

# Ensuring access to the full curriculum

## Consultation response form

Your name: The Revd. Canon Edward Evans

Organisation (if applicable): Executive Committee  
of WASACRE – Wales Association of Standing  
Advisory Councils on Religious Education

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Responses should be returned by **28 November 2019** to:

Health and Well-being AoLE Team  
Arts, Humanities and Well-being Branch  
The Education Directorate  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to

e-mail: [AHWB@gov.wales](mailto:AHWB@gov.wales)

Please indicate which of the following stakeholder groups you are responding as:

Child or young person	<input type="checkbox"/>
Parent/carers	<input type="checkbox"/>
Other family member	<input type="checkbox"/>
School, teacher, governor	<input type="checkbox"/>
Other education practitioner	<input type="checkbox"/>
Organisation or representative body	<input checked="" type="checkbox"/>
Individual	<input type="checkbox"/>
Other	<input type="checkbox"/>

Other (please specify): \_\_\_\_\_

**Question 1** – What implications would there be for learners, parents/carers and schools if all learners were required to receive RE and/or RSE lessons in the new curriculum?

Please use the space below for your comments:

**RSE – WASACRE will not be making any comments on RSE as this is not within our remit.**

## **RELIGIOUS EDUCATION**

**WASACRE met on 21<sup>st</sup> November 2019. The Welsh Government consultation was discussed at length. It was agreed that WASACRE fully endorses all views of its' Executive, which had met on a previous date, regarding the Welsh Government proposal to remove the right to withdraw their children from RE.**

**WASACRE is disappointed that the consultation for RE and RSE are dealt with in the same consultation when the issues surrounding them are both complex and separate. WASACRE, along with several other organisations of significance and SACREs, requested during the feedback to the White Paper that the consultations on RE and RSE be held separately.**

**In principle the Executive Committee of WASACRE agree that it would be ideal to remove the right to withdraw where the teaching of RE is objective, critical and pluralistic. There are significant implications for learners, parents/carers and schools if the parental right to withdraw their children from RE were removed with the introduction of the new curriculum. WASACRE Executive members pointed out that if there had never been the right to withdraw it would appear ludicrous to introduce it now. In which case, is this law still fit for purpose?**

**The WASACRE Executive understands that the intention of Welsh Government is to include all learners in RE. WASACRE executive members agree with Welsh Government that learners are less likely to become ethically informed and achieve the four purposes without RE. Schools would miss lots of opportunities to enable learners to achieve the Four Purposes if learners are withdrawn from the subject.**

**It would indeed be very difficult in an interdisciplinary curriculum to withdraw learners from RE. If the right is retained, then the RE would need to be visible. For example, if you were looking at the Reformation in both history and in RE which parts would you withdraw learners from? WASACRE executive members agree that it is an anomaly that you can withdraw learners from an academic subject like RE and not from another academic subject where learners may indeed be exploring the same topic. We also understand that learners should have access to the full curriculum.**

By removing the parental right to withdraw it is right that this is now no longer a school issue but becomes a WG issue. Schools would need guidance in dealing with parents who have previously held this right. WG could also be challenged in law if delivery as well as planning in schools is not deemed to be objective, critical and pluralistic. Legally RE has to be objective, critical and pluralistic in practice as well as in legislation in order to avoid legal challenges. There needs to be a clear complaints procedure for parents to follow if good RE is not being taught.

WASACRE Executive members would like to see the removal of the right of parents to partially withdraw their children from RE as sometimes this right has been used for reasons of prejudice.

In removing the parental right of parents some people argue that Welsh Government would be removing the ultimate responsibility of parents to educate their children. The implication of this would be great for some parents. There is a possibility that there will be a greater number of parents who might choose to home school their children as a result. Welsh Government could limit the consequences of this through a public dialogue, guidance for all stakeholders, professional learning for everyone involved in the education of children - Headteachers, SLT, practitioners, governors, SACREs, LA officers, etc., and guidance on school policies surrounding RE. Schools should put a policy on RE in their prospectus and on their website.

