cherished all her children equally, irrespective of socio-economic status, religion, sex, or other social markers used to limited life choices and chances.

A fundamental part of the Irish revolution championed by Markiewicz and her contemporaries was achieving equality for women and affording adequate social and economic protection to all children. Sadly, the rights of women and safeguarding of children have remained elusive for much of our first century as an independent State. *The Countess* was formed to address these failings through campaigning, awareness raising, policy development, advocacy, and constructive dialogue.

OUR WORK

We have a broad interest in women's rights and child safeguarding, *The Countess* was established in 2019 to focus attention on the unintended consequences of the Gender Recognition Act 2015 on the rights of women and its impact on all aspects of safeguarding. We promote constructive, respectful, and rights-focused dialogue on this issue, and wish to see a balanced approach to gender recognition that will:

- Vindicate the rights of women.
- Achieve best practice in safeguarding for children and young people.
- Defend the hard-won rights of same-sex attracted people.
- Ensure those with gender-questioning identities are treated equally to all others in society.

At our core is the belief that by virtue of our common humanity, all groups in society must be afforded the ability to live with dignity, respect, and safety.

MEMBERSHIP

Our membership comprises a diverse cross-section of people concerned by the conflict of rights and child safeguarding issues arising out of gender self-ID. Our membership draws on a range of individuals including doctors, lawyers, writers, IT specialists as well as students, carers, full-time parents, and anyone willing to contribute their time and skills to further our mission. We are volunteer-led, self-funded, and not affiliated with any political party or religion.

DEFINITIONS

As an organisation, *The Countess* is concerned with preventing the erosion or erasure of clear, sex-based terms that are important to how most people describe and think of themselves. With that in mind, and for the avoidance of doubt, the following are the interpretations of those words applied in this submission and in all our work that have become contested within debates around gender and sex. They are:

- Woman: 'Adult Human Female'
- Man: 'Adult Human Male'
- Girl: 'Female child or adolescent'
- Boy: 'Male child or adolescent'
- Sex: 'Either of the two categories (male and female) into which humans and most other living things are divided on the basis of their reproductive functions'

To use any other interpretation of the terms listed above makes it impossible to guarantee enduring clarity and consistency in the use and interpretation of the language used to craft law or State policy. This submission, therefore, applies these meanings to these words.

QUESTION 1: AIM

The aim of the updated curriculum is to:

‘Empower students to become healthy, resilient, responsible and empathetic young adults; nurture respectful and caring relationships; and prepare for the opportunities, responsibilities and experiences of life now and beyond school.’

Please state whether you agree this aim summarises the purpose of SPHE for senior cycle students and your reason for agreeing/disagreeing.

Insert response here:

Disagree.

The aim of the updated curriculum is to ‘empower students to become healthy, resilient, responsible and empathetic young adults; nurture respectful and caring relationships; and prepare for the opportunities, responsibilities and experiences of life now and beyond school.’

The course cannot meet its stated aims because:

1. It fails to observe some of the explicitly stated guiding principles of the Senior Cycle
2. Uses language that indicates a commitment to the ‘affirmative’ model of care for gender-dysphoric people.
3. The curriculum draws on ‘critical theories’ including queer theory, critical social justice, and critical race theory. These theories directly undermine the formation of a stable identity, undermine resilience, and destroy relationships.

1. Failure to observe explicitly stated guiding principles of the Senior Cycle

Choice and flexibility – this principle asserts that the Senior Cycle (SC) provides ‘flexibility and coherence’ for students. The draft SC SPHE specification undermines the coherent teaching of the SC biology curriculum because it does not provide a definition of sex and repeatedly conflates sex and gender.

It is not possible to coherently teach the SC biology curriculum AND teach that gender identity is a fact. Learning outcomes in the SC biology curriculum include, among others:

‘An understanding of the general structure of the reproductive system – male and female. Functions of the main parts. Role of meiosis (cell division) in the production of sperm cells and egg (ova). Definition of “secondary sexual characteristics.” Role of oestrogen, progesterone, and testosterone. The menstrual cycle: the events and outlined role of oestrogen and progesterone. Copulation, location of fertilisation, implantation, placenta formation and function. Birth – outline of process, milk production and breastfeeding.’

It is not possible to coherently teach this aspect of the curriculum and fail to define what sex is in the SC draft SPHE curriculum. **In order to claim that everyone has a gender identity it is necessary to obscure what the differences between sex and gender are.** The SPHE specification only offers definitions for gender, gender identity, and gender expression. Not sex. Failure to define sex undermines the student’s ability to challenge the sexist stereotypes and assumptions that underpin the concept of gender identity. A person’s sex is not a feeling. It is a biological reality. Acknowledging sex differences isn’t saying that sex is all that matters but it recognises that it does matter and not naming it is harmful. (Sex Matters, Schools Guidance)

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 that sex is fiction and gender identity is 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 not 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. What response will students or teachers who point out these evident inconsistencies receive?

Failure to be clear about what these terms mean will potentially lead to errors in the application of the Children First Act 2015 and the Equal Status Acts (ESA) 2000 – 2015.

Section 11 of the Children First Act 2015 states that relevant service providers must produce a child safety statement and risk assessments to comply with the Act. Failing to

understand the differences between ‘sex’ and ‘gender’ or failing to define ‘sex’ undermines pupils’ safety. By telling pupils they are behaving in an exclusionary or bigoted manner for expecting or wanting to retain single-sex provision, teachers undermine their safety. What reasonable educator would teach young people that to support female only or male only provision is exclusionary and phobic?

