

## ABOUT HUMANISTS UK

At 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, we are trusted to promote humanism by 130,000 members and supporters and around 120 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 particular 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 ([understandinghumanism.org.uk](https://understandinghumanism.org.uk)) and our school speakers programme. We have made detailed responses to all recent Government consultations on education and reviews of the school curriculum, and regularly 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, the Sex Education Forum, the PSHE Association, and the Children's Rights Alliance for England (CRAE). We have also been on all UK government steering groups that have reviewed RE in recent years.

Our primary interests in education concern the curriculum (in particular RE, PSHE/RSE, citizenship, and science), collective worship/school assemblies, and state-funded religious schools.

## CHAPTER 1

### **Question 11: Do you agree that these are useful principles for delivering improvements to school accountability?**

Agree.

### **Question 12: Are there any other principles that we should consider?**

We suggest adding a principle that school accountability arrangements must promote equality, prevent discrimination, and reflect the relevant human rights obligations held by public institutions. This should include explicit recognition of duties under the Equality Act 2010, including the Public Sector Equality Duty (PSED), which requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations. It should also take account of the Human Rights Act 1998, including the need to uphold rights such as freedom of religion or belief in the way education is delivered. This would help create a fairer system for all



pupils and their families, and clarify that schools are expected to meet clear standards pertaining to equality, diversity, and inclusion.

With respect to the suggested principles, we also believe there should be greater clarity around the phrase ‘taking appropriate account of context’ (p.13). While it is right that schools are only held accountable for factors within their control, it is equally important that certain characteristics of schools or their pupil intake are not used to justify lower expectations or reduced standards. For example, the fact that a school has a religious character or serves a large number of pupils from a particular religious background should not be used to justify omitting key curriculum content or modifying it in ways that undermine statutory requirements. This is particularly relevant in areas such as Relationships and Sex Education (RSE), where content must be delivered in a way that respects pupils’ rights and meets legal obligations, regardless of the school’s ethos or the predominant beliefs of its community. We note that this has been a particular issue with respect to the delivery of LGBT inclusive education in some faith schools<sup>1</sup> as well as non-denominational schools that serve religious communities.<sup>2</sup>

This principle is equally important in relation to Religious Education (RE). Although it is right that RE lessons reflect the religions and non-religious worldviews represented in the local area – and agreed syllabuses are generally designed to enable this – schools should also ensure that pupils are acquainted with the wider range of perspectives found across the UK today. As set out in *Fox v Secretary of State for Education*<sup>3</sup> and *Bowen v Kent County Council*,<sup>4</sup> this must include teaching about humanism. While faith schools are legally entitled to teach RE in accordance with the tenets of their faith, they also have a responsibility to familiarise pupils with other religious and non-religious perspectives, helping to prepare them for life in a diverse, modern Britain and to promote the values identified in the Fundamental British Values policy.

## CHAPTER 2

### **Question 13: Do you agree a school profile should be the place users can see the most recent performance information, where it is available?**

Yes.

<sup>1</sup> Humanists UK (2019) ‘Jewish school caught encouraging mass withdrawal of pupils from RSE so school can foster “good religious girls”’, 24 July 2019. Available at: <https://humanists.uk/2019/07/24/jewish-school-caught-encouraging-mass-withdrawal-of-children-from-rse-so-school-can-foster-good-religious-girls/> [accessed 22 April 2025].

<sup>2</sup> Humanists UK (2019) ‘600 pupils reportedly withdrawn from Birmingham school as protestors announce, “God created women for men’s pleasure”’, 20 May 2019. Available at: <https://humanists.uk/2019/05/20/600-pupils-reportedly-withdrawn-from-birmingham-school-as-protestors-s-announce-god-created-women-for-mens-pleasure/> [accessed 22 April 2025].

<sup>3</sup> *R (Fox) v Secretary of State for Education* [2015]. Available at: <https://www.judiciary.gov.uk/wp-content/uploads/2015/11/r-fox-vssfe.pdf> [accessed 15 April 2025]

<sup>4</sup> *R (Bowen) v Kent County Council* [2023]. Available at: <https://humanists.uk/wp-content/uploads/2023-05-26-R-Bowen-v-Kent-CC-Judgment.pdf> [accessed 28 April 2025].



