

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: Caerphilly Standing Advisory Council on Religious Education

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)

Caerphilly SACRE supports the principles of the CfW Bill, but with some reservations with regards to RE (RVE), SACREs and VA Schools.

SACRE agrees with the key principles for developing legislation to support the new curriculum and assessment arrangements.

SACRE agrees that the curriculum for all children should be driven by the four purposes and that this will support the spiritual, moral, cultural, mental and physical development of pupils and of society. However, SMCMP is only mentioned in the Bill in relation to post 16 education, yet it remains one of the key purposes of education under current law - which is not changing. Additionally, SMCMP is not referred to at all in the Curriculum for Wales guidance documents. This issue needs to be addressed.

SACRE agrees that all children and young people, including those with severe, profound or multiple learning difficulties, are entitled to a high-quality broad and balanced education throughout the period of statutory education. The what matters approach will provide a broad and balanced curriculum rich in knowledge, skills and experience. The approach also can enhance RE/RVE for learners if sufficient subject specific Professional Learning and ITE

programmes are in place. SACRE supports Prof. Donaldson's recommendation to place RE within the Humanities AoLE of the CfW and that this will protect learner entitlement to the subject in the long term.

SACRE agrees with the child centred approach to promoting learner progression. SACRE is supportive of the holistic approach Welsh Government have taken with the reforms to include all aspects of education. SACRE is supportive of the principle of encouraging stimulating and engaging teaching and learning, which supports learners to make connections across different aspects of their learning.

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 there is a need for a change in legislation to bridge the gap between learners in Wales and those in other countries and to meet the key principles as outlined in the Explanatory Memorandum. The current curriculum is outdated, and the review of legislation and guidance is needed if learners are to be prepared for the world in which we currently live. However, SACRE is of the opinion that not all changes within the Bill are necessary.

The change of name from RE to RVE

SACRE members feel that the name change to RVE is unsuitable for the following reasons:

- a. The new name was initially chosen by Welsh Government, rather than by experts in the field most of whom are not in support of it (see g. below).
- b. The name does not, as the Explanatory Memorandum suggests, 'reflect the proper scope of the subject.' The new name undermines the rigorous academic nature of the subject and might become confused with citizenship education. It omits so much of the scope of what RE currently is and SACRE considers it a backwards move in terms of the journey the subject is on.
- c. The direction of travel RE is already on, in Wales, the UK and internationally, toward teaching religious and non-religious worldviews, and has been ignored in the name change. This would have been better summed up in the name change Religion and

Worldviews, as advocated by the Commission of Religious Education. Wales has missed an opportunity to embrace this change and to lead the way internationally.

d. The public consultation Welsh Government seemed to lack understanding for the subject. This was evident in putting forward the name Religions and Worldviews as the preferred government choice. Adding the 's' and changes the nature of the word from the study of religion as a concept toward a continuation of the study of religions in silos, which it is necessary to move away from in a pluralistic approach. Therefore, RVE was chosen by default and not for reason of evidenced justification. Universities and professional organisations throughout the UK and internationally are currently conducting thorough research into the Religion and Worldviews approach and it is our fear that Wales is being left behind before it begins. It seems that Welsh Government have based this choice on a tick box vote in the previous consultation, as there was no due regard as to whether the responses submitted were from an expert body representing significant numbers of RE professionals or by one unqualified individual. Therefore, we seem to have ended up with a name that very few people within the RE world agree is suitable.

f. RVE discourages a focus on worldviews in favour of values and ethics, which may be detrimental to learners and to the new curriculum. It does not offer equality to religious and non-religious worldviews. RVE only sums up part of what is explored in RE and Values are usually studied within RE as part of Ethics.

g. As the Explanatory Memorandum points out, the name was not supported by major stakeholders including the Catholic Education Service, the Church in Wales, the Muslim Council of Wales and Cardiff University's Religious Studies faculty. Neither was it supported by any RE specialist expert bodies including the Wales Association of Standing Advisory Bodies on Religious Education, Caerphilly SACRE (and many others throughout Wales); the National Advisory Panel for Religious Education, the Religious Education Council of England and Wales, the Association of Religious Education Inspectors Advisers and Consultants, the National Association of Teachers of Religious Education and others.

h. Many professional bodies prefer a name change to Religion and Worldviews and this is the name Caerphilly SACRE prefers.

Standing Advisory Councils for Religious Education

To omit the name of the subject from Standing Advisory Councils advise on is an error. A name gives a body an identity and by making this change in the law, then Welsh Government seems to be removing the identity of the SACRE. Additionally, Welsh Government did not consult SACREs or WASACRE in advance of this consultation. SACRE

wonders whether this approach is a good reflection of the collaborative approach to curriculum that has been enjoyed thus far. SACs and WASAC (Wales Association of SACs) seem inappropriate acronyms for the organisations.

Committee A of SACREs should not be subdivided. It is unnecessary to add group 'aa' and it could potentially cause to cause this division. Currently Humanists sit on Committee A as it stands. This works well and SACRE feels that situation should continue.

