

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: Monmouthshire SACRE

1. The Bill's general principles

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

Yes

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)

Monmouthshire SACRE has not met formally to discuss this consultation as the SACRE meeting fell outside the consultation period. This response is being sent by the Chair of SACRE on behalf of members.

Overall Monmouthshire SACRE supports the principles of the Curriculum and Assessment (Wales) Bill. However, there are some concerns with regards to religious education and the changes to SACREs.

Monmouthshire SACRE members agree with the key principles outlined in the Explanatory Memorandum p. 12. We agree that the approach taken within the Curriculum for Wales (CfW) will enable schools to design their school level curricula in a way that enables all learners to develop and embody the four purposes. SACRE members agree that the characteristics of the four purposes will prepare learners in Wales in all aspects of life and work. SACRE is pleased that RE (RVE) will be a mandatory aspect of the new curriculum and that, if taught well, it will support learners' development toward the four purposes in a unique way. SACRE feels that good RE (RVE) will enhance the Humanities Area of Learning and Experience and the curriculum as a whole. There are many links and interdependencies between RE (RVE) and all other areas of learning and experience.

SACRE agrees that the CfW will offer a broad balanced curriculum for all learners, with its cross curricular and mandatory elements, the Literacy and Numeracy Framework (LNF) and Digital Competency Framework as well as the new approach to assessment and so forth. Members agree with the child centred approach to learner progression and that the progression steps in the Humanities AoLE take account of progression in RE (RVE). This needs to be accompanied by suitable qualifications that address the needs of all learners, taking account of the statutory nature of RE/RVE at 14-16.

The "What Matters" statements provide opportunities for rich learning experiences in all subjects including RE/RVE. However, there would need to be a significant amount of time available for planning this new curriculum as well as professional support and professional learning in order to ensure that all schools are given the same opportunities that Pioneer Schools and Innovation Schools have had to develop their curricula in readiness for 2022. SACRE particularly support the experiential nature of the new CfW.

SACRE is concerned that to promote the spiritual, moral, cultural, mental and physical development of pupils, and of society, remains a general statutory duty. SACRE feels that it is a necessity to highlight this in the curriculum guidance. SACRE can see that the four purposes of education as well as many aspects of the curriculum have the potential to strengthen this aspect of education. It will be necessary for Estyn to continue to have a focus on this in the work they do with schools and in inspection reports.

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)

SACRE agrees that it is necessary to update the legislation. However, not all suggested changes are required or are appropriate, and some required amendments have been overlooked, for example:

The change of name from RE to Religion, Values and Ethics (RVE). This is not a name chosen by, or supported by SACREs, experts or professional bodies, nor by the organisations representing schools of a religious character. SACRE requests that Welsh Government reconsiders this change. It does not as the Explanatory Memorandum suggests, reflect what is explored within the subject. The new name conflicts with the legislation surrounding schools of a religious character as their Tenets require religious

education be taught. Welsh Government needs to request sight of these and consider them more carefully before bringing in the legislative changes.

The changes to legislation around SACREs and their inappropriate change of name to SACs are unnecessary. Organisations representing non-religious philosophical convictions are currently allowed to sit on Committee without the need for subdivision and put unnecessary barriers between people who hold religious and non-religious viewpoints. These are unnecessary changes to the composition of SACRE by including group 'aa'. This could impact voting at meetings.

If Voluntary Aided schools have to teach more than one curriculum this will impact their costs in terms of staffing costs and resources as well as curriculum time restrictions.

Curriculum and Assessment (Wales) Bill, Chapter 4, Part 5 Section 62 states:

Teaching and learning provided under this section—

(a) must reflect the fact that the religious traditions in Great Britain are mainly Christian, while taking account of the teaching and practices of the other principal Religions represented in Great Britain, and

(b) must also reflect the fact that a range of non-religious philosophical convictions are held in Great Britain.

(Section 375(3) of the Education Act 1996)

Should this specifically include Wales, the United Kingdom (or Britain) and the wider world rather than 'Great Britain' to reflect the fact that is a Curriculum for Wales? The broad and vague description of philosophical convictions will be a barrier to implementation. This is a legal term. Academically, philosophical worldviews (convictions) can be both religious and non-religious. It is important to get this wording correct and in line with subject specific terminology to avoid confusion. Additionally, the guidance contained within the RE/RVE framework needs to unpack what this means in practice for schools to avoid the dilution of the subject by trying to 'fit in' too much content. Professional Learning is needed so that practitioners know what is required under law and how to put that into practice without losing the rigor of the subject.

The removal of the parental right to withdraw will cause concern to some parents which could potentially result in some parents choosing to home school their children. Members

suggest there is a need for awareness raising amongst families that the teaching of RE is to be objective, critical, and pluralistic and that it is not the objective of RE to proselytise.

Funding for professional learning will need to be provided to address key concerns regarding RE, and yet this has been decreased due to Covid-19. SACRE suggests that funding is ringfenced for RE to ensure it takes place. This is necessary given the barriers to implementation that may be caused by removing the parental right to withdraw.

There is a need for relevant bodies to work collaboratively to provide a comprehensive PL package so that all learners in Wales receive their entitlement to the best possible RE/RVE within the Humanities curriculum.

SACRE is pleased to see that the legislation regarding the spiritual, moral, cultural, mental and physical development is not changing. However, the CfW guidance does not refer to this or link this with the four purposes. It is necessary to do so as schools and practitioners need to be made aware that is still a general duty of education.

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)

The following are barriers to the implementation of the Bill:

Please see the comments above with relation to Section 375(3) of the Education Act 1996

Please see previous comments about SACRE members' concerns about the name to RVE not reflecting the scope or nature of the subject.

VA schools would be impacted in terms of increased workload and financial costs by having to provide two curricula for RE/RVE.

Please see previous comments relating to SACREs. This may have implications in terms of local democracy and the changes to the composition of SACREs are not needed.

One of the biggest barriers to implementation would be the lack of specialist Professional Learning for RVE. Welsh Government suggests in the Explanatory Memorandum that this is

needed, however SACREs have not been informed how this will take place and who it will be provided by.

SACRE members remind Welsh Government that they need to be consulted on the content of the RE/RVE Framework. They will need to be content with the Framework in order to adopt or adapt it. SACREs have not been consulted on the development of this framework on a regular basis as they were when the Humanities AoLE was being developed. SACRE is concerned that if they are not happy with the content of the supporting framework there will be very little time for amendments before an agreed syllabus conference is needed.

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)

No.

SACRE suggests that further dialogue is needed with WASACRE and SACREs on the above issues.

There needs to be a national plan for RE specific PL drawn up between Welsh Government, LAs, regional consortia, WASACRE and SACREs. SACREs have not been made aware of any plans for this.

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)

Please see comments above on spiritual, moral, social, mental and physical development. Unless this general duty of education is written into the curriculum guidance and inspected by Estyn a focus on it will be lost to the detriment of learners.

The proposed changes to SACREs could have unintended consequences for the smooth running of SACREs, especially with regard to voting protocol. Additionally, SACREs could lose their identity by removing the name of the subject they advise on from their name.

An unintended outcome will be that SACREs would have an advisory capacity within VA schools which they do not currently have.

There are potential inequalities with differing rights being given to parents in different types of schools. In some schools parents have been given rights for their children to be taught in accordance with the Tenets of their beliefs, and yet this right has been taken away from other parents.

Parents might choose to home school because of the removal of the right to withdraw from RVE.

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)

Monmouthshire SACRE members are concerned PL will not be addressed given that the finances set aside for PL can be used flexibly by schools and there has been no ringfencing of money for RE/RVE as explained on p.150-151 of the Explanatory Memorandum, This is despite the need to “ensure a positive impact and to address concerns raised in the responses on the need for high quality RVE and RSE provision we are heavily investing in professional learning.” Welsh Government will need to direct LAs and the regional consortia on what and how the PL for RVE is to be funded and delivered. It is essential that this PL is delivered by specialists.

Will Welsh Government be offering VA schools financial assistance and support in dealing this additional cost to them in terms of planning time, resources and staffing?

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)

This subordinate legislation would allow Welsh Ministers to change legislation without consulting with educational experts or the public. It is a concern that this would give Welsh Ministers the power to make significant changes such as removing a mandatory aspect of the curriculum like RE/RVE or to make changes to SACREs. Monmouthshire SACRE would like reassurance that subordinate legislation would not allow Welsh Ministers to make such significant changes, particularly to RVE and to SACREs, without consultation.

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 Foundation phase would particularly need support as RE has never previously been statutory in nursery settings.

