

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

Cllr. Joanne Collins

Chair Blaenau Gwent SACRE, Blaenau Gwent 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)

Blaenau Gwent SACRE agrees with the key principles for developing legislation to support the new curriculum and assessment arrangements. However, there are some concerns with regards to Religion Values and Ethics (RVE) and SACREs.

SACRE members agree that the curriculum for all children should be driven by the four purposes. However, SACRE recommends that there be reference to the spiritual, moral, cultural, mental, physical and social (SMCMPS) development of pupils within the CfW guidance. It will remain a legal requirement for schools, but the guidance does not make that clear.

The what matters approach will provide a broad and balanced curriculum, rich in knowledge, skills and experience, for all learners including those with severe, profound or multiple learning difficulties. Regarding RVE, SACREs feel that if taught well, the subject could be enhanced within the Humanities Area of Learning and Experience (AoLE). However, if excellent subject specific Professional Learning (PL) and Initial Teacher

Education (ITE) programmes and monitoring are not available, then the subject could be diluted and lose its place within the curriculum. Learner entitlement to good RVE must be ensured given that the subject is mandatory.

SACRE agrees with the child centred approach to promoting learner progression within the new CfW. SACRE is also 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 and that overall, the Bill will deliver what it is aiming to achieve. However, SACRE is of the opinion that not all changes within the Bill are necessary.

Professional Learning for RVE

In terms of RE/RVE SACREs across Wales and the Wales Association of SACREs (WASACRE) have recommended that Welsh Government ensure that RVE is delivered and engaged with in an objective, critical and pluralistic manner, ensuring that consistent standards are adhered to and that a comprehensive plan for Professional Learning and quality assurance measures are implemented. This is particularly important given that the parental right to withdraw is being removed. There is also a need to include raising awareness amongst parents about the nature of RVE so that they understand that the complex and sensitive issues discussed will be developmentally appropriate.

SACRE pointed out to Welsh Government in a previous consultation that a lot of groundwork needs to take place before the parental right to withdraw is removed. SACRE members would like to request communication from WG on their plans for PL for RVE. SACRE is disappointed that they have not been informed of firm plans for PL for school level curriculum planning and pedagogy. Generic Humanities PL delivered by non-specialists will not suffice.

Philosophical Convictions

Schools will need guidance about teaching philosophical convictions. This is a legal rather than a subject specific term. From specialist angle philosophical convictions (worldviews or beliefs) can be both religious and non-religious. There needs to be guidance about how to implement this within RVE in practice. Additionally, there needs to be PL to ensure that practitioners know what is required of them under law. SACREs needed to have access to the draft RVE Framework to see how this will work in practice. Unfortunately, SACREs have not been consulted on this in the same way, or with the same frequency, they were with the draft Humanities AoLE.

The change of name from RE to RVE

Blaenau Gwent SACRE members are of the opinion that current RE encompasses Religion, Philosophy, Ethics and Worldviews. It explores of the term 'religion' as a high-level concept, for engaging with the ethics and values taught within RE, but it also includes philosophy as well as religious and non-religious worldviews. RVE does not reflect the scope of the subject as the Explanatory Memorandum suggests. It omits vital exploration of religious and non-religious philosophical worldviews, which is at the heart of RE and of the proposed legislative changes being made by Welsh Government. Values are currently explored through the study of philosophy, ethics, and worldviews. They are also taught in every other subject within all AoLEs and should not be only the responsibility of RVE. In the previous consultation Blaenau Gwent SACRE preferred the option Religions and Worldviews. Some SACRE members pointed out that there is a conflict between the change of name and the Tenets of faith of schools of a religious character as is pointed out in the Explanatory Memorandum. As such a minority of members still prefer to retain the name Religious Education, but other SACRE members feel that a name change would help to mark a clear change in the teaching of RE/RVE.

RVE as a name is not supported by most subject specialist professional bodies. SACRE suggests that the change of name for RE is revisited taking account of expert opinion and research is being currently undertaken into the scope and nature of the subject at a UK and international level.