**Question 14: Is there other information published by the Department that you would like to see in a school profile in future? This could include, for example, relevant data on pupil characteristics, workforce or finance.**

School profiles should include pupil characteristics data, specifically the percentage of pupils eligible for free school meals (FSM) and the ethnic makeup of the school population. This information is already published by the DfE and provides important context for understanding school performance. It would also be useful to include comparable data for the local area, including FSM rates and ethnicity demographics, to support more meaningful comparisons between schools and their communities.

**Question 15: Are there other pieces of information that you might expect or want to routinely see in a school profile? This could include, for example, information from schools themselves such as its ethos or the breadth of, and pupil engagement in, curriculum enrichment activities.**

Despite the fact a third of state-funded schools have a religious character, and religion or belief is a protected characteristic under the Equality Act 2010, the School Census does not currently collect data on the religious affiliation of pupils or their families. We believe this gap should be addressed, and schools should be required to collect and report this information. Religious affiliation data should then be included in the school profile, alongside local area statistics where available. This would improve transparency and support better understanding of how schools, particularly those with a religious character, reflect and serve their local communities.

**Question 16: Do you have any further comments on our proposal for a new school profile service operated by the Department?**

No.

## CHAPTER 3

**Question 17: Do you agree that a school which is judged by Ofsted to require special measures should normally be subject to structural intervention?**

Neither agree nor disagree.

**Please explain your answer**

The structure of schools largely falls outside our policy remit, so we do not take a position on whether structural intervention is the appropriate response where a school is judged to require special measures. However, it is important to consider whether a school's ethos, including a religious ethos, has contributed to the issues identified and whether this means they can only be addressed through a change in that ethos. For example, in 2019 three failing state-funded Steiner schools were re-brokered following serious concerns identified by Ofsted, which highlighted



systemic issues linked to the Steiner approach.<sup>5</sup> In order to improve outcomes, the new multi-academy trust moved away from that ethos as part of the school improvement process.<sup>6</sup>

It should further be recognised that, in some cases, restructuring may lead to increased religious influence that is not in the best interests of pupils and/or the wider school community. For example, when voluntary controlled schools become academies, they often come under the governance of trusts with stronger links to dioceses, which can reduce parental representation and local accountability. This can also occur in mixed multi-academy trusts, where former community schools are incorporated alongside voluntary controlled or voluntary aided faith schools and, as a result, come under religious governance. In such cases, schools may adopt a faith-based ethos where there was previously none, often against the wishes of the broader community. Alternatively, despite ostensibly retaining a community ethos, the religious elements of the curriculum and wider school culture may become more pronounced.<sup>7</sup> While voluntary aided faith schools are already subject to significant religious influence, conversion may further centralise control depending on the structure of the academy trust. Where ethos is a contributing factor, structural change may risk entrenching, rather than resolving, the underlying problems.

**Question 18. Do you agree that, until September 2026, while we build improvement capacity, schools that require significant improvement should normally be subject to structural intervention?**

Neither agree nor disagree.

**Please explain your answer**

See previous response.

**Question 19. Do you agree that from September 2026, in schools that require significant improvement, targeted RISE intervention should be deployed to give the school targeted support to improve, before moving to structural intervention if necessary?**

Neither agree nor disagree.

**Please explain your answer**

As previously noted, school structure largely falls outside our policy remit. That said, it seems sensible to offer targeted support in the first instance, particularly where Ofsted has indicated that the responsible body may be capable of securing improvement. The proposed use of RISE teams from September 2026 could therefore help address issues without the disruption of structural change. If improvement is not possible without addressing more fundamental problems, including those related to ethos or governance, then we recognise that structural intervention may still be required.

<sup>5</sup> Humanists UK (2019) 'Three state Steiner schools rated "inadequate" after long-running campaign led by Humanists UK', 17 January 2019. Available at: <https://humanists.uk/2019/01/17/three-state-steiner-schools-rated-inadequate-after-long-running-campaign-led-by-humanists-uk/> [accessed 22 April 2025].

<sup>6</sup> Allen-Kinross, P. (2019) 'Rebrokered free schools won't keep Steiner ethos, says new trust', *Schoolsweek*, 22 October 2019. Available at: <https://schoolsweek.co.uk/rebrokered-free-schools-wont-keep-steiner-ethos-says-new-trust/> [accessed 22 April 2025].

<sup>7</sup> Humanists UK (2019) 'High Court grants parents permission to challenge school worship law', 29 July 2019. Available at: <https://humanists.uk/2019/07/29/high-court-grants-parents-permission-to-challenge-school-worship-law/> [accessed 28 April 2025].



**Question 20. Do you agree that following the introduction of Ofsted school report cards, we should define stuck schools as set out above?**

Agree.

