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Friday 1st November 2013

David Stewart MSP,
Convener, Public Petitions Committee
The Scottish Parliament

By Email to petitions@scottish.parliament.uk

Dear Mr Stewart and members of the committee,

We now submit our formal response to additional submissions received since the beginning of September.

We look forward to further discussion with the parliament and other parties.

Yours sincerely,

Caroline Lynch
Chairperson, Scottish Secular Society



SCOTTISH
Secular Society

**Formal response to
petition submissions
for
Petition PE01487
to the Scottish Parliament
by the Scottish Secular Society**



Response to Petition Submissions

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Abstract

We briefly reiterate the reasons for our petition, summarise and respond to the overall arguments advanced in responses, and then give, for completeness, our detailed responses to each submission individually at the Appendix.

We consider that the opponents of the suggested change from opt-out to opt-in ignore the evidence for problems within the present system, describe an ideal situation remote from any immediately obtainable reality, and at times speak as if changes they (and we) wish to see had already taken place.

Our petition, is very specific and addresses only Religious Observance (RO). It is limited to suggesting a change from opt-out to opt-in, with its attendant obligations to inform parents and provide an alternative. We are not asking for its removal. Indeed the changes necessary for RO's long term survival may be more likely to occur under opt-in. As clear from our original petition document and our presentation, it refers equally to all State schools.

The most common reason given by respondents for opposing change is that the present system is working well, and is delivering a valuable and non-confessional component to individual development. Unfortunately, this reasoning refers to an ideal future situation, not to present reality.

Several responses discuss a possible name change from RO to "Time for Reflection". Such a change on its own would be meaningless. However, it does express a recognition of the need for changes, of a kind that we think would be more likely to occur under opt-in.

Introduction and restatement of our case

We welcome the breadth of response to our petition. For reasons of space, detailed point-by-point responses to each one are relegated to an appendix. Here we recapitulate the reasons for the petition, and deal with the arguments presented, with reference to the responses in which they were raised.

Responses fall roughly into two classes: supporters of change from the status quo, and opponents. Supporters include organisations (Humanists, Jewish groups and the Pagan Federation) whose members are most likely to have experienced the realities of opting out, and the Scottish Parent Teacher Council, who again deal with the reality of RO.

Opponents of change include all those groups identifying themselves as Christian; which reflects on the claim that RO is in some unspecified way the non-confessional expression of shared values. Our experience is that it is generally Christian worship, and so the opposition from Christianity as a whole is not a surprise.

Responses from government bodies range from opposition to change on the grounds that there is no problem or that it would create administrative problems, to a neutral description of the present situation.

None of the opponents of change deal directly with the reasons why we consider change necessary. These are, in brief:-

- **Distinct failures in the current opt-out system.** These include failure to inform parents of the right to opt out, failure to provide sufficient information on which to base a decision, failure to provide alternative meaningful activities, schools bringing pressure to bear on parents, damage to school-parent relationships, and children feeling (and being) stigmatised. As the recent scandal at Kirktonholme Primary School illustrates, the system is vulnerable to exploitation by groups with extreme views.
- **Presumption in the face of demographics.** The current system presumes that

parents as a whole will be happy with an activity that presupposes a consensus in favour of Christianity. This is indefensible, given that according to census figures, 37% of Scots identify as non-faith, and by the best estimates of Tearfund (A Christian research organisation) only around 10% of the population actually attend church on a regular basis.

- **Failure of the current system to deliver.** By default all pupils are participants in RO. Few schools discuss the nature of RO with parents, the responsibility of deciding actual practice being devolved to the Head or Deputy Head. The requirement that the school Handbook should communicate the right to withdraw, and give sufficient information on which to make a decision, is, as we have shown in our survey in the petition documents, often ignored. Presumed consent allows failures to continue unaddressed, a situation which benefits neither the faithful nor those without faith.
- **Popular support for change.** This is evident from the breadth of support for our petition from parents, faith groups, the general public and the comments on the E-Petitions website.
- **Potential legal challenges to RO.** The present situation may well be at odds with Human Rights legislation. In addition, as Dundee and Tayside Humanists point out, the proposed change would be very much in accord with the current Children and Young People (Scotland) Bill.

All these points are fully documented in the original Petition and supporting materials, in our presentation before the Committee, and in our written submission (B) of 4th Sept. 2013.

To these we would now add:-

- **Serious legal confusion.** Current guidelines (School Handbook Guidance 2012, <http://www.scotland.gov.uk/Resource/0040/00401568.pdf>, p. 12) clearly state: "*The School Handbook ... should set out how religious instruction and observance is covered, as well as explain to parents their right to withdraw their child from any such religious activity.*" Yet few schools make any attempt to inform parents about "*how religious instruction and observance is covered*", some seem unaware of the parental right to opt out, and many seem to have no awareness of their duty to provide alternative meaningful activity.

To our amazement, AHDS, the Heads and Deputies union, writes in its submission (E) that, compared to granting our petition, a "*simpler and less onerous course of action would be to reintroduce the requirement that information for parents about opting out of religious observance be included in school handbooks.*" Thus the union representing the very people responsible for ensuring that the school handbooks comply with this legal requirement is under the impression that the requirement is no longer in place. A switch to opt-in would remove these problems, since those involved in providing RO would have a direct incentive for ensuring that parents were aware of the situation, and of the nature of their offerings.

- **Ongoing reports of abuse.** We continue to receive regular accounts of abuses. One recent episode will illustrate our concerns. The mother of a young child, with a tendency as many young children have to believe what he is told literally, described him as returning home from school in distress. He had been told in RO that Jesus had died for his sins, and was deeply worried about what sins he might have committed, and how they could have led to such horrible consequences. The mother, when approaching us for advice, was not aware of her legal right to opt out, and when she subsequently requested to do this, the school had told her that it would damage her child's education. The mother herself is a non-believer. We see here failure to inform parents, inappropriate presumption of consent, pressure to accept the status quo, and a clear

example of the fact that, in reality, RO is commonly very different from the ideal prescribed in official guidance, and implicitly assumed (see below) in the submissions from the Church of Scotland and the Scottish Government.

To avoid the confusion evident in some responses, we reiterate that we are addressing only Religious Observance, not Religious Education, that we are not seeking abolition (indeed, we believe that our proposal gives RO the best chance of long-term survival), and that, as made clear in the petition itself and in our oral presentation in 3 September, our petition applies equally to denominational and non-denominational schools.

One suggestion made by several of those opposing the petition is that RO change its name to "Time for Reflection". This suggestion, which would itself presumably require legislative action, dates back to 2004 if not earlier. In itself, it would change nothing. It does, however, suggest a desire for changes of a kind that we think would be more likely to occur under opt-in.

Those opposing the petition have not made any attempt to address the concerns that we raise. The Scottish government and some (not all) councils simply deny the existence of the problems that we have pointed out. The churches take inconsistent positions. On the one hand, they point to the benefits of an inclusive commitment to shared values, while on the other, they claim advantages for taking part in specifically Christian activities which are by their nature exclusive to other faith views.

Objectors claim that the proposed change would give rise to major problems. The Scottish Catholic Education Service chooses to imagine that we would require repeated consent to minutiae, which is untrue. The Church of Scotland makes a powerful case for moving from RO towards Time for Reflection, but then argues as if this change had already been universally accomplished, and that the interesting problems of evolving an expression of shared values in a society as diverse as present-day Scotland had already been solved. Some other specifically Christian bodies seem to be arguing simultaneously for RO as an inclusive activity, and for the virtues of their own particular belief system. If anything, the contradictions and special pleading in the submissions opposing the petition provide further evidence that the change we propose is necessary.

We believe parents should be fully and properly informed about RO in schools; fully and properly informed about the chaplains involved, their beliefs and the content of what their children will be told; when and how often. This has been explicitly required since the 2005 guidelines, and yet has been ignored in the 8 years since despite repeated reissue of this requirement. It is one of the points which would be rectified as a result of the proposed change.

For denominational schools, if the majority of their pupils share the faith and ethos of the school and accept their teachings, then little should change. For non-denominational schools, our proposal will bring about a real respect for individual human rights, an improvement in parental understanding, and ultimately in the content of RO itself. Those choosing to take part in RO will be those who want to take part and are not there under duress. For those not wanting to participate, we believe the disadvantage they currently experience will end.

We take freedom of conscience seriously, and do not think it should be overridden by inertia or by the wish to avoid a largely imaginary bureaucratic inconvenience.

We believe changing to opt in would enhance everyone's rights, both those who want RO in schools, and those who do not. If you want good, inclusive Religious Observance, protective and respecting of Human Rights, and which really fulfils the aims of the course,

Ask Parents First.

Arguments in support

Of those parties whose submissions support our proposals all of them recognise our findings and acknowledge the excesses and faults in the system. In particular, the following submissions are worthy of note:-

Dundee and Tayside Humanist Group (Submission D at the Appendix.) point out that Opt-in respects the rights of the child, specifically autonomy, equality, and the right to freedom of conscience and belief, as embodied in the United Nations Commission on Human Rights declaration on the rights of the child, and adds further to the sentiments expressed in the pending Children and Young People (Scotland) Bill. We agree.

The Scottish Council of Jewish Communities (Submission N at the appendix.) states that the present system assumes a consensus that does not and perhaps cannot exist. The rhetoric of inclusiveness may actually make things worse, by concealing this problem. Children can and do find themselves in distressing situations, or else, at best, excluded from such activities as drama, music, school assemblies, and even their own prize-givings, because these are unthinkingly linked, even in non-denominational schools, to specifically Christian religious activity.

This goes to the core of our case. RO is supposed to be a non-confessional celebration of shared values, but the reality is that in most schools it is based on its Christian confessional history. This despite the fact that, as we pointed out, around half of all Scots are now not even nominally Christian.

RO is particularly harsh for members of non-Christian religions. SCoJeC cites the case of a Jewish child, attending an Easter celebration without her parents' knowledge, under the presumption of agreement unless opted out. Not only is the Christian doctrine of the divinity of Jesus blasphemous to Jews, but she had to listen to the Jews being described as having killed Jesus. SCoJeC also quotes an actual letter from a school saying that "*Participating in a service in Holy Trinity Church is an ancient tradition in the school. Irrespective of any question of personal belief, Easter is part of our cultural inheritance and the theme of renewal is of universal significance.*"

SCoJeC also reports parents being told that "*we all worship the same God*" ("No we don't," quips SCoJeC, and we would add that most young Scots don't worship any God at all).

Such are the problems encountered among the groups perhaps most likely to be actively aware of the issues, and to have the strongest desire to avoid participation in the usual confessional activities.

Edinburgh Secular Society (Submission P of the Appendix) states that "*The present situation improperly gives a role to religious organisations in the State educational system.*" This is an argument for the complete removal of RO. It is NOT what we are requesting. It would be supported by some but by no means all of our members, and would require extensive further debate.

Edinburgh Secular Society further argues, with quotations from the Church of Scotland's own discussion documents, that "*The goals of RO are vague and ill-defined.*" Again, they regard this as an argument for abolition, whereas we regard it as part of the case for rehabilitation, which will not happen except locally under the present system but which would be greatly stimulated by opt-in.

They also state that "*RO in practice is exclusive, and linked to such specifically Christian activities as Prayer Spaces in Schools (PSIS).*" Regarding PSIS, we note that they and their associates claim faith healing of organic diseases.

(see <http://www.healingrooms-scotland.com/index.php/peoples-stories/testimonies> and <http://www.prayerspacesinschools.com/resources/item/healing-hands>)

ESS agree with our position that "*Children are disadvantaged by being opted out.*" We refer again to the examples in our petition and in our additional Submission B. We agree with them on the nature of the present problems, and disagree only in proposing a far less drastic remedy.

The Pagan Federation (Submission W of the Appendix) state that "*the present situation presents proselytising groups, including extremist fringe groups, with a means of infiltrating into the mainstream non-denominational Schools system*". This was seen in the recent Kirktonholme scandal. Fuller communication between school and home that would naturally follow from the adoption of opt-in would do much to stem such abuses.

They also state that "*Whether through incompetence or deliberately, the rights of parents and children to be informed are being ignored.*" Opt in would for the first time create a situation where it would be in the interests of those responsible for delivering RO to make sure that parents and children are properly informed.

Arguments for qualitative change or abolition

Although this is not our position, we note that those who express these views share our dissatisfaction with the present situation. In addition to the arguments discussed above, we note:

The Scottish Parent Teacher Council (SPTC), (Submission T at the Appendix) state that "*to meet the needs of Scotland's present multi-faith and no-faith society, the religious element should no longer be compulsory, but should be replaced where locally appropriate with a more secular duty for the development of the whole person.*" We note also that the Church of Scotland (A, Q) speaks as if it would welcome such a move, going so far as to revive the old suggestion that RO be re-branded "Time for Reflection". For such change to be meaningful, much inertia must be overcome, customary privilege reconsidered, and, we believe, such welcome developments as these, are far more likely to occur under opt-in than under the current system.

Steuart Campbell, an individual (Submission H at the Appendix), says "*It would be simpler to abolish RO altogether.*" Some, such as the Edinburgh Secular Society (P), may consider it preferable, but it would not be simpler, either legislatively or in terms of its replacement.

Edinburgh Secular Society (Submission P at the Appendix) states that "*The 'spiritual development' that is the aim of RO is inherently religious in context and exclusive, and, relatedly, ensures, since not all children will participate, that children are separated according to their parents' religion.*" In simpler terms, we believe, that RO is currently divisive.

Arguments in opposition to our proposed change

Religious Observance plays a valuable educational role (A, Q, C, I, J, L, M, O, S, U) This is contested by us. RO must have provision for withdrawal, and the petition refers to how this can best be accomplished. We would point out that this argument is often combined with incompatible claims, such as the alleged benefits of actively participating in Scotland's Christian heritage, and the need to respect individual beliefs. In addition, this argument is often coupled with reference to an ideal and perhaps unattainable form of RO that would be universally acceptable, ignores the reality of RO as actually delivered, and in some cases claims a role for RO that properly belongs to RE.

"Religious Observance is not, and should never be confessional in nature. (it is not worship nor can it be)." (A; direct quotation). What is worship, if it is not Religious Observance? Acts of worship occur daily in Scottish schools, and so if they are not part of RO, then what are they and by what right do they take place? What further separate provision should be made for withdrawal from them (an essential human right), and would all this not require a further elaborate legislative framework?

Scotland's Christian religious heritage ought to be celebrated (C). So it ought, by those who want to. Not, in a free society, by anybody else.

There are no serious problems with the present system (implicitly or explicitly, all submissions opposed to change). This ignores all the concrete evidence, as well as more abstract arguments based on respect for individual Human Rights.

Religious Observance is in the process of morphing into Time for Reflection (particularly important in A and Q). Such a change has been under discussion since at least 2004, and we cannot but wonder whether its revival is related to our petition, as well as other expressions of discontent with the present system. If so, this illustrates the importance of the kind of discussion that opt-in would encourage, in overcoming inertia and catalysing change.

Opt-out will deprive large numbers of young people of a valuable experience (Evangelical Alliance Scotland, C). We do not understand why Evangelical Alliance have so little faith in the ability of parents and older students to judge whether or not RO would provide a valuable experience in their own case.

Opt-out would impose a major administrative burden on schools (Association of Headteachers and Deputies in Scotland, E; Stuart Campbell, H, Scottish Episcopal Church, O). We do not see why unless schools are neglecting their current legal responsibilities (see under "Serious legal confusion", above), and are frankly disconcerted that AHDS regard this as an issue. Schools are required to inform parents of their right to opt out, and to make whatever administrative arrangements are necessary to respect those rights. In addition, it is normal for schools to keep parents informed of school activities, and to request individual permission for many such activities such as excursions. We envision an annual fact finding done in tandem with other annual reviews of information. The requirement to provide an alternative already exists and so is irrelevant.

Opt-in systems don't work adequately (O). Would they include our democracy in this? Should we say then that unless you choose to opt out by voting, we will assume you should be opted in to supporting the Conservatives?

Large numbers of pupils not taking part in RO would impose a strain on the schools, who would have to arrange meaningful alternative activity (O). Surely, under the well communicated idyll of modern Religious Observance as described by its supporters, few will abstain? If not, what business does the state have imposing a religious view on people who do not want it?

Even if change is appropriate for non-denominational schools, it is not appropriate for denominational schools, since enrolling in such a school is itself a form of opting in (I, N). We reject this answer for three reasons: -

1. Many children are in denominational schools without subscribing to the doctrine of that denomination. That is a legal requirement; denominational schools are open to all.
2. Pupils may change their views at any time between enrolment at age 5 and leaving the system at age 18, and should not be disadvantaged as a result.
3. Those enrolled in a state funded denominational school should have the same civil rights as everyone else.

Neutral submissions

These include, for the most part, submissions from councils and Education Scotland, who describe how they administer the present system, and how it is supposed to work, but do not take a stand on the issue under discussion, or in some cases simply oppose change out of inertia.

Conclusion

Those against our proposals ignore the clear evidence we have presented. In every case, those religious groups who object have an interest in maintaining the status quo as it favours their Christian faith stance. Every response from non-Christian faith groups favours our view. This is highly indicative that the current incarnation of Religious Observance is not the inclusive idyll sought by the Scottish Government.

Councils in the main have restated the current legislation and that changing it would be problematic, without benefit. They state all of this without evidence.

The counter arguments are weak and fail to address the issues of personal freedom to choose your faith. They prefer instead to misrepresent our petition, and dismiss as frivolous the concerns of countless parents over their religious freedom. We do not think the freedom to choose your own faith is frivolous. On the contrary, we think that freedom to follow your faith (or to have none) is worth fighting for.

Were RO truly to be inclusive and non-confessional, and parents properly informed and asked if their children are to participate, we would be content. This is not the case. Religious Observance in Scottish schools is not worship free, not inclusive and respecting of all views. We have presented much evidence to support that. What our petition seeks is the same as what the Scottish Government seeks, a model of Religious Observance which is truly inclusive, which respects the Human Right of all to choose their faith, and which has value for its participants.

There is a better way. A middle way which we have striven to explain in our petition. We believe parents should be fully and properly informed about RO in schools. Fully and properly informed about the chaplains involved, their beliefs and the content of what their children will be told; when and how often. Finally we want parents to be asked first before a presumption of belief is made. It really is that simple. A small number of simple questions asked once per year.

If our ideas are implemented, those choosing to take part in RO will really have a strong desire to participate, and will not be there under duress. For those not wanting to participate, the disadvantage they currently experience will end. Our solution to the problems we highlight will ensure individual Human Rights are properly respected.

We believe changing to opt in would ensure everyone's rights, both those who want RO in schools, and those who do not, making it a perfect compromise and we commend our proposal to the committee.

Appendix 1

Submission from Church of Scotland submission – PE1487_A & PE1487_Q

This submission presents aspiration as reality, attempts to solve problems about RO by redefining the terms, rather than coming to grips with the issues, puts forward an alarming new doctrine regarding acts of worship in schools, and says nothing about the concerns that we have articulated.

The submission makes the case for a new style of RO, perhaps to be re-designated as “Time for Reflection”, currently under discussion and development. It expresses the hope that this activity would appeal to universally shared values, something as yet to be demonstrated. In describing this activity, it makes the extraordinary statement that *“Religious Observance is not, and should never be confessional in nature (it is not worship nor can it be).”* Yet worship takes place every day in Scottish schools, both denominational and non-denominational, and is what most people regard as a core activity of RO. If worship is not part of RO, then what is it? Under what authority does it take place at all, and what protection is in place for those who do not wish to take part? **If the committee were to accept the view that RO does not in reality include worship, then it would be forced to recommend the construction of an entirely new regulatory framework to deal with worship.** We do not think that this is what any of us have in mind.

We would respectfully suggest that the confusions and ambiguities revealed by the Church of Scotland’s submissions, do nothing to allay our concerns about the present situation, and indeed illustrate the need for the kind of openness and communication that would be much more likely to occur under opt-in than in the current situation.

Submission from Evangelical Alliance Scotland – PE1487_C

The Evangelical Alliance puts forward reasons for retaining RO under existing primary legislation. This is irrelevant, since we are not seeking its removal. It also describes RO as we might wish it to be, rather than as it is. We do not understand their suggestion that RO is the place in which Scotland’s rich Christian heritage and tradition “ought to be celebrated” even by non-Christians. Cultural celebration belongs in the secular curriculum, while requiring non-Christians to participate in celebratory RO would be a major human rights violation. Least of all we understand the claim that pupils will miss out because parents will be *“guided by the preferences of their young people, who are unlikely to want to opt in to a curricular experience that is not obligatory.”* This claim presupposes both that parents are incapable of acting in the best interests of their children, and also that those children would opt out of a valuable experience if it ceased to be obligatory.

Once again, nothing is said that is at all relevant to the issues motivating our petition.

Submission from Dundee and Tayside Humanist Group – PE1487_D

This submission strongly supports our position, on the basis of autonomy, equality, and rights of the child to freedom of thought, conscience and religion. In addition, it relates this support to the current Children and Young People (Scotland) Bill, and to the United Nations Charter on the Rights of the Child, to which that bill is related. The submission also draws attention to the lack of balance on chaplaincy teams, which represent only believers, and to the related fact that RO, while ostensibly advancing universally accepted values, restricts itself only to values based on religion. We agree.

Submission from Association of Headteachers and Deputies in Scotland – PE1487_E

We are perplexed and, indeed, dismayed by this submission. It maintains that the proposed change would *“create a considerable additional administrative burden on schools without making any change to the flexibility open to children and families.”* As we explained in the main text, we do not see why this should be so, since it adds nothing to the burdens of communication and record keeping that exist in any case under the present system.

We are dismayed by the suggestion made that a *“simpler and less onerous course of action*

would be to reintroduce the requirement that information for parents about opting out of religious observance be included in school handbooks." This suggestion shows ignorance of the existing requirements, which clearly state (School Handbook Guidance 2012, p. 12) that "*The School Handbook ... should set out how religious instruction and observance is covered, as well as explain to parents their right to withdraw their child from any such religious activity.*" It is a matter of grave concern that the union representing just those whose responsibility it is to enforce this requirement, should be under the impression that it had been abolished.

That such confusion should exist at such a level is indeed further evidence of the need for the change that we propose.

Submission from Dumfries & Galloway Council – PE1487_F

This submission shows a lack of understanding of the very existence of non-faith value systems. It speaks of the importance that the school community can participate in RO without compromise to individuals' faith stances, but go on to say that "*Participation in the process is an essential element in terms of ownership of the agreed values.*" The whole point is that faith-based values are *not* agreed. Moreover, this submission, like that from the Church of Scotland, assumes that all RO actually follows the aspirations laid down in the 2011 guidelines. As we know, this is not the case. Again, nothing is said to address our concerns.

Submission from Aberdeen City Council – PE1487_G

Aberdeen City Council's response consists of a detailed affirmation of current government guidelines on the provision of Religious Observance(RO). Discussion on the merits of opt-in or opt-out are notable by their absence. No mention is made of any administrative difficulty, that opt in could conceivably entail. Everything they say applies equally to an opt in situation as it currently does with the opt-out situation and we can only presume by their silence on the matter that they have no objection to opt-in in principle. Indeed they make the key point that staffing and learning resources are always available for those opting out. We have no reason to suspect this should change under our proposed opt-in system.

Submission from Stuart Campbell - PE1487_H

Mr. Campbell perceives difficulties, both in the framing of legislation, and in the administration of a proposed change, that we think are illusory. He agrees with us that change is necessary, but seems to think that total abolition of RO would be simpler than our suggestion. We disagree.

Submission from Scottish Catholic Education Service – PE1487_I

SCES claims that RO in schools should provide an important set of experiences for young people, and add that "*it can also be enriched by the varied experience of other cultures, faiths and traditions.*" We find this comment strange, since the Catholic Church has a monopoly of provision of RO in the schools that SCES regulates. It also takes the view that pupils should no more be subject to opt-in than "*other areas of the curriculum which are regarded by the school as significant in the formation of young people.*" This dictatorial reasoning would also, by the same token, deny the right to opt out, and indeed we have received testimony from two separate parents who found that Catholic schools attempted to deny this legally enshrined right.

One minor, but to us hurtful, point is the accusation that we have altered our original petition by including denominational schools. Such action, had we taken it, would have shown at best lack of thought, and at worst, culpable deviousness. However, the charge is completely baseless, and we discuss this very point at length in the body of this document, as we did during our September 3 presentation to the committee.

SCES also comments as if there were proposals to undermine the rights of the denominational body to determine the provision of RO in a denominational school. We are not aware of any such proposals, nor would they have anything to do with the subject of our petition.

Once again, this submission does nothing to address our concerns, and indeed, by its dictatorial tone against the background of violations that we mention, deepens them.

Submission from South Lanarkshire Council – PE1487_J

This describes the present situation, mentions with approval the move towards “Time for Reflection”, ignores the as yet unresolved questions of whether, or how, this form of RO will involve those without religious beliefs, and opposes change, on the grounds that the present situation is satisfactory. Again, nothing is said that is relevant to our concerns.

Such complacency seems to us especially out of place in South Lanarkshire, in view of recent events at Kirktonholme Primary, where RO turned out to be under the control of an extremist group, and children were given books that stated that evolution scientists were lying, that dinosaurs were historically present on a historical Noah’s Ark, and that atheists are devoid of a moral compass.

Submission from Catherine Brown – PE1487_K

This lengthy individual submission would, taken point by point, require an equally lengthy response. We therefore confine ourselves to the main points. Ms Brown makes a number of detailed points about statistics, claims (incorrectly, unfortunately) that the 2011 guidelines and 2012 regulations are effectively everywhere in force, and then gives her opinion that our proposed change would limit freedom of expression, “ostracise faith communities” and “could cause a greater separation between faith and non-faith communities”. Ms Brown presents no evidence for her assertions and we do not think that any of this is true.

Submission from Scripture Union Scotland – PE1487_L

SUS argue in favour of a holistic view of education, and regrets failures to follow guidelines. They say of RO, “*It is not, and should never be, confessional in nature, nor is it about forcing pupils to be part of a Christian worship event*”. Again, this confuses aspiration with reality. They also refer to the “*need for clear guidance to be provided to parents about their options, and the provision of meaningful and appropriate alternative activities for those who are opted-out; with every assistance being given to Headteachers in making that provision.*” Here we believe all would agree. However, we see no basis for their claim that RO provides a place for young people of different world-views to come together, nor for their further claim that the proposed change would undermine this process.

Submission from Christians in Scottish Education – PE1487_M

CSE Repeats the official view that RO has an important part to play in promoting mental and emotional well-being. They state that they fail to see why some of us want a change from opt-out to opt-in, and ignore the fact that very large numbers of Scots are irreligious. They argue for the retention of RO on grounds related to mental health issues. We do not see how any of this relates to our actual petition.

Submission from Scottish Council of Jewish Communities – PE1487_N

This thoughtful submission analyses the concept of RO, and, to our mind correctly, castigates those who confuse matters by attempting to solve real problems by manipulating the meanings of words. It reminds us of the administratively inconvenient fact that there are irreconcilable differences between different religions, and, drawing on individual experience, shows us how ignoring these differences can lead to insensitivity in the treatment of those who do not belong to the dominant faith. For these reasons, and again drawing on members’ experience, it generally supports our petition. We particularly welcome this support, coming as it does from a group who will have experienced the realities of withdrawal from RO.

Being sceptical about the possibility of a universal RO, SCJC propose that where there are large numbers of children from different faith communities, more than one kind of RO should be provided. This suggestion is beyond the scope of our petition.

We part company on the issue of denominational schools. Admittedly, it would be very unlikely

for anyone to enrol in a Jewish denominational school who was not deeply committed to Judaism, but, as stated in the body of this document, we have always maintained that the right to be asked first applies equally to all.

Submission from Scottish Episcopal Church – PE1487 O

This submission, like others from the churches, extols the virtues of RO, and like the submission from the Church of Scotland maintains that RO and worship are two different things. For our response to this claim, see our discussion of Submission A, above.

The submission then claims that opt-in would diminish pupils' "*ability to experience the vast diversity of religious and non-religious expression found in all our school communities.*" Leaving aside the fact that in denominational schools always, and in non-denominational schools all too often, RO is the exclusive province of one particular religion, we do not understand why the relatively minor change that we propose would prevent RO from performing these functions, to the extent that it does.

The submission questions whether opt-in would work, given that it works poorly in organ donation, charitable giving, and voting. This argument is specious, since in the cases quoted, the beneficiary is distinct from the person doing the opting, whereas here they are one and the same.

The submission repeats the claim that opt-in will lead to considerably increased and constantly changing paperwork. We do not see any basis for this claim. They also seem to envisage a situation where those not participating in RO are taking part in an activity of greater value, or where RO is relegated to the lunch break. We do not quite understand their reasoning.

Submission from Edinburgh Secular Society – PE1487 P

Unlike us, ESS seeks the removal of RO. However, it welcomes our petition as drawing attention to the real problems that exist, including: the designation of Christian prayer space (we have our own very serious concerns about the organization Prayer Spaces in Schools; see main text); ways in which children who opt out are treated during the time of the RO activity; infiltration by evangelical groups offering RO; and a dangerous blurring of the lines between RO, which involves commitment to faith, however loosely defined, and RME, which is concerned with the critical examination of faith-based claims.

Submission from Education Scotland – PE1487 R

This submission describes how Education Scotland sets about encouraging best practice, and state that RO comprises "*community acts which aim to promote the spiritual development of all members of the school's community and express and celebrate the shared values of the school community.*" Again, we feel this to be the statement of an ideal, rather than a description of the actual situation. However, we note that this submission does not offer an opinion on the merits of the petition itself.

Submission from Interfaith Scotland – PE1487 S

Interfaith Scotland represent smaller religious groups. They agree with us over how important it is that RO should not compromise personal integrity, but overlook the fact that RO does, in reality, commonly include worship, and argue in favour of its retention, which is not the subject of our petition. There may have been a breakdown of understanding here.

Submission from Scottish Parent Teacher Council – PE1487 T

SPTC note that RO is ill-defined and (sometimes, at least, we would add) watered down. They also state that the nature of provision should reflect local conditions.

In the circumstances, they would prefer that RO be dropped.

Submission from The Scottish Government – PE1487 U

This is essentially a statement of policy aims, including the aim that RO be inclusive, valuable,

and a meaningful experience for all. They also state that RO should take parental views into account, and that there should be clear information to parents about the right to withdraw, and about the nature of the alternative activity provided.

We support all these goals, and think it clear that the change we suggest would facilitate their attainment.

We are therefore disappointed that, without discussion of the evidence we have presented, the Scottish Government regards the present situation as satisfactory.

Submission from Edinburgh City Council – PE1487_V

This is essentially a reply to questions about how the system is administered, and therefore does not address our petition directly.

Submission from The Pagan Federation – PE1487_W

This supports our petition, on the grounds that “*the present situation presents proselytising groups, including extremist fringe groups, with a means of infiltrating into the mainstream non-denominational Schools system*”, and expresses concern that “*Whether through incompetence or deliberately, the rights of parents and children to be informed are being ignored.*” We can only agree. Opt in would, for the first time, create a situation where it would be in the interests of those responsible for delivering RO to make sure that parents and children are properly informed.