Standing Advisory Councils for Religious Education

SACRE does not agree that WG should remove the name (or a new name) of the subject from Standing Advisory Councils. It is the subject name that identifies the body to the public. SACRE wonders why this change is being made without discussion or consultation with SACREs or WASACRE in advance of the Bill being published? Standing Advisory

Council (SACs) and WASAC (Wales Association of SACs) are inappropriate acronyms for both organisations.

The majority of SACRE members are of the opinion that Committee A of SACREs should not be subdivided to include group 'aa' and that could cause this division between people of faith and belief sitting on SACREs and interfere with SACRE voting protocols. Currently, organisations representing both religious and non-religious worldviews have a place on Committee A and this is working well. Nevertheless, representatives of non-religious worldviews on SACRE support the restructuring of SACREs for an additional committee as bodies representing non-religious beliefs are still struggling to gain places on all SACREs despite the ministers letter from May 2018.

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)

Blaenau Gwent 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.

Section 375(3) of the Education Act 1996 provides that every agreed syllabus shall reflect the fact that the religious traditions in Great Britain are in the main Christian whilst taking account of the teaching and practices of the other principal religious traditions represented in Great Britain. SACRE wonders whether changes to this legislation are sufficient as the focus on taking account of...other principal religions' will not allow for a rich and full exploration of other personal and institutional worldviews held by some people of faith within Wales and the wider world. It will encourage old fashioned practice of teaching religions in silos and will encourage a hierarchical view of religions and a lack of respect for others that might be practiced by learners within our classrooms. Whilst it is important to ensure learners explore principal religions, learning should not be limited to that. This seems out of line with the attempt to ensure RVE takes a pluralistic approach. Additionally, SACRE wonders whether the wording 'Great Britain' might have been changed to Wales, the UK (or Great Britain) and the wider world in order to enable learners toward an understanding of religion and worldviews locally, nationally and globally.

Please see previous comments about SACRE members' concerns about the name to RVE not reflecting the scope or nature of the subject. This change of name risks undermining the academic nature of RE and diluting the subject. It is not in line with the direction of travel for RE internationally and is a backwards move.

Voluntary Aided (VA) schools would be impacted by having to produce two curricula and deliver two separate courses for RVE. This could be a barrier in terms of workload and the financial costs of staffing and resources for those schools.

Please see previous comments relating to SACREs. Would changes to local democracy need further consultation outside of the Curriculum and Assessment (Wales) Bill? As we have suggested previously the changes to the composition of SACREs are unnecessary.

Please see previous comments about the need for specialist Professional Learning for RVE. 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 Blaenau Gwent 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 Memoranda). Schools, the LA and Regional consortia should be informed about how PL is to be funded and implemented.

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 the composition of SACREs, Professional Learning and the need for further legislative change to ensure the pluralistic approach.

The financial costs being placed on VA schools having to provide two curriculums for RVE.

The impact of the Covid-19 pandemic might be a barrier to the rolling out of the CfW as funding for Professional Learning has already been reduced this year.

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)

SMCMPS is a general requirement under law and this may be overlooked by schools. SMCMPs should remain a focus of Estyn inspections or support for schools.

The proposed changes to SACREs could have an impact upon position, role, identity, and purpose.

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)

Blaenau Gwent 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)

SACRE understands the need to future proof the CfW, however, subordinate legislation would allow Welsh Ministers to change legislation without consulting with educational experts or the public. There could be a risk to all aspects of the curriculum if those changes are significant. For example, Welsh Ministers could remove or change mandatory aspects of the curriculum, such as RE/RVE without consultation. Major changes to education should always be consulted on. There needs to be protection within the law to significant and mandatory elements of the curriculum. Blaenau Gwent SACRE would like reassurance that subordinate legislation would allow Welsh Ministers to make changes 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)

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.”

There is a need for both specialist Professional Learning and continued advisory support for RE/RVE. WG, LAs, SACREs, Regional Consortia, WASACRE, the National Advisory Panel for Religious Education (NAPfRE), the Church in Wales, the Catholic Education Service, 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. The Foundation phase would particularly need support as RE has never previously been statutory in nursery settings.

