

## 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

Laura Taylor  
Headteacher, -

## 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)*

I fully support many of the principles of the Curriculum and Assessment (Wales) Bill, including the vision of a broad, balanced and purpose-led curriculum; the practical freedom it gives schools, and clusters of schools, to create their own curriculum; and, the way in which the curriculum will allow for greater opportunities for develop experiences for pupils to connect further, and in a more authentic way, with the communities in which they live.

However, I find the proposals made by the Welsh Government to oblige schools with a religious character to deliver the RVE Agreed Syllabus to pupils, where requested by parents, discriminatory, legally impossible and threatening to such schools. (I will be referencing Religion, Values and Ethics (RVE) as Religious Education (RE) in the rest of the consultation. I believe it devalues the integrity of the subject discipline, Religious Education, by adding unnecessary words to its title).

As set out in the European Convention on Human Rights (Article 2 of Protocol 1), pupils have the right to be educated in accordance with the wishes of their parents, and the long established system of allowing parents to choose either a Voluntary-Aided Catholic School

or other schools with a religious character, together with 'maintained' community schools, has always ensured that this right was upheld. This provision is a source of great richness in Welsh society.

As a School Leader, and when giving advice to the Governing Body of the school, I would be very concerned that the proposal to withdraw the right of parents to withdraw their children from RE undermines their primary duty as parents for the religious and moral development of their children.

In addition, the proposal to require schools with a religious character to deliver the Agreed Syllabus will create situations in which a Catholic school will be faced with a clash of two legislations. The Catholic school is a charity (in my case, that of the Archdiocese of Cardiff). As a charity, registered with the Charity Commission, and in compliance with the 1944 Education Act, the school is required to fulfil its Trust Deed. The principal objects of the charity, that my school is bound by, are the preservation and advancement of the Roman Catholic faith and the provision of primary and secondary education within that. The Governing Body of a Catholic School has no alternative but to fulfil that Trust. This proposed legislative change puts the Trustees of the Archdiocese of Cardiff, and the Governing Bodies of its schools, in an impossible situation in that they will have to be in conflict with either Charity Law or Education Law. This is an unacceptable position to be in.

My belief is that parents make a primary choice regarding a Catholic school education when they apply for a place at the school. If this is not an appropriate choice to make, the parents make this decision at the point of application.

In addition, the proposal fails to understand a key element of Catholic school provision. Religious Education in a Catholic school should permeate the whole curriculum. Indeed, it is more than a 'core of the core curriculum', it is the key driver of the whole curriculum. Delivered in this way, it is impossible to extricate and isolate Religious Education in a way that makes it discrete. The Catholic Church in Wales is exploring ways in which Religious Education, understood in this way, can be linked not only to the Humanities Area of Learning and Experience (AoLE) in the New Curriculum for Wales but also to all AoLEs (for example the document at: <http://www.rcadcschools.org/ces-docs.html>). The proposal indicates a lack of understanding regarding the nature of Religious Education in a Catholic school.

Finally, there is a practical problem with this proposal. Currently, the requirements are that if parents request the provision of the RE Agreed Syllabus in a Catholic school, the school must consider the proposal and possibly seek alternative provision. The new proposal makes it an obligation on the Catholic school to provide such an education. Apart from the

impact this would have on the decades-long provision of Catholic education in Wales, the staffing, preparation, training and cost of such a provision would be prohibitive and have a potentially damaging impact on the quality of provision provided for all other pupils.

### **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 of legislation what already exists in law is balanced and fair for Catholic Schools. There does not need to change. This is especially true of the proposed burden on Catholic Schools to provide two curricula, which is unreasonable. In addition, the current legislation recognises the Trust Deeds of Catholic Schools. Under this Bill, Catholic Schools will be expected to deliver RE that cannot deliver the Trust Deed. We cannot be expected to teach something that undermines this.

## **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 impact of Covid-19 has put additional work and strain on staff both during lockdown particularly as we navigate through direct teaching on high alert due to the risk of spreading coronavirus, and through blended learning and remote learning if a contact group needs to self-isolate. It is challenging to ensure the correct balance between the capacity for staff to do their roles within these difficult circumstances and their capacity to participate in Professional Learning to ensure effective preparation to implement the New Curriculum for Wales, especially when our main focus is the importance of health and wellbeing for all members of the school community. The potential additional workload of delivering two Religious Education curricula is very disturbing.

### **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)*

I do not believe the Bill has taken these barriers into account as the time-frame for introducing the New Curriculum for Wales has not changed. The Bill also does not take into account that not all of the guidance has been published e.g. the RE (RVE in Welsh Government terms) consultation has not yet taken place. The Bill, in fact, was presented to Senedd before the consultation period was over, which has led educational professionals to conclude that the Welsh Government is not serious about listening to the professionals and addressing any potential barriers.

### **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)*

Unintended consequences include putting schools with a religious character in breach of complying with their Trust Deeds and the additional burden, both financially and professionally, that the Bill will place on schools with a religious character to deliver two Religious Education curricula.

### **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)*

Financial implications include the release of staff for curriculum development and professional learning e.g. in the cost of supply cover, the cost (and difficulty) of the need to collaborate across schools e.g. in the creation of resources. Most fundamentally, the resources, preparation time and delivery of two different RE curricula will have a significant financial implication, which community schools will not need to manage.

## 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)*

The potential for Welsh Government to make changes to legislation in the future could potentially mean that RE (RVE) may be removed as a mandatory element of the school's curriculum in Wales. In schools with a religious character, such as my own Catholic School, RE is at the core of the curriculum and is fundamental to the nature and purpose of the school. In addition though, for all children and young people of Wales, it is vital that Religious Education continues to be delivered well in both schools with a religious character and community schools, not least to break down barriers caused by ignorance and prejudice. If removed in the future, the consequences for all pupils, who need to be religiously literate, and for Welsh society, may be significant.

## 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)*

N/A

