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# Legislative proposals for religion, values and ethics in the Curriculum for Wales Framework: National Secular Society response

Submitted by email to: [RVEConsultation@gov.wales](mailto:RVEConsultation@gov.wales)

This submission is made by the National Secular Society (NSS). The NSS is a not-for-profit non-governmental organisation founded in 1866, funded by its members and by donations. We advocate for separation of religion and state and promote secularism as the best means of creating a society in which people of all religions and none can live together fairly and cohesively. We seek a diverse society where all are free to practise their faith, change it, or to have no faith at all. We uphold the universality of individual Human Rights, which should never be overridden on the grounds of religion, tradition or culture.

## 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?

1. **Agree**
2. We welcome efforts to make this subject area broader and more pluralistic, particularly by including greater emphasis on the non-religious beliefs and other philosophical convictions held by the majority of Welsh citizens. This is essential for pupils to “engage with, and appreciate, the pluralistic society in which they live”.
3. We are grateful that the government has moved away from the limiting language of including only beliefs that are “analogous to religion”. The standard of protected philosophical convictions as developed through human rights case law is clearly the correct one.
4. However, we are disappointed that the language in Section 375 of the Bill continues to frame religion and Christianity in particular as the default. We are disappointed that the more inclusive language regarding the diversity of beliefs in Wales proposed at earlier stages has been compromised on.
5. The objections noted in the explanatory notes by some faith groups to the name change “to reflect a broader scope” highlights the need for strong inclusive language to address those seeking to continue the marginalisation of non-religious beliefs and identities within the subject.

6. We welcome the explicit acknowledgment of the importance of pupils learning about secularism – which is accurately, albeit limitedly, defined as “the principle of keeping religion separate from civic and state matters.”

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

### 7. **Agree**

8. It is our long-standing contention that the system of SACREs and ASCs is educationally inappropriate. We believe that a national agreed syllabus developed by educational experts with regard to statutory guidance is necessary to liberate the subject from special interest groups; what *Reforming Religious Education: Power and Knowledge in a Worldviews Curriculum* (an anthology of academics and practitioners) have called “producer communities”.
9. However, while the system of SACREs and agreed syllabus conferences continues, we welcome the requirement that they must have regard to statutory guidance as this may address some of the inequities and inconsistencies between locally agreed syllabi.

## 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?

### 10. **Agree**

11. Schools without a religious character should deliver a broad, balanced, critical and objective RVE syllabus.
12. We reiterate our preference that the agreed syllabus is national, rather than controlled by SACREs/ASCs. Schools will have difficulty in delivering truly modern and pluralistic RVE where the design of the agreed syllabus is still dominated by special interest groups and producer communities. While legislative changes to make SACREs/ASCs more inclusive are welcome, this will do little to change the reality of the agreed syllabus being a space where different belief groups compete for favourable coverage.
13. Additional guidance for schools is necessary to ensure that RVE is genuinely broad, balanced, critical and objective, and to address the long-standing biases which undermine the credibility of the subject. We have referenced, for example, research showing that most RE teachers regard it as their responsibility to promote a positive view of religion, while addressing and framing negative manifestations of religion as “false” or “distorted”.

## 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?

### 14. Agree

15. The current provision creates an unnecessary, if rarely utilised, burden on schools without a religious character. It risks creating division in the education experiences of pupils at the same school. The provision is outdated and relates to a time where religious minorities justifiably feared that RE in non-faith schools would be dominated by Church in Wales perspectives.
16. Parents/carers have the right to raise their child in accordance with their beliefs, but they should not expect to do this via the state education system. Faith and belief communities make significant resources available to parents for faith formation. This should be separated from the academic practice of RVE in schools.

