



WHAT CAN CHINA LEARN FROM USA, UK & AUSTRALIA'S APPROACH TO SEX EDUCATION?

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Abstract

This dissertation aims to give policy reform recommendations for Chinese comprehensive sex education. This dissertation analyses sex education in the UK, the USA and Australia, three countries with a long history of sex education development. A comparative framework is constructed to identify their commonalities and differences. It then selects

the strengths and weaknesses that need to be considered in the context of Chinese society. In this way, recommendations are made for the development of comprehensive sex education in China. Given the international trend toward comprehensive sex education, the obstacles to the development of comprehensive sex education in China include the archaic curriculum and the lack of professionalism of the teachers, but also the lack of inclusion of the idea of rights and gender equality in sex education. This dissertation is intended to show the way forward for the development of comprehensive sex education in China through the experiences of other countries.

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1 Introduction

As the world rapidly evolves, there is an increasingly comprehensive focus on education. Sex education has always been controversial (Goldfarb and Lieberman, 2021). In the past, many people thought that sex education was about teaching children simple biological knowledge, but it is far from that. As awareness of sex education grows, it is also involved in human relationships, morality, gender, personal development, well-being, and basic biological aspects. Of course, at a social level, it is about social efficiency and the stable development of society. Sex education also varies according to the age of the person being taught (OECD, 2020). According to the OECD recommendations, sex education should be positive and inclusive, and it believes that people of any identity and orientation should have the right to free choice and dignity (OECD, 2020). Comprehensive sex education teaches about relationships, emotions, and dignity in addition to the physical curriculum, which means that it conveys deeper values to adolescents. Furthermore, comprehensive sex education can make adolescents aware of the importance of relationships and dignity, which will influence the choices they make in their social relationships (OECD, 2020). Their choices will not only affect others but also their own dignity and well-being (OECD, 2020). Therefore, practical, and holistic sex education has many benefits for both individuals and society.

The debate about sex education has had no unified view, and the underlying reason for this is the complexity of sex education. It is not only about politics but also has strong links to morality and values (MacKenzie, Hedge, and Enslin, 2017). The needs of adolescents' growth have not previously been met by one-sided, physiologically based sex education (MacKenzie, Hedge, and Enslin, 2017). Furthermore, sexism is a global and historical issue (Mella, 2022). Gender discrimination is considered to be a factor that leads to lower performance and limits potential in social systems and organisations (Mella, 2022). Social efficiency is always perceived as anti-liberal and anti-humanitarian, but in reality it is not, and efficiency and social justice, which is the public good, are mutually reinforcing (Knoll, 2009). Encouraging gender equality and recognising gender diversity

can increase the efficiency of organisations and societies (Mella, 2022). On the other hand, for individual adolescents, having a more autonomous mind can help them to better fulfil their lives. Human rights-based sex education is one way to address this issue (Campbell, 2016). This is because sex education can promote the rights of groups that are discriminated against, such as women and lesbian, gay, bisexual, transgender and queer (LGBTQ) groups (Campbell, 2016). Prior sex education can further entrench traditional gender roles (Campbell, 2016). Comprehensive sex education, on the other hand, allows adolescents to understand the essence of sexuality through a comprehensive and scientific transfer of knowledge. Adolescents who then receive comprehensive sex education gain a new understanding of gender and grow up with the freedom to choose their own gender roles. The autonomy of adolescents to respect others and themselves will lead to a decrease in gender discrimination and a reduction in gender-based violence and abuse (MacKenzie, Hedge, and Enslin, 2017). This is good not only for the personal growth of teenagers, but also for the long-term and stable growth of society as a whole.

Social efficiency has long been a concern to educators. Over the last century, sociologists, philosophers, and educationalists have argued that the goal of schooling is social efficiency (Knoll, 2009). While Dewey suggested that education should also focus on the native capacities of adolescents to better participate in social affairs (Dewey, 1980), for example, if there is gender discrimination in a society, then a person is not able to achieve his or her maximum personal potential in his or her position, which makes society less efficient. A gender perspective embedded in comprehensive sex education can improve this situation. Through the long development of social reconstructionism, education has not only had the role of promoting political and economic efficiency, but education has also derived the role of promoting social equality and human progress (Knoll, 2009). Sex education in schools is obviously not a curriculum that teaches test-taking in the traditional sense, but comprehensive sex education also falls under the category of efficiency, which is moral in dimension and idealistic (Knoll, 2009). As such, comprehensive sex education is capable of contributing to the stable development of

human society. Around the world, countries have encountered opposition and challenges from various quarters in the implementation of school-based sex education policies (Campbell, 2016). In Western countries, for example, sex education has suffered opposition from religious and conservative ideologies. Sex education policy in the UK, for example, reserves the right for parents to opt their children out of sex education (Vanderbeck and Johnson, 2015). The difficulties in implementing sex education in schools are, on the one hand, religious and cultural, and on the other hand, lie in the difficulties which school educators encounter in the actual teaching process. For example, the issue of teachers teaching the sex education curriculum and the issue of teaching materials (Bragg *et al.*, 2021). In China, the development of sex education has lagged very far behind. It is only in modern society that some scholars and educators have realised the importance of comprehensive education. However, due to China's traditional culture and social structure, sexuality education is not openly discussed (Zhao *et al.*, 2020). Chinese educators involved in sex education can be broadly categorised into three types. The first is educators who adhere to the traditional gender binary of Chinese society (Zhao *et al.*, 2020). The second variety of teacher is those who advocate the inclusion of gender and rights in comprehensive sex education (Zhao *et al.*, 2020). The third group is somewhere in between the first two, which attempts to implement comprehensive sex education in an implicit way (Zhao *et al.*, 2020). These groups of educators themselves affirm the role of gender and rights in sex education. However, they do not see the need to change China's current social structure and ideological culture (Zhao *et al.*, 2020). It is clear that the thinking and practices of the second group of sex educators are in line with international sex educational developments. Moreover, their thinking is influenced by Western culture (Zhao *et al.*, 2020). This is one of the reasons why this paper attempts to find a direction for the advance of sex education in China through the experiences of the UK, USA, and Australia.

On the one hand, comprehensive sex education that emphasises gender and rights contributes to the physical health of adolescents, for example by reducing the rate of

teenage pregnancy (Haberland and Rogow, 2015). On the other hand, the gender equality and rights components of comprehensive sex education with an emphasis on gender and rights contribute to adolescents' well-being and equity and justice in society (Haberland and Rogow, 2015). These components align with the Sustainable Development Goals (SDGs) announced by the United Nations in 2015 (UN, 2015). The development of comprehensive sex education promotes adolescents to grow up in an environment of dignity and equality and reduces the spread of sexually transmitted diseases. Both align with the UN Sustainable Development Goal of successfully realising personal potential (UN, 2015). The inclusion of LGBTQ groups in comprehensive sex education is in line with the UN Sustainable Development Goal of focusing on vulnerable groups (UN, 2015). This shows that the development of comprehensive sex education is important and is the right direction for the development of human society.

The issue of sex education is related to students' physical and mental health and the formation of their values. Students, as the future workforce of society, have an important impact on the development of both families and society. The family significantly impacts the development of sexual values and understanding in children and adolescents, and a lack of parental knowledge and awareness is a barrier to the implementation of sex education (Buston, Wight & Scott, 2001). Nevertheless, the scope of this paper is school-based sex education. Therefore, Bourdieu's theory, social efficiency theory, and social reconstruction will be addressed in this essay. A comparative framework will be constructed and appropriate comparative indicators will be selected. The comparative framework will be used to compare sex education initiatives in the UK, USA and Australia and to analyse their commonalities and differences. There are two reasons for choosing these three countries. Firstly, all three countries were early adopters of sex education in the world. Secondly, the abstinence-based sex education policy in the USA is similar to that in China, but different from that in the UK and Australia. This is followed by suggestions for reforming sex education in China, considering the views and beliefs of Chinese society.

1.1 Purpose of the Dissertation

This paper aims to make policy recommendations for the further development of sex education in China. The research questions are the differences and commonalities between sex education policies in the UK, the US, and Australia; a discussion of the barriers to providing sex education for adolescents; and the content of sexual ethics and gender equality in comprehensive sex education. Comprehensive sex education in China is currently in its infancy and the conservative ideology and culture of China is still deeply rooted in society. Therefore, this paper is intended to provide ideas and directions for the future development of comprehensive sex education in China through comparisons with other countries.