Regarding: Section 375(3) of the Education Act 1996 which 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. – It is not clear to Executive members whether it is the intention of Welsh Government to retain Section 375 (3) within legislation. If this is retained in law and RE remains ‘predominantly Christian’ how can it also be objective, critical and pluralistic and how, therefore, can you remove the right to withdraw? The danger here is that the legislation will contradict itself. However, Welsh Government has not overtly consulted upon this aspect of legislation in order to give the public a proper say on whether Section 375(3) should be retained or removed. Additionally, legislation needs to be future proofed. Currently the GCSE is 50% Christian for example, however, should the figures continue in a downward trend then the statement ‘in the main Christian’ may no longer be accurate. The language surrounding the term ‘principal religious traditions represented in Great Britain’ should also be considered – will this still be appropriate for the new curriculum? What do we mean by pluralistic in the new curriculum? Questions such as: What religions should be studied? might be assumed and inferred. WASACRE Executive members suggest that this language isn’t inclusive and would not lead to objective, critical and pluralistic RE. In which case this has an implication on removing the parental right to withdraw from RE.

There needs to be a meaningful dialogue with parents to launch this right to withdraw and to maintain this understanding year on year. There should be training for headteachers to enable them to deal with this. SACREs should be able to advise on this and SACREs should engage with their communities. This would only be able to happen if there are professional advisers to SACREs within local authorities.

The issues surrounding the parental right to withdraw children from RE are very different in Faith schools to those within community schools. This makes it difficult to completely remove the right to withdraw. The new curriculum should be inclusive and Faith school syllabuses should give ‘due regard’ to the Humanities AoLE. However, RE will still be taught in a denominational way. As many faith schools are state funded and, therefore, paid for by the tax-payer, anyone has a right to send their children there regardless of whether or not they adhere to that particular faith. Therefore, many children find themselves placed within faith schools for numerous reasons, e.g. if it is their nearest school geographically, for social reasons, etc. It is right, therefore, that the parents of these children retain the right to withdraw their

children from denominational RE which may not be deemed by them to be objective, critical and pluralistic. There should be equality under the law for religions and for learners whose personal views should be considered no matter what their religion or belief might be. If the right to withdraw is removed there will be a reaction from people because of misunderstanding in society about what RE is. This might have implications for families e.g. a number of Jehovah's Witnesses families.

**20. Implication –** Wales has a compulsory national curriculum and locally agreed syllabus. Welsh Government has addressed this potential tension the White Paper by proposing that Agreed Syllabus Conferences pay due regard to the Humanities AoLE. However, if a SACRE were to decide not to adopt or adapt the RE Framework as the Agreed Syllabus would it possible to remove the right to withdraw? How would Welsh Government ensure that parents know what the RE Curriculum would look like under those circumstances? The Executive Committee suggest that it would be more important to remove the clause Section 365/3 to ensure Agrees Syllabuses are objective, critical and pluralistic. This is an additional reason why professional advisory support is needed for ASCs and for reasons of accountability reasons this support should not be bought in from external companies/bodies by LAs or regional consortia. The WASACRE Executive committee fully supports RE being locally determined. This falls in line with the principle of subsidiarity. Local SACREs take their role and responsibilities seriously. Unless RE is valued and supported by LAs and the Consortia then the principal of subsidiarity in itself is an obstacle to the removal of the right to withdraw.

Currently the right to withdraw also includes the teacher's right to withdraw from teaching RE. Welsh Government has not addressed this in the consultation despite WASACRE and other organisations pointing this out in their responses to the consultation on the White Paper. Is Welsh Government intending to consult on this issue? Is Welsh Government intending to remove this right from teachers? This is very important in the new curriculum as RE may well be taught by more non-specialists in a Humanities Curriculum. Some teachers may feel that to teach RE conflicts with their personal faith, belief or worldview. And, if this is legislation is retained then it might be more difficult to remove the right of parents to withdraw their children.

**Question 2 –** What support, information and guidance would be needed if this approach was adopted?

Please use the space below for your comments:

Executive members of WASACRE suggest that it needs to be made crystal clear that the proposal to remove the parental right of withdraw their children is from RE and not from Collective Worship.

There is misinformation amongst the public and within some schools about the nature of RE and there needs to be a public dialogue so that parents are more well informed about why this right has been taken away and about the nature of RE in the new curriculum. There may well be objections to learners having to participate in certain activities, e.g. some parents worry about their children participating in meditation, or yoga, or Expressive Arts projects that have a religious theme. Access to guidance, professional learning and advisory support is needed so that headteachers can best manage situations like this whether the right to withdraw is retained or removed.

If it is decided that the right to withdraw is removed for all learners from September 2022 there is a need for guidance for schools and headteachers on how they can best

manage the reintegration of learners that are currently withdrawn. Whatever approach is taken there needs to be support for headteachers in terms of practical guidance from WG for dealing with the transition. Additionally, parents in the future may have concerns regarding RE or over what their children are being taught in RE. Sharing of information with parents about what is being taught is vital, especially as this curriculum is based upon the principle of subsidiarity. This is also another reason why guidance and advice are essential. There may be a need to strengthen the role of the local SACRE. The lack of an advisory service for RE and SACEs is problematic given the sensitivities the subject has to deal with and the absolute need for good Professional Learning for RE. If there is to be no right to withdraw. Welsh Government must be seen to be doing everything within its power to avoid litigation and practitioners need to be protected by receiving good subject specific specialist training so that they are confident in delivering objective, critical and pluralistic RE. Practitioners should not live in fear of making mistakes in this delivery.

**Question 3** – Our proposal is that parents/carers should not be able to prevent their child from having RE or RSE lessons. This will be rolled out from September 2022, for all primary age learners and learners in Year 7 in secondary school (with additional year groups being added each year).

Should the ability of parents/carers to prevent their child from receiving RE and RSE lessons also be stopped under the old curriculum from September 2022? (This would only have implications for learners in Years 8–11 in 2022, Years 9–11 in 2023, and so on.)

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Why do you think that?

If Welsh Government is arguing that not to allow all learners full access to a broad, balanced curriculum is an equality issue, then it seems logical that all learners be given equality at the same time. Legally the current curriculum for RE should also be objective, critical and pluralistic. It, therefore, it makes sense that equality should apply within both the current and new curriculum. Rolling out the right of withdrawal might undermine the thinking behind the proposed changes to legislation as this would be discriminatory to learners in years 8-11 who would not be accessing the whole curriculum.

On the other hand, to introduce a roll out would make it less challenging to headteachers. They would not need to have the conversation, and possible conflict, with parents of those children who are currently being withdrawn from RE about re-integration. Whatever path Welsh Government choose to take, there needs to be a clear path of action during the implementation of the new curriculum and beyond. For parents there needs to be discussion with schools, complaints procedures, etc. A document/policy needs to be ready and training received in advance setting out clear guidelines. There also needs to be clear description of what is being taught and why it is being taught so that it is clear that there is no need to withdraw from RE. SACREs, WASACRE and NAPfRE advisers might be able to assist Welsh Government with preparing the necessary guidance.

**Question 4** – What is an appropriate name for ‘religious education’, to accurately reflect the broader scope proposed in for the new curriculum?

No change	<input type="checkbox"/>	Religion, values and ethics	<input type="checkbox"/>	Religions and worldviews	<input type="checkbox"/>	Other (please specify)	<input checked="" type="checkbox"/>
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Other (please specify): **RELIGION AND WORLDVIEWS**

Reasons for your choice:

The WASACRE Executive Committee is in agreement that, if there is a name change for Religious Education, then it should be to **RELIGION AND WORLDVIEWS** as outlined in the Final Report of the Commission on Religious Education in England, where the name first appears. The commissioners of this document, made up of eminent scholars and experts in the field of Religious Education, thought long and hard about before recommending this name. WASACRE wholeheartedly appreciates the good intentions behind the WG proposal to change the name of the subject. However, WASACRE Executive members have major concerns about the preferred name proposed by Welsh Government. To add an 's' significantly changes the nature of name and does not satisfactorily reflect the nature of the subject, especially as it is intended within the new curriculum. The term Religions suggests content and would lead to the question: Which religions should we study? This, therefore, has the potential to be divisive. It also fails to fit with an objective, critical and pluralistic approach to RE.

The term Religion is a high-level, overarching concept and would be more fitting with the concept driven Curriculum for Wales 2022. Learners need to understand the conceptual category of 'religion' as well as other concepts such as 'secularity', 'secularism' and 'spirituality'. Understanding the origins and uses of the concept 'religion' will help to illuminate debates in the study of religion. It will enable learners to build a well-rounded understanding of religion as a force in shaping society. RE is a multidisciplinary field of study and it is vital that the new name reflects this. In our view only the name Religion and Worldviews does this. It continues to allow for a study of the concept of religion as it is currently explored in philosophy of religion, sociology of religion, religion and ethics, psychology of religion, religion and politics, religion and the state, and so on.

