

High Court rulings on Religious Education and the Composition of Standing Advisory Councils on Religious Education

Legal guidance on what these mean
for local authorities, Agreed Syllabus
Conferences, and SACREs

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Introduction

1. This document incorporates and revises previous legal guidance relating to *R (Fox) v Secretary of State for Education* 2015¹ in light of the more recent High Court judgment in *R (Bowen) v Kent County Council* 2023. Taken together, these cases provide a clear legal framework for the inclusion of humanism in religious education (RE) in schools in England. With this in mind, this legal note outlines each of the judgments before explaining their implications for those who teach or are otherwise involved in the oversight and development of RE syllabuses.

Summary of the law as it now stands

2. Local authorities **must** enable the appointment of representatives of religious and non-religious beliefs to group A of the Standing Advisory Council on Religious Education (SACRE) in a manner that broadly reflects the preponderance of those beliefs in the local area.
3. Accordingly, local authorities **may** appoint humanists to group A of a SACRE. Given the number of humanists in the UK, in reality, local authorities invariably **should** do this.
4. Local authorities **must not** co-opt humanists, or appoint them to groups C or D of the SACRE, as an alternative to appointing them to group A, unless they are being appointed for a reason other than their humanism.
5. Local authorities **must not** appoint generic ‘non-religious’ representatives to a SACRE.
6. Locally agreed RE syllabuses **must** be fully inclusive of non-religious worldviews and provide such worldviews with equal respect. In practice, given the number of humanists in the UK, this means they **should** afford humanism equal respect to the major world religions.
7. In order to realise equal respect for humanism, RE syllabuses **should** include humanism to the same extent as the major non-Christian world religions in both systemic and thematic study, at each key stage.
8. Schools other than voluntary aided faith schools or faith academies that follow the voluntary aided model, **must** teach RE in an objective, critical, and pluralistic manner.
9. Schools that do not provide a GCSE religious studies syllabus that is inclusive of non-religious worldviews **must** provide additional teaching on non-religious worldviews alongside the GCSE course.

1. *Juss, Satvinder, High Court ruling on Religious Education, Legal guidance on what it means for local authorities, academies, schools, teachers, Agreed Syllabus Conferences and SACREs* (Humanists UK, 2016). Available at: <https://humanists.uk/wp-content/uploads/2016-04-28-FINAL-High-Court-ruling-on-Religious-Education-legal-guidance.pdf>

Background

Fox v Secretary of State for Education [2015]

10. In 2015, the High Court ruled² that the Department for Education (DfE) had made ‘an error of law’ in its specification of content for the new GCSE Religious Studies (RS) for English schools.³ The error was in asserting that teaching the new RS GCSE would meet the legal requirements for the provision of RE in general, including for just Key Stage 4, and the consequent implication that it could therefore be used by schools as the entirety of their RE teaching at Key Stage 4.
11. The High Court said this assertion was unlawful because statutory RE in schools without a religious character must be ‘objective, critical and pluralistic’ and a syllabus that covered religions in detail but did not give pupils the opportunity to learn similarly about a non-religious worldview such as humanism would not meet this requirement. As the judgment states:

‘the state has a duty to take care that information or knowledge included in the curriculum is conveyed in a pluralistic manner... the state must accord equal respect to different religious convictions, and to non-religious beliefs; it is not entitled to discriminate between religions and beliefs on a qualitative basis; its duties must be performed from a standpoint of neutrality and impartiality as regards the quality and validity of parents’ convictions.’⁴

Bowen v Kent County Council [2023]

12. In May 2023, the High Court quashed a decision by Kent County Council (KCC) to reject Kent Humanists Chair Steve Bowen’s application for membership of group A of the SACRE because, they said, as a holder of a non-religious worldview (humanism), he does not represent ‘a religion or a denomination of a religion’. The Court ruled that this decision was ‘unlawful’ and ‘discriminatory’.⁵
13. Section 390(4) of the Education Act 1996 reads that group A should consist of members that ‘represent such Christian denominations and other religions and denominations of such religions as, in the opinion of the authority, will appropriately reflect the principal religious traditions in the area.’⁶ KCC considered that it did not have the power to appoint Mr Bowen to Group A and that it would have been unlawful for it to do so.

2 *R (Fox) v Secretary of State for Education* [2015]. Available at: <https://www.judiciary.gov.uk/wp-content/uploads/2015/11/r-fox-v-ssfe.pdf>

3 *The Religious Studies GCSE Subject Content*, February 2015: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/403357/GCSE_RS_final_120215.pdf

4 Paragraph 39

5 *R (Bowen) v Kent County Council* [2023]: <https://humanists.uk/wp-content/uploads/2023-05-26-R-Bowen-v-Kent-CC-Judgment.pdf>

6 Education Act 1996, Section 390(4): <https://www.legislation.gov.uk/ukpga/1996/56/section/390/enacted>

14. However, since the introduction of the Human Rights Act 1998 (HRA),⁷ all domestic legislation is required to be compatible with the European Convention on Human Rights (ECHR). This includes Article 14 (prohibition of discrimination), taken together with Article 9 (freedom of religion or belief) and/or Article 2 of Protocol 1 (right to education).
15. The Court found KCC's decision to be unlawful because, in line with the HRA, humanism must be 'read in' to most instances where the term 'religion' is used in current law.⁸ As the judgment puts it:

*'In interpreting section 390(4)(a) as KCC did, it failed to interpret the provision in compliance with the HRA 1998 when it was possible to do so... humanism is self evidently a belief system which is appropriate to be included within a religious education syllabus (not least because it overwhelmingly is already), and would be encompassed within any Convention-compliant interpretation of section 390(4)(a).'*⁹

16. On this basis, 'the decision of KCC prohibiting Mr Bowen from being included as a [h]umanist representative within Group A of the SACRE' was declared unlawful.¹⁰
17. The judgment was concerned with membership of a SACRE, but given that similar statutory requirements (as found in Schedule 31 of the Education Act 1996¹¹) govern the establishment of Agreed Syllabus Conferences (ASCs), the same interpretation of the law also applies for the latter body. The judgment also underlined the need to include humanism in RE syllabuses, often in stronger language even than found in Fox. For example,

*'...it is plain from Fox that a religious education curriculum must, in order to be compliant with the HRA 1998, cover more than religious faith teaching. The content of religious education teaching must include, at least to some degree, the teaching of non-religious beliefs (such as humanism)... [It] is not a non-religious worldview "at the margins", but well recognised as one which should be afforded equal treatment [with the major religions].'*¹²

7 Human Rights Act 1998, Schedule 1, Part 1, Article 14: <https://www.legislation.gov.uk/ukpga/1998/42/schedule/1/part/1/chapter/12>

8 Human Rights Act 1998, section 3: <https://www.legislation.gov.uk/ukpga/1998/42/section/>

9 Paragraph 106

10 Paragraph 107-108

11 Education Act 1996, Schedule 31: <https://www.legislation.gov.uk/ukpga/1996/56/schedule/31/data.pdf>

12 Paragraphs 21 and 88

What are the implications for Religious Education, SACREs and ASCs?

18. Taken together, Fox and Bowen have wide-ranging implications for the conduct of local authorities, SACREs, ASCs, academies and multi academy trusts, school leaders, and teachers of RE. These are examined in greater detail below.

RE at Key Stage 4

19. In the Fox judgment, the Court said the Government's claim that the RS GCSE could form the entirety of a Key Stage 4 RE course was 'false and misleading' and would encourage others to act unlawfully.¹³ This was because such a syllabus might not include non-religious worldviews to the extent required under the law for RE as a whole to be neutral, impartial, and pluralistic. Furthermore, it would not be adequate to balance the GCSE with teaching about non-religious beliefs during earlier key stages. The judge said:

'...it is obvious that GCSE is a vitally important stage in the development of a young person's character and understanding of the world. I do not consider it could be said that a complete or almost total failure to provide information about non-religious beliefs at this stage could be made up for by instruction given at earlier stages.'

20. Technically, this means that schools which fail to provide a suitably inclusive GCSE syllabus have to provide additional teaching on non-religious worldviews alongside the GCSE course in order to meet those statutory requirements. For this reason, the Government was required by the judge to clarify that using the RS GCSE as the entirety of the Key Stage 4 RE course might not be enough to fulfil the statutory requirements for RE.

RE syllabuses and teaching at other key stages

21. *Fox and Bowen* have significant implications for RE syllabuses in schools without a religious character.

- a. RE syllabuses remain bound by the statutory requirement set out in the Education Act 1996 that they 'reflect the fact that the religious traditions in Great Britain are in the main Christian whilst taking account of the teaching and practice of the other principal religions represented in Great Britain'. However, the phrase 'principal religions' must be read as including non-religious worldviews and includes humanism.¹⁴
- b. The legal requirement for RE to be 'objective, critical and pluralistic'¹⁵ in line with the state's 'duty of impartiality and neutrality' this means that non-religious worldviews cannot be excluded. It does not mean that strict 'equal air-time' must be given to all religions and

13 Paragraph 81

14 Paragraph 22 of *Fox*, citing section 3 of the Human Rights Act 1998

15 Paragraph 31(5) and *passim*

non-religious worldviews. As outlined in the previous subparagraph, it is still acceptable in law for syllabuses to give more attention to Christianity than to other worldviews, religious or otherwise. Similarly, a syllabus may give more attention to a religion or non-religious worldview that has a particularly high local following or relevance. As the *Fox* judgment states, ‘an RE syllabus can quite properly reflect the relative importance of different viewpoints within the relevant society... region or locality’.¹⁶

- c. But what the law does require is that ‘equal respect’ is given to different religions and non-religious worldviews. For example, an RE course that provides for the study of religions of a small size or little relevance without giving comparable attention to non-religious worldviews of the same or a greater size or relevance will breach this requirement. The *Fox* judgment states that a syllabus that ‘give[s] priority to the study of religions (including some with a relatively very small following and no significant role in the tradition of the country) over all non-religious world views (which have a significant following and role in the tradition of the country)’¹⁷ would not comply with the HRA. Such a syllabus would not afford ‘equal respect’, would not be pluralistic, and would therefore be unlawful.

The meaning of equal respect

22. The need to accord equal respect means:

- a. If at any key stage it is compulsory to systematically study a module on one or more of the principal religions (other than Christianity), then it should also be compulsory to systematically study a module or modules on one or more principal non-religious worldviews (which, in practice, means humanism).
- b. Similarly, if there is an option to study a module or modules on one or more (non-Christian) principal religions, the choice should include a module or modules on one or more principal non-religious worldviews (again, in practice, humanism).
- c. If there are thematic modules, those modules should include or allow for the study of principal non-religious worldviews to the same extent as any of the non-Christian principal religions.
- d. At Key Stage 4, given that (as explained above) the examination boards’ GCSE courses do not (owing to the Department for Education specification) provide for the study of non-religious worldviews in the way specified in the previous paragraph, the GCSE course cannot be used as the entirety of the RE syllabus. Additional teaching on non-religious worldviews must be provided alongside the GCSE, and agreed syllabuses cannot simply direct schools to follow the GCSE or a similar accredited qualification as the specified content for Key Stage 4. This is obviously not an ideal situation, but it is, regrettably, the unavoidable consequence of the relegation of non-religious worldviews in the GCSE specification.

¹⁶ Paragraph 74

¹⁷ Paragraph 77

23. The conclusions *Fox* drew regarding the syllabus were reiterated throughout the *Bowen* judgment. In reaching his decision that KCC had acted unlawfully, the judge underlined the requirement to include non-religious perspectives on a number of occasions:

‘...it is plain from Fox that a religious education curriculum must, in order to be compliant with the HRA 1998, cover more than religious faith teaching.’¹⁸

‘...[It] is not a non-religious worldview “at the margins”, but well recognised as one which should be afforded equal treatment [with the major religions].’¹⁹

‘I therefore conclude that the discriminatory nature of section 390(4) as interpreted by KCC is manifestly without reasonable foundation and not justifiable. Indeed, it is antithetical to what the provisions can sensibly be considered as aiming to achieve, when that aim is now to be realised in light of the fact that “religious education” must include some teaching of non-religious beliefs, as confirmed in Fox.’²⁰

‘It is not necessary to decide whether the words to read in are “beliefs” or “non-religious worldviews” or “cogent philosophical convictions” or some other formulation in order to determine that it was an error of law to exclude Mr Bowen from consideration for appointment to group A merely because humanism is a non-religious belief system. In interpreting section 390(4)(a) as KCC did, it failed to interpret the provision in compliance with the HRA 1998 when it was possible to do so. Whatever the precise wording that might in due course be adopted by Parliament, should it choose to do so, humanism is self evidently a belief system which is appropriate to be included within a religious education syllabus... and would be encompassed within any Convention-compliant interpretation of section 390(4)(a).’²¹

No demand for equal air time

24. The demand for equal respect is not a demand for precisely equal air time.²² But this can only be departed from where it reflects the local preponderance of different religions and humanism. As *Fox* says:

‘The Strasbourg jurisprudence shows that the duty of impartiality and neutrality owed by the state do not require equal air-time to be given to all shades of belief or conviction. An RE syllabus can quite properly reflect the relative importance of different viewpoints within the relevant society. The same would seem to follow for a region or locality.’²³

18 *Bowen v KCC* [2023] Paragraph 68

19 Paragraph 88

20 Paragraph 93

21 Paragraph 106

22 This is something the Government seems to have willfully misunderstood in the wording of the guidance they produced following the *Fox* case, despite the fact that it was never disputed either by the claimants in the case or in my legal commentary at the time (see Juss, S, *Commentary on the Department for Education’s Guidance for schools and awarding organisations about the Religious Studies GCSE* (May 2016), Paragraph 11 <https://humanists.uk/wp-content/uploads/2016-05-31-FINAL-Commentary-on-DfE-RE-guidance.pdf>)

23 *Fox v Secretary of State for Education* [2015] Paragraph 74

25. It is outlined above what the 'equal respect' required should mean for the inclusion of humanism, in systematic syllabuses.
26. Neither judgment alters the fact that schools that are legally obliged to follow their locally agreed RE syllabus must go on teaching that syllabus. However, in the light of *Fox*, schools should provide additional content on non-religious worldviews if their local syllabus does not include non-religious worldviews to the extent outlined above.
27. In cases where the RE syllabus fails to accord equal respect by excluding the teaching of humanism from one or more key stages, this should be addressed as soon as possible.

The position of humanists on SACREs / ASCs

28. In *Bowen*, the Court ruled that, in instances where the exclusion of a non-religious representative from group A occurs purely on the basis of the non-religious character of their beliefs, this constitutes a form of discrimination:

*'...it is obvious that all people who are holders of belief systems appropriate to be included within that [RE] syllabus are in an analogous position [to holders of religious beliefs]. It is in my view clearly discriminatory to exclude someone from SACRE Group A solely by reference to the fact that their belief, whilst appropriate to be included within the agreed syllabus for religious education, is a non-religious, rather than a religious, belief.'*²⁴

29. As noted above, this discrimination breaches Article 14 (non-discrimination) of the ECHR and thus the Human Rights Act 1998, taken together with Article 9 (freedom of religion or belief) and/or Article 2 of Protocol 1 (right to education), rendering it unlawful.
30. Further, with regard to humanism specifically, Mr Justice Constable was able to reach the position that humanism is a belief that is invariably appropriate to be included,²⁵ finding that 'humanism has already been afforded equal status to the major world religions in many aspects of public life in the United Kingdom.'²⁶ Constable also highlighted that, far from being

*'a non-religious worldview "at the margins" of British life, [humanism is] well recognised as one which should be afforded equal treatment [with the major religions].'*²⁷

31. Since local authorities are always happy to include a representative of each of the major religions, it follows that they should invariably therefore admit at least one humanist. The reading in to s.390(4) of the 1996 Act that was ordered was:

24 Paragraph 70

25 Paragraph 70

26 Paragraph 50

27 Paragraph 88

32. 'to represent such Christian denominations and other religions and denominations of such religions [**and humanism**] as, in the opinion of the authority, will appropriately reflect the principal religious [**and humanist**] traditions in the area.'²⁸

To what group on a SACRE / ASC should humanists be admitted?

33. The *Bowen* judgment found that group A is the only appropriate group for someone representing the humanist worldview. SACREs and ASCs are made up of four groups. Statute, with the reading in mentioned above, describes these as:

- a. a group of persons to represent such Christian denominations and other religions and denominations of such religions [and humanism] as, in the opinion of the authority, will appropriately reflect the principal religious [and humanist] traditions in the area;
- b. except in the case of an area in Wales, a group of persons to represent the Church of England;
- c. a group of persons to represent such associations representing teachers as, in the opinion of the authority, ought to be represented, having regard to the circumstances of the area; and
- d. a group of persons to represent the authority.²⁹

34. The *Bowen* judgment was clear that group A is the only feasible location for a humanist representative:

*'It is therefore also wrong to characterise the members of Groups C and D... as those providing the SACRE with a "secular perspective". The perspective of Group C is intended to be the view of associations of teachers. Their personal beliefs (be they religious or non-religious) are not relevant to their representative role in the SACRE... it is plainly wrong, and circular, to define Group A solely by reference to holders of religious based beliefs.'*³⁰

35. It may be the case that members of groups C or D personally hold humanist beliefs. However, it may also be the case that they personally hold religious views. Nothing in the judgment prohibits this. The point is that, in their capacity as members of group C or D, such individuals are not appointed to the SACRE to represent their religions or humanism. In these groups they represent only teaching associations or the local authority.
36. Some local authorities, who have not performed a Human Rights Act-compliant interpretation of S.390(4), but who still wish to accommodate humanists, have until now placed them in groups C or D of their SACRE. This unsatisfactory workaround is now unlawful. In order to comply with the law, they will now need to alter arrangements and transfer the humanist to group A. Other SACREs in receipt of a humanist application must accommodate them in group A only.

28 Education Act 1996, Section 390(4): <https://www.legislation.gov.uk/ukpga/1996/56/section/390/enacted>

29 Education Act 1996, Section 390(4): <https://www.legislation.gov.uk/ukpga/1996/56/section/390/enacted>

30 Paragraph 67

What about humanists as co-opted members of a SACRE / ASC?

37. Hitherto, many SACREs have appointed humanists as co-opted members, rather than members of a specific group. Provisions for this are set out in S.390(6) and 392(5) of the 1996 Act. Co-opting a humanist reflects a previous misunderstanding of the law that the existing statutory group structure does not provide a logical place for humanists to be represented, because it is not a religion and neither is the representative speaking on behalf of teachers or the local authority. Co-opted members do not have voting rights.
38. The *Bowen* judgment confirms that it is instead invariably appropriate to appoint humanist representatives to group A of the SACRE. As such, any humanist who is currently co-opted to their SACRE, who subsequently applies to become a member of group A, should now be accepted as a member of that group. The local authority will be acting in an unlawful manner if such an application is refused. Indeed, to ensure that the SACRE is properly representative, LAs where the humanist representative is a co-opted rather than a full member should seek to update their constitution to allow for full membership of group A at their earliest convenience.

Can there be more than one humanist on a SACRE / ASC?

39. Some SACREs already have more than one humanist representative, and this is lawful. Indeed, given changing demographics, it may well become more widespread as local authorities conclude they must do so to comply with section 390(6) of the 1996 Act, reflecting the local area's non-religious population:

*'The number of representative members appointed to any representative group under subsection (4)(a) to represent each denomination or religion [or humanism] required to be represented shall, so far as consistent with the efficient discharge of the group's functions, reflect broadly the proportionate strength of that denomination or religion in the area.'*³¹

What does this mean for representatives of other non-religious worldviews?

40. The *Bowen* judgment is concerned solely with the position of humanists on SACREs – rather than non-religious worldviews in general, or any other specific non-religious worldview. The judge explained firstly that humanism is a protected belief:

*'It is clear that before attracting the protection of Article 9, the thought, conscience and religion must attain a certain level of cogency, seriousness, cohesion and importance. Humanist beliefs undoubtedly qualify in this regard. Indeed... humanism has already been afforded equal status to the major world religions in many aspects of public life in the United Kingdom. Once this threshold has been satisfied, the state's duty of neutrality and impartiality is incompatible with any power on the state's part to assess the legitimacy of holding religious beliefs or the ways in which those beliefs are expressed or manifested.'*³²

31 Education Act 1996, Section 390(6): <https://www.legislation.gov.uk/ukpga/1996/56/section/390/enacted>

32 Paragraph 50

41. The judge emphatically did not order similar inclusion of other non-religious worldviews:

*'It is not necessary to decide whether the words to read in are "beliefs" or "non-religious worldviews" or "cogent philosophical convictions" or some other formulation in order to determine that it was an error of law to exclude Mr Bowen from consideration for appointment to Group A merely because humanism is a non-religious belief system. In interpreting section 390(4)(a) as KCC did, it failed to interpret the provision in compliance with the HRA 1998 when it was possible to do so. Whatever the precise wording that might in due course be adopted by Parliament, should it choose to do so, humanism is self evidently a belief system which is appropriate to be included within a religious education syllabus... and would be encompassed within any Convention-compliant interpretation of section 390(4)(a).'*³³

42. Should a representative of any other non-religious worldview wish to be appointed to a SACRE, that worldview would need to pass a similar test:

*'...it follows from this that my judgment extends no further than determining that the basis of KCC's decision was erroneous in law. It does not follow that any and every non-religious belief would need to be treated similarly – for example, it may be legitimate to conclude that a particular belief (religious or non-religious) does not attain the requisite level of cogency, seriousness, cohesion and importance³⁴ to attract protection. Similarly, as I have described, there remains considerable discretion for the local authority when determining who to appoint pursuant to section 390(6) to ensure consistency with the efficient discharge of the group's functions.'*³⁵

43. It is currently doubtful if there is any non-religious worldview besides humanism that is capable of attaining the requisite level of cogency, seriousness, cohesion and importance so prescribed. Atheism and agnosticism are not non-religious worldviews but merely narrow positions on the existence of a god or gods. Appointing an atheist, or creating a generic place on a SACRE for the holder of a 'non-religious worldview', would be akin to appointing a theist.

44. Furthermore, in his response to Kent County Council's initial application to appeal the ruling (which he refused), Mr Justice Constable stated:

'Note also the appellant is wrong in any event when referring to "non-religious persons": it is only those non-religious people who nevertheless have a belief system protected by the ECHR that may be eligible' [to join a SACRE].

45. In other words, 'generically non-religious' representatives cannot be appointed to SACREs. Only those representing protected belief systems can be. Humanism is protected by the ECHR.

33 Paragraph 106

34 European Court of Human Rights (2022) *Guide on Article 2 of Protocol No. 1 to the European Convention on Human Rights*, Para 61: https://www.echr.coe.int/documents/d/echr/guide_art_2_protocol_1_eng

35 *Bowen v KCC* [2023], Paragraph 107

Humanism

46. The word humanist has come to mean someone who:
- a. trusts to the scientific method when it comes to understanding how the universe works and rejects the idea of the supernatural (and is therefore an atheist or agnostic);
 - b. makes their ethical decisions based on reason, empathy, and a concern for human beings and other sentient animals;
 - c. believes that, in the absence of an afterlife and any discernible purpose to the universe, human beings can act to give their own lives meaning by seeking happiness in this life and helping others to do the same.
47. Thus humanism is plainly a ‘belief’ in the legal sense of the word defined above. It is also a non-religious worldview. It is the worldview held by most non-religious people in the UK today, and as the *Bowen* judgment makes clear, meets the ‘cogency, seriousness, cohesion and importance’ requirements of Article 9 of the ECHR.³⁶
48. About half the population regularly say they belong to no religion, compared to 37% identifying as Christian and 9% with other faiths.³⁷ Not all non-religious people are humanists. However, around half have humanist beliefs and values.³⁸ The *Bowen* judgment deals solely with the legality of admitting humanist representatives to SACREs and, as the non-religious worldview with the strongest claim to significance in the history, culture, and present-day life of Great Britain, it is also the most relevant to the legal requirements for the syllabus set out in *Fox*.
49. It is difficult to ascertain precisely how many people are humanists. Many local authorities draw on data from the Census to help them determine the religious composition of their local areas (and thus what to include on the syllabus and who to appoint to SACREs and ASCs). Nevertheless, due to the wording of the Census religion question – which presupposes that respondents have a religious faith – data relating to the non-religious tends to underestimate their number. Further, the number of humanists recorded in the Census is even more likely to be inaccurate. This is because the only way to respond ‘humanist’ in the Census is to write this in under the ‘other religion’ option. Since humanism is a non-religious worldview it is likely that most humanists will instead tick the ‘no religion’ box.³⁹

³⁶ *Bowen v KCC* [2023], Paragraph 50

³⁷ British Social Attitudes Survey, see Humanists UK (2021) ‘Latest British Social Attitudes survey shows huge generational surge in the non-religious’ (1 April 2021) <https://humanists.uk/2021/04/01/latest-british-social-attitudes-survey-shows-huge-generational-surge-in-the-non-religious/>

³⁸ YouGov polling for Humanists UK

³⁹ Indeed, Humanists UK actively encouraged them to do so for both the 2011 and 2021 Census (see e.g. Humanists UK (2021) *FAQs: Answering common questions on filling the Census in*, available at: <https://humanists.uk/census-2021/faqs/>)

50. What is clear however is that humanism is the most widely held and understood non-religious worldview, and that its prevalence in the UK is greater than the non-Christian religions. There are more humanist funerals in Britain than there are of many minority religions, and more humanist weddings than there are of any non-Christian religion (in Scotland, there are more humanist marriages than Roman Catholic or Church of Scotland marriages). There is a strong humanist movement in Britain and humanism is well articulated, with numerous books both popular and learned. Humanists from George Eliot to Bertrand Russell, David Hume to David Attenborough have been enormously influential in the formation of British culture. Therefore, to the extent that humanism is the most prominent non-religious worldview in Britain, a syllabus that excluded detailed study of humanism but included such study of minority religions would be unlawful.

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