

## **Draft guidance: Gender questioning children**

### **Written response from Centre for Mental Health and the Children and Young People's Mental Health Coalition**

Centre for Mental Health and the Children and Young People's Mental Coalition are writing to jointly respond to the Department for Education's consultation on the non-statutory guidance for schools and colleges on gender questioning children. We believe all children and young people have the right to education free from discrimination which promotes and protects their mental health and wellbeing, and LGBT+ young people are no exception. Given trans and gender diverse young people already face higher rates of bullying and discrimination in education settings, and higher prevalence of mental health problems linked to social attitudes and experiences, we are deeply disappointed that this guidance fails to make sure schools and college are safe places for every child and young person.

Schools and colleges are important places for protecting, supporting, and promoting children and young people's mental health and wellbeing. The Government advocates for all schools and colleges to adopt a whole education approach to mental health and wellbeing, and we support the aim to create safe and supportive classrooms for all. However, we are concerned that the guidance in its current form contradicts these aims, instead exacerbating harmful stereotypes, denying gender expression and trans identities, and creating barriers towards an inclusive and supportive environment for trans and gender diverse young people – which, if implemented, will have deeply harmful effects on their mental health and wellbeing.

The Children and Young People's Mental Health Coalition is part of the Supportive Schools Campaign, which is calling on the Government to listen to LGBT+ youth and inclusive educators, withdraw the guidance and rethink their approach. In addition, we make the following recommendations:

- The Government should embed whole education approaches to mental health and wellbeing across all educational settings.
- The Department for Education should use a whole education approach as a framework to develop guidance and support for LGBT+ young people within educational settings.
- The Department for Education should update the guidance to focus on supporting schools to develop and promote LGBT+ inclusive policies and interventions, so that all children and young people feel safe and can thrive at school.
- The Department for Education should carry out focus groups with both young people and parent-carers to inform the development of any guidance, to ensure their voices are placed at the heart.

- Wider work within the Department for Education should involve trans and gender diverse young people so their experiences and needs are effectively considered within policy development.

### **The mental health of trans children and young people**

Data on the mental health needs of trans and gender diverse young people in the UK is incredibly sparse, and their experiences are often subsumed within statistics regarding LGBT+ communities. It has been identified that LGBT+ people are often exposed to stigma, prejudice, discrimination, and abuse in societies which can create a hostile and stressful environment that can contribute and cause poor mental health (Schlief et al., 2023). This is reflected in the high level of mental health needs of those within the LGBT+ community, including children and young people.

- A recent study found that transgender people in England are much more likely to have a long-term mental health condition, with one in six transgender men and women aged 16+ at risk of a mental health problem compared to one in ten for cisgender men and women (Watkinson et al., 2024).
- Gender diverse young people are at increased risk of depression, anxiety, self-harm, and suicidality (Schlief et al., 2023).
- Research on transgender youth in the US has found that children as young as nine years old are also nearly six times as likely to experience suicidal thoughts (Russell et al., 2022).
- A study by Stonewall has shown that eight out of 10 (84%) young trans people have self-harmed and almost half of young trans people (46%) have thought about taking their own life in the last year compared to 31% of LGB young people who aren't trans (Stonewall, 2018).
- Research from Just Like Us shows that LGBT+ young people are three times more likely to self-harm and twice as likely to have depression, anxiety and panic attacks, as well as to be lonely and worry about their mental health on a daily basis (Just Like Us, 2021).
- Research has also shown that the proportion of neurodivergent people who are gender diverse or gender fluid is much higher than in the neurotypical population (Autistic Girls Network, n.d).

It is important to note, however, that the higher prevalence of mental health problems for trans people is not inevitable or inherent, instead higher levels of need are predominantly due to the harm caused by social attitudes and experiences. For example, evidence suggests that when transgender children and young people are supported in their gender identity, they have developmentally normative levels of depression and only minimal elevations in anxiety, suggesting that mental ill health is not inevitable within this group (Olson, 2016).

## **Experiences of education for trans young people**

Educational settings play an important role in protecting, promoting, and supporting children's mental health and wellbeing. However, there is evidence that many LGBT+ young people experience higher levels of bullying, discrimination, exclusion, and marginalisation in schools than their heterosexual or cisgender peers, which can negatively impact on their mental health (Schlief et al., 2023). For example, research by Stonewall highlights that 64% of trans pupils are bullied for being LGBT in Britain's schools and half of LGBT pupils hear homophobic and transphobic slurs 'frequently' or 'often' at school (Stonewall, 2017).

Research from Just Like Us also demonstrates that LGBT+ pupils feel far less safe in school, with only 58% of LGBT+ pupils reporting that they have felt safe at school on a daily basis in the past 12 months, compared to 73% of non-LGBT+ pupils (Just Like Us, 2021). Further risk factors in school include peer bullying, cis-normative practices and facilities and invalidation from others of their identity (Hall, 2022).

Evidence suggests that a failure to recognise the individual needs of trans young people within school policies and culture can have a negative impact on their mental health and wellbeing. A study exploring the experiences of children who socially transition during primary and early secondary school found a culture of 'cisnormativity' (a form of normative thought which assumes everyone is cisgender and has the same needs) within schools and a failure to protect trans children, potentially leading to serious consequences to their mental health and education (Reynolds, 2022). This included school policies failing to consider the needs or rights of trans pupils, reports of abuse against trans young people being tolerated, trans young people experiencing harassment and threats, and experiences of educational injustice. The research concluded that schools need to build safe and welcoming environments, enabling trans children to thrive and feel safe from harassment and discrimination (Ibid).

## **The impact of the guidance on the mental health of trans young people**

The guidance fails to seize the opportunity to ease the pressures for trans and gender diverse students, instead placing them at further risk of harm by perpetuating discriminatory and misleading stereotypes. As a result, we are concerned about the harmful impact the guidance will have on the mental health of trans and gender diverse young people.

Despite the high risk of mental health problems amongst this group, the guidance does not reference mental health or set out the support that schools should put in place. The guidance also fails to provide settings with sufficient clarity on how to make their settings inclusive for all students. In contrast, Coalition members, Mermaids note that the guidance will instead make school environments hostile and exclusionary for trans students, strip autonomy, damage trusting teacher/student relationships and could lead to school avoidance (Mermaids, 2024). This exclusionary approach is likely to impact trans young people's sense of belonging within school, negatively impacting their mental health.

The guidance states that it is essential to report to parents when a child has shown signs of social transitioning except for a minority of exceptional circumstances. The obligation to tell parents, who could be unaccepting of their child, could enhance safeguarding risks for the young person and undermines the threat that some young people may face at home which may often be unknown to the school. For example, two in five trans and non-binary people have experienced abuse at the hands of their family members (Galop, 2023). What is more, a recent briefing from ChildLine found that within counselling sessions about sexuality or gender identity, some children described instances of emotional abuse in the home, including constant shouting, hurtful comments, and threats of violence after coming out (NSPCC Learning, 2024). As it stands, the advice regarding disclosing a child's desire to transition puts them at risk, so it should be removed – or significantly revised to ensure a more proportionate approach that safeguards the young person's rights, autonomy and safety above all.

From a practical perspective, mental health practitioners working in schools have raised concerns about how the guidance will work in practice in relation to informing parents if a child questions their gender within the therapeutic space. For example, if in a therapy session a child or young person questions their gender, practitioners have queried if they will now need to report this as a safeguarding concern in light of the new guidance. Practitioners have called for greater clarity on how they can continue to support and create safe spaces for children questioning their gender in schools, without breaking confidentiality and the safety of the therapeutic space.

### **What needs to change?**

It is the stated vision of the Government to create 'calm, safe and supportive environments which children and young people want to attend and where they can learn and thrive.' It is essential that in practice this commitment is applied to all children and young people and schools are supported to be able to achieve this. However, the draft guidance risks perpetuating harm and discrimination for trans and gender diverse children and young people, directly contradicting this vision. It is imperative that we create inclusive and supportive cultures to ensure that schools and colleges are safe places for all children and young people, that actively promote and support mental health and wellbeing. For example, findings from a UK-based study have shown that providing a school environment that affirms LGBT+ identities and promotes school safety and belonging can improve mental health outcomes for LGBT+ pupils (McDermott et al., 2023).

