

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: Bishop Vaughan Catholic School

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)

There are numerous positive aspects that we support and welcome, particularly the implementation of a broad, balanced and purpose-led curriculum. The proposed changes give practitioners more freedom to create a curriculum which connects both to their community and their' experiences. We have shared widely our belief in these changes, working hard to prepare our workforce with energy and commitment.

However there are some elements that cause us deep concern. Those elements fail to recognise the professionalism of staff in Catholic schools. Further, they do not look at the particular context of the Catholic community. Within our school, we have worked intensively to identify those areas in which we can find alignment with our purpose and mission as a faith school - and we believe that there are many. We want very much to be able to embrace the changes fully but are absolutely unable to do so due to the ways in which they jeopardise the position and purpose of faith schools.

We disagree, for example, with the proposed use of the description 'Religion, Values and Ethics'. We disagree with the change of name because, in Catholic schools, values and ethics are instilled across the whole school and, while RE as a curriculum subject

contributes to this, it is not something which can in any way be confined to a single subject area.

Of particular concern is the matter regarding another syllabus to pupils upon request. Catholic schools should not have to deliver a second syllabus. Both the justification for this and the practical issues surrounding it are highly problematic. In terms of justification for this change, it carries the implication that Catholic schools will only teach about other religions and perspectives if forced to do so by teaching an alternative syllabus. This is far from true. Our schools already teach about other religions and philosophical convictions and, importantly, we already meet the legal requirements in this regard. What we teach and the way that we teach it is balanced. The compulsion to offer a second syllabus is indicative of a lack of trust in our capacity and our commitment to doing these things.

In practical terms also, providing a second syllabus is a burden on Catholic schools in terms of workload and cost. Catholic schools will be treated differently to other schools and this is discriminatory. By extension, it also discriminates then against parents who have chosen to have their children educated in a Catholic school. Requiring Catholic schools to teach a second syllabus may put schools in breach of their trust deeds. On that note, the bill also indicates that, post-14, the WG may change the content of subjects, which clearly may include RE, and which again may put us in breach of our trust deeds. It is difficult to envisage how a second syllabus might be offered without bringing in additional staffing or purchasing/ creating associated resources. This places considerable pressure upon faith schools at a time of great change (because of the changes brought in by the Bill more widely, amongst other key changes, upon practitioners, upon budgets and upon Headteachers. Ultimately, all of those pressures impact upon pupils. We cannot support that. It is also difficult to envisage how a similar requirement made in any other subject area would be met with anything other than the same concerns and objections. Offering and delivering a second syllabus upon request is simply not practicable.

The removal of the right to withdraw pupils upon parental request is also something we oppose strongly. This takes away the rights of parents - which we defend vigorously on our work as Catholic schools. Catholic social teaching recognises that parents are the first educators of their children. It is consequently respectful of this. This erosion of an existing right may impact negatively on relationships with parents. It categorically shuts down the dialogue that has always existed around RE and RSE.

For all the reasons stated here then: the compartmentalisation of 'Values and Ethics' teaching into one area of school life, the discriminatory nature of the requirement to offer

a second syllabus (plus the practical, legal and financial consequences of doing so), and the erosion of an existing parental right, we cannot wholly support the principles of the Bill.

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)

In some key areas for Catholic schools, what already exists in law is balanced and fair, so we would not want these things changed.

In the new bill, there will be a burden on Catholic schools to provide two RE curricula. I have already outlined the issues associated with this, it being discriminatory and beset with legal, financial and practical obstacles, all of which are very real and very problematic to schools already working within a context of significant change. Issues also surround the requirement that we may be obliged to teach something not in line with our Catholic faith. Furthermore, the post-14 changes that may occur may also require us to teach something contrary to our trust deeds. If what this Bill is trying to achieve is the introduction of a broad and balanced curriculum, then legislation surrounding the second syllabus being offered is not required as what is offered is broad and balanced in itself.

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)

Headteachers have written a letter to the WG regarding the barriers that we perceive to exist, yet these perspectives do not appear to have been taken on board, and this sets up a climate of fundamental distrust. There is a loss of dialogue on this important and truly central issue for us.