Everyone in the school population must know that they are welcome and included but that it is not ‘transphobic’ to state that everyone has a sex. This is crucial for equality, safeguarding, and sex and relationship education.

Inclusive education and diversity – this guiding principle states that ‘the educational experience in senior cycle is **inclusive of every student**, celebrating, valuing and **respecting diversity** and the contribution each student can make’. The SC SPHE draft undermines this principle by presenting certain modes of thinking as accepted and universal, e.g., the belief all humans have a gender identity. For those students who do not accept this belief, whether for religious, philosophical, or scientific grounds, their diverse view will be interpreted as bigotry and transphobia. Diversity of thought is not possible when one point of view (that everyone has a gender identity) is granted a privileged position protected from critique.

Challenge, engagement, and creativity – this guiding principle states that students should ‘experience challenging **high quality education** with opportunities for new and deep learning and for **critical**, creative and innovative thinking.’ Elements of this SC SPHE draft specification fail to offer high quality education and opportunities for critical thinking because it presents gender identity as a fact when it is a highly contested and unscientific belief system. Where schools have facilitated the social transition of students, introduced mixed-sex toilets, or engaged with or relied on resources provided by third party providers such as BeLonGTo, ShoutOut, or TENI it will be clear to students that the school has adopted the ideological position that humans can be born in the wrong body. Students will be intimidated and will not criticise gender identity theories. The opportunity for critical evaluation or questioning is undermined by a whole school adoption of a belief system that has no basis in science or fact.

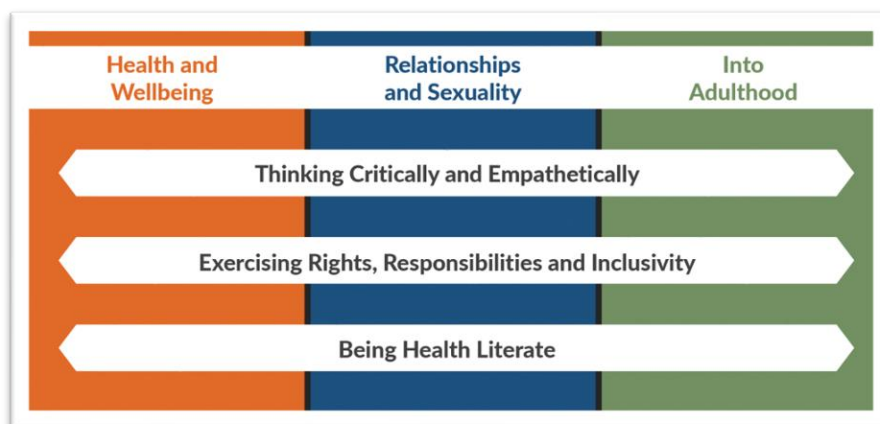
I. Uses language that indicates a commitment to the ‘affirmative’ model of care for gender-dysphoric people.

The Senior Cycle curriculum specification states that SPHE teaching and learning in senior cycle should ‘affirm diversity.’ This request is not neutral as it states this ‘affirmation’

involves ‘using inclusive and affirming language.’ This is a clear direction to teachers to use language that endorses a particular approach to gender distress called ‘social transition.’ The Cass Review Interim Report on the Gender Identity Development Service (GIDS) at the Tavistock in London, stated clearly and unambiguously that social transition is ‘not a neutral act’ and that social transition ‘may have significant effects on the child or young person in terms of their psychological functioning’. The ‘affirmation model’ not only affects the child being affirmed but co-opts the entire school community into the ‘affirmation’ process. Teachers are not equipped to facilitate this powerful psychological intervention that lacks robust, peer-reviewed evidence in support of its efficacy and safety for use on distressed children and by extension their peers.

QUESTION 2: THE LEARNING

The draft course is structured around three strands and three cross-cutting elements, illustrated below:



Below provides extracts from the draft specification. See draft specification pp. 11–15 for a more detailed outline of the learning.

In the following section, we would value your feedback on each of the three strands.

Strand I: Health and Wellbeing

Within this strand, students will explore the factors that influence their physical, social, emotional, and mental health and the relationships between these aspects of health. They will learn ways to take care of themselves and stay as healthy as possible, with a

particular focus on gaining awareness, skills, techniques, and information to protect their mental health and wellbeing.

Students should be able to;	
I.1	research the determinants of good health.
I.2	discuss the enablers and barriers to managing a healthy life balance - including study, work, play, sleep, people, 'me time,' and ways to manage greater balance.
I.3	critically analyse the origins and effects of social norms and attitudes to alcohol and drugs.
I.4	explore the factors that influence mental health and wellbeing, including the influence of family, peers, societal attitudes, media, technology, alcohol, and drugs, and one's sense of self.
I.5	recognise unhelpful thinking patterns and negative self-talk and how these can affect emotions and behaviour.
I.6	draw on a variety of strategies that can help regulate and manage harmful thoughts and emotions in order to nurture positive mental health.
I.7	recognise the signs and symptoms of stress and anxiety in themselves and others and recognise when help should be sought, where to go and how to access help if needed.
I.8	discuss healthy and unhealthy ways of responding to stress and anxiety.
I.9	explain the pathways towards addiction, the signs and consequences of different kinds of addictions and where to go and how to access help, if needed
I.1	discuss and devise ways to safely manage social situations where their own or others' health or safety may be at risk.