## 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?

### 17. Disagree

18. The default position is for voluntary-controlled schools to follow a model closer to that of community schools. Permitted deviations, for example to allow religiously selective admissions or denominational RE, are rare. Given this, and the decision to stop schools without a religious character providing denominational RVE in response to parental wishes, it makes sense to extend this change to voluntary-controlled schools.
19. We will expand on this in question six. Suffice it to say that schools with a religious character, particularly voluntary-controlled ones without religiously selective admissions, are not religious communities. Families choose such schools for a variety of reasons and not necessarily based on their religious designation or RE provision.
20. Maintaining this 'demand on request' denominational provision will undermine efforts to make pluralistic RVE the default in such schools, by diverting resources and encouraging pressure on families to request the denominational option. It may also be used to justify discriminating against otherwise qualified teachers on religious grounds in VC schools.

## 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?

### 21. Agree

22. For many parents it will be a welcome development. In our experience, the vast majority of parents, even those who feel they must withdraw from their school's RE, are keen for their children to learn about a diversity of religions and beliefs, provided this is delivered in an impartial manner.
23. However, making pluralistic RVE an option rather than standard raises significant issues. This will introduce a dual system regarding the teaching of RVE across Wales which will result in a divisive approach to how the subject is taught.
24. Faith schools running two RVE syllabi in parallel, one objective and one confessional, will also introduce additional burdens on schools and create confusion for parents, pupils, and teachers. It should however be recognised that this burden will be entirely of their own making my refusing to adopt a pluralistic model and disregarding the independent rights of pupils.
25. Faith schools in Wales vary widely in terms of how 'robustly' they promote their religious ethos. There is a real possibility that some schools will pressure parents to 'choose' the denominational RVE 'option' – or at least deter them from opting for the pluralistic model. The agreed pluralistic RVE option may as a result be under resourced and stigmatised.
26. Moreover, where a religious ethos permeates all aspects of a faith school, it is hard to see how this will not influence the agreed pluralistic RVE option, particularly as in VA faith schools where teachers are often selected on religious grounds.

**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.**

27. We welcome the government's efforts to introduce reforms that can deliver an RVE syllabus and system that is genuinely pluralistic and balanced in nature – one that guarantees all children across Wales access to a religious and ethical education fit for the 21<sup>st</sup> century and that shows Wales leading the way across the UK when it comes to the teaching of RVE.
28. We deeply regret that by permitting faith schools to continue to use the subject to promote their particular religious outlook through the denominational syllabus, many pupils in Wales will continue to be denied access to genuinely non-partisan and balanced education about the full range of religious and non-religious worldviews. **We believe this should be the right of every child, irrespective of the type of school they attend.**
29. **If the ambition is for every child to have universal entitlement to a broad and balanced curriculum, we believe implementing a duty on all schools to teach an objective, critical, and pluralistic RVE syllabus, without exception, must be the starting point.**
30. **We therefore urge you to extend the duty to teach pluralistic RVE in accordance with the agreed syllabus to all schools, regardless of religious designations.**
31. Schools with a religious character should not be prevented from offering additional and voluntary extracurricular provision in accordance with the tenants of their faith where demand exists.
32. We cannot emphasise enough that schools cannot be regarded as homogenous faith communities. The evidence is that families largely do not choose faith schools based on their religious ethos, and do not necessarily wish to opt into a religious community by virtue of their school choice.

33. Research in 2013 by YouGov for the Westminster Faith Debates shows that 77% and 58% of parents choose schools on the basis of academic results and location respectively, compared to 5% based on their “ability to ground children in a faith tradition”. According to the Catholic Education Service’s digest of 2019 census data, the percentage of Catholic pupils in maintained Catholic schools and colleges in Wales is just 54%.
34. Finally, given our concerns about the provision of objective, critical, and pluralistic RVE in schools with a religious character, and the privileged role of special interest groups, both religious and secular, in agreed syllabus design, we urge the government to pause on removing the parental right to withdrawal until the new curriculum has had time to bed in and be assessed.
35. Without a right to withdraw the delivery of RVE will be liable to legal challenge where it is not genuinely “objective, critical, and pluralistic”. The right of withdrawal currently exists to protect parents’ and children’s rights under Article 9 of European Convention on Human Rights (ECHR), which provides a right to freedom of thought, conscience and religion. There is a large body of human rights case law that suggests that scrapping this right will be unlawful.

## Would prefer your response to remain anonymous?

36. **No.**