

## 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: Holy Family RC Primary School

## 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)*

Generally yes. I would say that the Bill as a whole is broadly balanced. It allows for more creativity for practitioners which is positive and to be commended. It also encourages a sense of community and promotes the experience of learners.

That said, there are also a number of serious reservations which I would like to express. The first of these is that it fails to recognise the professionalism of staff, in Catholic schools in particular, and therefore seems to come across as discriminatory. Also, it doesn't address the particular context of the Catholic community which has played an immensely positive role in partnering with the Government in providing quality education over the last number of decades.

Firstly, I wish to draw attention to the fact that I disagree strongly with the name change for the RE curriculum to RVE. 606 respondents to the initial Government consultation on this matter explicitly stated they did not want to see a change in the name of RE compared to 377 respondents who favoured Religion, Values, and Ethics. Yet the Minister has persisted with the name change in the Bill. In Catholic schools, curriculum RE contributes to the whole school lived experience of values. Every lesson and learning experience is about promoting positive values. One humanities subject on its own is not equal to that

task. The integrated approach of Catholic schools with a combination of RE and a strong religious ethos allows for a more secure achievement of this outcome.

Secondly, a second RVE syllabus should not have to be delivered in Catholic schools. Catholic RE is already inclusive including philosophical convictions and diverse views which already meets the legal requirements. The way it is taught and what is taught is balanced. No evidence has been cited or alleged to suggest the contrary. Yet it would seem the Government does not trust Catholic schools to teach this in an inclusive and balanced way. And singling out Catholic schools alone for this discriminatory treatment suggests that the Government does not have confidence that the Catholic sector can achieve this

Additionally, providing a second syllabus within a Catholic school would be excessively burdensome in terms of workloads, costs and resources. In this respect also, Catholic schools are being treated differently and this is discriminatory.

The impact of such dual provision may discriminate against parents who choose to have their children educated in a Catholic school. This does not seem to have been factored into the planning. It was highlighted in submissions made at the consultation stage which closed at the end of July yet the Minister hastily published the Bill in early July without taking these submissions into account as the consultation period was still open.

This new 2nd requirement that Catholic schools could have to provide a second RVE curriculum may put schools in breach of their trust deeds. Catholic schools are required to teach RE in accordance with the teachings of the Catholic Church. Imposing an alternative curriculum which was not Catholic would lead to such a breach.

The Bill also makes provision for the possibility that Post 14 content may change according to the proposed bill which again could violate trust deeds of Catholic schools as outlined in my previous point.

The removal of the right to withdraw is a denial of the rights of parents under European Human Rights legislation and may also impact negatively on relationships with parents which depend on mutual trust which schools currently enjoy.

### **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)*

For Catholic schools what already exists in law is balanced and fair. These arrangements do not need to be changed and we do not desire them to be changed. The current RE provision at Catholic schools is legally compliant and very successful in promoting inclusivity and diversity. There is no evidence to the contrary. There is no demand for a change to current practice.

In the new Bill Catholic schools are being unnecessarily and additionally burdened by being required to provide 2 RE curricula which is impossible and unreasonable for schools to do so, and especially for only Catholic schools to do so.

The Trust Deeds of Catholic schools are currently recognised by law, including Charities legislation, however the new changes in terms of RSE and RE may violate the school's duty to deliver these in accordance with the tenets of the Catholic Church. Key areas where this is a concern relates to teaching about marriage and family. This implication of this legislation would be to force Catholic schools into a violation of their legal duties.

## **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 Catholic Headteachers letter to the First Minister outlining their concerns was largely ignored or not really listened to. This is a grave injustice and devaluing of the professionalism of our headteachers and their valued experience and perspective on this. If the government is not listening to the concerns of those on the ground with the most relevant experience who are tasked with implementing the Bill the this presents an immediate potential barrier that what is requested to be implemented does not fit with the realities that headteachers are dealing with.