Having considered the learning outcomes in Strand I, please comment on whether you think the learning outcomes provide (a) clarity on expectations for learning in Senior

Cycle SPHE and whether you consider the learning outcomes to be (b) relevant to the lives and needs of 16–18-year-olds today. Please also let us know if you think anything important is missing from this Strand.

Insert response here:

The intention of Strand I is well meaning but will fail to address the complexities and dangers in offering the ‘affirmative’ model of care to gender dysphoric students if teachers are instructed to ‘affirm diversity’ and use ‘affirming language’. The Interim Cass Reviewⁱ into the care provided by the largest gender identity service in the UK stated that:

‘There is lack of consensus and open discussion about the nature of gender dysphoria and therefore about the appropriate clinical response.’

and

‘Social transition – this may not be thought of as an intervention or treatment, because it is not something that happens within health services. However, it is important to view it as an **active intervention** because it may have significant effects on the child or young person in terms of their psychological functioning.’

Teaching Gender Ideology is negatively impacting students’ mental health.

In a recent articleⁱⁱ on the impact of teaching Gender Ideology in schools Genspect relied on research gathered from the My World Surveyⁱⁱⁱ: National Study of Youth Mental Health in Ireland, conducted by UCD. They reported that the numbers of students in Irish secondary schools who do not identify with their birth sex has been increasing steadily from 1% in 2012 to 6% in 2023.

The My World Survey^{iv}: National Study of Youth Mental Health in Ireland also reported that:

- In 2023, 94% of secondary school students who do not identify with their birth sex reported having some mental health difficulties, and 61% rated their mental health as ‘not good’.
- In 2023, 50% of secondary school students who do not identify with their birth sex identified **gender identity as one of their top stressors**.

- There has been a dramatic increase in referrals of Irish children and young adults for treatment for gender dysphoria.
- The rate of LGBT+ youth feeling unsafe at school is increasing (in 2022 76% reported feeling unsafe, up from 73% in 2019)

There can be no doubt that Genspect is correct that:

‘Since gender ideology was introduced into Irish schools, there has been an increase in gender questioning, confusion, and declining mental health among significant numbers of Irish school children’

It is incumbent on the NCCA to address this issue of gender-identity confusion in a cautious manner that prioritises evidence-based approaches and the long-term wellbeing of all students.

While any attempt to give students the skills to ‘take care of themselves and stay as healthy as possible’ is laudable, this strand will fail to enable students to ‘[gain] awareness, skills, techniques and information to protect their mental health and wellbeing’ by refusing to acknowledge, in the specification and resource toolkit, all evidence critical of ‘affirmative’ treatments/interventions employed to address gender-related distress/dysphoria.

The opportunity to critically assess treatments for gender-related distress will be significantly undermined in schools where;

- gender identity is taught as fact, rather than as a belief system
- students are ‘affirmed’ through social transition
- mixed-sex toilet facilities have been introduced
- preferred pronoun use is encouraged and lack of pronoun use is deemed ‘hateful.’

How will teachers facilitate students who may wish to draw their classmate’s attention to the experience of desistance and detransition? Desisting is the process of reversing a transition which was only social (e.g., by reverting to an earlier name). Desistance typically implies that an individual who was once seeking medical transition is no longer doing so. This is important information. Research conducted by statsforgender.org^y shows that gender dysphoria recedes in 80% of cases if not actively affirmed.

Students must be protected from accusations of bigotry and transphobia if they, for instance, draw attention to the fact that individuals who held a firm conviction that they

had a trans or non-binary identity and took social or medical/surgical steps to ‘affirm’ that conviction stopped believing they had a trans or non-binary identity. This experience of ‘desisting’ and ‘detransition’ is real and worthy of report in a curriculum that aims to encourage young people to make healthy, evidence-based decisions.

QUESTIONS FOR TEACHERS

A recent editorial^{vi} in *Nurse Education Practice* addressed significant concerns about the uncritical adoption of gender ideology in health and social care education, specifically the affirmative model and its application to the care and treatment of children and young people experiencing gender dysphoria. The authors provided a list of very important questions for every teacher to consider before approaching this topic. We recommend the adoption of these or similar questions before teaching addressing this subject with any student at Junior or Senior Cycle level.

- Are sex and gender synonyms for the same concept or do they mean different things?
- What are the issues involved with informed consent for transition in children and young people, especially in the context of vulnerable and or extremely distressed individuals.
- What evidence is there to support the claim that people can literally change sex?
- What explanations have been put forward for the very significant rise in the numbers of young people, many with co-existing mental health issues, autism, and histories of abuse, who present with gender dysphoria?
- Why are girls overrepresented in those seeking gender reassignment?
- What evidence is there for and against the use of puberty blockers in the treatment of young people with gender dysphoria?
- What is known about the long-term outcomes for young people who transition in terms of their mental and physical health?

STRAND 2: RELATIONSHIPS AND SEXUALITY

Within this strand students will explore the wide range of relationships that are important for their lives with a particular focus on gaining the awareness, knowledge, and skills to support them in creating and nurturing respectful, caring, and healthy relationships. This

strand also supports students to recognise and be empowered to respond to instances of abuse or violence in relationships.

