

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: Diocese of Menevia

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)

We support a broader balanced and purpose led curriculum

We also support the introduction of a new curriculum which encourages creative and high quality teaching and learning and more effective formative assessment to support and enhance learning. We also support the 4 Core principles of the new curriculum which reflect the curriculum and ethos in our Catholic schools.

We also support a curriculum which provides the freedom for practitioners to create a local curriculum that meets the needs of the learners and of the Catholic community served by the school.

Concerns:

The Bill fails to recognise the professionalism of staff in Catholic schools with respect to the new curriculum and the excellent work that is already being carried out on a daily basis in Catholic schools

Although the Bill encourages the development of a local curriculum meeting local needs it does not seem to recognise the particular context and needs of schools in the Catholic community.

1.2

We disagreed strongly with the change of name of Religious Education to Religion Values and Ethics which devalues the subject within the curriculum. Religious education is part of the core curriculum in a Catholic school.

Religion values and ethics permeate everything that happens in Catholic schools. It is much more than just a subject. Many Estyn reports and Inspectors have commented on how the Catholic ethos contributes positively to the quality of education received by young people and to the quality of pastoral care guidance and support received by pupils in our schools.

We object to the requirement within the Bill for Catholic schools to deliver an additional syllabus. This requirement is not expected of any other schools.

We feel that this element of the Bill it is based on a lack of trust, understanding and knowledge of the current curricular content in RE and RSE and the positive way that the curriculum is delivered within Catholic schools at present.

Catholic schools already meet legal requirements and deliver a pluralistic curriculum including the study of other faiths and world views. Catholic schools are extremely diverse and inclusive in nature as outlined in the Welsh Government publication 'Faith in the System'

If implemented the Bill will place an unfair burden on Catholic schools in terms of workload. Staff will have to prepare for and deliver two different specifications when this is unnecessary. There will also be significant increased costs in terms of staffing at a time when staff are under immense pressure supporting pupils and families during the Covid-19 pandemic. Only Catholic schools are required to do this under the new Bill.

Catholic schools will be treated differently from other schools and this is discriminatory.

The proposals in the Bill may put schools in breach of their Trust Deeds.

The diocese is very concerned about the Post 14 proposals within the Bill (which were not included in the consultation) whereby the Welsh Government may change the content of subjects including RE and RSE in the future. Again this has serious implications for Catholic schools and may impact on their legal duty to fulfil their Trust Deed.

Removal of the right to withdraw – we feel very strongly that removing the right to withdraw is a negative step. Not only does it take away the rights of parents but has a detrimental effect on the nature of the relationship and quality of communication with parents – it impacts negatively on the quality of dialogue and engagement around Religious Education and RSE.

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)

What already exists in law is balanced and fair and we do not want this changed

There will be an unreasonable and increased burden on Catholic schools to provide two curricular for RE.

The proposals may put Catholic schools in breach of their Trust Deeds

Catholic schools will be expected to deliver RE and RSE that doesn't comply with the tenets of the Catholic Church. Any changes to the Post 14 curriculum may require Catholic schools to teach something in the future which is contrary to our trust deeds.

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 has been a lack of proper consultation. Consultation has taken place during a period when schools have been prioritising the service of pupils and local communities during the Covid pandemic which is very unfair to leaders, governors and staff. The views of highly committed Catholic school leaders have been ignored despite every headteacher of a Catholic school in our diocese and in Wales having written to the First Minister to express their concerns.

Several key elements of the Bill which would have a significant impact on Catholic schools were not included in the consultation process, especially the inclusion of the right for this

and any future government to make additional changes to the curriculum without the need for further legislation, effectively bypassing consultation and scrutiny.

The proposals appear to be based on a lack of trust, knowledge and understanding of how the curriculum is being delivered in Catholic schools which is surprising as our schools have successfully served the young people and local communities of Wales for many years as partners in providing high quality education.

As partners in the provision of education in Wales there has been very little if any communication with the Catholic education sector and wider Catholic community regarding the drafting and content of the Bill.

Due to the current circumstances around Covid and the crucial role that all schools are playing in supporting young people and families, including the children of key workers and the most vulnerable, it seems insensitive and unreasonable to progress with this Bill without sufficient time and opportunity for full and proper consultation.

There will be a significant additional workload burden on the staff and leaders of Catholic schools and there will be issues relating to staff availability and additional costs to schools if separate RE and courses are made compulsory.