#### **1. Embedding a whole education approach to mental health**

We have long advocated for inclusive and robust approaches to mental health and wellbeing in schools and colleges and have been calling for full implementation of a whole education approach to mental health and wellbeing. Such approaches are crucial in making every pupil feel valued, and in supporting positive mental health and wellbeing in education settings. For example, a study by UCL and the National Education Union demonstrates the impact of a sense

of safety, belonging and wellbeing on student performance and engagement (National Education Union, 2020).

The Government has recognised the importance of a whole education approach in improving children and young people's mental health, yet education settings face many challenges, such as lack of capacity and resource, in fully implementing these approaches. We are also concerned that the publication of this guidance signals a step away from the Government's vision for all schools to implement a whole education approach, therefore we would welcome further clarity that this commitment remains.

We believe that a whole education approach should be used as a framework to develop guidance and support for LGBT+ young people within education settings. Below we outline suggestions for how this can be implemented in practice:

1. Curriculum teaching and learning to promote resilience and support social and emotional learning: This would include the inclusion of trans and gender diverse experiences within the curriculum as well as awareness raising around the mental health of this group.
2. Enabling student voice to influence decisions: Trans and gender diverse pupils should have fair and equal opportunities to have their voices heard in decision-making
3. Staff development to support their own wellbeing and that of students: Inclusive and supportive approaches also extend to trans and gender diverse staff in educational settings. Their mental health and wellbeing must be safeguarded, and all staff should receive training on the mental health inequalities facing trans and gender diverse people.
4. Identifying need and monitoring impact of interventions: Mental health and wellbeing measures used in schools should seek to effectively capture the experiences of trans and gender diverse pupils. School registration forms and monitoring surveys should allow pupils to indicate a gender identity representative of their experience and expression.
5. Working with parents and carers: Schools and colleges should work closely with parents and carers of trans and gender diverse young people, and signpost them to specialist support services.
6. Targeted support and appropriate referral: School-based mental health professionals, such as counsellors and Mental Health Support Teams, should be equipped with the skills and knowledge required to provide gender inclusive and affirming support to all pupils. For those pupils requiring specialist support, such as gender identity development services (GIDS), schools and colleges should be aware of local provision and signpost or refer accordingly.
7. An ethos and environment that promotes respect and values diversity: Educational settings should promote an ethos and environment whereby trans and gender diverse people are respected and celebrated. As part of this, schools and colleges should actively seek to reduce the known risk factors, such as bullying and exclusion, to enable a positive and safe learning environment for trans and gender diverse pupils.
8. Leadership and management: Senior leaders in schools, such as Headteachers, Principals, Governors and Senior Mental Health Leads should work together to deliver on a

comprehensive approach to the mental health and wellbeing of trans and gender diverse pupils and champion equality, diversity, and inclusion at all levels.

A key element of a whole education approach is creating an ethos and environment within schools that promotes, respects and values diversity – without demonstrating this, educational settings cannot claim to take a holistic approach to mental health and wellbeing.

**Recommendation:** The Government should embed whole education approaches to mental health and wellbeing across all educational settings.

**Recommendation:** The Department for Education should use a whole education approach as a framework to develop guidance and support for LGBT+ young people within educational settings.

## **2. Promoting LGBT+ inclusive policies**

Alongside this, research suggests that universal interventions which promote inclusivity and acceptance of diverse sexual and gender identities in schools could prevent or reduce mental health problems among LGBT+ young people (Schlief et al., 2023). Evidence has demonstrated a range of interventions to improve school life for LGBT+ young people, including providing young people safe spaces where they can normalise their thoughts and feelings, LGBT+ inclusive anti-bullying and harassment school policies, LGBT+ inclusive curricula and workshops and media-based interventions that can increase inclusivity and acceptance and raise awareness (Schlief et al., 2023). Research from Just Like Us also shows that pupils who have received positive messaging about being LGBT+ feel considerably safer in school, regardless of whether they're LGBT+ or not. Furthermore, positive messaging drastically improves pupil mental health and wellbeing, with notably lower rates of depression, anxiety, panic attacks, self-harm, eating disorders and alcohol and drug dependence (Just Like Us, 2021).

**Recommendation:** The Department for Education should update the guidance to focus on supporting schools to develop and promote LGBT+ inclusive policies and interventions, so that all children and young people feel safe and can thrive at school.