Note: Each of the learning outcomes below should be taught in a way that LGBTQ+ identities, relationships and families are fully integrated and reflected in teaching and learning, as opposed to being addressed within stand-alone lessons.

Students should be able to;	
2.1	demonstrate the awareness and skills needed for nurturing healthy in-person and online relationships, including respecting boundaries, communicating feelings and needs and preventing and managing conflict
2.2	reflect on how their attitudes, beliefs, values, and identity can influence the dynamics of friendships, relationships, and sexual behaviour
2.3	discuss sexual activity as an aspect of adult relationships characterised by care, respect, consent, intimacy, and mutual pleasure
2.4	examine how harmful attitudes around gender are perpetuated in the media, online and in society and discuss strategies for challenging these attitudes and narratives
2.5	identify and consider common signs of abusive relationships, including coercive control
2.6	explain the root causes and consequences of gender-based violence (GBV), with a particular focus on violence against women and girls, and outline the supports available
2.7	investigate the influence of pornography on attitudes, behaviours, and relationship expectations
2.8	discuss image-based abuse, sexual harassment, sexual assault, and rape and what to do if they or someone they know has experienced any of these

2.9 explore sexual and reproductive health, including fertility, safer sexual practices, possible responses to an unplanned pregnancy, and how to access sexual health services.

Having considered the learning outcomes in Strand 2, please comment on whether you think the learning outcomes provide (a) **clarity** on expectations for learning in Senior Cycle SPHE and whether you consider the learning outcomes to be (b) **relevant** to the lives and needs of 16–year olds today. Please also let us know if you think anything important is missing from this Strand.

Insert response here:

Strand 2 is the only strand that is accompanied by **a specific instruction** for how the strand should be taught. This is cause for concern. The strand learning outcomes are preceded by a note that states:

‘[students] should be taught in a way that LGBTQ+ identities, relationships and families are fully integrated and reflected in teaching and learning, as opposed to being addressed within stand-alone lesson’

This instruction force-teams lesbian, gay, and bisexual people’s experiences with those of the trans, queer, and + people. It suggests that being gay, lesbian, or bisexual is an identity. Homosexuality and bisexuality are not identities. They are sexual orientations based on same-sex attraction. The NCCA must clarify if it uses sex and gender as synonyms or if the NCCA considers these words mean different things? Trans, queer, and + are not defined in the glossary. If this strand is to be taught with integrity it is essential that the draft specification define all the following terms:

- Sex
- Homosexuality
- Heterosexuality
- Gender
- Transgender
- Queer
- +

The current glossary defines ‘gender.’ It does not define sex, homosexuality, heterosexuality, transgender, queer, or +. Definitions of all terms listed will enable students and teachers to see the clear difference between sexual orientation (gay, lesbian, and bisexual) and subjective identities (trans, queer, and +) and to confidently address those differences.

In centring LGBTQ+ the NCCA has elevated this group above all others. There is no instruction to fully integrate and reflect the disabled, economically disadvantaged, different ethnic groups, heterosexuals, or people of faith. In directing teachers to integrate the ill-defined LGBTQ+ group in all lessons, teachers are being coerced into teaching gender ideology and identity politics.

Learning outcome 2.2 states:

‘Identity can influence the dynamics of friendships, relationships and sexual behaviour.’

It must be made explicit that **sexual orientation is based on sex, not gender or gender identity**. It is profoundly homophobic to suggest that same sex-attraction is socially constructed. Sexual orientation can be empirically measured using physiological response tests. **To suggest sexual orientation is socially constructed is to suggest it can be deconstructed or erased**. Gay and lesbian students are not attracted to the same gender, but the same sex and students must not be taught otherwise.

The glossary states that gender is ‘socially constructed’ and pointedly fails to define sex. This is a deliberate attempt to make students accept that sexual attraction is not based on our physical bodies but on what we THINK about our physical bodies. This gives licence to heterosexual males to declare that they are girls/women and to assert that they are lesbians and coerce nascent lesbians into believing they are ‘bigoted’ for not accepting males who identify as lesbians into their dating pool. It gives licence to heterosexual females to assert that they are gay boys/men. This places those females in danger by convincing them that their perception of themselves as male is shared by society and encouraging them to enter male spaces where they may be targeted based on their female sex regardless of how they see themselves. To promote this idea is a dereliction of safeguarding and makes a mockery of the intention of learning outcome 2.6 to:

‘Explain the root causes and consequences of gender-based violence (GBV), with a particular focus on violence against women and girls, and outline the supports available’

Women and girls are victims of sex-based violence not because they identify as women and girls but because they ARE women and girls. The curriculum elevates ‘identity’ above physical reality. When taken to its conclusion, the positive and important learning opportunities available in learning outcome 2.6 are lost because accepting gender identity theory implies that to avoid sexual violence females could simply ‘identify out’ of their sex because as stated in the glossary gender is ‘socially constructed.’ This is illogical, dangerous, and intellectually dishonest.

Learning outcome 2.9 aims to:

‘Explore sexual and reproductive health, including fertility, safer sexual practices.’

How can safe sex be advocated for if students are told that ‘identity’ and not the physical body has primacy? 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 trans identifying afford a female student? Is a trans identified boy unable to impregnate a female partner depending on where he locates himself on the ‘sex spectrum’? The incoherence is obvious once critically evaluated.