1.2 Structure of Dissertation

In the literature review section, the essay will describe the history of the development of sex education policies. In the methodological section, the essay will construct a comparative framework to compare the sex education policies and practises of the three countries, followed by an analysis of the implementation and results, and identify the areas for correction and the areas for learning from the development of sex education in each country. In the section on policy recommendations, reasonable ideas are given in the context of Chinese culture, especially Confucianism.

1.3 Personal motivation

Before conducting my research, I had the impression that sex education in China was underdeveloped, and even in its initial stage. Growing up, I did not receive a full sex education. When I was in junior high school, there was a health education course, but this course did not teach anything substantial. Teachers often even glossed over it by playing films in class. Not to mention teaching us about sexual morality and gender equality. However, as I matured, I realised the importance of learning about sex education for a person's growth. In particular, after undergoing a master's programme, it gave me a deeper

understanding of education policy and equity. This led me to want to study the application and effects of sex education and gender equality in educational policy.

2 Literature Review

2.1 Background and context

The development of sex education therefore plays an important role in improving the quality of the workforce and maintaining social stability. Throughout the world, numerous countries are implementing, or have implemented curricula and programmes related to comprehensive sexuality education. Both traditionally developed and developing countries have made many explorations and efforts in the field of sex education and have made certain developments and progress, and it has become a global consensus to provide comprehensive sex education. In 2009, UNESCO, together with the Joint United Nations Program on HIV and AIDS, the United Nations Population Fund, the United Nations Children's Fund, and the World Health Organization, released the first edition of the International Technical Guidance on Sexuality Education (hereinafter referred to as "the first edition"). Haberland and Rogow argue that Comprehensive Sexuality Education (CSE) CSE policies are most effective when they emphasize gender and rights perspectives. The empowering approach used in CSE allows adolescents to have the right to maintain their physical and mental health (Haberland and Rogow, 2015). Santelli *et al.* argued that the abstinence-until-marriage policy and program in the United States is ineffective and that it has even made people identify more with traditional gender identities. They argued that to preserve the sexual health of adolescents, one should first respect human rights, and not subject LGBTQ people to exclusion (Santelli *et al.*, 2017). In the UK, Forrest *et al.* used the methods of a randomised Intervention Study of Pupil Peer-led Sex Education, a controlled, random experiment, which they then evaluated the effectiveness of (Forrest, Strange, Oakley, and RIPPLE Study Team, 2004).

UNESCO (2018) refers to comprehensive sex education (CSE) as follows:

".... a curriculum-based process of teaching and learning about the cognitive, emotional, physical and social aspects of sexuality. It aims to equip children and young people with knowledge, skills, attitudes and values that will empower them to: realise their health,

well-being and dignity; develop respectful social and sexual relationships; consider how their choices affect their own well-being and that of others; and, understand and ensure the protection of their rights throughout their lives.”

Comprehensive sex education not only promotes the physical health of adolescents but also benefits their psychological and moral aspects. It conveys to adolescents' ideas such as respect for themselves and others, as well as gender equality (UNESCO, 2018). This dissertation focuses on the impact of sex education policies on adolescents' psychological and moral dimensions.

The issue of legislation on sex education as a political tool has been a hotly discussed topic in the international community (Thorogood, 2000). Sex education is controversial, and government policies vary from country to country. Comparative policy analysis can clarify the different measures in different countries, which allows researchers to understand how the effects of different policies differ (Panchaud *et al.*, 2019). Such analysis can also highlight the gaps in current research in the field and point to key directions for further research (Panchaud *et al.*, 2019). Through this method, sex education policies are constantly being improved, contributing to the physical and psychological health of adolescents (Weaver, Smith, and Kippax, 2005). Thorogood (2000) suggests that sex education can be divided into two categories: "restricted" and "liberal" (Thorogood, 2000). He argued that the division between these two models reflects a country's approach to the relationship between state regulation and individual freedom (Thorogood, 2000). There has been much research into the different effects of different sex education.

Weaver, Smith, and Kippax surveyed statistics on sexuality education in four countries in 2005. They concluded that sexual health-related statistics were better in France, Australia, and especially the Netherlands, than in the United States (Weaver, Smith, and Kippax, 2005). The common feature of the former is the adoption of pragmatic and proactive

sexuality education policies, while the US has adopted policies based on sexual abstinence (Weaver, Smith, and Kippax, 2005). As can be seen, Weaver, Smith, and Kippax's findings are in favour of liberal positive sex education policies, and they argue that abstinence-based policies do not necessarily have a positive effect on adolescents' sexual health (Weaver, Smith, and Kippax, 2005). Lewis and Knijn (2002) analysed the differences in sex education policies between the UK and the Netherlands by comparing teenage pregnancy rates in the two nations (Lewis and Knijn, 2002). Unlike other authors, Lewis and Knijn argued that it is much more important to explore the differences and nature of sex education in context than to copy any one country's policies (Lewis and Knijn, 2002). While the discussion surrounding sex education in the UK has never ceased, the Netherlands, with the exception of some conservative religious figures, is almost always able to come to a consensus (Lewis and Knijn, 2002). Their research found some conceptual differences between the two countries, and the resulting different approaches revealed different understandings of the issues. In their 2017 study, Denford, Abraham, Campbell, and Busse comprehensively examined and analysed assessments of school-based sexual health and relationship education (SHRE) initiatives (Denford, Abraham, Campbell, and Busse, 2017). Their findings were similar to those of Weaver, Smith, and Kippax in 2005. However, the subtle difference is that Denford, Abraham, Campbell, and Busse's study concluded that abstinence-only measures in schools are ineffective in promoting healthy sexual behaviour among adolescents. Both studies concluded that comprehensive positive school interventions, such as those specifically targeting HIV prevention, were effective in improving adolescents' lack of knowledge, risky sexual behaviour, etc. (Denford, Abraham, Campbell, and Busse, 2017).

Thorogood's (2000) analysis of changes in sex education policy in England and Wales concluded that although the original intention of empowering sex education was to be inclusive of heterosexual family standards, this liberal sex education was not explicitly liberating or resistant. Noteworthy is the fact that Thorogood (2000) divides the models of sex education in his study into a restricted information model and a liberal model.

Restricted information is commonly used and refers to the transmission of moral concepts to adolescents through the teaching of sexuality (Thorogood, 2000). Society usually requires this morality and it is not freely chosen by adolescents. Under the guise of objectivity, it indoctrinates adolescents with a traditional and narrow ideology (Thorogood, 2000). In contrast the liberal perspective views empowerment as a kind of opposition against the prevailing form. This study by Thorogood (2000) differed from the previous ones in that it focused on the effect of sex education programmes on adolescents' ideologies and morals. Panchaud *et al.* (2019) analysed the policy environment in four low-income countries through a study of Ghana, Peru, Kenya, and Guatemala on the current state of school-based sex education policies. Their study is clearly a new perspective on sex education policy. However, the conclusions they draw are similar to those of other scholars. Through their analysis, they discovered that for the current school-based sex education policies in Kenya and Ghana, while there are supportive contexts, they do not have a fully defined sex education (Panchaud *et al.*, 2019). This is because both countries focus primarily on teaching adolescents about the biological aspects of sex (Panchaud *et al.*, 2019). In contrast, the sex education policies of Peru and Guatemala, while focused on rights and gender, are still lacking in practices (Panchaud *et al.*, 2019). From this, it can be seen that comprehensive sex education policies around the world tend to include rights and gender equality education. Nelson and Martin (2004) analysed sex education in the UK, the US, and Australia between 1879 and 2000, and in their book, they also touched on the topic of gender education and rights. Trudell (2017) focused on the sex education classroom of Mrs. Warren, an American teacher. In his book, Trudell (2017) stated that Mrs. Warren did not mention controversial content such as abortion and homosexuality in her classroom, while her students stated that content about homosexuality should be included in the school classroom. Trudell (2017) also noted that the needs of the student body who identified themselves as gay, lesbian, or bisexual could not be addressed in the sex education classroom at that time. Based on early American educational policies of sexual abstinence, Trudell's book portrays the real dilemma of sex education in the United States at the time.

Although the approaches and perspectives of scholars on sex education policy vary, it is clear from the findings of the various studies that the direction of sex education is encompassed in a comprehensive liberal sex education policy. In addition, liberal policies do not necessarily lead to increased sexual activity for young people; they can even teach adolescents about good sexual health skills. Analysis has shown that the acceptance of adolescent sexuality promotes adolescents' correct attitudes towards sexuality and the maintenance of their sexual health to a certain extent, but abstinence-based sex education does not (Weaver, Smith, and Kippax, 2005).

