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## CES Guidance for Schools: Consultation on RVE in the Curriculum for Wales (‘Legislative proposals for religion, values and ethics’)

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On 5 May 2020, The Welsh Government opened their ‘*Curriculum for Wales: Religion, values and ethics*’ consultation. This consultation follows on from a previous consultation (entitled ‘Ensuring Access to the Full Curriculum’) which asked respondents to comment on a number of proposals, including a change of name for Religious Education and the intention to rescind the parental right of withdrawal from the subject in the new curriculum. A large number of teachers and leaders in Catholic schools across Wales responded to that consultation to oppose the changes, viewing it as an assault on parental rights and on the academic rigour of Religious Education in Catholic schools. Indeed, according to the Welsh Government’s own [consultation analysis](#), opposition to their proposals came from across the whole sector. In spite of fervent opposition, however, the Welsh Government has moved to introduce these changes and proceed with a new consultation on how to implement them.

Broadly, this new consultation seeks feedback on proposals to change the scope of Religious Education in the school curriculum in Wales and the expectations placed on different types of school. All documents pertaining to this consultation can be found [here](#).

This ‘CES Guidance for Schools’ document gives the Catholic Education Service (CES) position on the issues in the new consultation and outlines how schools can respond, if they wish, along these lines.

### Changes proposed

The consultation (which can be read in full [here](#)) assumes the following conclusions from the previous consultation:

1. Religious Education will be renamed Religion, Values and Ethics in the new curriculum.
2. The parental right of withdrawal, which previously applied to RE and RSE, will be removed for the purposes of the new curriculum.

According to the Welsh Government, these changes are premised on advice from the previous consultation responses and impact assessment, although details of these are not disclosed.

The consultation (which can be read in full [here](#)) does seek feedback, however, on the following proposals/changes:

1. **The scope for ‘Religion, Values and Ethics’ in the new curriculum in Wales.** This change would make it explicit that any locally agreed syllabus for Religion, Values and Ethics must reflect both religious beliefs and non-religious beliefs deemed philosophical convictions by case law. The Welsh Government claims this change makes “explicit what the law already requires: the pluralistic teaching of RE in accordance with the European Convention on Human Rights.”
2. **The expectations placed on different types of schools.** This change would force voluntary aided schools in Wales (including all Catholic schools) to offer the locally agreed RE syllabus to the child of any parent/carer who requests it. This expectation is not mirrored for community schools, foundation schools or voluntary controlled schools.

The Catholic Education Service is responding to this consultation opposing the changes, urging the Welsh Government to:

1. Reconsider the proposed changes to the name and scope of RE in the new curriculum in Wales. The changes would make the subject more prescriptive and less academically rigorous in Church schools, undermining its centrality to our curriculum.
2. Reconsider the proposal to prevent parents/carers of learners in schools without a religious character from requesting denominational RE. Those with strong religious or philosophical convictions whose children are unable to attend a Church school (or whose community does not provide schools) will lose the right not to be subject to RE which may contrary to those convictions.
3. Revisit the expectations the proposed changes place on different schools. The proposals require adjustments to be made by voluntary aided Church schools in Wales (namely offering locally agreed syllabus RE as an alternative to denominational RE) which are not required in any other type of school. This puts voluntary aided schools (including all Catholic schools) in a disadvantaged position, creating practical and resource difficulties. This is unfair, prescriptive and makes compliance with the changes difficult.

## Responding to this consultation

The Archbishop of Cardiff and Bishop of Wrexham urge teachers, leaders and governors in Catholic schools to respond to this Welsh Government consultation to make clear the objections of the Catholic community to the proposed changes.

If you are able to respond, this can be done using the online response form for this consultation, which can be found [here](#).

The exemplar below serves as a walk-through of the online response form - giving proposed responses to the questions posed - and should allow respondents to complete the [online form](#) within 15 minutes.

## Exemplar: consultation response form

The consultation poses nine questions; these are outlined below, along with proposed messages to convey for each. Please read each answer carefully (some sentences will need customising) before paraphrasing or copying these into the online consultation response form (available [here](#)).

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**Question 1** – Do you agree that religion, values and ethics (RVE) should encompass both religious and non-religious beliefs that are philosophical convictions (in line with the European Convention on Human Rights) as described in the consultation document?