Strand 3: Into Adulthood

Within this strand students will gain specific knowledge and skills to support them as they make the transition to adulthood and learn how to take greater responsibility for themselves. This includes being able to manage choices, develop the skills that are needed to plan for the future, establish and maintain good habits, and achieve goals. It also supports students in learning how to take care of themselves in times of change or challenge, understand their rights and responsibilities before the law, and build the skills needed to be a good ally to those experiencing discrimination or inequality.

Students should be able to;	
3.1	explore strategies for self-care that can help maintain health and prevent ill-health
3.2	demonstrate self-management skills necessary for life
3.3	explore a range of life events where they might experience change, loss or heartache and discuss how to care for themselves and/or others during these times
3.4	summarise accurately their rights and responsibilities before the law as a young adult with reference to online communicating, age of consent, alcohol and drug use, their right to access services and work-place rights
3.5	consider the skills needed to stand up for themselves and others, and the range of situations where this might arise
3.6	demonstrate allyship skills to challenge unfair or abusive behaviours and support greater equity and inclusion.

Having considered the learning outcomes in Strand 3, please comment on whether you think the learning outcomes provide (a) **clarity** on expectations for learning in Senior Cycle SPHE and whether you consider the learning outcomes to be (b) **relevant** to the lives and needs of 16–18-year-olds. Please also let us know if you think anything important is missing from this Strand.

Insert response here:

Strand 3 learning outcome 3.6 contains elements that are deeply alarming in tone and uses terms that require an urgent response from the NCCA as to their intent. The tone of this strand promotes the teacher as a conduit to political activism. The role of the teacher is to educate not proselytise or politicise students. There are complex issues addressed in this strand however they are not addressed in a serious manner. **It appears that it is more important that students are taught to show solidarity than to understand highly complex issues.**

IF A STUDENT IS NOT AN 'ALLY,' ARE THEY AN ENEMY?

Allyship is defined in the draft specification glossary as:

'Refer[ing] to the actions, behaviours, and practices used to support, advocate, and collaborate with others, in support of justice and equity. Allyship involves recognising and using one's privileged status (for example as white or male or Irish person) to support individuals from minority identity groups understand their rights and responsibilities before the law, and build the skills needed to be a good ally to those experiencing discrimination or inequality.'

Allyship is a neologism that is not used widely or understood beyond academic and activist spheres. The word is ideological and its use in this context is cynical. Allyship is not friendship. On the surface the word appears to promote solidarity, but this is not its intention. Allyship destroys harmony within groups by demanding that the individual commits themselves to an idea and to the collective. It destroys collaboration.

Allyship requires the breaking of bonds between students so that they are in service to an idea (allyship) not in service to one another. In breaking these human bonds, the individual can be convinced that their duty is to an idea even when that idea undermines their own self-interest or the welfare of others e.g., girls are encouraged to share bathrooms with males or include males in their sports to demonstrate their allyship with those who identify as trans.

Allyship does not promote tolerance; quite the opposite, it encourages a profound intolerance of dissident voices. The 'best' practitioners of allyship will be those who believe it is their ethical duty to bully and harass those who do not share 'approved' views. Allyship replaces concepts of tolerance with the endless search for opportunities to be personally offended or offended on behalf of someone else.

How are those who are not 'allies' going to be defined? As enemies? Neutrality on any issue will not be an option. Those who practice allyship lay claim to a sort of enlightenment that is exceptional. Those who are 'unenlightened,' neutral, or disagree can be dismissed, ignored, or punished. The term allyship is intrinsically linked to 'critical theories' including 'anti-racism' which paradoxically seeks to address racism via racism. Anti-racism is not the same as not being racist. Allyship is a one-dimensional and shallow means of addressing complex problems. It offers no historical perspective or

context and fails to analyse the effect of sex, class, or income on inequality. It relies on facile simplifications and reduces complex individuals to their immutable characteristics.

How 'privileged' is a white, male, Irish 16-year-old student living in Cabra West or Priorswood in Dublin (both described on the Pobal index of deprivation as 'extremely disadvantaged') when compared to a black, female, and Irish 16-year-old student living in Malahide East or Rathmines West (both described on the Pobal index of deprivation as 'very affluent'). Asking teenagers to recognise their 'white privilege' does nothing to materially change the circumstances of the poor and marginalised. There is no single solution to the problem of racism and we need to hear from various perspective to find the best way to deal with it.

We do not assert that the NCCA is teaching pure 'critical race theory' as theorised by Derrick Bell or Kimberlé Crenshaw however we are concerned that a watered down but no less corrosive version of this theory is being introduced into the curriculum. This is manifest in the call to recognise the privileged position occupied by white Irish males and the promotion of transformative social and emotional learning. This submission will address transformative social and emotional learning in due course. If the curriculum were serious about addressing racism it would encourage the exploration of differing views including those who disagree with 'critical race theory' such as American academics Glenn Loury, John McWhorter and Erec Smith.

In line with the approach taken by Dr Martin Luther King students should be encouraged to judge people on the content of their character rather than the colour of their skin. This is a sensible approach shared by most reasonable people, save for a handful of far-right and far-left activists and academics.

That is not to suggest that the concept of race doesn't exist. Race is a concept designed to legitimise injustice. The question is how will teaching 'allyship' and power and oppression narratives stop these injustices? How does encouraging students to fixate on their 'privilege' and, more destructively, on the 'privilege' of others promote inclusion? Ultimately it is self-sabotaging.

