

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: Torfaen 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)

On the whole Torfaen SACRE supports the principles of the Bill, but with some concerns about the legislative changes with regards to RE/RVE and SACREs.

Torfaen SACRE agrees with the key principles for developing legislation to support the new curriculum and assessment arrangements as outlined on p.12 of the Explanatory Memorandum.

The curriculum, for all children, should be driven by the four purposes as recommended in Donaldson's Successful Futures. SACRE appreciates that the four purposes, and the curriculum, will enable all learners, including those with severe, profound or multiple learning difficulties, to have the opportunity to access a high-quality broad and balanced education throughout the period of statutory education.

SACRE is concerned that the Curriculum for Wales guidance for 3-16 year olds does not signpost the general duty to provide opportunities for the spiritual, moral, cultural, mental and physical development of pupils and of society. The four purposes of the new curriculum and each area of learning and experience can clearly provide rich opportunities for this; however, schools should continue to aware of this duty. Could SACRE suggest that

an amendment is made to the guidance so that this aspect of education is not lost and remains a general duty for schools in practice as well as in law.

SACRE is pleased that the what matters approach will provide a broad and balanced curriculum and that RE/RVE now sits within, rather than separate to, the curriculum. If taught well this approach also can enhance RE/RVE for learners. There is a real need for subject specific Professional Learning and ITE programmes.

SACRE agrees with the child centred approach to promoting learner progression. 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. Making links between all AoLEs and subject disciplines will enhance learning and progression toward learners realising the four purposes.

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)

Yes, there is a need for significant legislative change. However, concerns are outlined below:

SACRE members feel that the name change to RVE is unsuitable. WG has not evidenced or appropriately justified their claim that the name RVE better reflects the scope of the subject as suggested on the Explanatory Memorandum. It does not. SACRE would like to urge WG to re-examine the name change to RVE before the Bill is made law. SACRE is concerned that religious education is not dumbed down due to the weakness of this name. A focus on values and ethics may prevent learners from developing an understanding of the concept of religion and of religious and non-religious worldviews. Values and ethics should permeate the curriculum and the four purposes. The development of values and ethics does not wholly lie within RE and it is difficult to track any kind of progress in values. In terms of equity between religious and non-religious worldviews, the name RVE will not achieve this in the same way as a name change to Religion and Worldviews. RVE seems to be an old-fashioned way of referring to what is usually a forward-thinking subject. This choice of name seems to have been made based upon a choice initially made by Welsh Government rather than experts in the field and a tick box exercise in the previous consultation, where responses were converted to percentages. There was no consideration as to whether those responding were experts in the field, professional bodies representing RE specialists or SACREs, or whether they were unqualified individuals.

The scope of RE would have been better summed up in a change of name to Religion and Worldviews,

Additionally, 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 RE specialist expert bodies including the Wales Association of Standing Advisory Bodies on Religious Education (WASACRE), Torfaen 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, and the National Association of Teachers of Religious Education (to name a few who have shared their responses).

Standing Advisory Councils for Religious Education

SACRE members are concerned that WG proposes to refer to SACREs as SACs as suggested in the Curriculum and Assessment Bill. This is not acceptable to SACRE members and we feel that we should have been consulted on this change that directly affects us. We also disagree with WASACRE consequently being inappropriately referred to as WASAC. The main reason for disagreeing with this is that the identity of the subject has been removed from the name of the organisation. There is no indication as to what exactly Standing Advisory Council's would be advising on.

SACRE does not agree to changing the SACREs composition by adding the 'aa' group representing philosophical convictions to Committee A. This would cause division, impact voting procedures and could cause inequity. Their place is simply on Committee A without division.

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 and to move away from teaching religions in silos and also to reflect the wording of the new curriculum with regard to Wales and the wider world.

SACRE would have liked further clarification on the definition of the term philosophical convictions. This 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. This seems to be a term used legally rather than within curriculum planning for RE/RVE. Within RE philosophical convictions can be religious as well as non-religious. It would be better to use the terminology of religious and non-religious worldviews. SACRE members are concerned that if schools feel they must teach all of the philosophical convictions covered by ECHR then the time to teach religion and worldviews would diminish and the subject would be dumbed down. Further guidance on the teaching of philosophical worldviews (convictions) should also be given in the RE/RVE Framework as well as the focus of subject specialist Professional Learning.

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)

here is a need for legislative change to implement the Bill, however, concerns and potential barriers are outlined below.

Please see above with regard RE/RVE and to SACREs.

SACRE is of the opinion that learners within VA schools should be taught about a variety of religious and non-religious worldviews and to also be taught the tenets of the religious institution to which they belong. Parents in Wales have choice over which type of school they send their children to, including VA schools of a religious character. This is the point at which parents should opt for RE according to a denominational syllabus or choose an alternative setting where a locally agreed syllabus is taught. Currently schools can say no to parents if this is not practicable. Schools may find it difficult and costly to provide two different schemes of learning. Who would be responsible for funding this additionality? This is a barrier to implementation as it will negatively affect these schools financially and their staff wellbeing in terms of workload. Religious institutions have participated in the co-

construction of the CfW and will have regard to it when producing denominational curricula. It is possible for learners in these schools to learn about a variety of religions and worldviews in an objective, critical and pluralistic way as outlined in the new curriculum guidance.

Who will be responsible for monitoring, inspection of RE and PL if taught according to the locally agreed syllabus in VA schools? Will this have implications for LAs and SACREs? The practicalities of this proposal need to be addressed. There may be an impact upon workload of teachers, resources, and finances. Welsh Government would need to outline how this proposal would work in an integrated or interdisciplinary approach. How would it be possible to take learners out for separate RVE or for RE? And could learners potentially miss opportunities to engage with aspects of other subjects?

Trust deeds refer to RE and not RVE. How do WG suggest schools overcome the potential problem of breaching their trust deeds? This may be a barrier to implementation.

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 Torfaen 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). Regional consortia and LAs have not been made aware of the need for RE/RVE specific training. Given the advisory role and SACREs and their local responsibility they have for ensuring PL takes place. Any PL provided by regional consortia should be undertaken in collaboration with the local SACREs so that they are completely informed as to the provision taking place. In addition WASACRE also has a role to play in PL for RE/RVE and LAs/regional consortia should collaborate with WASACRE and SACREs on this.

PL should be available through the medium of Welsh. Welsh language resources should be developed at the same time as English medium resources. It would be better that authors work together bilingually to check for meaning.

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.

Neither the Bill nor the Explanatory Memorandum account for the financial implications being placed on VA schools having to provide two curricula 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, identity, and purpose. There may be unintended consequences for RE/RVE and for SACREs under subordinate legislation (please see the answer to 4.1)

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, Torfaen 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 ring-fencing 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)

Torfaen 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 or changes in the use of language. 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. There needs to be reassurance that subordinate legislation would not allow Welsh Ministers to make changes to RVE and to SACREs without consultation. If this were to happen in the future, it might undermine local democracy.

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.

It is concerning that the Bill is going through the Senedd before SACREs have had sight of the RE/RVE supporting framework and the detail it will provide on the implementation of the legislative changes for RE.