<b>Agree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input checked="" type="checkbox"/>
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**Supporting comments** (no more than 250 words)

- We disagree with the change of name to Religion Values and Ethics.
- In our school, values and ethics are instilled in pupils by the whole school. <Insert example of your outstanding practice re: SMSC here>.
- Whilst RE as a curriculum subject contributes to this, it is not the exclusive preserve of any part of the curriculum.
- RE in Catholic schools already engages with a broad and balanced range of religions and philosophical convictions, as required by law.

- We believe that these proposals (compelling RE to “encompass both religious and non-religious beliefs that are philosophical convictions”) represent a dangerous and unnecessary change to the current, balanced, legislative framework which already adequately reflects the law.

**Question 2** – Do you agree that agreed syllabus conferences **must have regard** to statutory guidance when they are developing their locally agreed syllabus?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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**Supporting comments** (no more than 250 words)

- As school practitioners, we support the autonomy and local intelligence of SACREs/ASCs, and see their oversight of the locally agreed RE syllabus as invaluable.
- <Opportunity to insert your view of the locally agreed RE syllabus>
- It is possible that the introduction of effective statutory guidance could serve to empower SACREs/ASCs and further improve the quality and impact of the locally agreed syllabi.
- Without more clarity on the content of the proposed guidance, however, there is no evidence that the proposal would achieve this, and it could have the opposite effect.
- We are concerned about the potentially prescriptive nature of any guidance which might impose a vision of religious education which conflicts with the values of the local communities it serves.

**Question 3** – Do you agree with our proposal that community schools and foundation and voluntary schools **without a religious character** must be required to have regard to an agreed syllabus in designing and implementing RVE?

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
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**Supporting comments** (no more than 250 words)

- There is a clear disparity between the way schools *without* a religious character and those *with* a religious character are being treated in these proposals.
- The effect of the proposals is to *weaken* the influence of the locally agreed syllabus in non-denominational and voluntary controlled schools but to *strengthen* its influence in voluntary aided schools such as ours. This is unfair and unjustified. Any proposed change to the regard schools must have to the locally agreed syllabus should be applied equally across Wales.
- By having different expectations of different schools, the Welsh Government appears to be suggesting Church schools cannot be trusted to deliver a balanced RE curriculum, whilst other schools can. We strongly contest this.

**Question 4** – Do you agree with our proposal that parents/carers of learners in schools **without a religious character** must no longer be able to request provision of RVE in line with tenets of a particular faith?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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**Supporting comments** (no more than 250 words)

- We have two serious concerns about this proposal.

- Firstly, under this proposal, those with strong religious or philosophical convictions whose children are unable to attend a Church school (or whose community does not provide schools) will lose the right not to be subject to RE which may be contrary to those convictions.
- This goes to the heart of the Catholic view of education. We support the parental right of withdrawal from RE in every school. As the primary educators of their children, parents opting to withdraw their child from elements of RE are exercising a fundamental and prior right. And whilst the Catholic Church does not actively encourage parents to exercise this right, it continues to defend their right to do so, believing the rights of the individual take priority over the role of the state. We believe there is no need to rescind this hard-won and long-standing parental right, and we urge the Welsh Government to reconsider their position.
- Secondly, there is a practical implication. The effect of this proposal will be that non-denominational schools will be advantaged by not having to make arrangements for alternative provision, whilst Church schools will have to do so. There is thus a clear disparity between the way schools *without* a religious character and those *with* a religious character are being treated in these proposals, which we believe to be unfair and unjustified. There is no indication in the consultation document how voluntary aided schools will receive additional resources to meet the requirements of this additional commitment.

**Question 5** – Do you agree with the proposal that voluntary-controlled schools **with religious character** can teach RVE in accordance with the trust deeds of the school or the tenets of the faith of the school **if requested by parents/carers**?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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**Supporting comments** (no more than 250 words)

- This reflects the current, balanced, position and should be retained.

**Question 6** – Do you agree that **voluntary-aided schools with a religious character** should be **required** to teach the agreed syllabus **where a parent/carer requests it** and should not have discretion to refuse to do so?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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**Supporting comments** (no more than 250 words)

- There is a clear disparity between the way schools *without* a religious character and those *with* a religious character are being treated in these proposals.
- We believe the proposals are unfair and unjustified: they demand that voluntary aided schools (including all Catholic schools) will be the only schools in Wales to be obliged to teach RE in accordance with a locally agreed syllabus.
- This puts voluntary aided schools (including all Catholic schools) in disadvantaged position, creating practical and resource difficulties.
- There is also no indication in the guidance that support or resources which will be made available for settings where compliance with the proposals is impossible or unreasonable. This is concerning, and it is deeply unfair to place schools in a position where they cannot comply with the law.
- If a disproportionate burden is to be imposed on VA schools compared to other schools, then

this must be accompanied by an increase in funding which will enable the school to resource this additional burden.