The black Irish author and academic Emma Dabiri illustrates the limitation of discussing race in a vacuum. She said:

'I say you might not experience racism as a white person but that doesn't mean that your life isn't sh**, that you don't experience other forms of oppression and inequality and

have your life opportunities diminished in certain ways. We can start to see this and see the struggles as interlinked – for example in America in the 17th century the Irish indentured labours and the enslaved Africans were fighting the landlord classes but once [the concept of] race was introduced it stopped these solidarities from occurring.’

In a recent presentation to Equiano Project^{vii} conference, author Ayishat Akanbi commented that:

‘.. the dangers of hyper focusing on racism have been acknowledged by social justice activists like Bell Hooks and Toni Morrison. In his collection of sermons “Strength to Love” first published in 1963 Dr Martin Luther King declared “we have foolishly minimised the internal of our lives and maximised the external” [...] the very best way of ensuring that views are heard is to highlight [that] the small print baked into [anti-racism] messages in its current iteration is disempowering, condescending, and infantilising. A movement that has gained speed because not enough people recognise the resemblance between the racist ideas that justified the worst historical racial violence and the messaging promoted by modern anti-racists. Both think of themselves as safer amongst their own, both believe it’s a struggle to relate to creative works from people who don’t look like them and ultimately both believe that black people’s salvation comes from somewhere outside of themselves. What a low estimation of such a broad complex and distinct set of individuals and this is precisely how ant- racism in trying to fight for the humanity of black people ends up denying it by making it harder for them to express themselves without being vilified.’

Allyship must be ‘performed.’ It requires action, whether that is adopting pronouns; the ‘privileged’ self-flagellating; or demanding radical far-left solutions to inequality. Performing allyship is rewarded with status typically in the form of social recognition. The word allyship is among a list of vacuous and ultimately destructive devices that divide rather than unite. The word is part of the lexicon of ‘critical theories’ that includes words like ‘equity’ ‘anti racism,’ ‘praxis,’ ‘cis heteronormativity’ and ‘intersectionality.’ They offer students nothing useful other than the argot/vocabulary to use to signal to others that they are morally superior and virtuous.

Schooling young people in the language of ‘critical theories,’ whether their focus is gender identity, social justice, or race demands ceaseless rumination on their place in the world relative to others and sows’ division. It is destabilising. The NCCA would be wise to consider the Nigerian author Chimamanda Ngozi Adichie comments on the public

performance of virtue and reflect whether promoting ‘allyship’ will improve or undermine students’ ability to recognise their common humanity.

‘The assumption of good faith is dead. What matters is not goodness but the appearance of goodness. We are no longer human beings. We are now angels jostling to out-angel one another. God help us. It is obscene.’

Equality or equity?

The word ‘equity’ is referred to in learning outcome 3.6. It is used four times in the full document, ‘equality’ is used twice, and ‘inequality’ is used once. These terms are not defined in the glossary. It is essential that they are defined.

Equity is not equality. Students may believe they are the same, but they are not. And given the ideological tenor of the draft specification it is reasonable to assume that ‘equity’ is used in a way that would be understood as promoting ‘critical social justice’ as opposed to ‘social justice.’ The document refers to ‘social justice’ twice but again fails to define it.

Social justice or critical social justice?

The term social justice was coined by Sicilian Jesuit scholar Luigi Taparelli d’Azeglio in the mid 1800’s. While the term is Catholic in origin, it was adopted by various secular movements related to human rights, climate change, anti-war efforts, racial and gender equality, and economic justice. There are conceptions of social justice that are conservative or liberal or socialist. All are equally entitled to call themselves ‘social justice.’ This is not the same as the specific set of doctrines of Critical Social Justice (CSJ), which is profoundly cynical and dehumanising. Proponents of CSJ would have students believe that there is no such thing as goodness in the world; that the default setting of all human beings is a malevolence that can never be undone. It must be relentlessly exposed and punished in service of a moral vision that is based on the belief that we live in a society made entirely of bigotry. CSJ relies on a fallacy of composition – that all people are stereotypes. It denies that individuals are complex, have agency, or can exercise free will.

One of the ‘guiding principles’ of the Senior Cycle curriculum is that students should ‘experience challenging... high quality education with opportunities for new and deep learning and for critical, creative and innovative thinking.’ CSJ offers the exact opposite of deep learning and critical thinking. Rather than promoting a world view that seeks out grievances, Senior Cycle students would be better served by being taught how to think critically and recognise that adaptability and resilience are the key to empowerment not seeking offence or obstructing free speech under the pretence that words cause ‘harm.’ Dr Erec Smith: Associate Professor of Rhetoric, York College and Co-Founder of Free Black Thought says that:

‘When the word harm is used in reference to ideas or words it taints civil society and what keeps us civil.’

Words can hurt feelings, but speech is quite literally the opposite of violence. Surely the goal of an education system that claims to prepare young people for the adult world must be to prepare them to defend their views with reason and rhetoric not with censorship or the imposition of a punitive morality that relentlessly seeks thought offenders to punish. It is misguided to limit the expression of ideas, including bad ideas, and replace truth with dogma. Adherence to dogma limits the individuals’ ability to develop the intellectual resilience needed to defend their views. How can students be engaged to change the world if the truth of it is obscured?

