

# Ensuring access to the full curriculum

## Consultation response form

Your name: Kathy Riddick

Organisation (if applicable): Wales Humanists

e-mail/telephone number:  
kathy.riddick@humanism.org.uk  
07881 625378

Your address:  
Wales Humanists, Cardiff House, Cardiff Road,  
Vale of Glamorgan, CF63 2AW

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

Health and Well-being AoLE Team  
Arts, Humanities and Well-being Branch  
The Education Directorate07  
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/carer	<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:

**Conflation of issues relating to RE and RSE:**

Firstly, we are extremely concerned that this consultation conflates the issues surrounding the right to withdraw from RE with those pertaining to the right to withdraw from RSE. At least as currently taught, these two subjects are substantively different in ways that mean the abolition of the right to withdraw will have very different ramifications for children and their families in the case of RSE than it will in RE.

To put it succinctly, RSE is a fact-based subject designed to provide pupils with the information they require to establish the kind of healthy, happy, and safe relationships (including sexual relationships) that are conducive to physical, mental, and emotional wellbeing. RE may also be taught in an informative, objective manner (and the decision to clarify the law on the inclusion of non-religious worldviews, such as humanism, on an equal footing with religious perspectives will go a long way towards ensuring that the subject is far less partisan than it has been in the past). However, the fact that religious schools are permitted to teach RE in accordance with their religious character means that statutory provision of the subject in all schools seriously risks violating the freedom of thought, conscience, religion and belief that young people are legally entitled to enjoy under Article 9 of the European Convention on Human Rights<sup>1</sup> and Article 14(1) of the UN Convention on the Rights of the Child.<sup>2</sup> And even outside of faith schools, these issues may come into play if, for example, a teacher teaches something from a faith-based perspective (even though they shouldn't), or otherwise in a disbalanced way. European case law suggests scrapping the right to withdraw from RE is likely to be unlawful. These issues are simply not in play when it comes to the objective teaching of RSE (unless it too is taught from a faith perspective).

**Policy implications - RSE:**

We fully support the proposal to make RSE a statutory part of the curriculum for all learners under 16. It is crucial that all pupils attending state schools in Wales are provided with high-quality, comprehensive, and accurate education about relationships

<sup>1</sup> [https://www.echr.coe.int/Documents/Guide\\_Art\\_9\\_ENG.pdf](https://www.echr.coe.int/Documents/Guide_Art_9_ENG.pdf)

<sup>2</sup> [https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC\\_united\\_nations\\_convention\\_on\\_the\\_rights\\_of\\_the\\_child.pdf](https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf) p.6

and sex, not least because this is what all the best evidence demonstrates will ensure that they are able to grow up healthy, happy, and safe.<sup>3</sup> The evidence shows that young people who have had good RSE are likely to have sex for the first time later than others, and when they do so it is more likely to be consensual and safe, and so less likely to lead to unwanted outcomes such as STIs, teenage pregnancies and abortion. RSE also plays a very important safeguarding role which brings it into line with Article 19 of the UNCRC which requires that 'States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child'.<sup>4</sup> The health benefits to individual children and young people, as well as the public health and wellbeing imperative for teaching the subject, are, for these reasons, extremely strong.

The new RSE curriculum is built around a framework of developmental appropriateness.<sup>5</sup> It therefore takes account of the age of pupils, while also giving due regard to their physical and cognitive development as well as being sensitive to the personal experiences of all learners.

This type of provision should be available to children irrespective of the type of school they attend (including schools with a religious character) or the beliefs of their parents, and we strongly endorse the proposal to remove the parental right to withdraw from the subject on this basis.

Since there will no longer be a right to remove children from RSE, schools with a religious character should no longer be permitted to provide the subject in line with the tenets of their faith as to present these issues in a religiously biased way, for reasons outlined below, constitutes a threat to freedom of religion or belief. It also risks children and young people being provided with inaccurate or pseudoscientific information with respect to certain topics. For example, when certain religious anti-abortion groups maintain that the procedure causes miscarriage, mental health problems and breast cancer.<sup>6</sup> This issue could be further addressed by a prohibition on the teaching of pseudoscience across the curriculum, as is already the case in England, where schools are prevented from teaching any 'view or theory' as evidence-based if it 'is contrary to scientific or historical evidence or explanations'.<sup>7</sup> We urge the Welsh Government to introduce the same requirements in Wales.

### **Policy implications – RE:**

We fully support there being a school curriculum subject that teaches children and young people about religious and humanist perspectives in a 'critical, objective, and pluralistic manner'.<sup>8</sup> On the grounds that religious education (or 'Religions and

<sup>3</sup> Sex Education Forum, *SRE: The Evidence* (2015)

<<https://www.sexeducationforum.org.uk/sites/default/files/field/attachment/SRE%20-%20the%20evidence%20-%20March%202015.pdf>> [accessed 11 November 2019].

<sup>4</sup> Convention on the Rights of the Child (1989) <<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>> [accessed 19 September 2019]

<sup>5</sup> See *The Future of the Sex and Relationships Education Curriculum in Wales: Recommendations of the Sex and Relationships Education Expert Panel* (2017)

<<https://gov.wales/sites/default/files/publications/2018-03/the-future-of-the-sex-and-relationships-education-curriculum-in-wales.pdf>> [accessed 11 November 2019].

<sup>6</sup> See Humanists UK, *Abortion factsheet launched to challenge spread of 'junk science' in schools* (31 January 2019)

<https://humanism.org.uk/2019/01/31/abortion-factsheet-launched-to-challenge-spread-of-junk-science-in-schools/> [accessed 12 November 2019].

<sup>7</sup> See E.g. DfE (2014) *Mainstream academy and free school model funding agreement: single academy trusts*

<https://www.gov.uk/government/publications/academy-and-free-school-funding-agreements-single-academy-trust> [accessed 12 November 2019].

<sup>8</sup> See E.g. *Fox v Secretary of State for Education* (2015) [https://www.judiciary.uk/wp-content/uploads/2015/11/r-fox-v-ssf\\_e.pdf](https://www.judiciary.uk/wp-content/uploads/2015/11/r-fox-v-ssf_e.pdf) [accessed 11 November 2019], *Kjeldsen, Busk Madsen and Pedersen v Denmark* (1976).

<https://hudoc.echr.coe.int/eng#%7B%22itemid%22:%7B%22001-57509%22%7D> [accessed 11 November 2019].

Worldviews' as the Welsh Government proposes to rename it) plays a vital role in enabling pupils to form and explore their own beliefs and develop an understanding of beliefs and values different from their own, we would very much like to see this subject taught in this way to pupils in all schools, including those with a religious character (also known as faith schools). We nevertheless have grave concerns about the plan to remove the right to withdraw from RE, particularly in faith schools. Even under the new curriculum arrangements, denominational syllabuses will still be set solely by religious bodies and, as is currently the case, the subject will still be permitted to be taught 'according to the tenets' of a particular faith. This risks allowing the state-sanctioned indoctrination of children who attend faith schools, but whose families do not share the religious perspectives of those schools (something which is particularly difficult to avoid in some rural areas), into religious beliefs against their parents' wishes. On this basis, the removal of the right to withdraw would therefore amount to a direct contravention of human rights law with respect to the right to education in conformity with parents' wishes, as well as freedom of religion or belief.

In mitigation of the proposal, the consultation paper states that, as is already the case, in addition to teaching RE 'in a way that accords with [their] faith basis', denominational schools will be expected to 'provide neutral information on other religions and non-religious views'. It goes on to say that, where this is not happening, the right to withdraw is 'not the appropriate mechanism' to deal with the problem and this should be tackled at school-level. The consultation document also says 'The parental rights in the second sentence of Article 2 Protocol 1 will be appropriately respected if the RE... provided it does not involve indoctrination and is provided in an objective, critical and pluralistic manner.' While the final statement is itself correct, the requisite degree of objectivity and pluralism is simply not compatible with the continuation of faith-based religious instruction of the type that is to be permitted in faith schools. Such schools may (and indeed should) teach about other perspectives, but because they aim to initiate children into a particular – usually Christian – worldview, and the law will allow this, they exhibit a level of bias towards a faith that, without a right to withdraw, amounts to the imposition of that faith on pupils and their families.