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)

Caerphilly SACRE agrees that there is a need for legislative change to implement the Bill, however, there are some changes that are unnecessary, or inappropriate, and some legislative changes have not gone far enough.

a. The name change from RE to RVE (please see explanatory comments in 1.3. The change of name does not reflect the scope or nature of the subject as the Explanatory Memorandum suggests (p152). This change of name risks undermining the academic nature of RE and diluting the subject. The Values and Ethics aspect are a small part of what is covered in RE and the most important aspect, namely religious and non-religious worldviews are not included within the title at all. It is not in line with the direction of travel for RE and is a backwards move.

b. The requirement for VA schools to offer two curricula for RE is a barrier to implementation. This could negatively affect these schools financially and their staff in terms of workload. This could negatively affect the relationships between these schools and LAs, Regional Consortia and Welsh Government.

c. Section 62 (Chapter 4 Part 5) and Schedule 2 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.

The wording of this legislation does not sit well with the pluralistic approach Welsh Government is aiming to achieve. To be fully inclusive, it might be necessary to reword this section to include more religious worldviews than 'other principal religions' and to move away from teaching religions in silos. The legal term 'philosophical convictions' is vague and does not adequately sum up what Welsh Government are hoping to achieve in aiming for the curriculum to be objective, critical and pluralistic. Philosophical convictions can be both religious and non-religious. It would be more appropriate to use the term 'religious and non-religious worldviews' within the curriculum guidance, if not in legislation. Additionally, should this section be amended to refer to Wales and the wider world instead of just limiting study to Great Britain?

d. Please also see previous comments relating to SACREs. Some of the changes with regards to LAs, SACREs and RE in this Bill could potentially undermine local democracy. Is it appropriate that changes to legislation concerning SACREs and to local democracy are being made through the Curriculum and Assessment Bill? Would this require further consultation? And are they all necessary anyway?

e. SACREs and WASACRE have highlighted on several occasions that Welsh Government should provide funding for specialist RE/RVE Professional Learning. It is the understanding of Caerphilly SACRE that this provision for RVE has not been planned for, or implemented thus far, despite being identified by Welsh Government as an area of risk for the implementation of the CfW (p152 of the Explanatory Memorandum). Regional consortia and LAs have not been made aware of the need for RE/RVE specific training.

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.

Please see previous comments with regards to the unsuitability of the new name RVE.

Please see previous comments with regards to the structure and composition of SACREs.

The Bill does not account for the potential disagreement that could be caused between parents and schools as the right to withdraw from RE/RVE is removed. Potentially, there may be legal challenges made under human rights legislation.

Neither the Bill nor the Explanatory Memorandum account for the financial implications being placed on VA schools having to provide two curriculums for RVE.

Funding for Professional Learning has been reduced this year because of the Covid-19 pandemic. This could be a barrier to implementing the Humanities/RVE curriculum.

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 proposed changes to SACREs is unnecessary and could undermine their position, role, identity, and purpose.

Schools will need to be reminded within the new curriculum guidance that SMSMP is a general requirement under law. An unintended outcome might be that this obligation is forgotten by schools. Additionally, SMCMP should continue to be inspected by Estyn. Focus on the Four Purposes may be an excellent way to fulfil this general requirement, but the guidance should be amended to ensure focus.

The Bill does not consider the added burden on VA schools who will have to produce and deliver two RE curricular. This will create excess workload and may potentially cause division within the school which might affect the ethos of these schools. An unintended outcome could also be that SACREs would have an advisory capacity within VA schools which they do not currently have.

In relation to the right to withdraw from RE/RVE. 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. Taking away the parental right to withdraw for all schools may still cause concern for some

parents and schools and could result in some parents choosing to home school their children.

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)

In the Explanatory Memorandum p.150-151 the impact assessment advocates the need for Professional Learning for both RE/RVE and RSE "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." However, Caerphilly SACRE is concerned that this 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. There needs to be direction from Welsh Government on the need for this specialist PL and how the money is to be spent. Given the nature of RE/RVE and RSE) is essential that this PL is delivered by specialists and not just lost in the generic training provided on the curriculum.

With regard to the additional financial costs to VA schools if they have to design and deliver two RE/RVE curricular, will Welsh Government be offering VA schools assistance and support in 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)

Caerphilly SACRE are concerned that the subordinate legislation allows Welsh Ministers to dramatically change legislation without the requirement to carry out consultations. This is

acceptable where the curriculum needs to be tweaked and future proofed, for example to keep up to date with pedagogical changes. However, there is a risk to all aspects of the curriculum if those changes are more significant. For example, Welsh Ministers might remove a mandatory aspect of the curriculum such as RE/RVE without public consultation. Changes of this nature should always be consulted on and there needs to be something built into the legislation to prevent this. Caerphilly SACRE would like reassurance that subordinate legislation would allow Welsh Ministers to make changes to RVE and to SACREs without consultation. SACRE questions whether this would undermine local democracy in the case of SACREs.

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)

Welsh Government have stated in the Explanatory Memorandum that:

“There will be a need for continued close working with all schools, in particular faith schools which are able to provide learning in line with the tenets of their religion (providing it is pluralistic), to ensure the learning offered in RSE and RE is pluralistic and non-discriminatory.”

Who will carry out this close working? Who will advise schools? There is a need for both specialist Professional Learning and continued advisory support for RE/RVE (and not for this reason alone). WG, LAs, SACREs, Regional Consortia, WASACRE, NAPfRE, CiW, CES, and other relevant bodies need to work collaboratively so that all learners in Wales receive their entitlement to the best possible RE/RVE within the Humanities curriculum.