According to recent studies, comprehensive sex education policies are more likely to promote adolescents' sexual health than abstinence-based sex education policies. Many scholars have focused on the issue of gender education in sex education.

2.2 Who is responsible for Sex Education?

Sex education concerns many aspects of our lives besides sex (Nelson and Martin, 2004). In his own report, the American Surgeon General, Satcher, called for equal opportunities in sex education through detailed classroom instruction (Satcher, 2001). In Satcher's report, there has been a heated debate about how much responsibility schools and parents should take for the sex education of young people (Nelson and Martin, 2004). Firstly, according to Bourdieu's theory of cultural capital and social reproduction, sexuality education is influenced by cultural capital just like any other curriculum that adolescents receive. Families in the upper class are likely to be more focused on the overall development of their students. As a result, children from upper-class families will have greater access to sexual health information than children from lower- and middle-class families. However, because social and cultural trends influence sex education, families may teach students less about the moral aspects of sexual health than about physical aspects. For these reasons, sex education taught in the school classroom is important. Secondly, the issue of equality of educational opportunities mentioned here is inextricably

linked to the concept of inclusive education. The concept of inclusive education has been around for decades and can be summarised simply as the elimination of discrimination and the belief that all children should be educated in mainstream schools (Terzi, 2014). This concept has been controversial, but it is indeed an idea that upholds social justice and promotes progress in education. Therefore, sex education ought to be covered in schools as part of the regular curriculum, and knowledge about sexual health should be taught to all adolescents.

2.3 Sex education and gender

The idea of inclusive education or equality should also be taught to all adolescents who are being educated. Gender is a key element in sex education. Sex and gender are mutually supportive and influential (Seidman, 1992, p. 132). Whereas traditional thinking holds that gender is biologically assigned, feminist thinking holds that gender is socially constructed and can be changed (Measor, 1996). In the past, people were socially "conditioned" from childhood to conform to a socially acceptable image. From early childhood, there were differences between masculine and feminine expectations in terms of toys, dress, and behaviour; girls' toys were static dolls such as rag dolls; girls' behaviour was expected to be quiet and demure; and parents deliberately cultivated a "submissive, quiet, and cooperative" temperament in girls. This is not a biological trait but the result of an acquired cultural upbringing. Furthermore, the main characters in textbooks are usually men, with women being in supporting roles. The theme of male domination has also been discussed by Bourdieu, who argues that the main reason for the persistence of this phenomenon is the habit of gender (Lovell, 2001).

There has also been some research on sex education and gender. Children of different genders should be taught about sexual health separately in the early years, based on their different responses to sexuality education. Measor (2004) used data analysis and interviews to understand the different ways in which boys and girls receive sexual health information.

Some scholars have concentrated on the part gender plays in sex education. Szirom's (2017) work provided an in-depth analysis and solution to the relationship between gender creation and sex education in schools. Szirom argued that the link between gender stereotypes and sociocultural understandings of sexuality was not addressed. Szirom believed that an important problem in the early stages of socialization is the inability of children to distinguish between natural and social constructions, and that gender is solidified in this social environment. But the aim of sex education should be to show adolescents the diversity of society and to teach them that these differences are reasonable and freely chosen. In their study, Gelman and Taylor (2000) illustrated the relationship between essentialism and children's gender cognitive development.

Liben (2015) examined the inequity of gender in education, with some girls not enjoying the same education as boys. McNamara, Geary, and Jourdan's (2011) study pointed to the influence of sociocultural factors on sex education. The reason for the low number of male teachers teaching comprehensive sex education is that some male teachers are reluctant to participate in sex and relationship classes (McNamara, Geary, and Jourdan, 2011). This is linked to their own gender stereotypes (Garfield, Isacco, and Rogers, 2008). The development of sex education in schools has faced significant ideological and cultural issues. Efforts are still needed to address teachers' gender perceptions so that school-based sex education can be well advanced (McNamara, Geary, and Jourdan, 2011). This requires a strong sense of responsibility on the part of teachers to actively resist gender stereotypes. Teachers should set good role models for their students so that they can impart the right knowledge about sex education and continue to deepen their professional identity (Hargreaves, 1994). While citing the influence of teachers on sex education, Elliott (2014) examined how sex educators use neoliberalism in their comprehensive abstinence curriculum. His findings indicated that some teachers in the sex education classroom conveyed ideas of discrimination and inequality in terms of gender and race to students due to their own lack of professionalism (Elliott, 2014). All

of these studies articulated the importance of teachers in the sex education process.

Fields and Payne's (2016) study articulated the inconvenience of LGBT students in school and the fact that they are marginalised, and hoped to draw attention to gender from sex education researchers. Payne and Smith (2013) studied bullying of LGBTQ adolescents in school. Carrera-Fernández, Lameiras-Fernández, and Rodríguez-Castro (2018), through a qualitative study of bullying, concluded that bullying is essentially a fully gendered phenomenon. The prevention of bullying should instead focus on finding the constructed nature of gender using socialization factors to convey to students an equal attitude towards gender and recognition of gender diversity (Carrera-Fernández, Lameiras-Fernández, and Rodríguez-Castro, 2018). This is because bullying can only be prevented by eliminating the perception of inequality and achieving inclusive education (Carrera-Fernández, Lameiras-Fernández, and Rodríguez-Castro, 2018). All of these studies illustrated the lack of inclusion of LGBTQ children in schools and further exemplified the importance of gender equality concepts. Bird *et al.*'s (2022) study showed that reproduction is no longer just about biology, but is also related to sociology, such as sex and gender diversity being socially transmitted. Allen (2013) used both spatial and physical dimensions to explore the ways in which students in a school-created standard heteronormative environment are inhibited from their own positive sexual embodiment. In his book, Fields (2008) argues that the core of school-based sex education should be the promotion of social and sexual justice. Fields (2008) also explicitly stated that accepting sexuality and resisting notions of inequality is a more fundamental aim than, for example, reducing teenage pregnancy rates. Ferfolja and Ullman (2017) examined Australian parents' views on gender and sexual diversity, and the results were that parents were not purely supportive. Ferfolja and Ullman (2017) argued that adolescents in all contexts have the moral right to be informed to the full extent because they are independent people. While parents in Australia have the choice to not expose their children to sexual health, doing so violates the right of all children to be able to receive a well-rounded education (Ferfolja and Ullman, 2017). Elliott (2016), through a review of

high schools in the Midwest of the United States, found that the Queer Perspective is challenging conventional ideas about gender and sexuality in the field of biology. "Queer perspectives have great potential to conceptualize gender and sexuality" (Elliott, 2016). Jones and Hillier (2012) argued that Australia could promote progressive sex education in classrooms to support and protect GLBTIQ students. In Le Mat's (2017) study, there was a novel finding. Despite the increasing focus on gender and power in comprehensive sex education, gender assumptions about students in the actual delivery of lessons result in students receiving only partial information, which allows gender stereotypes to re-emerge on campus (Le Mat, 2017). Sondag et al.'s (2022) study in US high schools showed that sex educators consider sex education with LGBT content to be important, although most students do not find the current sex education curriculum very useful (Sondag *et al.*, 2022). MacAulay *et al.*'s (2022) study argued that when schools restrict sex education or provide one-sided sex education, then schools are complicit in adolescent sexual violence (MacAulay *et al.*, 2022). Bird *et al.*'s (2022) study claimed that sex educators need to be sensitive to the importance of sexual minorities and gender education in addition to having specialist biological knowledge (Bird *et al.*, 2022).

Respect for gender diversity and sexuality is a trend in sex education and world culture. However, in recent years, anti-gender movements have emerged in Europe and around the world as part of a wave of neoconservatism (Venegas, 2022). The anti-gender movement defines relationships and sex education as an ideology rather than as democracy and human rights (Venegas, 2022). This misinterpretation of sex education has become an obstacle to the development of liberal and democratic topics such as gender equality in sex education.

It is the initial aim of this thesis to compare the sex education policies of these three countries in an international context and to find something to learn from them in relation to the promotion of young people's ideology and morality. The reasons for choosing these three countries as examples for comparison are: firstly, the UK, USA, and Australia all

have English as their main language. This supports, in part, their ongoing cultural exchange (Nelson and Martin, 2004). Secondly, American reformers had looked to Europe, particularly Britain, for guidance, and Australia, as a British colony, also received a lot of cultural input from Britain (Nelson and Martin, 2004).