QUESTION 3: ANY FURTHER SUGGESTIONS

We would appreciate any further suggestions for how the draft updated Senior Cycle SPHE curriculum could be improved?

Insert response here:

Social and Emotional Skills/Social and Emotional Learning

The glossary refers to students developing social and emotional skills (SEL) as set out in the CASEL Social and Emotional Skills Framework. SEL is not defined or explained. CASEL stands for Collaborative for Social and Emotional Learning. CASEL.org produces and markets proprietary SEL resources and is described on its website as a:

‘US based nonprofit, nonpartisan leader in SEL, we are uniquely positioned to evaluate programming, curate research, inform legislation, and partner on implementation.’

The Freedonia Group, a business market research company, states that the estimated sales of social-emotional learning (SEL) instructional materials were \$1.725 billion for the 2021–022 school year; representing an increase of 25.9% over the previous year and that the market will continue to grow.

Which version of SEL does the NCCA propose to promote to Irish schools?

Researcher Max Eden addressed the US Senate on Appropriations^{viii} (the US version of the Public Accounts Committee) in April 2022 and stated that CASEL redefined SEL as ‘Transformative SEL’ in 2020.

In 2019 the ‘competencies’ SEL taught were ‘self-awareness’ and ‘self-management’. The new 2020 version of ‘Transformative SEL’ encompasses,

1. ‘Identity’ with identity defined now through the lens of ‘intersectionality.’
2. ‘Self-management’ encompasses ‘agency’ with ‘agency’ defined through ‘resistance’ and ‘transformative/justice-oriented’ citizenship
3. ‘Transformative SEL’ also embraces ‘culturally relevant/responsive’ pedagogy.

Mr Eden commented that:

‘Whether or not one chooses to call the set of related ideological impulses that CASEL has embraced “Critical Race Theory,” they are clearly not morally or politically neutral. Indeed, CASEL’s public documents and leadership statements suggest an open embrace of leveraging social and emotional learning toward political and ideological ends. In its “Roadmap to Re-Opening,” CASEL defines “self-awareness” as “examining our implicit biases,” and defines “self-management” as “practicing anti-racism.” CASEL’s former CEO, Karen Niemi, declared “we believe that our work in Social and Emotional Learning must actively contribute to anti racism,” and that SEL can “help people move from anger, to agency, and then to action.”’ [emphasis added]

We are deeply alarmed that the revised SPHE curriculum may leverage SEL to deliver political or ideological goals.

In the United States CASEL is delivered via school surveys. These surveys ask students invasive questions about their ‘mood, their beliefs, their family and even their sexuality.’ We have specific concerns about the information gathered by SEL processes. Specifically,

- What rights will parents have to refuse permission for their children to engage in such data mining exercises?
- Will schools be instructed to ensure all students require parental permission to opt in or will a de facto opt out system be introduced?
- Who will own the data gathered and how will it be used or monetised?

SEL demands that teachers seek out ‘trauma’ and become therapist/social worker/chaplain^{ix} with a keen interest in the students’ beliefs, attitudes, and values. And when those beliefs, attitudes, and values do not match those prescribed by the SEL resources as ‘correct’ what will teachers do?

Toolkits

The draft curriculum directs teachers to the SPHE online toolkit. The current toolkit continues to centre the deeply ideological University of Limerick/TENI^x resources, among others. The contents of the UL/TENI toolkit contradict elements of the draft SC SPHE curriculum, in particular definitions included in the glossary. This must be addressed otherwise the UL/TENI resource undermines coherent teaching and delivery of the curriculum and undermines child safeguarding. The toolkit must be made available for inspection **before the final curriculum is implemented.**

Assessment

The specification states:

‘Detailed guidance on assessment and reporting in Senior Cycle SPHE (including sample assessment tasks) will be developed upon finalisation of this specification and published at Senior Cycle (curriculumonline.ie)’

It is imperative that any guidance on assessment including sample assessment tasks is made available for public inspection and feedback prior to implementation.

Praxis - Engaging Students In Political Activism

The word 'praxis' is defined on pg. 10 of the draft SPHE specification as an 'ongoing process of critical reflection and action, nurtured by dialogue with others.' The idea of praxis has been discussed by philosophers including Aristotle, Sarte, Marx, and Arendt. The overall tenor of the draft SPHE senior cycle curriculum suggests that the NCCA has adopted a version of praxis that relies upon awakening in some students a sense of personal oppression. This is essentially the raising of an individual's 'critical/political consciousness' – identifying how one is oppressed in relation to others.

While there are positive aspects in making students aware of social inequalities, the draft SPHE document points to an adoption of a radical version of praxis that does not simply encourage reflection but requires 'action.' The NCCA has not detailed what this 'action' might entail and therefore leaves 'action' open to the personal interpretation of individual teachers and resources providers, including third party facilitators and educational textbook publishers.

It is not the responsibility, obligation, or right of any teaching professional to educate students into activism. The NCCA must clarify what it means by using the word 'praxis' in the context of the curriculum and what 'action' it is referring to. Teachers are not cheerleaders for political fads.

GLOSSARY – ERRORS AND OMISSIONS

Consent - The definition of consent refers to sexual consent among other contexts. How are students to understand what sexual consent it if sex is not defined in the curriculum and when gender and sex are conflated? The Junior Cycle SPHE revised curriculum includes in its definition of gender the following important proviso which must be included in the SC curriculum.