It is important to include the term Worldview in the name as a worldview is a person's way of understanding, experiencing and engaging with the world. This includes how a person understands the nature of reality and their own place in the world. A person's worldview is likely to influence and be influenced by their beliefs, values, behaviours, experiences, identities and commitments. When exploring worldviews learners would explore their the personal worldviews or themselves and other as well as institutional worldviews shared by groups, organisations or institutions. These include both religious and non-religious worldviews. The language of worldviews helps us move away from a divide between the religious and the non-religious. It recognises that non-religious worldviews draw on the heritage of religious ones, and vice versa. Understanding worldviews in this way will enable learners to engage with, and appreciate, the pluralistic society in which they live. WASACRE suggests that the name **RELIGION AND WORLDVIEWS** best describes the nature of RE in the new curriculum.

It is the view of the WASACARE Executive Committee that the suggested name Religion, Values and Ethics is unsatisfactory as is does not allow for the study of personal and institutional worldviews. In addition, values and ethics are the responsibility of all subjects and all practitioners to enable learners to work toward the Four Purposes. Developing values and ethics is not the sole responsibility of the RE teacher.

Worldviews is one word rather than two, or a hyphenated word as is sometimes the case in the consultation documentation. It is vital that this is consistent in all WG documentation including the Humanities AoLE where it appears as two words.

The Welsh translation 'Crefyddau a Bydolygon' is problematic as the meaning does not reflect the meaning of the English 'Worldviews'. It refers more to a scenic view rather than views and opinions as intended within the English use of the term Worldviews. Also, the term 'bydolygon' is a term that has never been used within Religious Education in a Welsh medium setting. A more appropriate name would be 'Crefydd a safbwyntiau byd eang' which would better reflect the understanding of the English name.

WASACRE met on 21<sup>st</sup> November 2019 and The Welsh Government consultation was discussed at length. The views of representatives from SACREs present at the meeting were divided. Half preferred to retain the current name Religious Education and half would like to see a name change to RELIGION AND WORLDVIEWS. Other names for the subject were mooted but didn't receive as much support. The meeting of the Association would like to point out the difficulties with translating the term Worldviews into Welsh as outlined above. They would also like to point out the difficulty in translating other subject specific terminology alongside words that affect the nature of RE including the term 'pluralistic'. It was suggested that a Welsh speaking specialist in Religious Education be involved in the editing of both the RE Framework and the Humanities AoLE.

**Question 5** – We would like to know your views on the effects that not including a right to withdraw in the new curriculum would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

### Supporting comments

**There should be no negative effects on the Welsh Language should this proposal be implemented.**

**Question 6** – Please also explain how you believe the proposed plan could be formulated or changed so as to have:

- iii) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- iv) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

### Supporting comments

**There are many positive opportunities to develop Welsh Language in Religious Education.**

**RE and Welsh as statutory subjects on the curriculum should have parity. This was confirmed during the Humanities Planning meetings held between Welsh Government and WASACRE during the curriculum development process. How will Welsh Government ensure parity is achieved? In the same way that the new proposals**



should not have a negative effect on the Welsh Language, they should equally not have a negative effect upon Religious Education.

**Question 7** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

WASACRE Executive members appreciate the support that Welsh Government has given to both SACREs and RE during the curriculum design period. WASACRE appreciates the great deal of collaborative working that has taken place and the opportunity it has had to engage in the many consultations that have taken place.

The Executive Committee agrees with the Minister that all learners should have a broad and balanced curriculum. We would like to point out that the Ministerial forward refers to ‘a framework’ and not ‘frameworks’ for RE and RSE. We consider it confusing to refer to one framework for both RE and RSE.

We wish to make the following additional points with regard to the proposal:

19. We agree that RE has central role to play in realising the Four purposes and suggest that professional learning is needed in order to ensure that high quality RE is incorporated within the Curriculum. We suggest schools will need to be supported in exploring how RE fits into the Humanities curriculum, given that it sits outside the current curriculum. If all learners are to achieve the Four Purposes this is vital, as is a specialist advisory service.

We suggest that Welsh Government broaden and strengthen the role of SACRE as it is the role of SACRE to advise the LAs and their schools when dealing with complaints and the procedures surrounding them. The WASACRE Executive Committee is at pains to point out that this is the role of SACRE and should Estyn and the regional consortia play a role in this in the future, as these proposals suggest, the existing role of the LA and of SACREs ought not be undermined by changes to the wording of the legislation. If Estyn and the regional consortia are to have a future role then there needs to be dialogue and agreement around a shared vision for what that will look like in practice in order to avoid confusion.

22. It is important that the wording of this sentence stop after ‘RE takes account of non-religious worldviews’. It most definitely should not state ‘which are analogous to religions (for example, humanism)’ as this might suggest to practitioners that they are prohibited from exploring and discussing concepts such as secularism and atheism, etc. In a diverse society it is vital that all beliefs/worldviews should be open for discussion. This is reiterating the same point we made in the response to the White Paper. WASACRE Executive members are happy to discuss this with Welsh Government.

23. Worldviews is one word rather than two, or a hyphenated word as is sometimes the case in the consultation documentation. It is vital that this is consistent in all WG documentation including the Humanities AoLE where it appears as two words.

31 – The WASACRE Executive agrees that removing the right for parents to withdraw their children from RE would support the interdisciplinary approach in the new curriculum.



## Proposals

33. How will practitioners ensure developmental appropriateness? There needs to be a subject specific advisory service and PL to support for teachers and practitioners. E.g. currently some of the content of the RE GCSE is being taught in years 8 and 9 and is sometimes inappropriate. This is happening because performance measures are encouraging schools to teach courses earlier and earlier. This is most definitely not developmentally appropriate and should be avoided at all costs in the new curriculum. The health and wellbeing of learners should take precedence over performance measures or any other reason why this developmentally inappropriate teaching is taking place. An advisory service linked to SACREs and the regional consortia could ensure this.

38. As the right to withdraw is a government issue any guidance and PL endorsed by Welsh Government would provide consistency, gravitas and aid to headteachers. The role SACREs should be strengthened to aid Welsh Government in monitoring RE.

39. WASACRE agrees with the WG suggestions in this point. How are we going to ensure high quality, developmentally appropriate RE provision? RE is locally determined and the role of the SACRE should be strengthened to deliver effective PL.

40. We agree that the right to withdraw is not an appropriate mechanism to deal with poor quality RE and that there are other more appropriate methods to ensure this. We agree that PL would be required. However, there is a gap in specialism within regional consortia and an inconsistency in culture between consortia. Some consortia are very supportive of RE and are making changes to ways of working to ensure the schools within their region are able to access advisory support via the consortia and not solely through the LA. Nevertheless, some of the consortia see the responsibility for RE solely lying with the Local Authority. It is the opinion of the WASACRE Executive that all stakeholders should work together to ensure high quality RE takes place in schools throughout Wales. Nevertheless, if there is to be a future part for the consortia to play, then the role of SACREs should not be undermined. A consistent process by which LAs, SACREs and consortia can work together needs to be developed nationally. Currently some consortia do not communicate with SACREs or seek the advice of WASACRE e.g. in seeking advice about appointing professional advisory support to SACREs. Very worryingly Wales has seen a rapid decline in RE advisory expertise in recent years due to this lack of communication.

41. Re “the focus on developmentally appropriate and culturally sensitive teaching and learning; and the emphasis on engagement with communities and recognising and responding to the background of learners in discussing these subjects, would provide appropriate safeguards for parents.” WASACRE Executive members point out that good RE has the potential to encourage community cohesion. In order for culturally sensitive teaching, etc, to take place then practitioners, SLT, schools, governors, SACREs, consortia advisors, etc need to be confident in what and how that is to be delivered so that this does not potentially undermine community cohesion. Training will be needed for all now and consistently in the future to ensure this.

42. WASACRE executive members agree with all points here.

43. Parents will be concerned that their children are being protected and there is a need to safeguard children from RE that is not taught in an objective, critical and pluralistic way.

Welsh Government is proposing to change the way we interact over this issue. Therefore, WG will need a procedure to follow to deal with these changes and not to let headteachers deal with this alone.

WASACRE are willing to support Welsh Government in considering the implications of removing the right to withdraw. SACREs and WASACRE are in the position to help you with this. SACREs could be part of the solution to the implications that might be brought about through this change to legislation.