2.4 A Review of the Development of Sex Education in China

In China, sexual education dates back to the Republican era (Aresu, 2009). Jingsheng Zhang, who began advocating sex education as early as 1920, was a pioneer of sex education in China (Dalin, 1994). He believed that sex education was closely linked to good social organization and that such ideas were also progressive in contemporary society (Dalin, 1994). This was followed by Zuoren Zhou and Guangdan Pan, who translated and transmitted Western ideas on sex education to Chinese society (Dalin, 1994). Also in the 1920s, adolescents began to be considered as a target for sex education (Aresu, 2009). This was the beginning of sex education in China.

Between the founding of New China (1949) and 1976, sex education in China did not develop significantly due to the reforms and upheavals in Chinese society (Yu-Feng, 2012). In the 1950s, Zhou Enlai, who was then premier, proposed educating students about sex (Aresu, 2009), thus being the main promoter of sex education during this period. In 1963, Zhou Enlai formally called for an emphasis on family planning (Greenhalgh and Winckler, 2005), and he stressed the need to spread scientific knowledge of sex among young people (Aresu, 2009). In the decades that followed, sex education in China was banned from discussion due to political campaigns in the country. Even materials containing sexual innuendo were taken off the shelves, and contact between the sexes, other than marriage, was not promoted (Larson, 1999). In 1978, the one-child policy was introduced in China (Scharping, 2013). From 1978 to the present, sex education in China has been increasingly mentioned in various policies, and the legal status of sex education in China has been gradually established (Aresu, 2009). After the 1994 International Conference on Population and Development, China gave the

sexual and reproductive health (SRH) of adolescents more consideration (Liu and Su, 2014). In 2008, Chinese Ministry of Education issued a Guide to Health Education for Primary and Secondary Schools, which included a section on sex education, however the section in the guide was only short (Liu and Su, 2014). In 2011, the Chinese State Council promulgated the Outline for the Development of Chinese Children (2011-2020), which specifically integrates sex education into the primary and lower secondary school curricula (Outline for the Development of Chinese Children (2011-2020), 2011). In October 2016, the State Council issued the "Health China 2030" plan, which mentions the topic of sexual ethics ("Health China 2030" plan, 2016).

Sex education in China started later than in some Western countries. Sex education is a missing part of basic education in China. Sex education has only gradually gained attention in the development of Chinese society due to the increasing number of social problems caused by the lack of sex education (Yu-Feng, 2012). Early sex education in China, the same as in the United States, was based on abstinence education, which was a result of traditional Chinese ideology and culture. Sex education in China has developed rapidly over the past few decades while learning from the experiences of other countries (Kuate *et al.*, 2021). In recent years, due to the development of the Internet, more and more Chinese media have reported news about adolescent sexuality (Wu and Dong, 2019). The significance that society attaches to sex education has increased significantly as a result of this. At the same time, Chinese adolescents are becoming more liberal in their attitudes towards sex (Li, King, and Winter, 2009). However, the sexual and reproductive health of adolescents today is not encouraging. After more than 70 years of development, sex education for primary and secondary school students in China is more widely accepted and recognised. However, sex education in elementary and secondary schools is still dominated by "abstinence-based sex education." Like the sex education policies in the UK, USA, and Australia, China's current sex education policy has been a good catalyst for sex education in primary and secondary schools, but these are macro policies. It lacks a more guiding and operational content framework, implementation guidelines, and

evaluation criteria for sex education in schools. Secondly, comprehensive sex education is not widely available in China. The content of sex education in schools focuses on physical health, such as adolescent hygiene. Most sex education is not sufficiently in-depth and comprehensive. Some sex education programmes are incorrect in their orientation at the level of relationships and values, particularly in relation to gender and morality. School sex education does not meet the needs of adolescents, and the negative impact of the sexual knowledge that adolescents are exposed to on the Internet is greater. The heightened sexual awareness and curiosity of adolescents, especially during adolescence, is a critical period in the formation of sexual values and behaviours and a period of great plasticity. The provision of scientific sex education in schools at this time can prevent students' interests from turning to the Internet, which is full of sexual promiscuity, sexual perversion, exaggerated erotic stimulation, and unsafe sexual temptation, which may be detrimental to their physical, mental, and sexual morality. It is worth noting that it is only in recent years that China's sex education policy has included references to sexual ethics and gender equality. Much more needs to be done in China in this area. Firstly, the level of professionalism and progressiveness of the instructors of sex education classes needs to be changed and improved. Instructors of sex education classes need to identify themselves with the ideas of sexual morality and gender equality in order to be able to properly convey these ideas to their students. Secondly, the attitudes of society, especially parents, are also difficult to change. Most parents have not received sex education and are confused about sex education for young people at home. A few parents even hold opposing views on sex education.

In summary, most researchers have chosen to begin their research with sex education policies from the late 1980s. There are fewer comparative studies of modern sex education policies. There is also less research on the impact of sex education on adolescents' awareness of gender equality. Most studies have focused on the physical health of adolescents, such as teenage pregnancy and abortion rates. However, sex education is not just about teaching adolescents about their physical health, but more

importantly, it is about communicating gender equality awareness to them through this.
This has good implications for China's sex education policy.

3 Development of Sex Education Policies of USA, UK and Australia

Since the 1960s, Americans, like Australians and Britons, have often viewed the political aspects of sex education as a partisan issue (Moran, 2003). Politicians consider sex education as a guide to be a powerful and versatile social tool (Nelson and Martin, 2004). Adolescents are often taken advantage of by them (Nelson and Martin, 2004). The following is an overview of sex education policies in three countries: the US, the UK, and Australia.

3.1 USA

In the US, there has been a lengthy tradition of abstinence instruction, and is accepted by most people (Moran, 2003). The period 1880-1920 is when sex education began in the United States and when American society became aware of the role of sex education (Moran, 1996). This was due to the rise of schooling in America during that period and the germ of the idea that controlling the birth rate would be good for society (Tiles, 1999). In 1905, Prince Moreau launched the social hygiene movement in America, which predated moral reform (Huber and Firmin, 2014). In 1912 and 1914, the American Education Association resolve to integrate sex education into the school courses (Huber and Firmin, 2014). School-based sex education in America began at this time.

From 1920–1960, the United States shifted from a eugenics movement to a birth control movement (Huber and Firmin, 2014). In 1922, studies showed that young people in the United States were becoming concerned about sexual morality is deteriorating (Spring, 1992). Planned parenthood of America published the first formal document on sex education in the US.

In 1966, the US Office of Education helped more than six hundred institutions to provide

sex education in the community (Huber and Firmin, 2014). In 1971, Nixon mandated that sex education classes should be included in every public elementary and secondary school (Huber and Firmin, 2014), and continued and funded family planning programmes. In the early 1980s, people discovered HIV as a disease and developed a fear of it because of its incurability and lethality (Balanko, 2002).

In 1996, abstinence-only sex education was mandated by the US Social Security Act, which prohibits both premarital and extramarital sex (Santelli, 2006). The Act encourages abstinence from sexual activity to prevent risks including unmarried pregnancy and the spread of sexual diseases. Students were taught about the dangers of sexual behavior as a means of suppressing the sexual desires of adolescents (Santelli, 2006). During this time, the US government mandated abstinence education as the only way to avoid physical and psychological harm (Weaver, Smith, and Kippax, 2005). This also helped to break the cycle of poverty as government funding was provided to states based on the amount of child poverty (Huber and Firmin, 2014).

George W. Bush decided to provide the same amount of funding for different models of sex education, and in 2002, community-based abstinence education began in full force (Huber and Firmin, 2014). Since then, the Abstinence Plus concept, with contraception as the main ideology, was born (Huber and Firmin, 2014). During his presidency, President Obama recommended the abolition of abstinence education in favour of a greater investment in comprehensive education, although it was not considered to be entirely comprehensive (Huber and Firmin, 2014). The sex education guidelines available in the United States include the Comprehensive Education Guide, it was published by the Sexuality Information and Education Council of the United States (SIECUS) in 1991 and revised for the second time in 2004 (Kantor and Lindberg, 2020). In 2011, the Future Sexuality Education Initiative published The National Sexuality Education Standards (Kantor and Lindberg, 2020).

Sex education policy in the US can be summarized as a slow shift from abstinence-based education to comprehensive sex education. This is characteristic of American sex education and is also related to the country's own politics and culture.

3.2 UK

Health education and the National Curriculum in England emerged at the same time in the 1870s (Board of Education, 1930, p. 37). Until the establishment of the School Medical Service in 1908, health education for children in British schools was expanded to include medical and sport based education (Harris, 1995). Despite the controversy surrounding sex education during this period, some guidance on sexual health issues emerged (Pilcher, 2005). For example, instruction on sex education also appeared in the curricula of some fee-paying boarding schools and public schools, and in some cases, not only in the health classes (Pilcher, 2005). However, the London Assembly, held immediately afterwards in 1914, rejected the proposal on sex education for adolescents (Mort, 1987). During this period, school-based sex education remained poorly understood by the general public and may even have been resisted due to the controversies surrounding the physical aspects and sexual morality in the development of health education. Such controversies are also a conflict of interest between various groups (Pilcher, 2005).

In 1914, the Central Government Board of Education adopted a programme to support evening classes for parents on "sexual hygiene," hoping to clarify the importance of parents in the sexual education of adolescents (Hall, 2004). Subsequent public fears of an STD epidemic led the British government to embrace sex education and fund the National Council to Combat Venereal Diseases (NCCVD) to work with parents and schools on sex education (Pilcher, 2005). The NCCVD encouraged lectures on sex education during this period, but the content of the teaching was not clearly defined (Pilcher, 2005). The first official guidelines for the dissemination of general health instruction were issued by the central government in the UK in 1928, but in fact, the content of school-based sex

education did not appear in the guide until 1940 (Pilcher, 2005). In 1943, the British Council for Education published *Sex Education in Schools and Youth Organizations* (hereafter referred to as *Sex Education*). In it, the BoE recommended that biology be included in the sex education curriculum, but not overly so (Board of Education, 1943, p. 8). Sex education also proposed that the scientific approach was to educate adolescents about sexuality as soon as they became aware of it, rather than waiting until the conventional age of 13 (Board of Education, 1943, p. 9). Sex education conveyed the idea that sex was negative (Board of Education, 1943, p. 1-2). It argued that sexuality had moral and social implications and could even have destructive tendencies (Board of Education, 1943, p. 1-2). The *Health Education Handbook's* fourth edition was released in 1956, in which terms such as sex and menstruation could already be discussed explicitly and generously (Pilcher, 2005). By 1960, sex education had moved from being a word that was avoided to occupying a significant amount of space in health education guides. (Pilcher, 2005).

In the 1970s, the central government in the UK recognised the complexity of sex education in schools and attempted to provide specialist sex education expertise directly to schools everywhere, such as the Family Planning Association (Meredith, 1989, p. 77). At the same time, during this period, manuals acknowledged that sex could be pleasurable and also included a small number of questions about sexual morality (Pilcher, 2005). In the years between 1980 and 1990, when the Conservative Party was in power, the British government used sex education in schools to teach family values to adolescents, in the hope that this would counteract family breakdown and promote marriage (Lewis and Knijn, 2002). At the same time, however, there was no mention of homosexuality or respect for difference in Britain (Lewis and Knijn, 2002). The policies of this period were contradictory. In 1988, the British government adopted a policy banning the transmission of homosexuality (DoE, 1988), and in 1993, MPs removed the reference to AIDS from school textbooks in light of the reference to anal sex. In the same year, knowledge about homosexuality was still denied to teenagers in the UK, despite the fact that many people

were infected with AIDS (Lewis and Knijn, 2002).

By 1997, the marriage initiation rate had fallen sharply to 35.6 per 1000 people aged 16 and over, while the rates of cohabitation and out-of-wedlock births had risen sharply (Lewis and Knijn, 2002). In the UK, a specific curriculum guide for sex education was published in 2000, and the name was changed from 'sex education' to the more descriptive 'sex and relational education'. This guide expanded the content of sex education to include sexual ethics in addition to physical health. In 2019, the UK government released new guidance – the Relationships Education, Relationships and Sex Education and Health Education Regulations (Long, 2019). The policy directs schools to include in the curriculum how adolescents can deal with issues such as online safety and unhealthy relationships (Long, 2019; Department for Education, 2019).

3.3 Australia

In 1967, the New South Wales Department of Education decided to include sex education in the middle school curriculum (Weaver, Smith, and Kippax, 2005). This meant that sex education was officially part of schooling in NSW (Weaver, Smith and Kippax, 2005). With this one example, all the other states went on to incorporate school-based sex education into their policies over the coming ten years (Weaver, Smith, and Kippax, 2005).

The emergence of the AIDS crisis in the middle of the 1980s led to a greater public interest in sex education (Weaver, Smith, and Kippax, 2005). As a result, the need for sex education became stronger and more urgent, and schools proposed major changes to the delivery of sex education (Weaver, Smith, and Kippax, 2005). With the advent of AIDS, sex education became more important in Australian society, and consideration of comprehensive sex education followed (Mitchell *et al.*, 2000, p. 23). In the late 1990s, through a variety of studies, the Australian Federal Department of Health and Family Services created a national guide on sex education (Weaver, Smith, and Kippax, 2005). This policy is not only concerned with school-based education but also with the

perceptions and views of adolescents in relation to sexuality (Weaver, Smith, and Kippax, 2005). During the 1990s, the attention paid to elements such as equity and justice in Australian sex education declined (Shannon, 2022). However, after 2000, inclusive sex education returned to the public consciousness (Shannon, 2022). The Australian National Curriculum's Health and Physical Education (HPE) section covers contemporary Australian sex education, which emphasises elements of diversity and equality but has no practical guidance on this (Shannon, 2022).

4 Methodology

Sex education is not fixed and immutable. Sex education is an evolving concept that reflects and changes social mores about gender, race, sex, and social class (Moran, 2002). Mis-modelled sex education is itself a source of sexual corruption. Therefore, in this section, I have constructed a comparative framework to compare and contrast measures of comprehensive sex education in the three selected countries (UK, USA, and Australia).

4.1 Selection of comparative indicators:

Funding: Funding is a very important component. It reflects the importance that the government attaches to comprehensive sex education. It is also a reflection of the public's attitude towards comprehensive sexuality education.

Legislation: The legislation also indicates the model of sex education chosen by the government, whether it favours abstinence-based sex education or comprehensive sex education.

Research by professional teams: the comparison here is whether a country has a dedicated institution and professional staff to research and guide the development of sex education.

School practices: School practices give an indication of the implementation of a country's sexuality education policy.

Acceptance/effectiveness: the effectiveness of sex education policies can be reflected one-sidedly in terms of student and social acceptance. Furthermore, understanding adolescent's perspectives is crucial in raising the standard of sex education in improving the quality of sex education (Pound, Langford, and Campbell, 2016).

Attitudes towards LGBTQ groups: this gives an indication of how inclusive a country's sexuality education is.

4.2 Research design and justification

Regarding this qualitative research, I have developed a comparative framework. Research and comparison of school-based sex education policies could disclose information about attitudes and measures of different governments towards sex education issues as well as the socio-cultural acceptance of sex education in different countries (Weaver, Smith, and Kippax, 2005). Comparing sex education policies in different countries can provide feedback and new ideas for researchers, educators, and policymakers. There is research in this area of sex education in various countries worldwide, but nothing develops smoothly, and it takes a long time of exploration and trial and error. I chose the comparative framework partly to study the experiences of other countries in the development of sex education and partly to examine the differences between sex education policies in these countries and the barriers they encounter. The policies I have chosen are those that are relevant to the indicators I have selected. Most of the specific policies I have chosen are those that the Ministry of National Education has introduced in relation to sex education, but they are named differently in each country.

4.3 Research Aims and Questions

This study aims to analyze the development of sex education in three countries—the UK, the USA, and Australia—through a comparative framework. The study compares the three nations' similarities and contrasts and analyses the strengths and weaknesses of the evolution of sexual education in each nation. This will identify what China can learn from and propose suggestions for improving sex education in China. The research questions are the barriers to providing sex education for adolescents and the inclusion of sexual ethics and gender equality in comprehensive sex education. Two of the indicators that I have selected in the comparative framework; school practices and attitudes towards LGBTQ groups, can reflect to some extent the issue of gender equality.

4.4 Ethics section

In the qualitative study of this article, the research relied heavily on a literature review. Bourdieu proposed habitus, which argued that one's thoughts and behaviours are influenced by the social environment in which one lives and the culture one receives (Khanal, 2021). In this paper, the researchers and the authors of the chosen references will also be unconsciously biased toward their own habits. This will lead to a certain lack of rigour and scientific rigour in my research and analysis. For example, in selecting policies and literature, I may unconsciously choose what is relevant to my topic, but this approach is incomplete.

4.5 Strengths and weaknesses of approach section

Strengths: A comparative framework has been developed and analyzed. The issue of gender equality is addressed and reflected in the comparative framework. In this study, I have analyzed the strengths and weaknesses of each country's sexuality education after comparing similarities and differences, so that it can be used as a reference for sex education in China.

Weaknesses: The indicators selected in the comparative framework were decided by me after doing a literature review and may not be very scientific. The discussion of policy aspects is not very comprehensive and specific.

5 The Findings

Throughout the comparative framework, I have chosen six indicators. They are funding, legislation, research by professional teams, school measures, acceptance and effectiveness, and attitudes towards LGBTQ group. The following content is a comparison and analysis of them.

5.1 Funding

In the USA, the federal government started two programs. One is the Personal Responsibility Education Program (PREP), and the other one is the Teen Pregnancy Prevention Program (TPP) (Mark and Wu, 2022). They both provide funding for sex education, but for different audiences (Mark and Wu, 2022). The former provides funding for the state and the latter for the county (Mark and Wu, 2022). During the Trump administration, a large amount of the funding was redirected to programs focused on abstinence (Leung *et al*, 2019). In the UK, the government does not invest in sex and relationship education on a continuous basis. In Australia, the government funds some social institutions such as the Safe Schools Coalition (SSC) (Grant and Nash, 2019). In terms of funding, all three governments - the UK, US and Australia - provide funding for sex education. However, one problem they all have in common is that government funding for sex education is not continuous for political reasons, and there is a risk of funding being reduced and withdrawn. This is also connected to the controversial nature of sex education.

5.2 Legislation

In the US, in 1991, SIECUS (Sexuality Information and Education Council of the United States) released the Guide to Comprehensive Sex Education: Grades K-12, the first national policy on comprehensive sex education in the United States (Bordogna, 2022). In 2012, the US released the Future of Sex Education Initiative [FOSEI] Standards for

Sex Education document (Future of Sex Education Initiative, 2012). The Future of Sex Education (FoSE) was developed by SIECUS in collaboration with Advocates for Youth and Response. They also released the National Sex Education Standards (NSES) in the same year, and the NSES was updated after eight years in 2020 and backed by almost half of individuals (Bass and Coleman, 2022). In the UK, the Education Act devolved responsibility for sex education from the state to individual LEAs and schools in 1986. The National Curriculum for Science was revised in 1992 (Scott and Thomson, 1992), and the Education Act of 1993 legalised sex education as part of the right to education. And all references to sex were removed from the statutory national curriculum. Parents could choose where their children would receive or not receive sex education, but students could not withdraw from relationship health education (Wilder, 2022). In 2019, the UK government published new guidance—the Relationships Education, Sexuality and Gender Relations Education and Health Education Regulations. Amendments to the Children and Social Work Act confirm that every school is required to have its own sex education policy and that it will become a legal requirement in 2020 (Farrelly, Barter, and Stanley, 2022). In Australia, the Australian Curriculum, Assessment and Reporting Authority (ACARA) created a national curriculum adapted to the primary and middle school in 2008 in order to prescribe standard teaching methods (McKay, Vlazny, and Cumming, 2017). This is the first curriculum to include sex education materials at a national level (Ezer, Jones, Fisher, and Power, 2019). In terms of legislation, all three countries have government-issued comprehensive education policies, and although the US is biased towards abstinence-based education, the latest US sex education policy tends towards comprehensive sex education. This shows that a national sex education policy is essential. However, the US sex education policy is wavering, while the UK and Australian sex education policies are also influenced by politics and religion but are overall based on comprehensive sex education.

5.3 Research by professional teams

In the US, they have the Centers for Disease Control and Prevention's (CDC) Division of

Adolescent and School Health (Brindis, 2022), as well as the Sexuality Information and Education Council of the United States (SIECUS) (Huber and Firmin, 2014). In the UK, they have the Sex Education Forum (1987), the Family Planning Association and the Department of Health Education (Iyer and Aggleton, 2015). In Australia, they have a multisectoral professional group that developed the 2008 National Curriculum for Sex Education in Australia (Collier-Harris and Goldman, 2017). In terms of professional teams/institutions, the UK, US, and Australia all have dedicated institutions and organizations that conduct research on sex education. This suggests that sex education is an evolving curriculum and that research by specialist agencies and organizations can contribute to the improvement of a country's sex education framework.

5.4 School practices

In the US, currently, each state in the United States has its own sex education policy, which leads to different sex education curricula in each school. In the UK, since 1986, primary schools in England have needed to create their own comprehensive sex education policies (Scott and Thomson, 1992). The perceived competence of school policymakers themselves determines the quality and scope of a school's sex education policy (Wilder, 2022). Britain's public elementary schools likewise adhere to the national curriculum (Farrelly, Barter, and Stanley, 2022). Statutory guidance provides for areas such as stereotypes and relationships to be covered in the national curriculum (DfE, 2019). In Australia, ambiguous national guidance has led to inconsistent school sex education curricula in Australia (Mitchell *et al.*, 2011). In terms of school-based measures, the specific methods of implementation vary between the three countries. For political and cultural reasons, different states have adopted different sex education policies, which has resulted in American adolescents receiving different sex education curricula depending on the state in which they live. Abstinence-based policies, abstinence-based comprehensive sex education policies, and fully comprehensive sex education policies are the three types of sex education curricula. While the US has an abstinence-based policy, in the UK and Australia, sex education policies recognize the sexual activity of

adolescents (Weaver, Smith, and Kippax, 2005). And they argued that sexual responsibility and sexual abstinence are quite different (Weaver, Smith, and Kippax, 2005). In the UK, schools are autonomous in determining their own sex education policies. In Australia, the school sex education curriculum is developed and taught with reference to the national sexuality education curriculum set by the Australian government. What all three countries have in common is that the government has an unspecified set of national sex guidelines. In all three countries, the sex education curriculum is not sufficiently professional in terms of teachers, length, and inclusiveness. This shows that the implementation of sex education needs to be clearly guided by the state, otherwise it will become chaotic and disorganized, which will lead to poor results in sex education.

5.5 Acceptance/effectiveness

In the US, most adolescents and parents prefer comprehensive school-based sex education. In the UK, the majority of British adolescents are unable to accept their own teachers teaching a comprehensive sex education curriculum (Pound, Langford, and Campbell, 2016). In Australia, adolescents in Australia are more likely to be taught about sex topics in school (Ezer *et al.*, 2019). In terms of acceptance of sex education programs, adolescents in the UK, USA, and Australia all prefer comprehensive education and prefer to learn about it at school. In the UK, adolescents show a need for boundaries in their access to sex education. This provides new challenges for the good use of sexuality education in schools.

5.6 Attitudes towards LGBTQ groups

In the US, twenty-two states in the United States have sex education policies that address content related to LGBTQ adolescents (Garg and Volerman, 2021). These policies are classified as inclusive, discriminatory, or neutral. In the UK, LGBTQ adolescents in the UK are often subjected to being bullied in schools (Llewellyn and Reynolds, 2021) and are a marginalized population. However, in recent years, the UK government has been interested in changing this and has undertaken a number of affirmative action campaigns

(Llewellyn and Reynolds, 2021). In Australia, LGBTQ adolescents in Australia are marginalized in sex education, with teachers rarely mentioning the content (Ullman, 2014). However, there is a general lack of sex education in schools for LGBTQ students (Grant and Nash, 2019), and students are eager to be respected and to learn about relevant sex education. In terms of attitudes towards LGBTQ people, the LGBTQ adolescent group is marginalized in all three countries. There is also little mention of LGBTQ people in their sex education policies. Australia's Safe Schools Coalition (SSC), for example, offered a range of optional programs for schools to support the LGBTQ adolescent group in 2016, but was strongly opposed by conservatives (Grant and Nash, 2019). But the principle of gender equality requires comprehensive sex education to be inclusive. And to improve the quality of comprehensive education, these taboos and sensitivities must be confronted (Le Mat, 2017). It follows that sex education in the UK, US, and Australia still has a lot of work to do in relation to the LGBTQ adolescent group. School policies could be revised in relation to gender bias. Sex education teachers could be trained in ethics and could employ LGBTQ people as sex education teachers. To foster a positive school climate, the curriculum might address topics like same-sex desire and permit open discussion of same-sex and transgender issues in both elementary and secondary schools (Ullman, 2014). This can help them to be aware of issues of gender assumptions and prejudice and to learn that the sex a person is born with is not indicative of their social gender.

There is still a room for development regarding ethics and gender equality in sex education. Of course, a policy document is not simply a statement of values; it represents a much more complex negotiation and compromise. Sex education has become controversial because it is about sex, relationships, and morality. Considered from another perspective, a country's sex education policy represents only a socially acceptable idea or vision of what is good at the moment (Thorogood, 2000). Policy is not the only path to civilised social norms, yet it can be used to endorse particular social behaviours (Thorogood, 2000). With regard to the study of educational policy and social development,

people are always slowly mapping their way towards the ideal society.

6 Discussion: What can we learn from the comparative framework?

6.1 USA

The quality and wide range of sex education programmes in the United States need to be improved (Brindis, 2022). For example, ongoing training for sex educators requires more funding from the government or relevant agencies (Brindis, 2022). Inadequate funding is also a barrier to the advance of sex education in America (Szucs *et al.*, 2022). More importantly, sex education for adolescents needs to be an ongoing programme so that it can be effective in improving the physical health of adolescents. Also, sex education needs to be longitudinally sustained because it is a topic that continues throughout a person's life (Manning-Ouellette and Shikongo-Asino, 2022). This requires an adolescent development approach to teach adolescents, which is an integrated model (Brindis, 2022). The implementation of this integrated model in the United States is difficult for political reasons (Brindis, 2022). The extent to which the specific implementation of sex education in America fits with individual state policies also needs to be considered. While each state has its own sex education policy and some guidance for local schools, are schools implementing sex education instruction in accordance with the state's guidance? This suggests that a monitoring mechanism is needed for sex education programs in US schools (Tavrow, Schenker and Johnson, 2022). Linking policy and concrete action ensures that all adolescents can enjoy sex education and related health services (Brindis, 2022). This helps adolescents form positive and healthy relationships. There are, of course, problems with the length of the curriculum in US schools and with teachers not receiving adequate professional training (Cummings *et al.*, 2021).

Despite the fact that, currently, the majority of adults in the United States are in favour of sex education in schools (Szucs *et al.*, 2022). Research has shown that sex education policies are different in each state in the US (Garg and Volerman, 2021). In the United

States, abstinence-based comprehensive sex education, abstinence education, and comprehensive sex education are all present (Garg and Volerman, 2021). This has the effect of differentiating the sex education received by adolescents in the United States. Inconsistent and prejudiced school-based sex education regulations exist in America, especially when it comes to LGBTQ issues (Garg and Volerman, 2021). The acceptance of LGBTQ people's perceptions about sex education posts facilitates the development of relevant concepts in sex education (Garg and Volerman, 2021). The United States needs a national standardized sex education policy, though this is difficult.

6.2 UK

A school-based sex education policy should transmit some moral values to adolescents. But what constitutes the correct morality is debatable. In the UK, sex education was used in schools as a tool to instill traditional Christian morality in families during the Conservative rule between 1980 and 1990 (Lewis and Knijn, 2002). However, the UK's Minister for Public Health did not believe that policy on physical health should include guidance on value judgements (Lewis and Knijn, 2002). Thus, the development of sex education policies is related to religion as well as other social factors. Firstly, adults are concerned that the UK comprehensive sex education curriculum does not draw the line between the public and private spheres. They were also concerned about changes in the interpersonal relationships between family and society (Thomson, 1997). Although the influence of religion on sex education has become less strong over time, the religious, ethnic, and moral diversity of contemporary Britain has increased in line with social developments (Thomson, 1997). The emergence of this diversity has led to a greater difficulty in reaching consensus on the moral aspects of sex education and an increasing plurality of values about sex. These difficulties in reaching a consensus have led to sex education remaining controversial and widely discussed by society (Thomson, 1997). The current heated debate about sex and relationship education in the UK is dominated by the issue of the allocation of responsibility for sex education and the right to control the education of young people (Wilder, 2022). The main reason for this is that it involves

both sex and relationships. Secondly, for a century, sex and relationship education has not received much attention, although it has been included in the British national sex education curriculum. In this context, the UK government has often delegated decision-making on sex education to a number of social organizations (Wilder, 2022). The UK government has delegated the development of sex and relationship education policies to schools, which has left schools' sex education policies with some lack of authority (Wilder, 2022). The main reason for this phenomenon is the lack of clarity and consistency in the guidance given to schools by the government. Furthermore, sex education teachers lack professional training and can be confused and embarrassed by some of the content of the curriculum (McEwan, Bhopal, and Atkinson, 1994). This is one of the limitations of sex education in schools. School sex education is also limited by the short duration of the sex education curriculum (McEwan, Bhopal, and Atkinson, 1994). Additionally, there is a disconnect between the UK government's policy on sex education and how it is actually carried out in classrooms. This gap is large because sex educators often ignore the perspectives of adolescents in discussions about sex education policy and its implementation (Thomson, 1997). Finally, by allowing parents to decide whether or not their children receive sex education, the UK government has somewhat denied young people the right to information and freedom of choice (MacKenzie, Hedge and Enslin, 2017). However, to advance the idea of freedom and equality, the choice of sex education needs to be defended (MacKenzie, Hedge, and Enslin, 2017).

Much work needs to be done to raise the calibre of sex and relationship education. This is in addition to having uniform national-level policy guidance. Firstly, sex education requires quality expertise and resources. However, teachers teaching sex education courses in the UK currently show a wide range of expertise (Wilder, 2022). To address this issue, there is a need for government guidance and assistance that varies according to the level of expertise in each school. What the government needs to do is to provide more flexibility for sex educators in those schools with professionally competent sex education teachers. This is because these experienced teachers are able to judge and

design sex and relationship education programs that are most appropriate for local adolescents (Wilder, 2022). For those schools that are weak in the area of sex education, the government needs to not only provide direction to the sex education policy makers in these schools but also provide professional training and guidance to the teachers responsible for the sex education curriculum. In this way, these sex educators can improve their professionalism and contribute to the sustainability of the sex education programs in these schools (Wilder, 2022). Secondly, the perception and positioning of sex education in schools also needs to be adjusted. Schools should recognize the specificity of sex education and acknowledge the fact that adolescents have sexual activity and should not divide adolescents from sex education (Pound, Langford and Campbell, 2016).

For the sex education curriculum in schools, there is large room for improvement. The first is to ensure that sex education discussions are private and mutually respectful. Also, practical and interactive content could be incorporated into specific sex education lessons (Selwyn and Powell, 2007). There is also a demand for improvement in the lack of comprehensive sex education programs in the UK and the insufficient length of these programs. With the prevalence of exams in the UK, comprehensive sex education courses are often relegated to the back of courses that require exams (Adler, 2003). This has led to a lack of sustainability for integrated education. This requires schools to focus on integrated education to ensure that adolescents receive a quality integrated education at all stages. In addition, British adolescents show a need for clear boundaries when it comes to the school curriculum (Pound, Langford, and Campbell, 2016). They expressed concerns about their teachers' teaching of the sex education curriculum. On the other hand, the power relations between teachers and students in schools are not conducive to the teaching of sex education and even affect the moral considerations between teachers and students (Aultman, Williams-Johnson, and Schutz, 2009). Clarifying boundaries then requires a distinction to be made between teachers who teach other courses and those who teach comprehensive sex education courses. Firstly, it is certainly a smart choice for teachers to be responsible for imparting knowledge of sex education. This is because

schoolteachers are a stable teaching force, and hiring external experts is not only expensive but does not meet the teaching requirements for sustainable sexuality education (Pound, Langford, and Campbell, 2016). Therefore, schools should provide specialist teachers who teach comprehensive sex education, who teach only the one subject of comprehensive sex education and are not involved in the rest of the students' school lives. This would not only address adolescents' needs regarding the boundary nature of the sex education curriculum but would also significantly increase the professionalism of comprehensive sex education in schools.

6.3 Australia

The approach to sex education in Australia has been deeply impacted by neoliberalism. It teaches adolescents to make responsible and moral decisions about their sexuality (Leahy, 2014). Despite the diversity of sex education policies in Australia, there are still many difficulties and issues in the specific transmission of knowledge about sex education. Concerns and controversies about the sexuality, gender, and morality of young people in Australia are still very heated (Shannon, 2022). Faced with this situation, some Australian state governments and regional sex educators have attempted to address these issues. They have attempted to confront and manage the educational environment in schools by adding arbitrarily controversial issues and some sensitive topics to the official sex education policy (Shannon, 2022). These elements related to politics and religious culture may lead to parents and adolescents not accepting them. These policies often deal with sensitive issues based on progressive and rights-based principles, which leads people to still view sex education as dangerous and controversial (Shannon, 2022). There are some conservative parties that even specifically target and undermine progressive government initiatives such as the Positive Queer Project (Shannon, 2022). They believed that these progressive attempts would be detrimental to young adolescents and their families. However, despite this, most Australian parents have a positive attitude towards sex education, preferring to support progressive and inclusive sex education.

For the curriculum content of sex education in schools, there is a demand from young people for open-minded professional teachers to teach richer and broader content (Barbagallo and Boon, 2012; Ezer *et al.*, 2020). Due to the Australian National Curriculum's ambiguity, some teachers have had a great deal of freedom in how they teach the material for the sex education courses (Leahy *et al.*, 2015). Teachers may decide whether to cover issues such as homosexuality and intersexuality as they feel fit. Furthermore, the lack of specificity in Australia's national curriculum is such that it does not favor any position. Also, such a neutral policy is responsible for the lack of clarity in content. The inclusion of critical thinking, intercultural understanding, and ethical understanding in the new Australian sex education curriculum is essential, but it is only a small part of the changes being made (Australian Curriculum, Assessment and Reporting Authority [ACARA], 2015).

7 Recommendations for Sex Education in China

Sex education in Chinese schools has gone through physical health, puberty, family planning, and sex safety education. As such, sex education in China has come a long way and has taken on different characteristics at different times. However, due to various factors, the implementation and popularisation of sex education has not yet reached a mature stage compared to that of developed Western countries. Sex education is needed to solve social problems and for the development of young people, but when it is introduced, parents and the community oppose its content and the way it is taught. As a result, there is a dilemma between the growing societal demand for sex education and the current inadequacy of sex education and the opposition of some people to its implementation. The above descriptions of sex education in the USA, UK, and Australia, combined with the current situation of sex education in China, provide some insights and policy recommendations.

- Establishing a comprehensive sex education system

Sex education, like other types of education, is an integral part of the education system, both in terms of policy support. Sex education can be integrated with other curricula, but it should not be marginalized or relegated to a non-existent status. Sex education policies should include guidance at the national level and specific to the curriculum, and the policy addresses the need for sex education and improves the relevant laws and regulations. In particular, research and development are needed on teacher training, teaching materials, content, delivery methods, implementation stages, and evaluation of teaching. It is also necessary to develop scientific, rigorous and practical sex education materials suitable for China and to strengthen the professionalization of sex education teachers through the establishment of a specialization in sex education as well as the preparation of sex education instructors. This process should not only draw on the experiences of other countries but also take into account local realities and develop a model of sex education that suits local characteristics. In terms of curriculum, some organizations in China have

already conducted research, such as Beijing Normal University, which organized floating school-based sex education activities (Liu and Su, 2014). The inclusion of gender equality and sexual morality in the sex education curriculum is important and in line with the general trend of international educational development. For example, there are also issues with the teaching process. For example, teachers always use the terms "dad" and "mom" when teaching about sex education, yet comprehensive education should convey a more inclusive attitude towards relationships between heterosexual and same-sex couples. The mere use of the terms "dad" and "mom" goes against the idea of equality in comprehensive sex education (Wilder, 2022).

Regarding LGBTQ issues, sex education in China may not progress much in terms of LGBTQ topics for some time afterwards, as the current Chinese government regards LGBTQ topics as a potential threat to traditional authority structures and families (Ji and Reiss, 2022). For example, a version of a textbook that included sensitive issues such as feminism and LGBT issues applied to Chinese primary schools was recently withdrawn (Ji and Reiss, 2022).

- Standardizing the content of sex education curricula and improving the capacity of sex education teachers.

Through previous analysis, the US, UK, and Australia are all lacking in sex education teachers. Sex educators are the ones who are in direct contact with students. Therefore, the ideas transmitted by teachers in the sex education classroom are the ones that directly influence the minds of adolescents. However, teachers who do not value human rights and gender equality concepts emphasize gender stereotypes in the classroom, and sometimes students object to this teaching (Elliott, 2014). It is therefore important to provide professional training for sex education teachers, such as pre-service training and in-service workshops, to strengthen their professional skills (Haberland and Rogow, 2015). Curriculum for sex education ought to be scientifically accurate and include guidance on gender and emotional aspects (Haberland and Rogow, 2015). Furthermore,

training for sex educators can increase their confidence and comfort level (Sondag *et al.*, 2022). Professional training for teachers has become an important indicator for judging the effectiveness of teaching and learning in sex education (Sondag *et al.*, 2022).

- Specialized sex education research and development teams were set up and the government invested funds in sex education projects.

These teams enlist scholars, teachers and people from all walks of life. There are currently a small number of sex education research teams in China, but they are relatively limited in strength. There is a need to increase the number of sex education research teams, to grow the pool of researchers, to expand the research questions on sex education, and to develop a practical pathway to sex education that is appropriate to China's current situation. Schools are among the key settings that have a significant impact on young people's healthy growth and are one of the primary providers of sex education. Schools should not only offer sex education programs but should also work with families and society to help young people receive formal and sound sex education in order to promote their healthy development. However, due to ingrained cultural views, sex education progress in China has been static for some time. Government departments should use their research findings when formulating policies while investing funds in relevant institutions and departments.

- Strengthening the monitoring mechanism for the implementation of school sex education policies.

Social efficiency can be applied to the accountability system in schools. School-based sex education requires specific normative standards and monitoring departments to ensure that sex education is effectively taught in schools (Kim, 2018). From the perspective of policy implementation, the best way to encourage schools and teachers to put sex education into practice is to give more support to schools that actively implement sex education programs and to give more policy facilities to teachers who teach sex education programs, with a high degree of support from higher authorities. From a monitoring

perspective, the best way to do this is to conduct regular nationwide monitoring of the quality of education in the subject of sex education, along the lines of other subjects. Students' academic achievements in terms of sexual knowledge, skills, attitudes and values can be measured quantitatively or reliable information can be collected through qualitative methods to evaluate whether sex education is being delivered properly. Only by establishing a strong implementation and monitoring mechanism can sex education in schools be driven forward.

- Development of sex education activities by civil society organizations.

Social efficiency can be applied to the accountability system in schools. School-based sex education requires specific normative standards and monitoring departments to ensure that sex education is taught well in the classroom (Kim, 2018). Some Chinese scholars in the exploration of sex education argue that we cannot reach a consensus on the concept of sex education when the debate around values persists. School-based sex education policies cannot move forward. Based on this situation, Chinese scholars have proposed civil sex education. It advances sex education and acts as a supplement to that taught in schools. Its flexibility lies in the fact that folk sex education is only aimed at young people who want to receive sex education. Sex education in schools will be strengthened in the interim.

8 Conclusion

Sex and relationships are uncertain in real life and can bring up good or bad emotions for a person. Comprehensive sex education, on the other hand, provides young people with professional knowledge and moral support from an objective point of view, enabling them to think openly and make free decisions with an understanding of sexuality (Wilder, 2022). This dissertation analyses sex education in the UK, USA, and Australia. It identifies the shortcomings and good practices that can be learnt from them. The dissertation also considers the development of sex education in China and offers suggestions for future development. Analysis reveals that the trend of international sex education is not only to focus on the physical health of young people but also to include guidance on sexual morality and gender equality. In the past, sex education focused on the biological aspects of gender. Gender includes not only biological and sex-derived topics, but also social institutions and culturally constructed concepts of gender. In today's society of unequal gender relations, comprehensive sex education as a way to spread the idea of equality can to a certain extent reduce the emergence of situations like gender violence. For the purpose of maintaining a stable society, the essential key to solving the problem is to change people's ideology of inequality. Secondly, gender education is education for gender equality, not gender stereotyping. Good sexuality education enables adolescents to comprehend the social nature of gender and gives them the knowledge to make judgements about their own gender freely. For the UK, USA, and Australia, their sex education systems are relatively well developed, whereas China's sex education system is not yet established, and the Chinese have deep-rooted traditional thinking, but the common goal is comprehensive education. Contemporary moral panic is a problem that needs to be addressed, and sex education is a lifelong process of moral renewal (Thomson, 1997). Of course, sex education involves not only morality but also religion and culture, so it will take the persistent efforts of governments and sex educators to achieve the goal of comprehensive education, to make society more equitable, and to make people more open-minded and free.

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