Additionally, the huge impact of COVID has raised many obstacles to the smooth implementation of current plans and its continuance makes implementation nigh on impossible according to the current timescale. No consideration of this seems to be taken into account. The ability to engage successfully with professional learning and other areas

is being dominated by current Covid compliance pressures. Ability to prepare well for future changes is difficult, to say the least.

The workload implication is also of concern particularly for Voluntary Aided Schools, of which Holy Family RC Primary is one, who would have to prepare a second syllabus. Implications in terms of logistics for delivery would be divisive and undermine the stated aim of being inclusive by corroding the sense of unity and community.

## **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)*

In a word, no. No adjustments seem to have been made in terms of COVID 19 and the impact it would have regarding the timetable for implementation.

Full guidance has not yet been published nor has the latest consultation submissions or analysis. The fact that the bill was presented before the consultation closed in late July means the bill cannot have taken into account any potential barriers that may have been flagged up in the consultation process.

There is no suggestion of additional funding for Catholic schools to enable them to implement a dual RVE curriculum in terms of additional resources such as classrooms, staffing etc.

## **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)*

Quite frankly, there are many unintended consequences arising from this Bill.

The first and most obvious one of these is that it potentially puts Catholic schools in breach of their duty to comply with their trust deed.

Secondly, it seems to be treating Catholic schools in an unequal way because of the requirement for additional RVE without any flexibility and which no other types of school are required to comply with and this may be construed as discriminatory.

Post 14 changes, when implemented, would most probably not be in compliance with the requirements of Catholic bishops for Catholic schools.

Additional burden of having to run two RE curricula with implications for cost for the school. For small schools this would have a huge impact. Holy Family RC Primary School has a very limited budget. This would have a severe impact and implications for the school's continued existence as it currently functions.

It seems to suggest current Catholic RE curriculum is not balanced. Again, without evidence and with the added implication that Catholic schools cannot be trusted.

The impact on parents in undermining their rights under European convention does not seem to have been considered – this could this lead to an increase in home schooling.

## **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)*

There are several financial implications of the bill to be considered.

Costs of supply cover – where additional staffing would be required.

Collaboration across schools, which the Bill would require, needs additional financial resourcing

Increasing fees for new qualifications is an additional burden on schools already tight budgets.

Additional costs may impact other provision of existing RE curriculum and other areas of school life e.g., Welsh language provision, Additional Learning Needs. This would seem contrary to the spirit of diversity and inclusion.

No other schools will have this burden so this is also an additional financial penalty on Catholic schools.

## 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)*

It is possible under this legislation that at some point in the future RVE could be removed as a mandatory element of core curriculum. For Catholic schools this would massively impact on what it means to be a Catholic school – it would be a denial of its very nature and raison d’etre.

If it was removed in the future this would impact all schools and undermine the stated aim of the new RVE course in terms of diversity and religious literacy. This should be safeguarded against in the legislation again if the goals of the legislation are diversity, inclusion and religious literacy.

## 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)*

The Catholic Schools Headteachers letter does not appear to have been listened to and this seems to undermine or devalue the right of headteachers to offer their valued perspective.

I share a tremendous sense of disappointment with many in the Catholic education sector in the implication that Catholic schools cannot be trusted to deliver an inclusive curriculum.

Role of Catholic schools in education in Wales historically and currently seems to be overlooked and undervalued in this proposed legislation by the unintended consequences and the failure to address the concerns expressed in submissions made by the Catholic sector.

It is also a grave worry that this legislation will diminish the extremely positive role that Catholic schools play in their local community.

The adequacy of the current RE curriculum has never been called into question, in fact the most recent Estyn Inspection report on Holy Family RC Primary School noted that: "International days, supporting Christian charities and the study of other religions, enable pupils to understand different cultures." The current curriculum promotes diverse views and is inclusive as is required not only by current legislation but also by the Catholic Bishops of England and Wales. The proposed power to impose an additional RE curriculum on Catholic schools in this new Bill is corrosive, discriminatory, burdensome, unreasonable and unjustified. It undermines, or could potentially remove, one of the key planks which has consistently supported diversity, inclusion and social cohesion in our society today.

