

## 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

A Bolt  
Headteacher, Mrs

### 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)*

The current curriculum is outdated. We need a curriculum which prepares our future generations for the present and future as citizens of a rapidly changing Wales and wider world. Since the implementation of its predecessor, the world has changed beyond recognition, not least in relation to society, technology, sustainability and employment. We now need a curriculum which can adapt to this rapid change and to the needs of our learners on an individual, local and national basis, a curriculum that focuses on quality of learning and the development of skills, knowledge and attitudes. A purpose led curriculum will drive school behaviour towards honest learning rather than data driven outcomes which have no bearing on learning or the future for our young people. CfW is based on principles and purposes of high quality learning and teaching approaches drawing on international models from top performing countries, the expertise of education leaders in a range of fields, decades of research and impact studies and the knowledge and experience of practitioners and leaders in successful schools. The philosophy of a purpose driven curriculum relies on a high quality professional workforce and the professional learning opportunity the curriculum affords can only support a shift in the value of achievement for every learner. Engagement with the principles and purposes of CfW is already high, and

leaders and practitioners recognise the impact the change will have on all their learners as their understanding of child development and proven successful pedagogical practice grows. The curriculum guidance clearly sets out the ultimate aim for learners to move towards the four purposes which underpin the framework that schools will build their curriculum around for their learners.

The statements of what matters were agreed upon after considerable collaboration, research, reading and evidence gathering in order to pinpoint accurately those aspects of the six Areas which are most important to children and young people today.

The CCSs, integral skills, cross-cutting themes and wider elements provide a comprehensive curriculum on which to build a design for each school and setting.

The final edit was the result of a rigorous process of testing, editing and refining prior to the comprehensive consultation period, during which it was scrutinised by a wide variety of organisations. It would be impossible for a learner to achieve the four purposes if RSE and RVE were not integral to their experiences. Welsh and English are vital to accessibility. The Curriculum for Wales embodies the premise that a highly effective curriculum recognises that curriculum, pedagogy and assessment cannot exist independently of each other. It follows therefore that school curriculum design must be considered with pedagogy and assessment as integral to it.

Effective assessment practice is crucial to the learning process, enabling every learner to make progress. The purpose of assessment in the Curriculum for Wales Framework is, fundamentally, to support progression towards the four purposes. Schools and settings will need to ensure that practitioners develop a shared understanding of what progression looks like, across the setting, in order to inform planning for learning. Schools should give themselves permission to stop any assessment practices that do not contribute to this.

With appropriate support and challenge, learners will not only make progress, but will also learn to recognise their individual achievements and identify their next steps in learning independently. The Curriculum for Wales places the focus of assessment in schools on formative assessment, taking place while the learning is happening, and considering the whole child – their knowledge, skills, experiences, attitudes, values and wellbeing.

Schools now have the autonomy to design a curriculum for their context and their learners' individual needs whilst fully including the learners in the process. Professor Louise Hayward described the reform as, 'moving the school culture from measuring to feeding'. Learning experiences, therefore, should focus on 'growth', ensuring that there is scope for breadth and depth of learning that allows learners to make progress at their own pace in order to

reach their true potential. Schools will need to think about the inter-related nature of learning, teaching and assessment when designing their curriculum and planning for its delivery. This will mean collaborating to consider how their design will meet learners' individual needs over time as they make progress towards the four purposes. Practitioners should have the autonomy to use a wide range of effective and appropriate pedagogy, including those that support the social and emotional aspects of learning which are so important at all times but particularly at this time. The teaching approaches selected should encourage learners to take increasing responsibility for their own learning, understanding where they are, where they need to go and how to get there, including their views when creating the curriculum and in planning their learning experiences. Planning for progression should always take account of the pace and depth of learning, moving from literal, simple information to more abstract and complex concepts. Progress happens when skills, knowledge and understanding can be transferred to and applied in new and increasingly unfamiliar contexts and is enabled when discussion, reflection and evaluation form an integral part of the learning.