**Question 7** – We would like to know your views on the effects that these proposals in relation to religion, values and ethics 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

- The Catholic community has been an integral part of Welsh culture for centuries, and our schools serve and support the rich fabric of Welsh culture. This consultation, and damage the proposals will cause, undervalue and undermine Catholic schools and their continuing contribution to Welsh culture.
- We are strongly supporting the Welsh Government's language initiative, Cymraeg 2050. <Insert example of your work on Cymraeg 2050 here>.
- Unfortunately, we believe the proposals in this consultation are a threat to this initiative in our school and other Catholic schools.
- These proposals are unfair and unjustified – making voluntary aided Church schools the **only** schools in Wales required to teach in accordance with (rather than having regard to) the locally agreed syllabus – and will hit our school, and other Catholic schools, the hardest in practical terms.
- The implication for a school such as ours is that resources (including funding and staff) will need to be reallocated to deal with the additional burden of offering an alternative RE syllabus. These resources may need to be diverted from the delivery of other initiatives, including Cymraeg 2050.
- These proposals should be reconsidered in order to preserve trust in the Welsh Government and their agenda (including the use of the Welsh language) and the ability of our schools to support it.

**Question 8** – Please also explain how you believe the proposed policy on religion, values and ethics in the Curriculum for Wales could be formulated or changed so as to have:

- i) 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
- ii) 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

- These proposals are unfair and unjustified and should be reconsidered in order to preserve trust in the Welsh Government and their agenda (including the use of the Welsh language).
- A consistent approach between schools is essential and would encourage schools to engage with Welsh Government initiatives.

**Question 9** – 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.

- Firstly, we have concerns about the quality of the consultation and its process.
- We believe this consultation has been made particularly difficult to engage with and that it has forced respondents to make complex responses to oversimplified questions. It is very difficult, for instance, for respondents to tick 'disagree' as a response to any of the questions raised which, by implication, makes it look as though antipathy towards the proposals is low. This is not the case. Respondents are simply concerned that the response could be misinterpreted, given how oversimplified the questions have been made.
- We believe that direct engagement with stakeholders, in particular the Catholic community, regarding the proposals in the consultation has been poor.
- It is also clear that the Welsh Government is not heeding negative warnings from those responding to its consultations and is not behaving in a transparent way. Indeed, in its consultation analysis from the previous consultation on these issues (Ensuring Access to the Full Curriculum), the Welsh Government admits that opposition to proposals – such as the right of withdrawal or the change of name for RE – outstrips support for the proposals, but the changes have been adopted regardless and without explanation. This is deeply concerning.
- We urge the Welsh Government to reconsider rescinding the parental right of withdrawal, as this fundamental right is the factor which best ensures learners across Wales receive RE appropriate for them and maintains the carefully-crafted relationship between Church and state in education, which has stood the test of time so successfully.
- Secondly, we have grave reservations about the basis for the proposals in the consultation.
- We are disappointed that the proposals appear to be premised on a false implications about RE in Church schools: that denominational RE is not balanced in its content and manner of teaching in the same way as non-denominational RE. This is not true.
- We believe that Catholic RE both meets the benchmarks of balance required by law and provides a rigorous, academic core to the curriculum in Catholic schools.
- Thirdly, we have significant concerns about the contradictions in the proposals.
- The proposals serve to strengthen the Welsh Government's hand over the content of locally agreed syllabi through the introduction of statutory guidance.
- Simultaneously, they serve to weaken the influence of these syllabi over all schools except voluntary aided Church schools such as ours (over whom the influence of the local syllabus will increase).
- This represents a de facto tightening of control over RE in our school, whilst our neighbouring community school, for instance, will see such control eased. This is unfair and unjustified.
- Fourthly, we are deeply concerned about the impact these changes will have on the quality of RE in all schools in Wales, particularly in voluntary aided Church schools.
- Any change to the current framework threatens to make RE more prescriptive and less academically rigorous, and undermines the work of ASCs/SACREs on the locally agreed syllabus.
- We urge the Welsh Government to revisit these proposals as a matter of urgency to ensure that unequal treatment of schools in Wales can be avoided and that ASCs/SACREs are not undermined by the proposed statutory guidance (of which we have had no further information).

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: ☐