In other words, RE in faith schools is not merely quantitative, it is qualitative – it doesn't simply involve devoting more curriculum time to a particular religious perspective, it treats that perspective as true or, at the very least, more worthy of consideration and adherence than others. Case law in this area<sup>9</sup> has found that even partial exemptions from such teaching are not enough to bring it into line with A2P1. The state has 'a duty to take care that information or knowledge included in the curriculum is conveyed in a pluralistic manner'<sup>10</sup> that refers not only to **what** is on that curriculum but **how** it is delivered, and may not be satisfied even in cases where the state's overarching aim was not itself one of 'indoctrination'.<sup>11</sup> Indeed, a recent European Court of Human Rights judgment involving conscience-based exemptions from RE in Greece found that it is necessary for states 'in so far as possible, to avoid a situation where pupils face a conflict between the religious education given by the school and the religious or philosophical convictions of their parents.'<sup>12</sup>

At the very least, any proposal that RE in faith schools be taught in an objective manner can only be taken seriously if the relevant exemptions concerning the treatment of religion in the curriculum in the Equality Act 2010 are abolished.

<sup>9</sup> *Folgerø v Norway* (2007) <http://hudoc.echr.coe.int/eng?i=001-81356> [accessed 11 November 2019].

<sup>10</sup> *Fox v Secretary of State for Education* (2015) paragraph 31, <https://www.judiciary.uk/wp-content/uploads/2015/11/r-fox-v-ssfe.pdf> [accessed 11 November 2019].

<sup>11</sup> *Zengin v Turkey* (2008) <https://hudoc.echr.coe.int/eng#%7B%22itemid%22:%5B%22001-82580%22%5D> [accessed 11 November 2019].

<sup>12</sup> *Papageorgio and Others v Greece* (2019) <http://hudoc.echr.coe.int/eng?i=001-197254> [accessed 11 November 2019]

Here, it is also worth mentioning that some religious groups that run schools in Wales are explicitly against making their RE provision fully inclusive. In their initial public response to the consultation document, the Catholic Education Service even refers to the inclusion of non-religious worldviews in the subject as 'dumbing down'.<sup>13</sup> This does not suggest that non-religious perspectives will be treated with the respect and seriousness necessary to ensure that RE in Catholic schools is adequately critical, objective, or pluralistic.

Unless there is a plan to abolish faith-based RE or, at the very least retain the right to withdraw from that aspect of the curriculum and make 'Religions and Worldviews' a separate subject, we would strongly reject the proposal to remove the parental right to withdraw from RE in faith schools. To press ahead with this potentially unlawful proposal threatens the right to freedom of religion or belief of children and their families and, in so doing, undermines the very purpose of the new curriculum.

With all of that said, we are also concerned about the removal of the right of withdrawal outside of faith schools. Domestic case law in Belgium, based on the European Convention, has found that a right to withdraw must even be maintained with respect to ostensibly objective ethics classes, never mind about anything dealing with religion/s or humanism.<sup>14</sup>

### **Key recommendations:**

- Treat the right to withdraw from RSE lessons separately from the right to withdraw from RE/R&W on the grounds that the former necessarily involves teaching in a way which is objective whereas the latter, particularly in schools with a religious character, does not.
- Remove the parental right to withdraw from inclusive, fact-based RSE for all pupils in all schools, and ensure that the highest standards of accuracy and objectivity are maintained.
- Maintain the right to withdraw from R&W in all schools, including those without a religious character, at the very least until a fully inclusive curriculum is up and running, with all pupils receiving the critical, objective, and pluralistic teaching to which they are entitled, and this is seen to be working well.
- If the right to withdraw from RE/R&W in faith schools is to be scrapped, also remove the right of faith groups to produce denominational syllabuses in line with the tenets of a particular religion.
- Alternatively, require faith schools to provide R&W as a separate subject from denominational RE with a right to withdraw maintained from the latter.

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

Please use the space below for your comments:

**RSE:**

<sup>13</sup> Catholic Education Service (2019) <https://www.catholiceducation.org.uk/component/k2/item/1003674-statement-from-the-catholic-education-service-on-the-consultation-to-re-and-rse-in-wales> [accessed 11 November 2019].

<sup>14</sup> *de Pascale* (2015) [https://www.google.com/url?q=https://www.const-court.be/cgi/judgments\\_popup.php?lang%3Den%26ArrestID%3D3863&sa=D&ust=1571935395472000&usq=AFQjCNEuNSZ7fep4Elw75bkqgNf8DAGaEw](https://www.google.com/url?q=https://www.const-court.be/cgi/judgments_popup.php?lang%3Den%26ArrestID%3D3863&sa=D&ust=1571935395472000&usq=AFQjCNEuNSZ7fep4Elw75bkqgNf8DAGaEw) [accessed 11 November 2019].