The Right to withdraw – We believe that the removal of the 'right to withdraw' was a mistake. Catholic schools have always enjoyed very positive relationship with and support from our parents. This has been a key factor in our success. We want all pupils to attend Religious Education lessons but believe that parents as the first educators of their children should have the right to withdraw. Having this fundamental right encourages good communication with parents around the content of the RE and RSE curriculum and has been a significant factor behind the lack of withdrawal in Catholic schools up until now.

We are concerned that the Bill is progressing when the guidance for RE and RSE hasn't been published

and the views and feelings of the Catholic community haven't been taken on board.

We do not believe that the response to the initial consultation has been published in full and fear that despite significant numbers of the Catholic community from across the diocese and Wales taking the time to respond, these responses and genuine concerns of many people have been ignored or regarded as one response.

Several proposals in the Bill and many questions in the original consultation are related specifically to Catholic schools and not to other schools and appear to be based on a lack

of knowledge and understanding of what is done in Catholic schools despite us working in partnership with the Welsh Government and local authorities for so many years. T

he reasons why these specific questions in relation to Catholic schools were included have not been fully explained. The Bill creates a negative impression of Catholic schools, implying that the content of RE and RSE is not balanced, pluralistic and in accordance with legislation.

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)

We cannot see how the Bill could address potential barriers when there was no engagement in the development stage of the Bill. The Bill was published before the consultation had been completed and following very little if any consultation with the Catholic community and education sector.

The views of our highly professional and committed Headteachers expressed in a letter to the First Minister also appear to have been disregarded.

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 proposals will put Catholic schools in breach of their duty to comply with their trust deed.

Post 16 – pupils will be required to engage in courses of study that don't meet the needs and requirements of Catholic Bishops.

Catholic schools will be required to provide two curricular with all the additional associated costs, staff workload issues and unfairness of treatment that this entails.

The Bill creates a negative impression of Catholic schools, implying that the content of RE and RSE is not balanced, pluralistic and in accordance with legislation

RE as a rigorous academic subject may be undermined which will have a knock on effect on the numbers studying RE at university and will further decrease the pool of teachers available in this shortage area of the statutory curriculum.

These proposals undermine the rights of parents and could lead to an increase in home tuition

Discrimination against Catholic schools could lead to a legal challenge from the Catholic community

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 significant costs to schools of implementing two separate curricular

There will be increased staffing costs if Catholic schools are required to deliver additional courses to all other schools.

Further increased costs in order to release staff for professional development and to provide supply cover

Increased cost of fees to fund new qualifications

There will be additional budgetary and time implications for schools after many years of cumulative cuts and the additional burden of managing schools during Covid-19

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)

Proposals in the Bill introduce the powers and potential for the Welsh Government or future governments to make changes to legislation without consultation or scrutiny – This

could lead to further unacceptable changes to the Catholic community and even to the removal of RE as a mandatory element of the curriculum.

As RE is at the core of the curriculum in our Catholic schools it would impact on the very nature of a Catholic school.

If RE were to be removed from the curriculum in the future it would impact on all schools – RE is important for all pupils in all schools in order for young people to have an understanding of diversity, to become religiously literate and to make a positive contribution to social cohesion.

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)

All Headteachers of Catholic Schools in Wales wrote to the First Minister to express their concerns regarding the Bill. We feel that these committed professionals, many who have been involved in developing the Curriculum for Wales are not being listened to.

We do not agree with the change of name from Religious Education to RVE

We strongly feel that the right to withdraw should be maintained

We are concerned about the impact on parents' rights

We are concerned about the impact on RE as a core subject in a Catholic school

We are disappointed that Catholic schools are perceived as delivering an imbalanced curriculum based on a lack of knowledge, information and understanding of what is delivered in our schools.

The place and important contribution of Catholic schools and the Catholic community to Welsh Culture, history and education in Wales has not been recognised.

The longstanding partnership in the provision of quality education for young people in Wales has not been acknowledged in this Bill despite the Welsh Government publishing a document called 'Faith in the System' which acknowledged the valuable contribution of Church schools to promoting inclusion and social cohesion.

Many of our schools have received very positive Estyn Reports reflecting the quality of education and inclusive ethos of our schools and curriculum.

Similarly our Section 50 denominational Inspections highlight lots of good practice and case studies in our schools, including examples of the inclusive and caring ethos and the quality of pastoral care and guidance.