It is important to distinguish gender from 'sex' which refers to the biological and physiological characteristics that are defined as being male and female. (Junior Cycle SPHE curriculum definition)

Sex – The draft specification fails to define sex. This must be rectified.

Gender – The definition of gender is confusing and again fails to differentiate gender from sex. In the Junior Cycle SPHE curriculum the distinction is made as noted in our

comment on consent. The definition states that ‘understanding of gender differs across contexts and over time.’ If gender is expanded to include biological sex this statement is untrue. The concept of sex does not change over time because sex is not a concept. It is an empirically observed fact of life.

Gender Identity – This is belief is presented as a fact. It is more accurate to say that ‘some people believe they have a gender identity’ and then define what a gender identity is.

LGBTQI+ – Strand 2 of the draft specification refers to LGBTQ+. The glossary refers to LGBTQI+. Why are different acronyms used? What does the ‘I’ refer to? Lesbian, gay, and bisexual people experience same-sex attraction not same-gender attraction. The NCCA describes ‘gender’ as ‘socially constructed.’ The LGB needs to be decoupled from the TQ+ in this definition to avoid the homophobic suggestion that being gay is a social construct that can be deconstructed or undone. What is trans? What is Queer? What is +?

CONCLUSION

All reasonable adults want children and young people to receive age-appropriate and accurate information about any topic that will influence their choices and quality of life. *The Countess* is committed to the ideal that children and young people should be respected and treated with dignity. The aim of this submission is not to denigrate or belittle the authors of the Draft specification for Senior Cycle SPHE. However, we have specific concerns which can be summarised as follows;

2. The specification uses language that indicates a commitment to disputed ‘affirmative’ model of care for gender-dysphoric people.
3. Strand 2 addresses relationships and sexuality. It is accompanied by a specific instruction that centres LGBTQ+ experiences. By giving this instruction the NCCA has elevated this group above all others. There is no instruction to fully integrate and reflect the experiences of the disabled, different ethnic groups, heterosexuals, or people of faith.
4. The draft specification fails to offer coherent and high-quality education with opportunities for new and deep learning and for critical, creative, and innovative thinking.

5. The draft specification fails to be inclusive of every student. It does not celebrate, value, or respect diversity of thought, opinion, or belief.
6. Allyship requires the breaking of bonds between students so that they are in service to an idea (allyship) not in service to one another. The individual can be convinced that their duty is to an idea even when that idea undermines their own self-interest or the welfare of others e.g., girls are encouraged to share bathrooms with males or include males in their sports to demonstrate their allyship with those who identify as trans. Allyship does not promote tolerance; quite the opposite, it encourages a profound intolerance of dissident voices. The ‘best’ practitioners of allyship will be those who believe it is their ethical duty to bully and harass those who do not share ‘approved’ views. Allyship replaces concepts of tolerance with the endless search for opportunities to be personally offended or offended on behalf of someone else.
7. Equity is not equality. Critical Social Justice is not Social Justice. Given the ideological tenor of the draft specification it is reasonable to assume that ‘equity’ is used in a way that would be understood as promoting ‘critical social justice’ as opposed to ‘social justice.’
8. The current toolkit continues to centre the deeply ideological University of Limerick/TENI resources among others. The contents of the UL/TENI toolkit contradict elements of the draft SC SPHE curriculum, in particular definitions included in the glossary. This must be addressed otherwise the UL/TENI resource undermines coherent teaching and delivery of the curriculum and undermines child safeguarding.
9. The introduction of CASEL into any level of the Irish education system is cause for serious concern. The NCCA must address
 - CASEL’s claims to ‘evidence-based’ practice;
 - how data required to implement TSEL (transformative SEL) will be collected, retained, or monetised;
 - the safety and legality of unlicensed teachers practicing ‘therapy’ in the classroom;
 - the financial costs of implementing SEL; and
 - the potential for SEL to be introduced into primary education if SEL is introduced into secondary schools.
10. We are deeply alarmed that the revised SPHE curriculum may leverage SEL to deliver political or ideological goals.

Thank you for taking the time to share your views with us.
Please email this document to SPHEdevelopments@ncca.ie
before November 3rd, 2023.

- I. cass.independent-review.uk/publications/interim-report
- II. genspect.org/gender-ideology-and-the-breakdown-of-the-chain-of-trust-in-irish-education-part-1
- III. researchrepository.ucd.ie/entities/publication/f028b522-c3ed-4e3a-8ffe-e1578443f885/details
- IV. researchrepository.ucd.ie/entities/publication/f028b522-c3ed-4e3a-8ffe-e1578443f885/details
- V. statsforgender.org/desistance
- VI. Robin Ion et al., *Nurse Education in Practice*, doi.org/10.1016/j.nepr.2023.103788
- VII. youtube.com/watch?v=7a5Md4FMkmc
- VIII. docs.house.gov/meetings/AP/AP07/20220406/114597/HHRG-117-AP07-Wstate-EdenM-20220406.pdf
- IX. Robert Pondiscio. American Enterprise Institute. The Unexamined Rise of Therapeutic Education: How Social-emotional Learning Extends K–12 Education’s Reach into Students’ Lives and Expands Teachers’ Roles.
- X. ul.ie/gender-identity-school-resources



THE COUNTESS