

**Consultation
response form**

Your name: Vaughan Salisbury, Education
Representative

Organisation (if applicable): Free Church Council of
Wales

e-mail/telephone number:
vaughans143@gmail.com/07950655477

Your address: Glanaber, Tregeiriog, Llangollen LL20
7LA

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

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

or completed electronically and sent to

e-mail: 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:

The answers noted below relate specifically to the proposed changes relating only to RE.

Implications for learners: If all learners were required to receive RE in the new curriculum then there is more of a chance of all learners becoming educationally literate in discussions pertaining to religious issues both within a school setting and in society at large.

Implications for parents/carers: a) There would a better chance of parents/carers realising that the teaching of RE poses no threat to their personal beliefs. b) They might also increase their understanding of the wider religious issues that face believers and non-believers in society and that are often headlined and discussed superficially in the media. c) According to Sally Holland, Children’s Commissioner for Wales the parental right to withdraw a child from RE is incompatible with the human rights of children under the domestic legislation of the Human Rights Act 1998, the European Convention on Human Rights and the commitment in Wales to the UNCRC guaranteed by the Rights of Children and Young Persons (Wales) Measure 2011.

Implications for schools: a) given that current provision is often inadequate and inconsistent, this new arrangement would I believe be welcomed by schools, e.g. it would facilitate considerably the interdisciplinary nature of the new curriculum. b) where relevant, careful and sensitive explanation and guidance would need to be given to those parents/carers who had formerly requested their children to opt out of RE lessons. c) additional arrangements and training would need to be made available to ensure that RE be taught to all children between the ages of 3 to 16 years of age, especially those in a nursery setting.

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

Please use the space below for your comments:

RE and senior school staff would need to discuss the issues with learners/parents/carers as noted above under question 1.

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

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

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

If the current arrangements were stopped then those children would have a better chance of becoming properly educated in religious and non-religious issues that are so relevant locally, nationally and throughout the world today.

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

No change	<input type="checkbox"/>	Religion, values and ethics	<input type="checkbox"/>	Religions and worldviews	<input type="checkbox"/>	Other (please specify)	✓
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Other (please specify): 1) Religions and Humanism or 2) No change

Reasons for your choice:

Whatever is proposed here will be problematic given the additional study of a non-religious perspective on life in a curriculum currently fully focused on a broad multi-faith study of local, national and global issues. We offer two possible names:

- 1. ‘Religions and Humanism’ as it presents exactly what will be studied according to the new curriculum documents. Those documents refer repeatedly to ‘Humanism’ as an example of a non-religious perspective that might be studied and it is the humanists who appear to be most enthusiastic to be included in the RE curricula. Given this situation, why not simply name the non-religious perspective that will be studied. This also avoids the problem of the ambiguous use of the plural term ‘worldviews’ or is there an intention to study more non-religious perspectives even anti-religious viewpoints and less religions as time goes on.**

Keeping the word ‘Religions’ in the new name would also provide clarity for learners and parents/carers and this is important in presenting the subject at school level.

This would also be an argument for not using the word ‘Religion’ in the title. While the word has a useful conceptual frame of reference and would often be used in Higher Education Religious Studies courses, it does not provide enough focus or clarity within a 3-16 age range school context.

Given our proposed alternative new name for RE namely, ‘Religions and Humanism’ and recognising that the wording of the law will need to change to

include Humanism, we are strongly of the opinion that the law and the study of the subject should continue to 'reflect the fact that the religious traditions in Great Britain are in the main Christian whilst taking account of the teaching and practices of the other principal religions represented in Great Britain'. It would be appropriate therefore to 'take account of' the study of Humanism in the RE curriculum as on a par with one of the 'other principal religions'.

The word 'worldviews' is problematic in both 'Religion and worldviews' (CORE report England proposal) and 'Religions and worldviews' (WG proposal) as it is undefined. What constitutes a 'worldview'? Sandberg notes in a recent article '*One area where centralised directive would be advisable would be in relation to providing guidance as to what constitutes a 'worldview'. This is an area of legal uncertainty at present. Employment Tribunals have struggled with it...*' (lawandreligionuk.com 'Religion in schools in Wales', 4 October 2019). Given the current law and SACRE guidance, it is quite clear and long established what religions will be studied but this is not the case with regard to the study of the non-religious element. This issue needs to be thoroughly investigated so that the term is clear and transparent to all stakeholders.

The implications of this discussion on 'worldviews' are potentially considerable. For example, do 'worldviews' relate only to the non-religious element of study? Does the use of 'Religion/s and worldviews' relate to the weighting of subject study, to say 50% study of religions and 50% study of non-religious perspectives? If this is what is proposed, then we would disagree fundamentally with that interpretation. Thirdly, given the plural 'worldviews', how many worldviews are envisaged here? This has implications for a) curriculum time so that the subject topics are properly studied and b) what exactly will be the other worldviews studied? Clarity on the above issues is of the utmost importance here for all concerned. Using the word 'Humanism' as part of the new subject name as noted above avoids all these potential problems.

2. No change. We also recognise that the study of non-religious perspectives is not limited to the Religious Education curriculum. If twentieth century history is studied in schools then presumably some elements of marxism and nazism/fascism would also be taught. Non-religious standpoints would therefore permeate the Humanities curriculum at various times especially at a secondary school level. Given this situation might it not be better to simply keep the Religious Education subject title as it currently stands with the added legal proviso that Humanism also be taught under the well established RE subject title. In support of 'no change', we would also refer you to paragraph 22 of the consultation document which states '*Therefore we propose the current legislation will be amended to ensure the agreed syllabus for RE takes into account the non-religious world views which are analogous to religions (for example, Humanism)*'. If Humanism is seen as 'analogous to religions', then there is no reason to change the subject name and every reason to keep it as it is.

Clearly, whatever name is finally adopted will need to be carefully explained and developed in the proposed new Framework for RE. It is the Framework that will be fundamentally important in the successful delivery of the subject at school and at LA level with its possible adoption as an agreed syllabus.

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

- i) Learners would gain a greater Welsh vocabulary in this subject and consequently feel more confident in discussing religious issues through the medium of Welsh.**
- ii) It would contribute to furthering an equality of status between Welsh and English both in the eyes of the learner and parents/carers.**

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

By changing the law to what is proposed.

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.

The translation of 'pluralistic' in the English document, e.g. paragraphs 3, 7 and 30 to 'amlblwyfol' or 'amlblwyfaeth'(7) in the Welsh language document needs to be changed as soon as possible as it is inappropriate and misleading. It has already led to misunderstanding in certain Welsh ecclesiastical circles referring as it does historically to the practice of holding more than one ecclesiastical office or parish at a time. This is not good practice in an RE document! We suggest that variations on the Welsh word 'lluosog' be used here.

This translation issue is also relevant to the Welsh language document, 'Asesiad Effaith Integredig Llywodraeth Cymru, page 4.

We believe it also unfortunate and potentially misleading that both RE and RSE have been presented together in this consultation document as they are distinct and quite separate aspects of a school's curriculum.

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: