



Department  
for Education

**Consultation Response Form**

**Consultation closing date: 1 May 2013**  
**Your comments must reach us by that date.**

**Secondary School Accountability  
Consultation**

**Consultation Response Form**

**THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://www.education.gov.uk/consultations>).**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

**Please tick if you want us to keep your response confidential.**

Reason for confidentiality:

Name	Pavan Dhaliwal
Organisation (if applicable)	British Humanist Association
Address:	39 Moreland Street, London EC1V 8BB

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Public Communications Unit by e-mail: [consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@education.gsi.gov.uk) or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please mark an 'x' in the box that best describes you as a respondent.

<input type="checkbox"/> Teacher	<input type="checkbox"/> Head teacher	<input type="checkbox"/> School
<input type="checkbox"/> Parent-Carer	<input type="checkbox"/> Local Authority	<input type="checkbox"/> Awarding Body
<input type="checkbox"/> Subject Association	<input type="checkbox"/> Union	<input type="checkbox"/> Governor/Governing Body
<input checked="" type="checkbox"/> Other		

Please Specify:

The British Humanist Association is the national charity working on behalf of non-religious people who seek to live ethical and fulfilling lives on the basis of reason and humanity. We promote Humanism, support and represent the non-religious, and promote a secular state and equal treatment in law and policy of everyone, regardless of religion or belief.

Founded in 1896, we have around 30,000 members and supporters, and over 70 local and special interest affiliates. Our policies are informed with the support of over 120 of the UK's most prominent philosophers, scientists, and other thinkers and experts and we seek to advance them with the help of over 100 parliamentarians in membership of the All Party Parliamentary Humanist Group. Our trained and accredited celebrants conduct funerals and other non-religious ceremonies attended by over 500,000 people each year.

### **Our expertise in education**

The BHA has a long history of work in education, children's rights and equality, with expertise in the 'religion or belief' strand. We provide materials and advice to parents, governors, students, teachers and academics. We also work closely with others on wider equalities issues in a range of forums. The BHA is a member of the National Children's Bureau Sex Education Forum (SEF), the Children's Rights Alliance for England and the Religious Education Council for England and Wales.

**Previous consultation responses:** We previously responded to the national curriculum review's call for evidence in April 2011<sup>1</sup> and the draft primary national curriculum for science in August 2012,<sup>2</sup> and more recently responded to the consultation on reform of the national curriculum in April 2013.<sup>3</sup>

<sup>1</sup> *National Curriculum Review - Call for Evidence: Submission from the British Humanist Association (BHA)*, April 2011: <http://humanism.org.uk/wp-content/uploads/1bha-response-curriculum-review.pdf>

<sup>2</sup> *Draft National Curriculum for science Key Stages 1-2: Response from the British Humanist Association (BHA)*, 15 August 2012: <http://humanism.org.uk/wp-content/uploads/draft-national-curriculum-for-science-key-stages-1-2-response-from-the-bha.pdf>

We also responded in March 2011 to the House of Commons Education Select Committee's inquiry into the English Baccalaureate,<sup>4</sup> and in September 2012 to Ofqual's consultation on A Level Reform.<sup>5</sup>

### **BHA policy on education**

We are interested in education for three reasons:

- we aim for the UK to be secular state with no privilege or discrimination on grounds of religion or belief. The continuing religious discrimination in our state school system is therefore a concern for us
- we aim for Humanism to be better understood as an ethical and fulfilling non-religious approach to life and so we have an interest in ensuring that it features on the school curriculum on equal terms with religions
- humanists see education as a vital process and have been rich contributors to both the philosophy and practice of education

We have an interest in promoting better education that will meet these aspirations because we promote humanist perspectives in public debate and policy.

We concentrate on laws and policies that we believe are discriminatory and violate principles of human rights or equality in state-funded schools or on matters where we have a distinctive humanist view. For example we work for progressive reform of the school curriculum and inclusive assemblies in place of mandatory religious worship.

One of our aims is to promote a humanist perspective on public policy issues. Many humanists have had a profound interest in education and so the school curriculum has naturally been a focus for us. In practice, we concentrate on aspects of the curriculum where the humanist voice is excluded or weak or where others are actively promoting policies at odds with our principles.

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<sup>3</sup> *Reform of the National Curriculum in England: Consultation Response Form* from the British Humanist Association, 16 April 2013: <http://humanism.org.uk/wp-content/uploads/Reform-of-the-National-Curriculum-in-England-British-Humanist-Association-response.pdf>

<sup>4</sup> *Submission to the Education Select Committee Inquiry into the English Baccalaureate* from the British Humanist Association, 10 March 2011: <http://humanism.org.uk/wp-content/uploads/bha-position-on-re-on-the-english-baccalaureate.pdf>

<sup>5</sup> *A Level Reform Consultation response* from the British Humanist Association, 11 September 2012: <http://humanism.org.uk/wp-content/uploads/a-level-reform-consultation-response-from-the-british-humanist-association.pdf>

## 1 Do you agree with the proposals for the headline accountability measures?

Yes

No

Not Sure

Comments: Generally speaking, discussion of the headline accountability measures is outside of our remit. However, we are interested in the debate around the exclusion of Religious Education from the English Baccalaureate and we think it is worth revisiting our position in that debate in this response.

In our 2011 *Submission to the Education Select Committee Inquiry into the English Baccalaureate*, we argued that the subject should not be added to the EBacc because we do not think that Religious Studies is of a consistent enough quality – due to Religious Education’s absence from the national curriculum. We acknowledged that RE would be hurt as a subject by the EBacc, but argued that RE should be put on the national curriculum before RS is considered for inclusion in the performance measure.

Our position on this has not changed in the two years since.

The reasons why we consider that RS is not of a consistent enough quality is because:

- Some locally agreed syllabuses are poorly written. Some focus disproportionately on Christianity. Others promote faith as a virtue, to the marginalisation of non-religious pupils who do not have a faith (for example, Birmingham’s ‘Faith Makes a Difference’ syllabus).
- In addition, a significant minority exclude any teaching about non-religious beliefs such as Humanism. This is in spite of the fact that a very high proportion of young people do not have any religious beliefs – for instance, the 2003 Citizenship Survey found 46% of 11-15 year olds not having a religion (44% were Christian);<sup>6</sup> while a 2004 Department for Education report found 65% of 12-19 year olds are not religious.<sup>7</sup> It is vital that these young people’s beliefs are included, as is recommended by the 2004 non-statutory national framework and the 2010 national guidance for RE.
- Voluntary Aided schools, Academies and Free Schools with a religious character can teach Religious Education from a confessional point of view, denying young people the right to form their own religious or non-religious beliefs. For instance, the Catholic Education Service for England and Wales says that ‘religious education and religious worship will be provided in accordance with rites, practices, discipline and liturgical norms of the Catholic Church’. Catholic schools

<sup>6</sup> Christine Farmer, ‘2003 Home Office Citizenship Survey: Top-level findings from the Children’s and Young People’s Survey’ (Home Office and Department for Education and Skills, 2005), p. 37: <http://www.communities.gov.uk/documents/communities/pdf/452490.pdf>

<sup>7</sup> Alison Park, Miranda Phillips and Mark Johnson, ‘Young People in Britain: The Attitudes and Experiences of 12 to 19 Year Olds’ (Department for Education and Skills, 2004), pp. 10-11: <https://www.education.gov.uk/publications/eOrderingDownload/RR564.pdf.pdf>

'Promote Gospel values and the teachings of the Catholic Church as an integral part of their mission.'<sup>8</sup> In addition, the problems identified above are, in our experience, exacerbated in this sector – particularly the issue of not teaching Humanism.

We think that it is very important that young people receive high quality education about the different religions and non-religious beliefs that are common in society today, as such education makes positive contributions to helping people understand the views and opinions of those with beliefs other than their own, and hence make a strong contribution to community cohesion. In addition, we think that there should be a place on the curriculum for discussion of ethical and moral issues and for young people to consider philosophical questions and dilemmas, in order to help them form their opinions and develop their critical thinking skills. Finally, we think that education about religious and non-religious beliefs is also important due to the high importance of religion or belief in understanding other subjects such as history and geography.

We think this education would be best delivered through a reformed subject called Beliefs and Values Education, of which education about religious and non-religious beliefs would form an important part. However, we recognise that RE currently represents the best place in which to deliver education of this nature.

We continue to agree with the Religious Education Council and others that the evidence shows that the omission of RS from the EBacc is causing schools to shift focus to other subjects. The evidence gathered over the last two years appears to confirm this conclusion. However, given that so many pupils are currently receiving what we think is inappropriate RS, we do not think that these pupils' qualifications should be recognised through the EBacc. We would first want to see RS added to the national curriculum before such a change is made.

## 2 Is there any further information we should provide about the performance of disadvantaged students?

Yes

No

Not Sure

<sup>8</sup> *Christ at the Centre (2nd Edition)*, Catholic Education Service, January 2013:  
<http://www.catholiceducation.org.uk/catholic-education/publications/item/1000085-christ-at-the-centre-2nd-edition>

Comments: We think that you should also publish data, alongside results, showing how representative schools are in terms of socio-economic factors, when compared with other schools in their area. This could be done, for example, by comparing the proportions of pupils eligible for free school meals.

Evidence shows that many schools have admissions criteria that in effect socio-economically select pupils, for example by having stringent faith-based oversubscription criteria, with the result being that they have a lower proportion of pupils requiring free school meals. For instance, research conducted by *The Guardian* in March 2012 showed that ‘faith’ schools in England socio-economically select when compared to other schools within their postcode or local authority, as well as when looking at the national picture.<sup>9</sup>

Without the inclusion of such a measure, schools could choose de facto selective admissions criteria, with the result being that they have a lower proportion of pupils requiring free school meals. As a result, such schools may perform better overall and so attract better teachers. Those pupils requiring free school meals who *do* get into the selective school may consequentially improve more than pupils at other schools – but this would be an unfair comparison because it was the skewed intake that led the school to perform better in the first place.

Publishing an additional performance measure would help to expose this effect, where it occurs, and would encourage schools to consider how they can ensure that their intake reflects the socio-economic status of their area. For this reason is something we would like to see.

### 3 Should we look to use a relative measure as the floor standard in the first year of the new exams?

Yes

No

Not Sure

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<sup>9</sup> Jessica Shepherd and Simon Rogers, ‘Church schools shun poorest pupils’, *The Guardian*, 5 March 2012: <http://www.guardian.co.uk/education/2012/mar/05/church-schools-shun-poorest-pupils>

Comments: No comment.

**4 Are there any other measures we should consider publishing?**

Yes

No

Not Sure

Comments: No comment.

**5 Do you think we should collect and publish test data from internal assessments through the Data Warehouse?**

Yes

No

Not Sure



Comments: No comment.

**6 What other data could be published to create the right incentives for schools, including special schools, to ensure the best progress and attainment for all of their students?**

Comments: No comment.

**7 Do you agree that the Department should stop the collection of Key Stage 3 teacher assessment results?**

Yes

No

Not Sure

Comments: No comment.

**8 How should we ensure that achievement beyond formal qualifications is recognised?**

Comments: We have responded to question 2 emphasising the importance of schools having an intake that is socio-economically representative of their local area, and that some measure should reflect how schools are performing in this regard.

**9 How can national sample tests best be introduced?**

Comments: No comment.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

E-mail address for acknowledgement: \_\_\_\_\_

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/>	<input type="checkbox"/>
Yes	No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: [carole.edge@education.gsi.gov.uk](mailto:carole.edge@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 1 May 2013

Send by post to:  
Phil Elks  
Department for Education  
Level 2  
Sanctuary Buildings  
Great Smith Street  
London  
SW1P 3BT

Send by e-mail to: [accountability.consultation@education.gsi.gov.uk](mailto:accountability.consultation@education.gsi.gov.uk)