**Please explain your answer**

We broadly support the move to define stuck schools based on repeated weaknesses in leadership and governance. These areas are often central to driving school improvement and can be more difficult to address than issues in other parts of the inspection framework. Using two consecutive 'attention needed' judgements in these areas provides a reasonably clear and proportionate trigger for further scrutiny or support.

However, we would caution that leadership and governance judgements may not always capture deeper, systemic issues linked to a school's ethos or culture. For example, where a school's religious character has contributed to weaknesses in curriculum breadth, inclusion, or statutory compliance, these problems may not be fully reflected in leadership ratings alone. It is therefore important that Ofsted's evaluation criteria are sufficiently robust and that the Department keeps under review whether the definition of 'stuck' is effectively identifying schools where change is most needed.

**Question 21. Do you agree with our proposed intervention approach for stuck schools and that we should amend regulations to give effect to this?**

Neither agree nor disagree.

**Please explain your answer**

We do not take a position on the specific intervention model proposed for stuck schools, as decisions about structural change and formal intervention fall outside our policy remit. However, we recognise the importance of timely and effective support for schools that are unable to improve without external support and/or challenge.

It is essential that any intervention is informed by a full and accurate understanding of the issues affecting a school's performance. As outlined in our response to earlier questions, particular care should be taken to identify whether problems stem from the school's ethos or culture, especially in the case of schools with a religious character. In such cases, intervention that focuses solely on leadership or organisational structure may not be sufficient if the underlying ethos is contributing to weaknesses in curriculum, inclusion, or compliance with equalities duties. The proposed approach should therefore be implemented in a way that allows for this level of scrutiny and understanding.

**Question 22. Do you agree that RISE should also engage with schools that have concerning levels of pupil attainment?**

Agree.

**Please explain your answer**

While contextual factors such as pupil demographics should be taken into account, persistently low attainment or a sudden decline in outcomes can indicate wider issues that warrant support. In such cases, RISE engagement may be appropriate to help identify and address the underlying causes.



**Question 23. What is the appropriate measure and approach for understanding if a school has attainment results of significant concern or shows a sharp decline in year-on-year pupil attainment, and may need external help to address these concerns?**

No response, falls outside our policy expertise.

## IMPACT

**Question 24: Do you believe the proposed arrangements (any or all) would have a positive/negative impact on particular groups of learners or staff because of their protected characteristics?**

Agree.

**Please explain your answer, specifying which proposal your response relates to.**

As they stand, some of the proposals could have a negative impact on pupils with protected characteristics, particularly in relation to religion or belief. These risks could be reduced if the DfE takes account of the suggestions we have set out elsewhere in this consultation response.

For example, in relation to the core accountability principles (p.13), while the commitment to inclusion and high expectations for all pupils is welcome, these principles need to be explicitly linked to schools' obligations under the Equality Act 2010. Without this, there is a risk that equalities issues will not be consistently identified or addressed.

Where a school's ethos or governance arrangements affect curriculum breadth or pupil experience, this may disproportionately affect pupils who are non-religious, from minority faith backgrounds, or who hold protected characteristics such as sexual orientation or gender reassignment. If such risks are not clearly reflected in monitoring and intervention frameworks, some pupils may continue to face discrimination or unequal access to education.

The absence of data on pupil religious affiliation in the School Census also limits the Department's ability to assess whether schools with a religious character are serving diverse communities fairly. Addressing this gap would support a more informed and equitable approach to accountability.

**Question 25: Do you have any suggestions for how any potential negative impacts on particular groups of learners or staff could be mitigated, or positive effects enhanced?**

See previous response.

**Question 26: What do you consider are the likely staff workload and wellbeing implications and/or burdens of the proposals in this consultation? Please specify which proposal your response relates to.**

No response, falls outside our area of expertise.

**Question 27: Do you have any suggestions for how any potential negative impacts on workload and wellbeing could be mitigated, without negative effects on standards for children? Please specify which proposal your response relates to.**

No response, falls outside our area of expertise.



**Question 28: What steps could be taken to help reduce or manage any burdens leading up to and during the introduction of the proposed arrangements, without negative effects on standards for children? Please specify which proposal your response relates to.**

No response, falls outside our area of expertise.

**For more details, information, and evidence, contact Humanists UK:**

**Richy Thompson**

Director of Public Affairs and Policy

0203 675 0959

[richy@humanists.uk](mailto:richy@humanists.uk)

[humanists.uk](http://humanists.uk)