As such, it is important to remember that we are dealing here with people, not products. Progression doesn't happen in age boxes or phase boxes – it happens when it happens. Our current thinking in relation to assessment and progression can easily be distorted by the constructs which frame our thinking which have grown from decades of unhelpful terminology and assessment tools. The job now is to strip away the aspects which do not focus on the learner, constructing the learner-focused curriculum and thinking about how children make progress. The new curriculum and assessment arrangements require us to develop a new understanding of progression and how it informs curriculum planning and assessment for the purpose of learner progression.

These principles of progression are supported by descriptions of learning which provide more detailed guidance on progression within each area of learning, and what it means for a learner to progress throughout the continuum of learning.

They should be used as part of discussions within clusters and networks of schools in order to build collaborative approaches to curriculum, assessment and learner progression. Learners will not simply move from one progression step to the next. They will get there through the equitable and authentic learning experiences that are created, the knowledge and skills they gather and the formative feedback they receive. This isn't written into the framework because it is individual to the learner, the group, the setting and the community. Assessing 'what matters' needs to be our guiding principle and whilst that may seem an obvious analysis it is not always reflective of what we do in schools today. Now,

more than ever, a purpose driven curriculum needs purpose driven assessment reflecting and enhancing learning rather than detracting from it.

**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)*

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**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)*

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**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)*

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**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)*

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## 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)*

It is important to remember that schools have always had to develop. They have always had to improve and to take account of staff development through high quality professional learning. They have always had to set aside budget for this and allocate time from the given hours and Inset days. Implementing a new curriculum is not additional to this - it enhances it and ensures that schools focus their time more carefully and productively on their learners. Some schools may need to think about how they utilise budget, time and resources differently.

## 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)*

My only concern will be around the amount of legislation detracting from the school's autonomy. If we over legislate we will lose the very purposes and principles of this curriculum in improving education for all.

## 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)*

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## 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

Kim Morgan

Teacher, Mrs

### 1. The Bill's general principles

#### 1.1 Do you support the principles of the [Curriculum and Assessment \(Wales\) Bill](#)?

No

#### 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)*

The current provision of the New Curriculum will not ensure fit for purpose skills, particularly in language learning for our future learners. Although there is a greater focus on Welsh, our learners also need to learn Modern Foreign Languages, if the country is to set up effective trading relationships with other countries. Currently, 2/3 of Welsh exports go to the EU and the majority of those are exported to Germany. If the new curriculum does not have more robust wording in its expectations that Welsh learners should have the skills to communicate in Welsh/ English and Modern Foreign Languages (please note the plural and see comments on unintended consequences) then this ability to look outwards will be severely diminished.

MFL learning and particularly the learning of German in schools has reduced dramatically over the years and is in danger of being wiped from children's curriculum choices. This is because the optional element of language learning has allowed pupils to seek perceived "easier" options and other languages are perceived as "easier". It has not been supported in the same way that STEM subjects have and yet it is a perfect skill to combine with STEM subjects, if Wales wants to be able to trade globally. In manufacturing it is the best choice,

as well for areas such as R and D, IT, Finance and publishing ( to name but a few). The figures on Welsh exports show that Spanish and French are not necessarily the skills that are most in demand by Welsh businesses. It has been easy for schools to "save money" by narrowing the curriculum choices of pupils and wiping German from the curriculum. Unless the New Curriculum states clearly that the offering of more than one MFL is required and desirable for our future learners, schools will simply offer the bare minimum (see comments on unintended consequences).

Also, there seems to be an over reliance on the Global Futures program to address this problem, but frankly this won't work. Most German teachers cannot access this help and support because the financial situation is so desperate in schools. They're not allowed out of their classroom to access the training and support that is offered. Basic cover costs are not paid. (As an example; In order to seek support from colleagues in other schools to set up a new German A'level in our school, I had to organise my own teaching cover and rely on the support of favours from colleagues. Nothing would be paid by the school, despite the A'level being a mandatory element of bringing in extensive funding from outside.) Schools will inevitably find ways to reduce costs, against the spirit of the New Curriculum.

The New Curriculum must make the expectation that we want multilingual learners in the future, who are equipped to communicate with many countries, including Germany, very clear. The only way to ensure this is to make the offering of more than one MFL in a secondary setting mandatory. This will be even more important in the wake of Brexit, where our businesses will be much more reliant on the relationships with trading partners to survive.

### **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)*

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## **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)*

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## **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)*

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## **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 unintended consequence of not making the expectation clear that more than one MFL should be on the curriculum is that the linguistic abilities of future generations will be narrowed to one single MFL (probably Spanish, where we spend our money as tourists in the Spanish economy, but do not make money as a trading nation from them). As MFL learning at GCSE is much lower than in England anyway, we will have a generation, where the vast majority of people are bilingual in Welsh and English, but cannot communicate outside of Wales's borders. This is a dangerous place to be in the current economic climate.

Also, the primary agenda for MFL is too vague. It currently allows schools to offer an "other language". Many primary schools are intending to offer "sign language" to meet this criteria. A whole generation of people being able to communicate through sign language is noble, but is hardly in the spirit of building learners who can contribute to a robust economy! Similarly, many schools are planning to offer this provision by offering ad hoc sessions with 6th formers. Again, if Wales is serious about building linguistic competences from primary school age upwards, it must use specialists and ensure that it makes those demands clear on schools. The principle of starting learners on one MFL besides Welsh at primary level and then expanding to a second MFL at secondary level is a good one, but only if the teaching is coherent and serious in its aims to build linguistic competences. Currently, this will not happen and schools will pay lip service to the provision. Again, more robust wording and expectations are needed.



## 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)*

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## 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)*

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## 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)*

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## 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: colege cambria

### 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)*

by ensuring the curriculum is purpose lead and skills based it should create a better foundation for young people to progress from school into further education and employment with a better grounding

its important that this also prepares young people to stay safe and well and become good citizens so that mandatory elements are critical

hopefully the proposed new AOs will give a rounded education and ensalbe young people to develop the skills they need in maths, English, research in a holistic way

i think more needs to be done to understand how GCSEs and A Levels fit into the system and how the wlesh system prepares young people to meet employers needs in a clear and understandable way

#### 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 if its to be delivered consistently and to take action where its not

## 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)*

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**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)*

-

## 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**

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## 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**

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it could be costly to schools to have staff with the more vocational expertise required to deliver some areas, but if delivered in partnership with FE this could be minimised

## 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)*

no

## 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)*

-

## 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: Parents Voices in Wales CIC

### 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)*

Yes there needs to be a change to the curriculum as it is outdated and not meeting the needs of all learners. Those who are not reaching potential are being failed by the academia focussed process which is based on stats attainment and not the strengths of the child as an individual. Academia is not the strength of all children and the impact of those children can be life lasting - especially those with Neurodiverse conditions which constitute 20% of learners. There needs to be a new way of providing opportunities for success through a variety of learning mediums and opportunities through arts culture and apprenticeships. Mental health and wellbeing is indeed the foundations of the new curriculum and this would be most effective with the embedding of the whole school approach to provide an optimum Healthy environment for learners to achieve.

We would like to see Child Rights also embedded in the curriculum to meet the above needs and to be in the legislation of the Bill along with the whole school approach to prevent variability in standards and quality between schools. We need to ensure that legislation and frameworks are in place to support each school in providing equitable education to every child and those in EOTAS. No child should suffer a deficit in their

education because they are not suited to a populated environment with peers. We must ensure that legislation supports all learners in every environment.

### **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 we need equity across all schools in Wales and avoid schools working in silos where attainment of pupils may differ. Uniformity of quality in standards should be a legal requirement of all schools.

Whole school approach should also be in the legislation to ensure mental health and wellbeing is embedded across all schools.

We also require a children's rights approach in the legislation so that UNCRC aims and objectives are met for every child in Mental and physical health, education, safety and play.

A whole systems approach is the gold standard of service delivery and is being proposed in the transformation in Wales. We believe that partnership working should therefore be a requirement in the Bill as this will be valid going forward. If the Bill includes partnership as a requirement it will ensure that the whole school approach, child Rights and whole systems will meet the needs of every child in every school in Wales.

## **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)*

Whole systems approach would benefit the implementation of the Bill to ensure that every school is supported by business, health, social and third sectors to ensure the health and wellbeing as the foundations of the curriculum and whole school approach & AOLES can be implemented effectively. The ALN Bill and Autism Bill needs to be full

Dovetailed to compliment the C&A Bill to ensure there are no barriers in every child meeting the objectives of each AOLE.

## **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 not until Child Rights Approach and Partnership working via whole systems approach & dovetailing of ALN Bill & Autism Bill are included in the Bill as a legislative requirement to support each and every child

## **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)*

If the UNCRC Articles, ALN Bill, Transformation in Wales for Mental Health services and Autism Bill are not appropriately dovetailed to the Curriculum & Assessment Bill - there will be failings to meet the aims and objectives of the health and wellbeing, a curriculum for vulnerable learners, and for Early Help and Neurodiversity to be effectively considered. Each Bill should be working towards Early Holistic Assessment and Support for every child as required so that every child has the opportunity to meet the objectives of each AOLE. This can only be undertaken with legislation of the ALN & Autism Bill also be included in the C&A Bill.

## **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)*

Funding for the whole school approach should be additional to the funding of the implementation of the Bill. We also believe that the £7m monies for the Transformation of Services in Wales in the Mental Health Services Improvement Fund should also be ringfenced and protected and independent to this funding.

## 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)*

There may be subordinate legislation for different sectors to meet their requirement for delivery but there should be a common theme of partnership and a whole systems approach in each to ensure that the main legislation of the Bill is able to meet its objectives. There may be subordinate legislation on softer issues like religion, sex education, ALN & Autism which may require updating as research dictates.

## 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)*

No please see other points. Our main concern is the elements below are also embedded in the Bill and made part of the legislation to ensure that quality of education is inclusive and equitable in all

Schools in Wales.

UNCRC

Mental health and wellbeing

whole school approach

Additional Learning Needs Bill

Autism Bill

Whole Systems Approach



## 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

Professor Russell Sandberg

Professor of Law, School of Law and Politics, Cardiff University

### 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)*

The Curriculum and Assessment (Wales) Bill will transform the way in which religion is taught in Welsh schools as part of the new curriculum. The changes are bold but are both long-overdue in terms of updating an outdated legal framework and are necessary for the new curriculum to flourish.

Both of these reasons also mean, however, that attention needs to be afforded to whether the provisions are bold enough, in order that the new law will facilitate the Welsh Government's vision of universal pluralistic Religion Values and Ethics teaching and also to ensure that the law is human rights compliant.

There are a number of concerns with the current proposals as articulated in the Bill:

[1] The requirement that agreed syllabi must 'also reflect the fact that a range of non-religious philosophical convictions are held in Great Britain' and the inclusion of groups to represent non-religious philosophical convictions on Standing Advisory Councils is welcome and long over-due. However, how this change is made needs considerable care in four respects.

First, it is questionable whether referring to the ECHR jurisprudence for the definition will give the conceptual clarity needed. The ECHR has taken a broad brush approach to the issue of definition. Just referring to that will not be of any practical help for those designing local syllabi or those planning and teaching lessons in schools.

Second, it is questionable whether the term ought to be 'belief' rather than 'convictions' to be in line with Article 9 of the ECHR as well as domestic human rights and discrimination laws.

Third, it would be advisable to enshrine the pluralistic requirement in legislation. Retaining the statutory requirement that the RVE syllabus 'must reflect the fact that the religious traditions in Great Britain are in the main Christian while taking account of the teaching and practices of the other principal religions represented in Great Britain' is likely to encourage both a Christian bias and a conservative approach.

Fourth, the risk of conservatism is even more concerning given the localism at the heart of the new curriculum. This makes it all the more important that due emphasis is given to the pluralistic requirement.

[2] The proposal that agreed syllabus conferences must have regard to Welsh Government guidance is welcome but it does not go quite far enough and that (i) this should apply to Standing Advisory Councils generally and (ii) agreed syllabus conferences should have to develop their syllabi in accordance with the regulations.

Indeed, given the nature of the new curriculum (which will be created as a school level) and the fact that there will be statutory guidance, it is questionable whether there is a need for locally agreed syllabi at all.

The current system dates back to a time when it was thought that religious diversity differed on a regional basis. Affording power and discretion to the local authority level made sense in that context. It does not make sense now. Given financial pressures, it is now questionable whether Standing Advisory Councils now need to exist. A case could be made for one such council to serve the whole of Wales.

[3] The proposed changes to schools with a religious character do not facilitate the Welsh Government's vision of universal pluralistic Religion Values and Ethics teaching and run the risk of not being human rights compliant.

In schools with a religious character an element of the parental opt-out remains and there is a risk that pupils at these schools will not have access to the pluralistic RVE which the Welsh Government seeks to make universal. A preferable approach would be to permit denominational religious education in addition (rather than in place of) RVE in schools with a religious character.

[4] There is an anomaly in Schedule 2 of the Curriculum and Assessment (Wales) Bill. Paragraphs 34 and 35 provide that the duty to provide religious education under section 69 of the School Standards and Framework Act 1998 Act applies only to England. Paragraph 36 amends section 71(1) of the 1998 Act to provide that the parental right to opt out of religious education only applies in England. The right of parents and sixth formers to opt out of religious worship under 71(1A-1B) are not amended.

The anomaly is that section 71(3) is not amended. This provides that pupils who have been excused from RE under section 71(1) or religious worship under section 71(1A-1B) can in certain circumstances be withdrawn from the school for the purpose of receiving religious education. This has a curious effect. The explanatory notes suggest that this means that a

pupil withdrawn from religious worship could still receive RE elsewhere under this provision but that this would be in addition to the RVE that they received at their school (para 187). This seems an odd provision to retain. It should be removed.

[5] The provision under Schedule 19 to the School Standards and Framework Act 1998 that the agreed syllabus cannot provide for the teaching of RE by catechism or formulary should also be retained in Wales.

[6] The Bill also makes a significant change in relation to sixth-formers – under clause 62 RVE is only to be provided for those who request it. This is a welcome change. However, the Explanatory Memorandum states that 'A school may make the study of RVE compulsory for all pupils if it wishes. As with pupils under 16 there is no right to withdraw' (para 3.104). This is not expressed in clause 62 and would go against the rights for sixth-formers where Wales led the way.

The proposed changes would transform the teaching of religion especially in schools without a religious character and the boldness of the Welsh Government is to be applauded but there is need for an even bolder and clearer approach, especially in relation to the status of Welsh Government guidance and most importantly in relation to schools with a religious character – pluralistic RVE should be compulsory there too with denominational religious instruction taught in addition to rather than instead of pluralistic RVE.

### **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, this is a matter that needs legislation.

## 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)*

N/A

**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)*

N/A

## 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)*

Please see my answer above, especially points 1, 4 and 5.

## 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**

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N/A

## 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)*

N/A

## **6. Other considerations**

### **6.1 Do you have any other points you wish to raise about this Bill?**

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N/A

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### About you

Individual

### 1. The Bill's general principles

#### 1.1 Do you support the principles of the [Curriculum and Assessment \(Wales\) Bill](#)?

No

#### 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)*

As Wales has no state religion since the disestablishment from the Church of England, religion education should removed from any mandatory curriculum.

The provisions in the bill for assessment and learner progression fail to address the need for a learner to have the right of appeal and and independent verification in the event of any dispute of a teacher assessment of a learner progress and attainment capability.

#### 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)*

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## 2. The Bill's implementation

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## 4. Financial implications

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*(we would be grateful if you could keep your answer to around 500 words)*

Yes

The conditions proposed do not protect a learner, financial cost should not be a consideration for whether a learner follows a particular course of study



## 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)*

Yes, this is inappropriate, ministers change with elections, and this mechanism may be abused in the future to fast track curriculum changes without the current legislative oversight.

The lessons learnt from the rise of Nazi Germany and the rapid indoctrination the German children went through in the 1930s come to mind.

## 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)*

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