Furthermore, in this time of immense pressure, it seems that there is not true recognition or understanding of the impact of Covid-19 on Heads. The stark reality of this is encapsulated in the report of Allen (TeacherTapp), Jerrim and Sims (both UCL) for the

Nuffield Foundation. The evidence is that the impact is overwhelming, and yet there appears to be an expectation that we will carry on preparing for the new curriculum in the same way as we would have in a non-Covid world. The workload and stress for staff are at an unprecedented level. There are inherent difficulties in engaging with professional learning at this time, when our focus is upon safety and continuity of learning, and upon pupil wellbeing and catch up. Staff availability for training is a real challenge and all of the practical issues connected with the pandemic affect our preparation for the new curriculum. Importantly, these disproportionately affect faith schools too if faith schools must, in addition to all else, begin to prepare to deliver a second syllabus in RE. Even in normal circumstances, the workload implications are considerable. Currently they are almost insurmountable. Inevitably, the Unions have also picked up on the fact that there is more of an issue for VA schools due to the requirement to prepare for a second syllabus. The consequences and impact upon staff may well have been unintended, but with this being raised and highlighted, it is essential that it is now considered.

Further potential barriers may be presented if there are parental objections on the right to withdraw, and there is no evidence yet that this possibility has been considered.

I would like to re-emphasise that there is much about the Bill about which we are excited, enthused and eager to embrace, but because of issues in these important areas, faith schools cannot wholly embrace the Bill.

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)

Ultimately it cannot have done, as Covid-19 and its impact do not seem to have been factored in. Furthermore, the Bill cannot have taken account of the barriers as the RVE consultation outcome has not been published and there is no evidence of the additional impact and workload for Catholic schools being taken into account. Also, it cannot have considered these potential barriers as it was presented to the Senedd before the consultation finished in July. All of this suggests that there is no commitment to acknowledging these barriers, let alone addressing them, as there was not even a commitment to waiting for the consultation to finish.

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)

Unfortunately, there appear to be several unintended consequences:

- With regard to the additional burden for two parallel curricula, this presents both a workload issue and potentially a significant cost to the school, in terms of staffing and resourcing this.
- The changes may put Catholic schools in breach of their legal duty to comply with their trust deeds, and any future changes post-14 may require schools to teach material that does not meet the requirements of them by the Catholic Bishops.
- In addition - and we would hope that it's an unintended consequence - the Bill creates a negative view of Catholic schools that their teaching is not balanced and pluralistic. This is categorically untrue.
- RE as a rigorous academic subject may also be undermined by the changes proposed.
- The impact on relationships with parents is that it undermines their rights. There may even be an increase in home schooling as a result of this.
- The changes put pressure on parents to make a decision about a subject in a way that they do not have to for any other subject: this is unfair and also discriminatory.
- It is possible and indeed probable that there could therefore be a legal challenge as a consequence of discriminatory treatment.

This is unfortunate as there is so much that is welcomed in the Bill, and easily addressed with proper attention to these valid concerns, rooted as they are in the wellbeing and rights of pupils, parents and teachers.

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)

There are clearly significant costs to teaching two parallel curricula. These are not merely limited to textbooks and photocopying, but extend to the very significant costs associated with additional staffing, as concurrent teaching of a second syllabus would be the only option. At least one additional staff member would therefore be required.

The professional learning to be undertaken by staff required to teach another syllabus is also cost-bearing and will require supply cover. The Bill also implies that there must be collaboration across schools and this will have a financial impact. There will be the associated increase in fees for new qualifications and funding for additional teaching resources. The preparation, resourcing and delivery of these curricula are burdens that non-faith schools do not have to carry.

It is worth noting too that, because of CV-19, more robust digital platforms are needed to undertake professional learning.

Furthermore, the emphasis within the Bill on experiential learning will have significant budgetary implications. Parents are unlikely to be able to make voluntary contributions where schools are situated in disadvantaged areas, this further impacting on families and upon school budgets.

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)

I am concerned about the potential for WG to make changes to legislation in the future. This could mean that RVE could be removed as a mandatory element. For Catholic schools,

this is at the core of our core curriculum and this would impact on the very heart of what it means to be a Catholic school.

If RE were to be removed in the future, this would have consequences for all pupils in all schools, for whom it is essential to have an understanding of diversity and to become religiously literate.

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)

In order to ensure that a climate of distrust does not take hold, it would be very valuable if the Headteachers' letter could be taken into account, this demonstrating listening to and valuing professionals.

Our concerns are centred around the change of name, the impact on parents, the recognition of RE as a core subject for our schools, the impact on teachers and our disappointment that Catholic schools are perceived as not balanced and inclusive and its staff not trusted to deliver RE in this way. The value that our schools have added to education in Wales surely means that these deep concerns require further consideration? The place of Catholic schools in the history of Welsh education is something of which we are proud, yet here the WG is taking away historic rights and potentially requiring us to teach in a way that does not reflect our traditions and values. These are by no means indoctrinated as our defence of parents' rights demonstrates, and as the Estyn and Section 50 reports of our schools will confirm.

We support the CES and Diocesan responses on this consultation, and we hope that these concerns can be addressed with the energy and resolve they deserve, the better to allow us to embrace the very many tremendously welcome aspects of the Bill.