As is evident from the various controversies arising from the introduction of statutory RSE in England,<sup>15</sup> it is possible that some groups in Wales will attempt to stymie the introduction of the new RSE curriculum (or any proposal to remove or amend the parental right to withdraw) on religious grounds. This kind of resistance could threaten the potential of the subject to have the necessary impact on the aforementioned rights of children and young people, as well as the health, wellbeing of society more generally, including with respect to social cohesion. For this reason, the requirements of the UNCRC, including freedom of religion or belief, and equal treatment for 'protected characteristics' like sex, sexual orientation, and gender identity, must be kept front and centre, not only when making policy decisions, but when providing public information and guidance on the subject.

#### Advice and guidance for teachers:

Religious groups of all kinds include individuals with the full range of protected characteristics, and of course young people frequently decide during the course of their education that they hold a different religion or beliefs from their parents. We therefore think that guidance on RSE and the removal of the right to withdraw should emphasise how and why all pupils should receive full, comprehensive, and developmentally appropriate RSE, regardless of personal background or the type of school they attend (e.g. if they go to a school with a religious character). The guidance should also make it clear that schools must pay due regard to the full range of protected characteristics, and children must learn about a wide variety of different relationships, including LGBT relationships, as well as about LGBT people more generally. The benefits of such education are clear, and are worth emphasising from the outset.

Many of the problems that have arisen as a result of the new RSE curriculum in England have come about because the Government has not been sufficiently clear about the content of the subject and has given schools and head teachers too much flexibility with respect to what is to feature on the curriculum. We therefore think that it is crucial that the Welsh Government does not repeat this error and provides comprehensive, mandated by statute, information on what should be taught and when in RSE in schools in Wales. Last year, the Sex Education Forum (SEF) published a high quality RSE curriculum design tool.<sup>16</sup> That tool acts as an extremely easy to use checklist setting out topics that should be included at each key stage.

With respect to the guidance issued to teachers responsible for the provision of RSE, the Welsh Government should:

- a) Include a section that spells out in clear, straightforward terms, minimum expectations for each key stage, or at least by the end of primary and by the end of secondary. Without that there is no direction as to what teaching in a timely manner looks like, and no guarantees at all that such teaching will therefore prepare pupils for challenges that lie ahead before they face them. It should focus on the rights of children and young people to this information and include reference to Gillick competence, i.e. the point at which young people acquire the rights to make decisions for themselves, rather than being dependent upon their parents.
- b) Cover all the topics featured in the SEF tool. For example:
  - i) at ages 3-6, the SEF tool talks about naming body parts, including private body parts, and who children can talk to if they're worried about or need to know something – all of which plays a strong safeguarding role. It

<sup>15</sup> See, for instance, this petition that was discussed in a recent Westminster Hall debate: <https://petition.parliament.uk/petitions/235053> [accessed 19 September 2019]

<sup>16</sup> [https://www.sexeducationforum.org.uk/sites/default/files/field/attachment/SEF\\_Curriculum%20Design%202018.pdf](https://www.sexeducationforum.org.uk/sites/default/files/field/attachment/SEF_Curriculum%20Design%202018.pdf)

- opens up the topic of 'where babies come from', and growth and development since infancy.
- ii) at ages 16 and beyond, the SEF tool takes about the challenges of long-term relationships, dealing with break-ups, communication skills, parenting, body image and self-esteem, contraception, abortion STIs, pornography, and infertility.

There should also be clear instruction on the age appropriateness and the scope of RSE in relation to identifying body parts, abortion and contraception, FGM, and pornography.

We appreciate that the wider curriculum reforms may represent a trend away from prescription. But where there has been no compulsory teaching before, no initial teacher education, and schools generally have had no specialist teachers, they need this kind of detailed guidance in a way they may not in other subjects.

Here it is also worth mentioning that the PSHE Association has produced a very good and comprehensive programme of study for personal, social, health, and economic education (PSHE) in England.<sup>17</sup> We appreciate that this is geared towards the English subject, but the PSHE Association has also produced guidance on how the programme of study fits with the Welsh subject of personal and social education,<sup>18</sup> and we hope that the programme of study could similarly assist the Government in providing inspiration for what should be covered in its RSE guidance.

#### Information for parents:

In addition to comprehensive guidance for schools and teachers, it will be crucial for the Welsh Government to provide simple, easy to understand information on the new RSE curriculum and the removal of the right to withdraw for parents and carers. This should go some way towards preventing spread of misinformation that has been the cause of so many of the issues pertaining to RSE in England and elsewhere. Parents should be made aware of precisely what is (and isn't) on the RSE curriculum, as well as the rationale for the inclusion of this material.

Schools should be supported and encouraged to engage with parents about the subject. But parents should be made aware that they are not entitled to veto certain aspects of the curriculum and that this includes learning about issues that they might find difficult or uncomfortable. Parents should also be informed about the content of the UNCRC and how RSE forms an important part of safeguarding children's rights and interests.

#### **RE**

Setting aside the issue of RE in denominational schools for a moment, we note that the Welsh Government intends to remove the right to withdraw from RE (R&W) but retain the system of Standing Advisory Councils on Religious Education (SACREs) and Agreed Syllabus Conferences (ASCs). While we appreciate that these will now be fully inclusive of humanists, we are nevertheless concerned that the continuance of SACREs and ASCs could lead to great variations in the content of the RE curriculum and mean that where some curricula are 'critical, objective, and pluralistic' others are less so. The intention of Successful Futures is to produce one national curriculum across Wales, and one of the four key purposes of the curriculum is 'to support our children and young people to be... ethical informed citizens of Wales and the World.' This will simply not be

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17

<https://www.pshe-association.org.uk/curriculum-and-resources/resources/programme-study-pshe-education-key-stage-s-1%E2%80%935>

18

<https://www.pshe-association.org.uk/curriculum-and-resources/resources/personal-and-social-education-pse-wales-how-pshe>

achieved if we allow 22 different versions of the curriculum to be created. With respect to the issue of the right to withdraw, the proliferation of RE/R&W curricula may also mean that, in areas where the curriculum does not meet the necessary standards to be considered pluralistic, the freedom of religion or belief of children who are exposed to it will be under particular threat.

For this reason, we believe that a move to a single RE/R&W framework across all Local Authorities, including voluntary aided and voluntary controlled schools, constitutes the only effective way to ensure consistent delivery of RE as a pluralistic and academic subject. This should obviously be developed with the input and advice of a variety of religious and humanist groups and their representatives, but should ultimately be the responsibility of subject experts who have a full grasp of the broader context for the subject and the legal requirements pertaining to inclusivity and pluralism. As noted in the recent Commission on Religious Education report into the subject, there should therefore be a repeal of the law relating to ASCs and this should be replaced with a 'national entitlement statement for RE which sets out clearly the aims and purpose of RE and what pupils should experience in the course of their study of the subject.' Within the confines of this entitlement, schools should be free to determine their own syllabuses with respect to the subject.<sup>19</sup>

As already mentioned above, the existence of separate frameworks for RE for Church in Wales and Catholic schools allows the continued teaching of denominational RE where other beliefs are not treated equally. Therefore, if they are to be permitted to continue to offer such teaching, it must be treated as distinct from 'Religions and Worldviews' and parents and young people should retain the right to withdraw from it.

#### **Key recommendations:**

- Ensure that all guidance and information published on RSE focuses on the rights of children and young people to grow up healthy, happy, and safe;
- With this in mind, tell schools and head teachers that they must provide an RSE curriculum that pays due regard to **all** of the protected characteristics and ensure that every child receives developmentally appropriate, LGBT inclusive relationships education at every stage of their schooling, irrespective of background or the type of school that they attend;
- Provide comprehensive guidance on the content of RSE with clear expectations with what should be learnt at each key stage, level, or progression step and use tools from the SEF and PSHE Association to support this process;
- Provide guidance on how to engage (rather than consult with) parents in a way that makes it clear that they may not veto RSE curriculum content and children's rights will always be a central concern;
- For RE/R&W, repeal the law on ASCs and replace it with a 'national entitlement statement for RE which sets out clearly the aims and purpose of RE and what pupils should experience in the course of their study of the subject.';

In faith schools, remove the right of religious bodies to produce faith-based syllabuses or, in the event that denominational RE is separated from R&W, produce guidance on how these two subject areas are distinct.

**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).

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<sup>19</sup> Commission on Religious Education (2018) *Religion and Worldviews: The Way Forward A National Plan for RE* <https://www.commissiononre.org.uk/wp-content/uploads/2018/09/Final-Report-of-the-Commission-on-RE.pdf>



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.)

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

As previously stated, our position on RSE is different from our position on RE/R&W and, within RE, there is a notable difference between provision in denominational schools and those without a religious character.

**RSE:**

Yes

It is important to remember that, currently, there exists only a right to withdraw from sex education. There is no right to withdraw from relationships education. If the subject of RSE is changed consistently (including in schools with a religious character so that they comply with the same national guidance on RSE) and with strong guidance of the sort outlined above, there should be no right to withdraw from the curriculum – doing so would actually extend the areas that children can be withdrawn from and would impact many more lessons and children. We therefore think that the right to withdraw should be removed as soon as possible from all aspects of RSE.

**RE:**

No

We support the new curriculum in its aim to teach pluralistic RE and as such, if it can be proven to be delivered in a fair and balanced way, with reference to an RE framework that is underpinned by a comprehensive ‘national entitlement’ and equal treatment of religious and non-religious worldviews, there could be support for the removal of the right to withdraw in the future. However, this is not the case with the existing curriculum, or in faith-based VA and VC schools. Therefore we cannot support the removal of the right to withdraw from the old curriculum, faith schools, or even the new curriculum unless and until the subject is taught to one national, objective and pluralistic syllabus. What’s more, given the threat to freedom of religion or belief removal of the right to withdraw might represent, we think this curriculum must be introduced and monitored for compliance long before any decision to remove this right is taken.

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

<b>No change</b>	<input type="checkbox"/>	<b>Religion, values and ethics</b>	<input type="checkbox"/>	<b>Religions and worldviews</b>	<input checked="" type="checkbox"/>	<b>Other (please specify)</b>	<input type="checkbox"/>
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Other (please specify): \_\_\_\_\_

Reasons for your choice:

We firmly support the proposal to rename RE ‘Religions and Worldviews’. In our view, the name ‘religious education’ is antiquated and misleading and, given the changes

proposed as part of the new curriculum it would be unsustainable for the Welsh Government to continue to use it whilst also expecting schools to provide the subject in a sufficiently pluralistic manner. Religious education should be as inclusive as possible, not just of all religions, but of humanism too. Since the proposed changes to the curriculum and the legislation surrounding it are designed to reflect the fact that humanism is a worldview which is 'analogous to religious views', the name of the subject should be amended to recognise this broadened scope.

Whilst we do not wish to see the various religions and non-religious worldviews examined with any less rigour, we would like a name that is more thematic and values-led, focusing on the study of important moral and ethical issues, different perspectives on those issues, and encouraging children to grapple with them.

Given this, it has long been our view that religious education should be renamed to more accurately reflect both the nature of the subject we want to see and its inclusive nature. Other names for the subject already exist. In Scotland, 'religious and moral education' is taught. This is better than RE but is not, in our view, a good solution, both because it fails to address the exclusion of non-religious worldviews, and because it might imply that moral questions are exclusively within the realm of religion, which is clearly not the case. It had been suggested by the previous Minister for Education that RE in Wales be reformed into 'religion, philosophy, and ethics', which is better, but still does not fully respond to these issues.

Our preference would therefore be for a subject name along the lines of 'Beliefs and Values'. 'Religions and Worldviews,' which is the current proposal, would also be better, as it would be accurate and inclusive, albeit not putting that values-led emphasis first and foremost.

We note that the Commission on RE favoured the name 'Religion and Worldviews' (without the first s) and that this title is also endorsed by the Religious Education Council of England and Wales. We think the view, advanced in a public statement on the matter made on the REC website,<sup>20</sup> that referring to 'religion' rather than 'religions' will ensure that teachers 'open up the subject to a higher-order conceptual approach' which considers religion 'as a conceptual category' is overstated. Conceptual analysis of this kind will only really become a feature of the subject if it is explicitly built into the content of the curriculum and, given the REC's view that the subject should also involve similar analysis of other concepts like 'secularity' and 'spirituality', might beg the question as to why 'religion' is to be prioritised over, say, 'secularism' in this name. Further, the argument that 'the proposed name risks making it seem as if 'religions' and 'worldviews' are equivalent terms with the latter meaning the non-religious equivalent of the former' could be just as well addressed by renaming the subject 'Worldviews'; something to which we would not object, but suppose may meet with resistance from many religious groups.