## **3. Listening to the voices of children and young people**

The voices and experiences of young people should be central to the development of this guidance. Feedback gathered from trans young people often highlights poor experience of schools, and supports calls for more inclusive trans-policies, which is in direct contrast to what is set out in the guidance. It is imperative that any future draft of the guidance is produced based on the views and experiences of children and young people, including both trans young people and cisgender young people, in order to allow for evidence-informed approaches to meeting needs and providing safe, nurturing learning environments for all students. What is more, consideration needs to be given to the specific needs of neurodivergent young people who are gender diverse or gender fluid, whose autonomy and choices are often negated within these debates.



**Recommendation:** The Department for Education should carry out focus groups with both young people and parent-carers to inform the development of future guidance to ensure their voices are placed at the heart.

**Recommendation:** Wider work within the Department for Education should involve trans and gender diverse young people so their experiences and needs are effectively considered within policy development.

## References

Autistic Girls Network (n.d.) *Gender and Autism*. Available from:

<https://autisticgirlsnetwork.org/gender-and-autism/>

Galop (2023) *Galop's statement on the non-statutory trans schools guidance*. Available from:

<https://galop.org.uk/news/galops-statement-on-the-non-statutory-trans-schools-guidance/>

Hall, N. (2021) *An exploration of the lived experiences of gender diverse young people in schools*. Available from:

<https://theses.ncl.ac.uk/jspui/bitstream/10443/5457/1/Hall%20N%20L%202021.pdf>

Just Like Us (2021) Growing up LGBT+: The impact of school, home and coronavirus on LGBT+ young people. Available from: <https://www.justlikeus.org/wp-content/uploads/2021/11/Just-Like-Us-2021-report-Growing-Up-LGBT.pdf>

Leonard, M (2019) *Growing up trans: Exploring the positive school experiences of transgender children and young people*. Available from: <https://edpsy.org.uk/thesis-directory/growing-up-trans-exploring-the-positive-school-experiences-of-transgender-children-and-young-people/>

McDermott, E. et al. (2023) *Understanding how school-based interventions can tackle LGBTQ+ youth mental health inequality: A realist approach*. Available from:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10001812/>

Mermaids (2024) *What does the proposed trans school guidance really say?* Available from:

<https://mermaidsuk.org.uk/news/trans-schools-guidance-explainer/>

NSPCC Learning (2024) Challenges young people are facing around sexuality and gender identity. Available from: <https://learning.nspcc.org.uk/media/2m3fstfm/challenges-sexuality-gender-identity-helplines-insight-briefing.pdf>

Olson KR, Durwood L, DeMeules M, et al. (2016) Mental Health of Transgender Children Who Are Supported in Their Identities. *Pediatrics*. 2016;137(3):e20153223

[https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4771131/pdf/PEDS\\_20153223.pdf](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4771131/pdf/PEDS_20153223.pdf)

Schlieff, M et al (2023) *A rapid realist review of universal interventions to promote inclusivity and acceptance of diverse sexual and gender identities in schools*. Available from:

<https://www.nature.com/articles/s41562-023-01521-z>

Stonewall (2017) *School report (2017)*. Available from:

<https://www.stonewall.org.uk/resources/school-report-2017>

Stonewall (2018) *LGBT in Britain- Health (2018)*. Available from:

<https://www.stonewall.org.uk/resources/lgbt-britain-health-2018>

Reynolds, E (2022) Transgender children face discrimination even at primary level. Available from:

<https://www.bps.org.uk/research-digest/transgender-children-face-discrimination-even-primary-school-level>



Russell, D. Monsurul, H. Coghill, D. (2022) Prevalence of mental health problems in transgender children aged 9 to 10 years in the US, 2018. *JAMA Network Open*, 5(7).

[https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2794486?utm\\_source=For\\_The\\_Media&utm\\_medium=referral&utm\\_campaign=ftm\\_links&utm\\_term=072222](https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2794486?utm_source=For_The_Media&utm_medium=referral&utm_campaign=ftm_links&utm_term=072222)

Watkinson, R.E., Linfield, A., Tielemans, J., Francetic, I. and Munford, L., 2024. Gender-related self-reported mental health inequalities in primary care in England: a cross-sectional analysis using the GP Patient Survey. *The Lancet Public Health*, 9(2), pp.e100-e108. [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(23\)00301-8/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(23)00301-8/fulltext)