

Consultation on the Curriculum and Assessment (Wales) Bill

Evidence submitted to the [Children, Young People and Education Committee](#) for Stage 1 scrutiny of the Curriculum and Assessment (Wales) Bill.

About you

Organisation: Ysgol Bendigaid William Davies Catholic Primary School, Llandudno

1. The Bill's general principles

1.1 Do you support the principles of the [Curriculum and Assessment \(Wales\) Bill](#)?

Partly

1.2 Please outline your reasons for your answer to question 1.1

(we would be grateful if you could keep your answer to around 1500 words)

We are largely supportive of the widespread changes being undertaken due to the Curriculum for Wales and the reasons behind these changes. We are actively engaged in considering how to implement and deliver this exciting and innovative curriculum and we are confident that we can achieve this whilst maintaining the distinctive nature of our Catholic school. The curriculum for Wales gives us the freedom to be creative in our teaching and learning, helps us to connect to our school community and enables rich experiences for our learners. However, the principles of the Curriculum and Assessment Bill throw up areas of concern which we believe have an unintended consequence of compromising the ethos of the Catholic education sector in Wales. We feel that the bill fails to recognise the professionalism of our staff and ignores the context of our Catholic community.

The Curriculum for Wales guidance is a clear statement about what is important in delivering a broad and balanced education. The four purposes are the shared vision and aspiration for every child and young person in Wales. A defining feature of the framework is that it requires schools to design their own curriculum and assessment arrangements which is something we welcome as professionals. This ensures that we have more freedom

to create a curriculum which connects to our communities and the experiences of our learners.

However, we wish to express our concerns regarding the proposed changes the Welsh government is considering which we believe will be to the detriment of Catholic Education. We would like to draw your attention to the three main reasons we have for believing this,

1. We disagree with the change of name to 'RVE' (Religion, Values and Ethics). The name change fails to recognise the heritage and deep connection Religious Education has within schools of religious character, such as ours. Values and ethics are instilled and integral to our whole school ethos and it is our Religious Education which contributes to this. In our school we already engage with a broad and balanced range of religions and philosophical convictions, as required by law. The move away from RE also fails to appreciate the significant benefits a theological based approach to RE gives to students in their everyday lives.

2. We are strongly against the prospect of Catholic schools having to deliver a second syllabus. Our teaching is well rounded and balanced with provision in place to support the teaching of other faiths. It would appear there is a lack of trust from the Government in our successful delivery of RE in this way. We would argue that the expectation that we deliver a separate RE curriculum is not just impractical, but discriminatory. It would appear that the Government is moving towards a homogeneous education system which will no longer recognise the importance of allowing children to pursue a deep knowledge and spiritual understanding of faith. This will do little to improve community cohesion or foster tolerance of world religions. We believe Wales is a pluralistic, diverse and tolerant country built on respect for people with or without faith. We believe we can ensure this remains the case through continuing to support the diverse provision of education facilities.

3. In being asked to provide a second syllabus, Catholic schools are being treated differently. Planning and delivering a second syllabus would be an additional burden on an already substantial teacher's workload and have a significant impact on school budgeting. In seeking to enforce a so-called 'neutral values' curriculum it may discriminate against parents who want their child to be educated in a Catholic school. Our families of many faiths, cultures, ethnicities and backgrounds have chosen to have their children educated at our Catholic school and their beliefs and feelings have not been considered and their opinions have not been sought.

1.3 Do you think there is a need for legislation to deliver what this Bill is trying to achieve?

(we would be grateful if you could keep your answer to around 500 words)

We believe that in some key areas what already exists in law is balanced and fair and we do not believe that this needs to be changed.

1. In the new Bill there is an expectation that Catholic schools will provide a separate RE and RVE curriculum which is an unreasonable and impractical for our staff and confusing for our families and our learners.

2. Current legislation recognises trust deeds, however the Welsh Government does not recognise those trust deeds. Most trust deeds state that the school is provided 'for the maintenance and advancement of the Roman Catholic religion', and the provisions of Canon Law form part of the trust deed in every Catholic school. Under Charity and Education law, the school is regulated by its trust deed, and the school's Instrument of Government must reflect those requirements.

2. The Bill's implementation

2.1 Do you have any comments about any potential barriers to implementing the Bill? If no, go to question 3.1

(we would be grateful if you could keep your answer to around 500 words)

There is a clear disparity between the way schools without a religious character and those with a religious character are being treated in these proposals. By having different expectations of different schools, the Welsh Government appears to be suggesting Church schools cannot be trusted to deliver a balanced RE curriculum. We feel the Government are not listening or responding to these concerns.

We are concerned about the potentially prescriptive nature of any guidance of the RVE which might impose a vision of religious education which conflicts with our Catholic values and beliefs. The changes would make the subjects more prescriptive and less academically rigorous, undermining the centrality of RE to our curriculum.

As primary educators of their children, parents opting to withdraw their child from elements of RE are exercising a fundamental and prior right. Whilst the Catholic Church does not actively encourage parents to exercise this right, it continues to defend their right to do so, believing the rights of the individual take priority over the role of the state.

The practical implications of implementing the Bill vary. Firstly, the effect of this proposal will be that non- denominational schools will be advantaged by not having to make arrangements for alternative provision, whilst Church schools will have to do so. There is thus a clear disparity between the way schools without a religious character and those with a religious character are being treated in these proposals, which we believe to be unfair and unjustified. There is no indication in the consultation document how voluntary aided schools will receive additional resources to meet the requirements of this additional commitment.

The impact of COVID-19 cannot be underestimated at this time. The many changes and added pressures on all stakeholders has meant that head teachers need to consider the strain, anxiety and many difficulties facing learners. Their capacity to engage, the focus on their well-being, the importance of their faith – all of these seem not to have been considered. There does not seem to have been any dialogue to establish the strength of feeling that parents may have and there has been no additional time given despite the effects of COVID-19 restrictions.

Parents' perspective is so valuable and yet they have not yet been given a clear picture nor any published guidance as to what is being planned and will affect their children's life in school.

2.2 Do you think the Bill takes account of these potential barriers?

(we would be grateful if you could keep your answer to around 500 words)

In the Bill there is no evidence or acknowledgement of the additional work burden in Catholic schools. Nor have the Government opened dialogue with head teachers in Wales to address their concerns outlined in their letter to the First Minister. There is no indication in the guidance that support or resources which will be made available for settings where compliance with the proposals is impossible or unreasonable. If there is a disproportionate burden to be imposed on Catholic schools compared to other schools, then this must be

accompanied by an increase in funding which will enable our school to resource additional training and adaptations to successful and established RE teaching and learning.

Alongside the previous barriers identified, the Government are not taking into consideration the impact Covid- 19 has had on our staff and children. The time frame for the implementation of the new curriculum has not accounted for the pandemic our staff have had to adjust to. Staff have had to adjust to new ways of teaching and learning within the school building and through blended learning and online approaches.

3. Unintended consequences

3.1 Do you think there are there any unintended consequences arising from the Bill? If no, go to question 4.1

(we would be grateful if you could keep your answer to around 500 words)

The unintended consequences arising from the bill include the compromising the ethos of the Catholic education sector. The Catholic community has been an integral part of Welsh culture for centuries, and our schools serve and support the rich fabric of Welsh culture. Before there were schools, there were Catholic schools. This consultation, and the damage the proposals will undervalue and undermine Catholic schools and their continuing contribution to Welsh culture.

In practical terms the proposals are unfair and unjustified- making voluntary aided schools the only schools in Wales required to teach in accordance with (rather than having regard to) the locally agreed syllabus.

The implication for a school such as ours is that resources (including funding, staffing and training) will need to be reallocated and the offering of an alternative RE syllabus will mean that the great work already done on creating and developing a curriculum which combines the demands of the Curriculum for Wales but which is embedded in our 'Come and See' syllabus.

We are disappointed that RE as a rigorous academic subject may be undermined. We believe that Catholic RE both meets the benchmarks of balance required by law and provides a core to the curriculum in Catholic schools. We are disappointed that the proposals appear to be premised on false implications about RE in Church schools: that

denominational RE is not balanced in its content and manner of teaching in the same way as non-denominational RE.

The proposals outlined in the Bill should be reconsidered in order to preserve trust in the Welsh Government and their agenda and the ability of our schools to support it. Direct engagement with the Government and the Catholic community is needed to open up dialogue regarding the proposals.

For our school, our diverse population (including speakers of 11 different languages and families of differing faiths including Islam) our curriculum, ethos and provision are the reason they chose to send their children here and they should be consulted and informed about these changes.

4. Financial implications

4.1 Do you have any comments on the financial implications of the Bill (as set out in Part 2 of the [Explanatory Memorandum](#))? If no, go to question 5.1

(we would be grateful if you could keep your answer to around 500 words)

The financial implication for a school such as ours is that, with budgets already tight, costs will rise in order to train staff, fund resources, employ supply cover and adapt our current successfully developing curriculum in order to provide a parallel RVE curriculum.

Staff will need appropriate professional development and training opportunities for development of the new curriculum. There is the potential additional costing surrounding the development of separate curricula. We also need to factor opportunities for experiential learning within our curriculum development which needs to be considered within budget.

Potentially the stress and pressure of delivering this unrealistic parallel curriculum could have a negative effect of staff well-being and health, particularly in these difficult and unpredictable times.

5. Powers to make subordinate legislation

5.1 Do you have any comments on the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the [Explanatory Memorandum](#)). If no, go to question 6.1.

(we would be grateful if you could keep your answer to around 500 words)

These plans undermines R.E. as a rigorous academic subject in Catholic Schools, it will have a negative impact on relationships within school and local communities, undermining the parental right to choose how they wish their children to be educated. There is potential discrimination against Catholic schools and an inequality of treatment and unfair pressure the leaders of these schools. The decisions regarding RE and RVE in this Bill are being made on the basis of one subject and this would not be done in this way for any other subject.

6. Other considerations

6.1 Do you have any other points you wish to raise about this Bill?

(we would be grateful if you could keep your answer to around 1000 words)

The nature and strength of our Catholic school means that we are seen to represent a particular form of education, a nurturing environment with a focus on faith and we are held to the expectation that we aspire to provide as good an education, or better than other schools in our area. The consequences of this Bill could serve to dilute this strength and prevent the provision of a curriculum that creates religiously literate learners. The bill threatens the historic rights of Catholic schools and their respected traditions. We are disappointed that this bill seems to uphold a perception that our curriculum is not balanced and inclusive and we are concerned that the expectations will have a negative impact of our staff, our stakeholders and, most importantly in all of this – our children. We implore to you to seek and consider the thoughts, feelings and opinions of all those that this Bill will impact and to pay heed to the messages from all the head teachers and governors who have communicated with you.