On the contrary, the problem with the name 'Religion and Worldviews' is that the 'Worldviews' in the name is intended to refer to both religious and non-religious worldviews; therefore, the name would be unpacked as 'religion, religious worldviews, and non-religious worldviews', and so still puts religion/s on a pedestal above non-religious worldviews. If we are going to refer to 'religion' in the singular and have 'worldviews' carry the weight of both religious and non-religious worldviews, then the name should logically be something like 'Religion, Non-Religion, and Worldviews', but that obviously is a mouthful.

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<sup>20</sup> Religious Education Council of England and Wales (2019), *Welsh Government proposal to change the name of RE and remove the right of withdrawal* <https://www.religiouseducationcouncil.org.uk/news/welsh-government-proposal-to-change-the-name-of-re-and-remove-the-right-of-withdrawal/> [accessed 12 November 2019]

'Religions and Worldviews' has the benefit of placing religious and non-religious perspectives on an equal footing, whilst still acknowledging that there will be a diversity of perspectives in each category.

**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

N/A. This question falls outside of our policy remit.

**Question 6** – Please also explain how you believe the proposed plan 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

N/A. This question falls outside of our policy remit.

**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.

As noted in our responses to all of the Welsh Government's recent consultations on curriculum reforms and the associated proposals for legislation, the issue of collective worship has been entirely excluded from the process. This consultation unwisely conflates the right to withdraw from RE with the right to withdraw from RSE, but completely omits to mention the only other significant part of the school day where a parental right to withdraw exists. This is despite the fact that the outdated requirement for daily worship that is 'wholly or mainly... Christian' both contradicts the new legislation pertaining to inclusivity and pluralism in the RE curriculum and fails to uphold both the Human Rights Act and the UN Convention on the Rights of the Child's requirement for freedom of religion or belief. Assemblies are an important part of the school day and provide schools with a real opportunity to promote the spiritual, moral, social, and cultural development of pupils. Even with the right to withdraw retained, to continue with a policy of enforced collective worship contradicts much of the rationale for the new curriculum and risks diminishing the impact of the important changes being made. We therefore strongly urge the Welsh Government to remove the requirement for collective worship in all schools and replace it with fully inclusive assemblies, that take account of and are respectful of all religions and beliefs.

Our new website <https://assembliesforall.org.uk/> provides a good model of what such inclusive assemblies should look like.

### **ABOUT WALES HUMANISTS**

Wales Humanists is a part of Humanists UK. We want a tolerant world where rational thinking and kindness prevail. We work to support lasting change for a better society, championing ideas for the one life we have. Our work helps people be happier and more fulfilled, and by bringing non-religious people together we help them develop their own views and an understanding of the world around them. Founded in 1896, Humanists UK is trusted to promote humanism by over 85,000 members and supporters and over 100 members of the All Party Parliamentary Humanist Group. Through our ceremonies, pastoral support, education services, and campaigning work, we advance free thinking and freedom of choice so everyone can live in a fair and equal society.

We have a long history of work in education, children's rights, and equality, with expertise in the 'religion or belief' strand. We have been involved in policy development around the school and the curriculum for over 60 years. We also provide materials and advice to parents, governors, students, teachers and academics, for example through our Understanding Humanism website (<https://understandinghumanism.org.uk/>) and our school speakers programme. We have made detailed responses to all recent reviews of the school curriculum in Wales (and the rest of the UK), and submit memoranda of evidence to MPs, civil servants and parliamentary select committees on a range of education issues.

We are an active member of many organisations working in education in the UK, including the Religious Education Council for England and Wales (REC), of which we are a founding member, and our Chief Executive is the Treasurer; the Welsh Association of Standing Advisory Councils on RE (WASACRE), of which our Wales Coordinator is an executive committee member; and, in England, the Sex Education Forum (which for many recent years our Education Campaigns Manager was on the steering group of), the PSHE Association, and the Children's Rights Alliance for England (CRAE). We have been on all Welsh and UK government steering groups that have reviewed RE in recent years.

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: