

## Cabinet

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Meeting Venue  
**Brecon Elim Church, Canal Road,  
Brecon**

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Meeting date  
**Monday, 3 July 2017**

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Meeting time  
**10.30 am**

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For further information please contact  
**Stephen Boyd**  
01597 826374  
steve.boyd@powys.gov.uk



County Hall  
Llandrindod Wells  
Powys  
LD1 5LG

28 June 2017

### AGENDA

<b>1.</b>	<b>APOLOGIES</b>
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To receive apologies for absence.

<b>2.</b>	<b>DECLARATIONS OF INTEREST</b>
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To receive any declarations of interest from Members relating to items to be considered on the agenda.

<b>3.</b>	<b>WELSH MEDIUM STREAM AT BRECON HIGH SCHOOL</b>
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To consider a report by County Councillor Myfanwy Alexander, Portfolio Holder for Education.

(Pages 3 - 430)

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## CYNGOR SIR POWYS COUNTY COUNCIL.

## CABINET EXECUTIVE

3<sup>rd</sup> July 2017

**REPORT AUTHOR:** County Councillor Myfanwy Alexander  
Portfolio Holder for Education

**SUBJECT:** Welsh-medium stream at Brecon High School

**OBJECTION REPORT**

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**REPORT FOR:** Decision

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**1. Summary**

- 1.1 Further to the decision made by Cabinet on the 14<sup>th</sup> March 2017, the authority published a Statutory Notice proposing closure of the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, with Brecon High School becoming an English-medium school from the 1<sup>st</sup> September 2017. The Statutory Notice was published on the 16<sup>th</sup> March 2017.
- 1.2 The purpose of this report is to inform Cabinet of the Objections received during the statutory objection period, which ended on 13<sup>th</sup> April 2017, so that they can determine whether or not to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017.
- 1.3 The report is supported by the following appendices:
- **Appendix A** – Objection Report
  - **Appendix B** – Updated Impact Assessments

The following background documentation which was published throughout the statutory process is also attached, for information:

- **Appendix C** – Consultation Document (published November 2016)
- **Appendix D** – Consultation Report (published March 2017)
- **Appendix E** – Statutory Notice (published 16<sup>th</sup> March 2017)

**2. Background****2.1 The Consultation Period**

Formal consultation in relation to the proposal for the Welsh-medium stream at Brecon High School was carried out in accordance with the

requirements of the School Organisation Code (2013) from the 21<sup>st</sup> November 2016 to the 9<sup>th</sup> January 2017. The consultation document issued in respect of this proposal is attached, for information, as Appendix C. A Consultation Report listing the issues raised during the consultation and the authority's response to them was considered by Cabinet on the 14<sup>th</sup> March 2017. This report is attached, for information, as Appendix D.

## 2.2 Statutory Notice / Objection Period

Further to the decision made by Cabinet on the 14<sup>th</sup> March, the authority published a Statutory Notice proposing to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, with Brecon High School becoming an English-medium school from the 1<sup>st</sup> September 2017. There followed a 28 day objection period, in accordance with the guidance within the School Organisation Code. The objection period ended on the 13<sup>th</sup> April 2017. The Statutory Notice is attached, for information, as Appendix E.

A total of 77 written objections were received during the statutory objection period. However, 21 of these were received from one individual.

In addition, a petition was received, which was signed by approximately 1700 individuals, and included 218 written comments.

The issues raised in the written objections and the petition received during the statutory objection period are listed in the Objection Report in respect of this proposal, as well as the authority's response to these issues.

## 3. **Proposal**

3.1 This report proposes that Cabinet:

- i) Receives the Objection Report in respect of the proposal to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017
- ii) Rejects the proposal to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, and retains a Welsh-medium stream at Brecon High School.

## 4. **Options Considered / Available**

4.1 A range of options have been considered throughout this process. These have been outlined in the documentation issued during each stage.

4.2 Reference was made to a number of alternative options in the Objections received to the proposal, these are listed on pages 139-142 of the Objection Report produced (Appendix A).

4.3 The School Organisation Code states the following in relation to proposals which require approval by the local authority:

*'Local authorities must decide whether to approve, reject or approve with modifications, the proposals.*

*Modifications can only include changes to matters related to implementation such as changes to admission numbers or to the timing of implementation....'*

4.4 Therefore the options currently available to Cabinet are as follows:

- i) To approve the proposal
- ii) To reject the proposal
- iii) To approve the proposal with modifications

## **5. Preferred Choice and Reasons**

5.1 The preferred choice is to reject the proposal to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, and to retain a Welsh-medium stream at Brecon High School.

5.2 The reasons for the recommendation are as follows:

- i) To ensure the continued provision of Welsh-medium education in Brecon
- ii) To ensure that Welsh-medium pupils can access provision in the new school building planned for Brecon High School
- iii) To support the Welsh Government vision to create 1 million Welsh speakers by the year 2050

## **6. Impact Assessment**

6.1 Is an Impact Assessment required? Yes

6.2 If yes is it attached? Yes

## **7. Corporate Improvement Plan**

7.1 One of the priorities in the council's Corporate Improvement Plan is 'Improving learner outcomes for all, minimising disadvantage'

7.2 Within this priority, the council states that we must 'provide improved access to Welsh-medium education'.

**8. Local Members(s)**

8.1

**9. Other Front Line Services**

Does the recommendation impact on other services run by the Council or on behalf of the Council? No

**10. Communications**

10.1 Have Communications seen a copy of this report? Yes

**10.2 Communications Comment:** The report is of considerable public interest and requires use of proactive news release and appropriate social media to publicise the decision.

**11. Support Services (Legal, Finance, Corporate Property, HR, ICT, Business Services)**

11.1 **Legal:** The recommendation can be supported from a legal point of view.

11.2 **Finance:** There is no financial change to the authority or school, however it should be noted that the funding per Welsh-medium pupil at Brecon as a result of the language uplift equates to £2,885 per pupil, in Builth it equates to £708 per pupil. A recent analysis of the curriculum has indicated that the estimated cost of delivering the Welsh-medium provision in Brecon exceeds the available funding by £54,000.

**12. Scrutiny**

12.1 Has this report been scrutinised? No

**13. Statutory Officers**

13.1 The **Solicitor to the Council (Monitoring Officer)** has commented as follows: "I note the legal comment and have nothing to add to the report".

13.2 The **Strategic Director Resources (Section 151 Officer)** comments will be reported.

**14. Members' Interests**

The Monitoring Officer is not aware of any specific interests that may arise in relation to this report. If Members have an interest they should declare it at the start of the meeting and complete the relevant notification form.

Members should also consider whether or not they are predetermined.

<b>Recommendation:</b>	<b>Reason for Recommendation:</b>
i) <b>To receive the Objection Report in respect of the proposal to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017.</b>	<b>To understand the issues raised in the Objections received and the authority's response to those issues.</b>
ii) <b>To reject the proposal to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, and to retain a Welsh-medium stream at Brecon High School.</b>	<ul style="list-style-type: none"> <li>- <b>To ensure the continued provision of Welsh-medium education in Brecon</b></li> <li>- <b>To ensure that Welsh-medium pupils can access provision in the new school building planned for Brecon High School</b></li> <li>- <b>To support the Welsh Government vision to create 1 million Welsh speakers by the year 2050</b></li> </ul>

<b>Relevant Policy (ies):</b>	School Transformation Policy, Welsh in Education Strategic Plan		
<b>Within Policy:</b>	Y	<b>Within Budget:</b>	Y

<b>Relevant Local Member(s):</b>	All local members serving the catchment area of the Welsh-medium stream at Brecon High School.
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<b>Person(s) To Implement Decision:</b>	Marianne Evans
<b>Date By When Decision To Be Implemented:</b>	Immediately

Contact Officer Name:	Tel:	Fax:	Email:
Sarah Astley	01597 826265	N/A	sarah.astley@powys.gov.uk

**Background Papers used to prepare Report:**

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## **PROPOSAL TO CLOSE THE WELSH-MEDIUM STREAM AT BRECON HIGH SCHOOL**

### **OBJECTION REPORT**

**JUNE 2017**

#### **1. Introduction**

Powys County Council consulted on a proposal to close the Welsh-medium stream at Brecon High School with effect from the 31<sup>st</sup> August 2017 during the period 21<sup>st</sup> November 2016 to the 9<sup>th</sup> January 2017.

On the 14<sup>th</sup> March 2017, the council's Cabinet considered the Consultation Report produced in relation to this proposal, and agreed to proceed with the closure of the Welsh-medium stream. Statutory Notices were published on the 16<sup>th</sup> March 2017, and the Objection Period ended on the 13<sup>th</sup> April 2017.

#### **2. Objections received**

A total of 77 written objections were received during the statutory objection period. However, 22 of these were from one individual.

The objections received included responses from the following:

- The Governing Body of Brecon High School
- The Governing Body of Ysgol y Bannau
- The Headteacher of Brecon High School
- Members of staff at Brecon High School
- Brecon Town Council
- Chris Davies MP
- Kirsty Williams AM
- Neil Hamilton AM
- County Councillor Matthew Dorrance
- County Councillor David Meredith
- Cylch Meithrin Aberhonddu
- Talybont-on-Usk Tennis Club
- Brecon & District Swimming Club
- Brecon Beacons National Park Authority
- Parents of pupils at Brecon High School and Ysgol y Bannau
- Members of the community

The issues raised in each of the objections received are listed in the tables on the following pages, along with the authority's response to these issues.

### 3. Petition

In addition to the written objections, a petition was also received, which was signed by approximately 1700 individuals. Individuals had either signed a paper copy of the petition or had signed the petition on-line.

The petition also included 218 comments made by those that signed the petition. The issues raised in these comments are reflected and responded to in the list of issues below.

### 4. Issues raised

A range of issues were raised in the Objections received. These issues are listed in detail in section 5 of this report, along with the authority's response to the issue.

The following table provides a summary of the main themes of the issues raised, as well as the page number where the detailed list of issues relating to this theme and the authority's response to the issues can be found.

Ref.	Issue	Page
<b>1. Criticism of the process</b>		<b>5</b>
1.1	Reference to the decision made by Cabinet on the 14 <sup>th</sup> March 2017	5
1.2	Consultation process	15
1.3	Issues relating to the documentation issued during the process	24
1.4	Consultation Meetings	28
1.5	Issues relating to the Consultation Report	29
1.6	Predetermination	44
<b>2. Issues relating to impact on the Brecon Area</b>		<b>48</b>
2.1	Impact on Ysgol y Bannau	48
2.2	Impact on availability/access to Welsh-medium education in the Brecon area	53
	2.2.1 Access to Secondary Welsh-medium provision in Brecon	53
	2.2.2 Access to Primary Welsh-medium provision in Brecon	57
2.3	Impact on Brecon / the community	57
2.4	Concern about the impact on the Welsh language in the area	60
2.5	Impact on pupils in Brecon	51

<b>3. Issues relating to travel and transport</b>		<b>65</b>
3.1	Impact of additional travel on pupils education, health and wellbeing	65
3.2	Access to extra-curricular activities will be restricted	72
3.3	Transport appeal 2015	76
<b>4. Issues relating to pupil numbers</b>		<b>79</b>
4.1	Impact of previous consultations on Welsh-medium pupil numbers at Brecon High School	79
4.2	Prospective Welsh-medium pupils numbers at Brecon High School	82
4.3	Concern about pupils transferring from Welsh-medium provision to English-medium provision	84
4.4	Welsh-medium primary pupil numbers	87
4.5	General issues relating to Welsh-medium pupil numbers	89
<b>5. Issues relating to Welsh Language and Welsh Education Policy</b>		<b>93</b>
5.1	Welsh Government Policy	93
5.2	Criticism of council's treatment of the Welsh language / Welsh-medium education	97
5.3	Reference to the council's WESP	101
5.4	Criticism of RhAG	104
<b>6. Issues relating to Brecon High School</b>		<b>106</b>
6.1	Impact on the schools viability and financial situation of Brecon High School	106
6.2	Issues relating to Welsh-medium provision at Brecon High School	108
6.3	Impact on English-medium pupils	113
6.4	Criticism of the council's treatment of Brecon High School	115
6.5	Issues relating to the new school build for Brecon High School	116
<b>7. Financial issues</b>		<b>119</b>
7.1	Issues relating to the cost of providing category 2B provision at Brecon High School	119

7.2	Cost of transport	125
<b>8. Issues relating to Builth Wells High School / The new Mid-Powys Secondary School</b>		<b>130</b>
8.1	Uncertainty about future of Builth Wells High School	130
8.2	Provision at Builth Wells High School	132
<b>9. Issues related to quality of provision</b>		<b>134</b>
9.1	Standards at Builth Wells High School	134
<b>10. Reference to alternative options</b>		<b>139</b>
<b>11. Issues relating to equality / discrimination</b>		<b>142</b>
<b>12. General criticism of the council</b>		<b>146</b>

## 5. Issues raised in Objections

1. CRITICISM OF THE PROCESS		
1.1 Reference to the decision made by Cabinet on the 14 <sup>th</sup> March 2017		
1.1.1	<p>Throughout the consultation period, at all meetings, officers insisted that the proposal was not based on financial considerations, however when Cabinet members commented prior to voting on the 14<sup>th</sup> March, their main argument was financial, thus making a mockery of the entire consultation</p>	<p>The consultation document stated clearly that the reasons for the proposal were:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>These reasons were also included within the cabinet report. However, when considering any subject/proposal, Cabinet members are free to comment in any way they want, and some cabinet members chose to focus on the financial sustainability of the stream.</p> <p>The minutes of the meeting provide a record of the topics discussed at the meeting which include a range of issues, not just financial issues.</p>
1.1.2	<p>Five members of Powys' Cabinet voted against the democratic will of 80% of council members and ignored the wishes of the community.</p> <p>Undemocratic that 5 members of the Cabinet voted to close the Welsh stream despite 32 council members voting to retain it and despite the views expressed by the community</p> <p>This is too important an issue to be decided by 5 Cabinet members when 80% of councillors voted</p>	<p>At a meeting of the County Council on 16<sup>th</sup> June 2016, the Council voted in favour of Cabinet retaining the responsibility for making decisions on school reorganisation proposals. The minutes of that meeting record the following resolutions;</p> <p><i>'RESOLVED that full Council has the opportunity to meet and discuss recommendations relating to secondary schools affected by the Council's transformation policy, to express an opinion ahead of decisions taken by Cabinet.'</i> Cabinet did consider the views of full Council, however there is no obligation for Cabinet members to act in accordance with the views of the full Council.</p>

	<p>against the proposal</p> <p>The council's vote on the 7<sup>th</sup> March was advisory, however this was ignored</p> <p>The whole process is undemocratic and did not represent the views of the electorate – 32 out of 40 voted to keep the stream open, however 9 people then make the final decision and 7 of these live in north Powys</p> <p>Unfair that the Cabinet ignored councillors, who voted in favour of keeping the stream open</p> <p>Undemocratic that the Cabinet ignored the full council vote not to go ahead with the proposal</p> <p>We clearly have a topsy turvy system of local government when the vote of 80% of councillors can be overturned by a small number of Cabinet members.</p> <p>The PCC Cabinet method of governing is thoroughly undemocratic.</p>	
1.1.3	<p>The Cabinet who made the decision will not be the Cabinet that implements the decision.</p>	<p>It is true that the final decision on this proposal will be made by a new Cabinet.</p>

	<p>First priority of the new Cabinet should be to overturn this decision – an urgent meeting should be convened, not to prolong the uncertainty we continue to face</p>	
1.1.4	<p>The decision made by Cabinet was not an overwhelming majority – this casts doubt as to the conviction of this decision</p>	<p>The Cabinet voting system is based on a majority vote to pass any recommendation. The views of all Cabinet members are recorded in the minutes.</p>
1.1.5	<p>Disappointed that the council is ignoring the valid reasons brought up in the consultation</p> <p>Ask you to pay more regard to the people of Brecon</p>	<p>The consultation report in relation to this proposal, which lists the issues raised during the consultation period and the authority's response to those issues, was taken into consideration by the Cabinet at the meeting on the 14<sup>th</sup> March, when they determined how to proceed in relation to this proposal.</p>
1.1.6	<p>Cabinet decision on the 14<sup>th</sup> March lacked any scrutiny by members of Cabinet.</p> <p>The decision made on the 14<sup>th</sup> March was based on misleading facts and figures</p> <p>The decision on the 14<sup>th</sup> was made using statistics that had no evidence or substance – Ian Roberts had no evidence to support the statement that it would take ten years for pupil numbers to return at Brecon High School – parents have</p>	<p>The decision of Cabinet on the 14<sup>th</sup> March was to publish a Statutory Notice proposing closure of the Welsh-medium stream at Brecon High School. Cabinet had received a detailed Consultation Report in order to inform their decision, which outlined all issues raised during the consultation period and provided the authority's response to those issues.</p> <p>During the meeting, Ian Roberts responded to a question by Cllr Graham Brown who asked whether the current situation in Brecon High School is salvageable. Ian Roberts responded by stating that there needed to be a growth in Welsh-medium primary pupil numbers at Ysgol y Bannau and Sennybridge CP School in order to sustain the number of subjects required for a Category 2B school, and suggested that, in his opinion, this wouldn't happen, based on current pupil numbers, for at least 10 years.</p> <p>The authority does not have any significant evidence to suggest that parents who have already moved their children from Brecon would choose to return if provision remained. Even if they did return, pupil numbers in the stream would remain low. The authority's view</p>

	<p>stated that they would bring their children back tomorrow if Brecon High School had 2B provision</p> <p>Ian Roberts said that it would take 10 years for Brecon Welsh stream to return to being a viable Welsh stream, however there are many parents who would return to Brecon if it had the threat of closure removed</p> <p>No evidence to back up Ian Roberts' statement that it would take 10 years for numbers to recover in Brecon High School.</p>	<p>is that the current number of Welsh-medium pupils in the area is not sufficient to support two secondary streams and to provide appropriate curriculum choice for Welsh-medium pupils.</p>
1.1.7	<p>The education authority produced new information in the Cabinet meeting that was not true and should have been contained in the consultation document for all to see and question</p> <p>The answers given to questions in the Cabinet meeting were just opinions from the council employees</p>	<p>In line with the statutory process outlined in the School Organisation Code, any queries raised during the consultation period in respect of this proposal were addressed in the consultation report. However, there is also an opportunity for Cabinet members to ask questions when determining how to proceed. These questions will reflect their own concerns in relation to the proposal, and won't necessarily be matters that were already included in the Consultation Report.</p> <p>In respect of the Cabinet meeting held on the 14<sup>th</sup> March 2017, the majority of information was provided to Cabinet in the Consultation Report and associated papers. However, members also questioned officers on various topics, and the information supplied at the meeting was clearly explained.</p>
1.1.8	<p>Barry Thomas said that the education of the children was suffering – this is untrue as Brecon Welsh stream consistently outperforms Builth and Ystalyfera, however the authority refuses to</p>	<p>Information about the quality of education at all affected schools was included in the consultation document, which was included with the papers considered by Cabinet on the 14<sup>th</sup> March 2017.</p> <p>Performance data for all affected schools was included in the consultation document in respect of this proposal, however as stated on page 35 of the consultation document:</p>



	<p>include this in the document, stating that it would not be valid to include it because of low numbers</p> <p>Question re standard of education in Brecon High School was avoided time and time again because the standard of education in Brecon Welsh stream is higher than Ystalyfera and Bulth</p>	<p><i>'Official Welsh Government data sets relating to the school's performance relates to all pupils at the school, rather than pupils in the Welsh-medium stream alone. The number of Welsh-medium pupils at each school, particularly Brecon High School, is small, therefore it would not be valid to compare the performance of Welsh-medium pupils in these schools. In addition, 2016 information for Key Stage 4 has not been finalised.'</i> This view was supported by Estyn, who stated in their response to the consultation that the authority <i>'reasonably makes the statement that as numbers are small in Brecon High School, it would not be valid to compare the performance of Welsh-medium pupils in these schools'</i>.</p> <p>In the Cabinet meeting, Cllr Tony Thomas asked a specific question about the experience of pupils in the stream in Brecon High School. Ian Roberts, Head of Schools, responded by stating that it would be unfair to compare standards per subjects in the Welsh stream, but explained that the provision in terms of choice and ability to progress through the medium of Welsh was limited.</p> <p>The authority's view is that the current Welsh-medium provision at Brecon High School is not providing an appropriate educational experience for pupils, due to the small number of pupils accessing this provision and the limited subject provision offered.</p>
1.1.10	<p>Questions raised by voting Cabinet members were not answered by any points that had been covered in the consultation documents or supported by any evidence</p>	<p>The Cabinet are decision makers in the process, not consultees. When making their decision, the Cabinet considered the issues raised during the consultation period, as outlined in the consultation report, however it is also reasonable for them to ask questions on issues not raised during the consultation, if they require further information in order to make a decision on how to proceed.</p>
1.1.11	<p>Huge frustration from the general public at the meeting as we watched the incorrect information and answers being given</p> <p>The decision is based on flawed evidence in particular relating to finances, standards, breadth of provision and equality</p>	<p>The authority is satisfied that the information and answers presented during the Cabinet meeting were accurate, to the best of the officers' knowledge.</p>

	The decision has been made based on historic figures which were inaccurate and which no longer apply																									
1.1.12	71 letters sent in for the consultation were belittled by Arwel Jones at the start of the cabinet meeting – made it sound like 71 of the same letter were sent in, did not explain that there were 71 different reasons as to why the Welsh stream must stay in Brecon	All issues raised in the letters were included in the consultation report, along with the authority's response.																								
1.1.13	In the meeting on the 14 <sup>th</sup> March, none of our concerns were raised and supported by the council	The consultation report in relation to this proposal, which lists the issues raised during the consultation period and the authority's response to those issues, was taken into consideration by the Cabinet at the meeting on the 14 <sup>th</sup> March when determining how to proceed in relation to this proposal.																								
1.1.14	No recognition by Cabinet of the fact that the number of children in the Cylch Meithrin in Brecon has increased and the organisers have needed to increase their area	Section 9.1.3 of the Consultation Report states the following: <i>'The authority is pleased to note that the number of children attending the Cylch Meithrin provision in Brecon is increasing. Should the proposal be implemented, the authority would work with organisations such as Mudiad Meithrin and Menter Brycheiniog a Maesyfed to promote the benefits of bilingualism and Welsh-medium education, in order to promote progression into Welsh-medium education, and would hope that the greater clarity in terms of the Welsh-medium provision available in the secondary sector for pupils from the Brecon area would support this.'</i>																								
1.1.15	Hope that the new Cabinet will see that any decision to close the stream based on the numbers provided is a decision based on shifting sand and is therefore unreliable. If anything, the numbers actually prove that there is more	Based on information taken from the authority's Teacher Centre database on the 1 <sup>st</sup> June 2017, primary Welsh-medium pupil numbers are as follows: <table border="1" data-bbox="846 1251 1998 1386"> <thead> <tr> <th></th> <th>R</th> <th>Year 1</th> <th>Year 2</th> <th>Year 3</th> <th>Year 4</th> <th>Year 5</th> <th>Year 6</th> </tr> </thead> <tbody> <tr> <td><b>Ysgol y Bannau</b></td> <td>16</td> <td>28</td> <td>17</td> <td>15</td> <td>23</td> <td>10</td> <td>18</td> </tr> <tr> <td><b>Sennybridge</b></td> <td>9</td> <td>6</td> <td>11</td> <td>5</td> <td>5</td> <td>2</td> <td>5</td> </tr> </tbody> </table>		R	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	<b>Ysgol y Bannau</b>	16	28	17	15	23	10	18	<b>Sennybridge</b>	9	6	11	5	5	2	5
	R	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6																			
<b>Ysgol y Bannau</b>	16	28	17	15	23	10	18																			
<b>Sennybridge</b>	9	6	11	5	5	2	5																			

	<p>call for and commitment to Welsh-medium secondary education in BHS catchment than there is in the BWHS catchment.</p>	<table border="1" data-bbox="853 193 1998 300"> <tr> <td><b>Builth CP</b></td> <td>24</td> <td>11</td> <td>16</td> <td>14</td> <td>21</td> <td>19</td> <td>14</td> </tr> <tr> <td><b>Trefonnen</b></td> <td>8</td> <td>20</td> <td>9</td> <td>8</td> <td>11</td> <td>11</td> <td>6</td> </tr> <tr> <td><b>Rhayader</b></td> <td>8</td> <td>9</td> <td>11</td> <td>7</td> <td>13</td> <td>4</td> <td>5</td> </tr> </table> <p>The authority is satisfied that these figures show that there is greater demand for Welsh-medium provision in the current catchment area of Builth Wells High School. In addition, the breadth of Welsh-medium provision available at Builth Wells High School is greater than the breadth of provision available at Brecon High School.</p> <p>Whilst the number of pupils attending primary Welsh-medium provision in the current catchment of the Welsh-medium stream at Brecon High School were included in the consultation document in respect of this proposal to provide an indication of possible future demand in the Brecon area, the reasons for the proposal were related to the current level of Welsh-medium provision at Brecon High School. As stated in the consultation document, the reasons for the proposal were:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul>	<b>Builth CP</b>	24	11	16	14	21	19	14	<b>Trefonnen</b>	8	20	9	8	11	11	6	<b>Rhayader</b>	8	9	11	7	13	4	5
<b>Builth CP</b>	24	11	16	14	21	19	14																			
<b>Trefonnen</b>	8	20	9	8	11	11	6																			
<b>Rhayader</b>	8	9	11	7	13	4	5																			
1.1.6	<p>Portfolio Holder's recommendation is based on his view that there is a lack of Welsh-medium provision at BHS, stated intention is to attempt to achieve parity with English-medium provision in whichever school the pupils attend, but nowhere is it acknowledged that none of the PCC schools that offer Welsh-medium education can offer this parity</p>	<p>The authority agrees that no school in Powys provides exact parity of provision between Welsh-medium and English-medium streams, and there is still inequality in terms of the subject provision available to Welsh-medium pupils compared with the provision available to English-medium pupils. The authority's view is that this situation is no longer acceptable.</p> <p>The current small number of pupils accessing the Welsh-medium stream at Brecon High School will make it increasingly difficult for the school to offer Welsh-medium subjects for pupils, and to provide a level of provision which will enable learners to achieve and maintain fluency in both English and Welsh. This is particularly the case in Key Stage 4.</p> <p>The alternative schools which pupils currently in the catchment of the Welsh-medium stream at Brecon High School would be expected to attend would offer a greater level of Welsh-medium provision compared to that currently available at Brecon High School – there are more Welsh-medium pupils at Builth Wells High School, therefore the school is able to provide a greater number of Welsh-medium subjects, providing a better opportunity</p>																								

		<p>for learners to continue to develop their Welsh language skills through their secondary education, whilst Ysgol Gyfun Ystalyfera is a Welsh-medium school, where all subjects are provided through the medium of Welsh.</p> <p>The consultation document states the following: <i>‘The business case concluded that the most appropriate option at the current time is to centralise Welsh-medium secondary provision across the Mid and South Powys region. The authority’s view is that this would ensure a larger critical mass of learners, which would improve the level of provision that can be offered to the Welsh-medium pupils currently attending Builth Wells High School and Brecon High School, and would provide a solid base which could be further developed in the future.’</i></p>
1.1.17	<p>PCC has not been able to properly quantify the amount of investment that would be required to improve BHS to a 2B school. It is stated in the consultation response that, if BHS put the 80% provision in place, they would secure £47k additional funding. This is then contradicted at paragraph 5.2.4 by a figure of £55k. These figures were well known until the debate immediately before the Cabinet decision when the Portfolio Holder and his officers suddenly invented figures of £200k - £300K as being needed for the investment. These figures were not previously made public and no evidence or justification for them has been provided; neither do they form any part of the consultation documentation. It is abundantly clear that these figures do not form</p>	<p>The figure of £55k provided in issue 5.2.4 in the consultation report is not the correct figure – it should have read £47k as stated throughout the report.</p> <p>Whilst initial financial information in relation to the estimated savings should the proposal be implemented were included in the consultation document in respect of this proposal, further information was requested during the consultation process. In line with the statutory process outlined in the School Organisation Code, any queries raised during the consultation period in respect of this proposal were addressed in the consultation report. However, there is also an opportunity for Cabinet members to ask questions when determining how to proceed. These questions will reflect their own concerns in relation to the proposal, and won’t necessarily be matters that were already included in the Consultation Report. The information provided in the Cabinet meeting was provided in response to a question from a Cabinet member.</p> <p>The following provides a summary of the financial information that was provided throughout the process, as recorded in the documentation:</p> <p><b>Consultation Document – page 31:</b>  <i>‘In accordance with the authority’s Funding Formula, dual stream schools receive funding based on the proportion of the curriculum delivered through both the medium of Welsh and English in separate streams.</i></p> <p><i>For the 2016/17 financial year, Brecon High School received £58,475 through the formula to</i></p>

	<p>a safe basis for any decision.</p>	<p><i>support the additional cost of operating as a dual stream school. Should the Welsh-medium stream close, this funding would not transfer with pupils to their alternative schools or streams, therefore this would be a saving to the authority.</i></p> <p><i>Following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. As this transport is already provided, implementation of the proposal would not incur any additional transport costs.</i></p> <p><i>The total saving to the authority should the proposal be implemented is estimated to be £58,475.'</i></p> <p><b>Consultation Report – page 41:</b>  <i>'During the recent consultation period on the proposal to close the Welsh-medium stream at Brecon High School, a county councillor requested details of the additional funding that would be required for the Welsh-medium provision at Brecon High School to meet the definition of a Category 2B school. The figure provided was £47000, which is the additional funding that would be provided to the school through the authority's funding formula to support the provision of Welsh-medium subjects for 80% of curriculum time in years 7 to 11.</i></p> <p><i>However, whilst the funding provided to dual stream schools through the authority's funding formula is based on the % of curriculum time where Welsh-medium options are available to pupils, the Welsh Government's definition of a category 2B school is as follows: 'At least 80% of <b>subjects</b> (excluding Welsh and English) are taught through the medium of Welsh but are also taught through the medium of English.'</i></p> <p><i>In relation to the funding provided through the formula to support dual stream provision in key stage 4, the authority considers that Welsh-medium curriculum time is available when a minimum of 1 Welsh-medium options subject is available in each options block. For example, a dual stream school offering 1 Welsh-medium subject and 5 English-medium subjects in each options block, as well as all core subjects through the medium of Welsh, would receive the maximum funding available from the authority to support its dual stream provision, and would be providing 80% of curriculum time through the medium of Welsh. However, this school would not necessarily meet the Welsh government definition for a</i></p>
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		<p><i>category 2B school, as the school would not be providing 80% of <b>subjects</b> through the medium of Welsh and English.</i></p> <p><i>Therefore, whilst the figure of £47000 provided during the consultation is the maximum additional funding that would be provided to support dual stream provision at Brecon High School based on the authority's funding formula, this would not be sufficient to enable the school to provide Welsh-medium provision which would meet the definition for a category 2B school.'</i></p> <p><b>Cabinet meeting 14<sup>th</sup> March 2017:</b> During the Cabinet meeting, Gareth Jones explained how much funding would be required for a category 2B school, which is recorded in the minutes of the meeting as follows:</p> <p><i>'The Cabinet also sought clarification on the cost of bringing Brecon High School up to Category 2B status. Officers explained that £106k would come to the school from the fair funding formula dual stream uplift, £54k which the school already received and an additional £47k, plus the per pupil funding of £2,500 per pupil giving a total of approximately £160k. However, to deliver 80% of the curriculum in Welsh, there would need to be 5-6 additional teachers at a cost of approximately £270k cost to the schools delegated budget. This meant that an additional £110k would have to be found in the school's budget which was already in deficit with the sum having to come from the English stream.'</i></p>
1.1.18	The decline in the number of WM subjects being offered in Welsh at BHS has declined as a direct consequence of the public consultation process. In relation to both pupil numbers and provision, the Cabinet should have been looking only as far as 2013/14 when the school was not under threat	<p>The authority recognises that many parents chose to move their children out of Brecon High School's Welsh stream in 2015 once the consultation was announced, and this has affected pupil numbers at the school. This was acknowledged in the consultation document and has been acknowledged throughout the process.</p> <p>However, throughout the process, the data considered has been factual, based on the most recent information available to the authority. This is in line with the requirements of the School Organisation Code, which requires the authority to provide information about current pupil numbers, as well as pupil numbers for the last 5 years.</p>

1.1.19	All the councillors who voted for this are from Montgomery, they couldn't care less what happens to the people of Brecon.	This statement is untrue. The Cabinet have a responsibility to the whole of Powys, regardless of where they live or which ward they represent. The Objection Report will be considered by a new Cabinet, which represents all parts of Powys.
1.1.20	The Portfolio Holder has failed to apply sufficient weight to the negative aspects of the travel involved thereby rendering his recommendation and the decision unsafe.	<p>All issues raised during the consultation period in respect of this proposal were included in the consultation report produced, along with the authority's response to the issues. These included numerous issues relating to the impact of additional travel.</p> <p>In respect of consultation reports, the School Organisation Code states that authorities must publish a consultation report:</p> <ul style="list-style-type: none"> <li>• <i>'Summarising each of the issues raised by consultees;</i></li> <li>• <i>Responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons, and</i></li> <li>• <i>Setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal'</i></li> </ul> <p>There is no requirement for authorities to provide a weighting to the issues raised.</p>
<b>1.2 Consultation Process</b>		
1.2.1	<p>The consultation process has ignored the points made by parents, schools, councillors</p> <p>The council is showing a total lack of understanding of the needs of the children and the wishes of parents</p> <p>Overwhelming consensus during the consultation period was not to proceed with the proposal – instead the council should have invested in</p>	All issues raised during the consultation period were listed in the consultation report, which was considered by the Cabinet on the 14 <sup>th</sup> March when determining how to proceed in relation to the proposal.

	<p>the provision at Brecon High School, as promised, to bring it up to a category 2B status school.</p> <p>Disappointed with how the whole consultation and our voices and concerns have been brushed off as unimportant. Our concerns and voices have not been taken seriously and understood correctly</p> <p>The proposal to keep the Welsh stream in Brecon had strong support so who are the Cabinet to go against this</p> <p>A despicable decision by Powys County Council, which is a kick in the teeth for those who have dedicated their careers to teaching the children of Brecon</p>	
1.2.2	<p>Consultation process was flawed – run three times due to mistakes made by PCC, which resulted in residents feeling they had already made their views known, however the previous responses were not considered in the final consultation report, this gives an artificial impression that enabled the Cabinet to force their proposals through</p>	<p>The consultation process was not flawed. Whilst it is true that consultation on closure of the Welsh-medium stream at Brecon High School has taken place three times, this was not due to mistakes made during the consultation processes.</p> <p>The reason why the consultation has taken place three times was explained on pages 8-9 of the consultation document in respect of this proposal:</p> <p><i>‘In March 2015, the council’s Cabinet considered and approved a report which identified four priorities to be taken forward in respect of the Secondary School Reorganisation programme, which were as follows:</i></p> <p><i>Priority 1 – Beacons Learning Campus</i>  <i>Priority 2 – To review Secondary Education in Mid Powys</i></p>



*Priority 3 – To review Post-16 Provision in Ystradgynlais  
Priority 4 – To review Secondary Education in North Powys*

*The initial recommendation in respect of Priority 1 was to carry out consultation on closure of Brecon and Gwernyfed High Schools, with the opening of a new English-medium school. Formal consultation on the closure of the Welsh-medium stream at Brecon High School was carried out in the summer of 2015, and a Consultation Report was produced and received by Cabinet on the 29<sup>th</sup> September 2015. At this meeting, Cabinet resolved to ‘note the content of the consultation report and that a further report will be brought back to Cabinet for decision at a later date’.*

*The School Organisation Code states that ‘Proposals must be published within 26 weeks of the end of the period allowed for consultation responses, otherwise the proposals will lapse and a new consultation document must be issued to revive them’. No further report was taken to Cabinet with proposals, and therefore no proposals were published within the 26 week period.*

*During the consultation period, concerns were raised that the proposal to close the Welsh-medium stream could not be considered in isolation to the work that was ongoing in respect of secondary provision in Mid Powys and South Powys (Priorities 1 and 2). Therefore it was agreed to re-consider the future of Welsh-medium secondary provision in the area as part of these reviews.*

*A business case in respect of Mid and South Powys was considered by Cabinet on the 23<sup>rd</sup> February 2016, when Cabinet determined:*

- To approve the commencement of formal consultation on the closure of Bulth Wells High School and Llandrindod High School and to establish a new dual-stream 11-18 secondary school that will operate across the current sites of the two school*
- To approve the commencement of formal consultation on the closure of Brecon High School and Gwernyfed High School, and to establish a new English-medium school to operate from the current sites of the two schools initially, before transferring to the new campus in Brecon.*

*Consultation on these proposals took place later in the year. Consultation reports were*

		<p><i>published in line with the requirements of the School Organisation Code, and were considered by Cabinet on the 27<sup>th</sup> September 2016. At this meeting, Cabinet determined the following:</i></p> <ul style="list-style-type: none"> <li>- <i>To publish a statutory notice for the closure of Builth Wells and Llandrindod High Schools on the 31<sup>st</sup> August 2018 and the establishment of a new dual-sites dual-stream 11-18 school that will operate on the current campuses of Builth Wells and Llandrindod High Schools with effect from 1<sup>st</sup> September 2018</i></li> <li>- <i>To abandon the elements of the proposal with regard to Brecon High School and Gwernyfed High School relating to closure of the two schools and the establishment of a new school, and to re-consult on the closure of the Welsh-medium stream at Brecon High School from September 2017.'</i></li> </ul> <p>It is true that responses from previous consultations were not considered in the consultation report produced in respect of the current proposal. This is a different process and the proposal is different to the proposal consulted on previously. The authority is satisfied that the most recent consultation process has been carried out in line with the requirements of the School Organisation Code.</p>
1.2.3	<p>All proposals should place the interests of learners above all other and give paramount importance to the impact on the quality of outcomes, provision and leadership and management</p> <p>A consultation should have the interests of children foremost, the authority is rushing this through but has failed to get it done in time – if the authority had the children's interests foremost, they would have allowed time for families to prepare for these changes</p>	<p>All school reorganisation proposals taken forward are taken forward in the interests of learners. The proposal's impact on the quality of outcomes, provision and leadership and management were considered in the consultation document issued in relation to this proposal.</p> <p>Issues relating to the proposal's impact on the affected pupils were raised during the consultation period. These issues, and the authority's response to them, were included in the consultation report which was considered by Cabinet when determining how to proceed in relation to this proposal.</p>

1.2.4	Incorrect data and mis-information provided during the consultation process	The authority is satisfied that data and information used throughout the consultation was the most up-to-date information available at the time.
1.2.5	The authority has not adhered to 'Brown's principles' in this consultation, particularly in regard to Equalities Act 2010, Welsh Language Measure 2011, Wellbeing of Future Generations Act 2015	<p>The authority's view is that consultation has been carried out appropriately and in line with the requirements of the School Organisation Code.</p> <p>At its meeting on the 14<sup>th</sup> March 2017, Cabinet considered the Consultation Report produced in relation to the proposal, as well as a range of impact assessments. These included an equality impact assessment, a Welsh language impact assessment, a community impact assessment and an integrated impact assessment, which included consideration of the well-being goals outlined in the Well-being of Future Generations Act 2015.</p>
1.2.6	<p>Consultation has not been carried out in line with the requirements of the Code, which states:</p> <p>The nature of journeys to alternative provision for secondary school pupils one way journeys should not exceed an hour – our children would need to travel over an hour!</p>	<p>The authority's view is that consultation has been carried out appropriately and in line with the requirements of the School Organisation Code.</p> <p>Section 1.4 of the School Organisation Code states:</p> <p><i>'Where a school closure, reduction in capacity or age range contraction is proposed the following must be considered:</i></p> <ul style="list-style-type: none"> <li>- <i>The nature of journeys to alternative provision and resulting journey times for pupils, including SEN pupils; in particular, whether primary school pupils will have one-way journeys in excess of 45 minutes or secondary school pupils one way journeys of over an hour'.</i></li> </ul> <p>Section 3.2 of the School Organisation Code outlines the information that must be included in a consultation document, which includes:</p> <ul style="list-style-type: none"> <li>- <i>'The impact on pupils' journeys to school and on school transport costs.'</i></li> </ul> <p>The authority provided information about the impact on pupils' journeys to school and on school transport costs in section 8.3 of the consultation document, as follows:</p>

### **'8.3 School Transport**

*The authority acknowledges that closure of the Welsh-medium stream at Brecon High School would lead to an increase in school transport costs and an increase in travel for pupils who live in the current catchment area of the Welsh-medium stream at Brecon High School and who wish to access Welsh-medium secondary provision.*

*Should the proposal be implemented, home to school transport would be provided in accordance with the council's School Transport Policy and the Learner Travel (Wales) Measure 2008<sup>1</sup>. The council's current School Transport Policy can be found at <http://www.powys.gov.uk/en/schools-students/apply-for-school-transport/>.*

*Pupils are eligible for free home to school transport if they live more than 3 miles from their nearest school offering provision in the language of their choice. For some pupils, the nearest Welsh-medium provision could be located outside Powys.'*

As stated in section 3.3 of the consultation report:

*'The authority's transport policy states that travel time should not normally be more than one hour to / from school. It is the authority's view that travel time to the nearest alternative Welsh-medium provision would be within this travel time for the vast majority of pupils.*

*The authority notes the comments in respect of the likely distance / travel time from locations such as Llangors, Trecastle and Talybont to Builth Wells. As stated in the proposal on page 3 of the consultation document, 'pupils wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream of Brecon High School would be able to attend Builth Wells High School or their closest secondary Welsh-medium provision'. The proposal also states that 'pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School that live closer to alternative Welsh-medium secondary provision outside Powys would have the opportunity to transfer to these schools.' It is likely that pupils living in some of the areas referred to would live closer to alternative Welsh-medium secondary*

<sup>1</sup> <http://gov.wales/topics/educationandskills/allsectorpolicies/learner-travel/?lang=en>

		<i>provision outside Powys.'</i>
1.2.7	Local authorities need to ensure that in carrying out their school organisation functions they act at all times in ways which are reasonable and founded on the interest of learners – with all the objections you have received and the numbers of people who have signed a petition calling for the retention of Brecon Welsh stream, we can safely say these proposals are in fact un-reasonable and are not founded on the interests.	<p>All school reorganisation proposals taken forward are taken forward in the interests of learners. The proposal's impact on the quality of outcomes, provision and leadership and management were considered in the consultation document issued in relation to this proposal.</p> <p>Issues relating to the proposal's impact on the affected pupils were raised during the consultation period. These issues, and the authority's response to them, were included in the consultation report which was considered by Cabinet when determining how to proceed in relation to this proposal.</p>
1.2.8	<p>A consultation must be conducted with honesty and integrity and this consultation has not been</p> <p>Might have no alternative but to go down the road of a Judicial Review due to misinformation in the report, especially with regard to costings</p> <p>The decision of the Cabinet of Powys County Council needs to be challenged at the highest level of the Welsh Assembly due to the questionable results of their consultation</p>	The authority's view is that consultation has been carried out appropriately, and in line with the requirements of the School Organisation Code.
1.2.9	There is a clear demand for retaining Welsh-medium secondary education in Brecon as shown by	The authority is aware of the petition referred to. This report refers to the petition that was received, and the issues raised in the written comments received have been incorporated into this report.

	the petition signed by 1711 people	
1.2.10	Please explain how the proposal meets the 3 reasons for re-consulting – ‘To provide a more sustainable, educationally and linguistically viable model of Welsh-medium secondary education’.	<p>The authority notes the Objectors view that the proposal does not provide a more numerically / financially sustainable, educationally viable and linguistically viable model of Welsh-medium secondary education.</p> <p>However, due to the current small number of pupils and limited Welsh-medium provision available, the authority’s view is that the current provision at Brecon High School is not providing an appropriate educational experience for Welsh-medium pupils. The authority’s view is that the current number of Welsh-medium pupils in mid and south Powys is not sufficient to support two Welsh-medium streams and to provide a comprehensive Welsh-medium curriculum for pupils.</p> <p>The paper considered by Cabinet at their meeting on the 27<sup>th</sup> September 2016 stated the following in relation to the recommendation to re-consult on the closure of the Welsh-medium stream:</p> <p><b><i>‘The preferred choice is to re-consult on element C of the Proposal. The reasons for this are as follows:</i></b></p> <ul style="list-style-type: none"> <li><i>• The Authority recognises that concerns were raised by many participants during the consultation period about the proposed removal of the Welsh-stream from the proposed new school in Brecon. However, the Authority’s intention is to provide equality of provision. Builth Wells High School provides a more equitable distribution of subjects between English-medium and Welsh-medium streams. The Authority believes that building the critical mass in one school will develop a vibrant and viable Welsh stream. The improved choice and Welsh-medium experience will enable them to be even more confident Welsh speakers who can still contribute to the development of the Welsh language in Brecon. We believe that learners will be more attracted to Welsh-medium provision in future if there are clear progression routes and continuity of provision throughout their educational life – this is currently not the case in Brecon High School.</i></li> <li><i>• The Welsh Government’s Welsh-medium Education Strategy states ‘Welsh-medium education from the early years, with robust linguistic progression through every</i></li> </ul>

		<p><i>phase of education, offers the best conditions for developing future bilingual citizens.'</i></p> <ul style="list-style-type: none"> <li>• <i>'The term 'bilingual provision' is used to refer to a wide range of teaching and learning settings which include varying amounts of Welsh language in the delivery. Bilingual schools can include those where a large proportion of the curriculum is delivered through the medium of Welsh, those where there are two streams – Welsh-medium and English-medium – taught separately (sometimes called 'dual stream' schools), and those where only a few elements of the curriculum or only a small number are taught through the medium of Welsh.'</i></li> <li>• <i>The linguistic outcomes of these different types of provision will vary significantly. Where a pupil from a Welsh-speaking background attends a bilingual school, a balanced curriculum through the medium of Welsh and English can be effective in ensuring fluency in both languages. This is the case in some areas of Wales. However, where learners' linguistic skills in Welsh are not reinforced by family or community, they are unlikely to achieve full fluency and confidence in Welsh when learning in a bilingual setting. Bilingual provision, therefore, does not always ensure that an individual becomes a bilingual speaker.'</i></li> <li>• <i>Whilst there are no designated Welsh-medium primary schools in the Builth Wells High School catchment, there are a greater number of primary Welsh-medium streams and a greater number of Welsh-medium pupils compared with the Brecon High School catchment.</i></li> <li>• <i>Evidence shows that Welsh-medium provision in terms of pupil numbers and subjects available has grown over the last five years. The Authority has provided the same guidance and support to Builth Wells and Brecon High School over this time.</i></li> </ul> <p><i>Whilst Welsh-medium pupils would be leaving Brecon to access Welsh-medium secondary provision, they will continue to live in the town and surrounding areas, and will continue to be able to participate in Welsh language activities in the local community. The Council's view is that the increased level of Welsh-medium provision available to them will enable all Welsh-medium pupils to become more confident Welsh speakers, who will be able to play a</i></p>
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		<i>greater role in terms of the Welsh language in the community.'</i>
1.2.11	Cabinet has to be very careful when making their decision as words like 'many', 'a number of' can be interpreted either way as quite a lot or not a lot – this is a major problem with this consultation and leads to the wrong assumption	Noted.
<b>1.3 Issues relating to the documentation issued during the process</b>		
1.3.1	The Equality Impact Assessment appears to be wholly inadequate	A range of impact assessments have been carried out, including an equality impact assessment, a community impact assessment, a Welsh language impact assessment and an integrated impact assessment. Initial versions were produced prior to the commencement of consultation, and these were updated to take account of issues raised during the consultation period.
1.3.2	<p>The consultation document was biased and written to favour the authority's preferred outcome</p> <p>In the consultation document, any negatives to the proposal are furnished with 'will' and 'expect to' – this is biased</p> <p>The consultation document is written one sided and does not reflect the actual truth which will lead to an uninformed decision being made</p>	<p>The authority does not agree that the consultation document is biased in its use of language.</p> <p>The document has been produced in line with the requirements of the School Organisation Code and provides factual information about the situation at the time of writing and the authority's view on the impact implementation of the proposal would have.</p>
1.3.3	Why are the other feeder school numbers for Builth not included in	The consultation document relates to a proposal to close the Welsh-medium stream at Brecon High School due to the small number of pupils accessing this provision. The



	<p>the consultation? We should be able to see how they compare to the numbers of Ysgol y Bannau and Sennybridge</p> <p>Why are the other feeder school numbers for Builth not included in the consultation? We should be able to see how they compare to the numbers of Ysgol y Bannau and Sennybridge</p>	<p>information provided in the document is in line with the requirements of the School Organisation Code, which sets out the type of information that is required to be included within a consultation document. Page 26 of the Code states that the following information should be included:</p> <p><b><i>‘Details of affected schools</i></b></p> <ul style="list-style-type: none"> <li><i>the names, locations and categories (i.e. community, voluntary controlled, voluntary aided, foundation) of all existing schools likely to be affected by the proposals (for example, in the case of a proposal to close a school information should be provided about all the surrounding schools to which it might reasonably be considered that pupils may wish to transfer)’.</i></li> </ul> <p>On this basis, the consultation document included information about Brecon High School, Builth Wells High School and Ysgol Gyfun Ystalyfera. Information was also provided about the number of pupils in streams/schools that feed the Welsh-medium stream at Brecon High School. Information about feeder schools to the Welsh-medium stream at Builth Wells High School was not included as the authority’s view is that these schools would not be affected by the proposal.</p> <p>However, information about the number of Welsh-medium primary pupils in the current catchment area of Builth Wells High School was provided on page 92 of the consultation report, in response to a query raised during the consultation period.</p>
1.3.4	The documentation produced does not give a true reflection of the situation and the benefits of having a Welsh stream in Brecon High School	<p>The information contained in the consultation document is in line with the requirements of the School Organisation Code. The authority’s view is that it reflects the position at the time of writing, and the document includes factual data which reflects the position at the time of writing. The data included is in line with the requirements of the School Organisation Code.</p> <p>In addition, the document outlines the advantages and disadvantages of the proposal, from the authority’s point of view, on pages 15 to 16.</p>
1.3.5	Every time you mention the low numbers in Brecon Welsh stream, in order to be fair, you must state	The authority acknowledges on page 13 of the consultation document that <i>‘it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil</i>

	that this is mostly due to this being the third consultation to close the Welsh stream. In particular in the Impact statement, it is not mentioned once that this is the reason for the small numbers	<i>numbers at Brecon High School.'</i>
1.3.6	The document is written so that everything is positive for Welsh going to Builth	<p>The document has been produced in line with the requirements of the School Organisation Code and provides factual information about the situation at the time of writing and the authority's view on the impact implementation of the proposal would have.</p> <p>The reason why the authority is proposing closure of the Welsh-medium stream at Brecon High School is due to the small number of pupils accessing the provision and the need to ensure appropriate curriculum choice for Welsh-medium pupils. The number of pupils currently accessing the Welsh-medium stream at Builth Wells High School is greater than the number of pupils in Brecon, and the school provides more Welsh-medium subjects.</p> <p>The authority does also acknowledge that there are disadvantages and risks associated with the proposal, these are outlined on pages 15-18.</p>
1.3.7	Incumbent on the council to properly consider S10 of the Well-being of future generations (Wales) act 2015. Cannot accept that any of the impact assessments that have been undertaken are in any way compliant with the Act.	The Well-being goals of the Well-being of Future Generations Act 2011 have been considered in the Integrated Impact Assessment carried out in relation to this proposal. An initial assessment was carried out prior to the consultation period, this was updated to reflect issues raised during the consultation period.
1.3.8	Reference to impact assessment – additional transport cannot be said to be a low carbon approach	<p>As stated in the impact assessment produced in respect of this proposal:</p> <p><i>'It is acknowledged that additional travel would have an environmental impact. However transport to alternative providers is already provided, therefore the additional transport that would be required would be minimal.'</i></p>
1.3.9	Providing free transport to Builth	No numbers have been falsified in the consultation document. The consultation document

	<p>before an official decision was made means that the council has falsified the numbers in the consultation document</p>	<p>provides factual data, and reflects the most up-to-date information that was available to the authority at the time when the document was published.</p> <p>Home to school transport to Builth Wells was provided following successful transport appeals, due to the increased breadth of Welsh-medium provision available at Builth Wells High School compared with the provision available at Brecon High School.</p> <p>The authority acknowledged in the consultation document that <i>'It is acknowledged that it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.'</i></p>
1.3.10	<p>The skewed statistics used in the proposal are the result of the council's own failings.</p>	<p>The information provided in the consultation document issued in respect of this proposal is factual data which reflects the position at the time of writing.</p> <p>It is true that the number of pupils attending the Welsh-medium stream at Brecon High School has reduced in recent years, and this is evidenced in the information provided on page 11 of the consultation document.</p> <p>It is also true that two previous consultations have taken place on the future of the Welsh-medium stream since 2015. Information about these previous consultations and the reasons why these processes did not proceed is provided on pages 7 – 9 of the consultation document. The consultation document also acknowledges on page 13 that <i>'it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.'</i></p> <p>18 months or so ago, following the initial Cabinet decision to carry out consultation on closure of the Welsh-medium stream at Brecon High School, a number of parents of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education.</p> <p>As an admissions authority, the council cannot refuse places to children if there is a place available at the school to which they apply. When parents applied for places at Builth Wells High School, there were places available, therefore the authority was unable to reject the</p>

		<p>applications, however transport was refused at Stage 1 and 2 of the transport application process. Following this, the applications were taken to appeal, and the appeal panel took the decision to award transport.</p> <p>Whilst the authority acknowledges that the previous consultations have impacted on Welsh-medium pupil numbers at Brecon High School, the authority does not agree that the statistics used in the document are 'skewed'.</p>
<b>1.4 Consultation Meetings</b>		
1.4.1	<p>Minutes of the consultation meeting are incorrectly written to miss out the council officer's agreement of the figures</p> <p>When asked why the consultation meeting on the 1<sup>st</sup> Dec 2016 was not being filmed, the answer given was that minutes were being taken and would be made available for anyone unable to make the meeting. Why were the minutes never made available? People unable to make the general consultation meeting were unable to know what was said at the consultation meeting, and were unable to comment on information provided at the meeting</p> <p>As the minutes have not been made available, the consultation has not been able to run fairly. This shows that the council is trying to hide information that came out in</p>	<p>The purpose of minutes taken at formal consultation meetings related to school reorganisation proposals is to inform Cabinet members of the issues raised in the meetings.</p> <p>In accordance with the authority's normal process during school reorganisation consultations, the minutes of the public meeting held in Brecon High School were checked by officers that attended the meetings, and confirmed by the Portfolio Holder for Education. The minutes were then sent to Cllr David Meredith, Chair of Brecon High School, and Mr Rob Broadbridge, Headteacher of Brecon High School, to give them the opportunity to comment / request any amendments to the content. The authority does not normally send out minutes of public consultation meetings to members of the public or individual requestors.</p> <p>The issues raised in all the meetings that took place were reflected in the consultation report in relation to the proposal, and the minutes were also published with the papers that were considered by Cabinet when determining whether or not to proceed with the proposal in relation to the Welsh-medium stream at Brecon High School at their meeting on the 14<sup>th</sup> March 2017, therefore they are available to anyone who would like to view them.</p>

	<p>the consultation meeting</p> <p>The minutes of the consultation meeting came out a few days before the end of the consultation response time, despite being requested from the Monday after the meeting. This was not good enough</p> <p>The minutes of the meeting were not correct in terms of what was agreed in relation to the minutes along with a number of other points, this was highlighted to the School Transformation team, who said that as the general consultation period had finished there was nothing we could do about it</p>	
<b>1.5 Issues relating to the Consultation Report</b>		
1.5.1	<p>18.5.2 in consultation report – the authority’s response is that parents have had an opportunity to contribute to the consultation – implies that it has no interest in what the people want, need or demand</p>	<p>Issue 18.5.2 in the Consultation Report criticised the authority for not engaging with parents as part of the recent consultation exercise. The response provided was an explanation that the council had given all parents the opportunity to contribute to the consultation.</p> <p>The issues raised by parents and all other stakeholders were listed in the consultation report in respect of this proposal, including those raised in writing and in the consultation meeting. The School Organisation Code does not require the authority to differentiate between issues raised by parents and issues raised by other stakeholders.</p> <p>The issues raised, as listed in the consultation report, were taken into consideration by Cabinet when determining whether or not to proceed with the proposal.</p>

1.5.2	Why were the submissions from children not responded to by the local authority in the consultation report?	The issues raised by pupils were listed on pages 8 – 12 of the consultation report. These issues were incorporated into the 'Issues raised during the consultation period' section of the consultation report, which also included the local authority's response to each issue.
1.5.3	Why were the comments to the online petition not responded to in the consultation report?	The issues raised in the online petition were incorporated into the 'Issues raised during the consultation period' section of the consultation report, which also included the local authority's response to each issue.
1.5.4	The Estyn summary and recommendation was indifferent – it seems Estyn have significant reservations about the proposed closure	Estyn's response, as published in the consultation report, included the following summary:  <i>'It is Estyn's view that the proposer appears to have suitably demonstrated that, given the small numbers of pupils in the Welsh medium stream, that overall the proposal is likely to at least maintain the current standards of education in the area.'</i>
1.5.5	Reference to extract from consultation report March 2017 (issue 7.4.3) and consultation report from Sept 2015 (issue 12.1) which contradict in relation to linguistic ability of pupils at Builth.	In the 2015 consultation report the authority stated the following in response to issue 12.1:  <i>'The authority accepts that the pupils that currently feed the Welsh-medium stream at Builth Wells High School come from a different type of school to Ysgol y Bannau, and that they may be less comfortable speaking Welsh when they enter the school at year 7. The inclusion of pupils from Ysgol y Bannau will allow the school to strengthen the linguistic ability of all Welsh-medium pupils.'</i>  In the 2017 consultation report, the authority stated the following in response to issue 7.4.3:  <i>'The council did not say they would 'use Ysgol y Bannau children to improve the standard of Welsh in Builth' in the first consultation on closure of the Welsh-medium stream at Brecon High School. In the consultation document issued at that time, the council identified as an advantage of the proposal that 'an increased number of Welsh-medium pupils would enable Builth Wells High School to further develop its Welsh ethos.'</i>  The authority does not believe that these extracts are contradictory. Whilst it is true that an increased number of Welsh-medium pupils would have a positive impact on the Welsh ethos of Builth Wells High School, improving the Welsh ethos of Builth Wells High School is not one of the reasons why the authority is proposing to close the Welsh-medium stream at

		<p>Brecon High School. As stated in the consultation document in respect of this proposal, the reasons for the proposal are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul>
1.5.6	<p>Object to the way the authority has responded to many issues raised in the consultation</p> <p>Responses to the consultation were summarised in such a way that misses out the important points raised and are therefore misleading</p> <p>Consultation report – too many points appear to be swept aside with the reply ‘the authority notes this comment’ – this is unsatisfactory’</p>	<p>The School Organisation Code states the following in respect of consultation reports:</p> <p><i>‘Within 13 weeks of the end of the period allowed for responses (and in any event prior to the publication of the proposals), the proposer <b>must</b> publish a consultation report:</i></p> <ul style="list-style-type: none"> <li>• <i>Summarising each of the issues raised by consultees;</i></li> <li>• <i>Responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and</i></li> <li>• <i>Setting out Estyn’s view...of the overall merits of the proposal.’</i></li> </ul> <p>The authority is satisfied that the consultation report meets these requirements.</p>
1.5.7	<p>There are two consultation reports circulating – amendments were made after the document was discussed and voted on by the council – the council therefore voted on a different version.</p> <p>Which is the more accurate consultation report, the one published prior to the council’s vote or the one published after the council’s vote?</p>	<p>The consultation report that was published on the 1<sup>st</sup> March 2017 as part of the papers for the full County Council meeting on the 3<sup>rd</sup> March did not include a specific reference to the media clip of pupils protesting outside Ysgol y Bannau and Brecon High School and press articles which were submitted during the consultation period, however the issues raised in these responses were reflected in the consultation report, in line with the requirements of the School Organisation Code. Following communication from a member of the public, the consultation report was amended to include a reference to these items.</p> <p>The updated consultation report was published on the 8<sup>th</sup> March 2017, to be considered by Cabinet at its meeting on the 14<sup>th</sup> March 2017. Cabinet made their decision based on the final report, which included a reference to the media clip and press articles.</p> <p>The consultation report was not published by the authority on the ‘Plans for Powys Schools’</p>

		<p>section of the council's website until Friday the 10<sup>th</sup> March. The version published here was the updated version which was to be considered by Cabinet on the 14<sup>th</sup> March 2017.</p> <p>In accordance with the requirements of the School Organisation Code, stakeholders were notified that the authority had published a consultation report in respect of the proposal relating to the Welsh-medium stream at Brecon High School. Stakeholders were notified on the 10<sup>th</sup> March, and were directed to the 'Plans for Powys Schools' page, where they could access a copy of the consultation report which was to be considered by Cabinet.</p>
1.5.8	The authority acted dishonestly and gave false information in the consultation report	The authority disagrees with this comment. The consultation report includes all the issues raised in the consultation and the authority's response to those issues. Any information provided was the most up-to-date information available to the authority at the time.
1.5.9	<p>If the authority has no answer to a point raised, it is omitted from the consultation report</p> <p>Letters were changed, and important parts of letters omitted</p>	The consultation report produced in respect of this proposal is 194 pages long and goes into great detail in terms of the issues raised during the consultation. The authority refutes the accusation that points have been deliberately omitted from the report.
1.5.10	The authority is attempting to mislead the public and the cabinet in the consultation report	This statement is untrue. The consultation report provides an unbiased, unweighted list of the issues raised in the consultation responses received, along with the authority's response to those issues.
1.5.11	<p>Important letters were omitted from the consultation document, such as the reply from Brecon Beacons National Park.</p> <p>Brecon Beacons National Park is one important organisation that needs Welsh-medium children living and learning in Brecon, so why did PCC not include this in the consultation document?</p>	<p>The issues raised in all responses received during the consultation period, including the response received from Brecon Beacons National Park, were incorporated into the 'Issues raised during the consultation period' section of the consultation report, which also included the local authority's response to each issue.</p> <p>Whilst the consultation response received from Estyn was published in the consultation report, in line with the requirements of the School Organisation Code, no other individual responses were included in the report. Copies of all consultation responses were provided to the Portfolio Holder prior to the Cabinet decision to proceed with the proposal.</p>



1.5.12	<p>Children spent a great deal of time protesting outside Brecon High School, all information was sent to the School Transformation Team, however newspaper cut outs and links to S4C coverage were left out of the consultation document that went to Cabinet members</p> <p>The newspaper articles and links regarding Brecon High School and Ysgol y Bannau protesting outside Brecon High School to keep Brecon Welsh stream were not included in the consultation document</p>	<p>The consultation report that was published on the 1<sup>st</sup> March 2017 as part of the papers for the full County Council meeting on the 3<sup>rd</sup> March did not include a specific reference to the media clip of pupils protesting outside Ysgol y Bannau and Brecon High School and press articles which were submitted during the consultation period, however the issues raised in these responses were reflected in the consultation report, in line with the requirements of the School Organisation Code. Following communication from a member of the public, the consultation report was amended to include a reference to these items.</p> <p>The updated consultation report was published on the 8<sup>th</sup> March 2017, to be considered by Cabinet at its meeting on the 14<sup>th</sup> March 2017. Cabinet made their decision based on the final report, which included a reference to the media clip and press articles.</p>
1.5.13	<p>Unfair that you only publish figures that support your case and omit the figures that don't support your case – numbers were not fairly made available in the consultation report, and were not transparent. You should include the following:</p> <ul style="list-style-type: none"> <li>- Numbers leaving Welsh-medium education</li> <li>- Low numbers coming into Ysgol y Bannau's new year intake</li> <li>- That 2/3 of children will not continue in Welsh-medium education</li> <li>- The numbers leaving Ysgol y Bannau throughout the</li> </ul>	<p>The authority refutes this accusation. The information used throughout the consultation has been factual data based on the most up-to-date information available to the authority. The data provided in the consultation document issued in respect of this proposal was in line with the requirements of the School Organisation Code, and the authority has endeavoured to provide additional information where requested throughout the process.</p> <p>In respect of the specific points raised:</p> <p><u>i. Numbers leaving Welsh-medium education</u></p> <p>Information about the number of pupils leaving Welsh-medium education on transfer from Ysgol y Bannau and the Welsh-medium stream at Sennybridge CP School to secondary provision in September 2016 was included in the consultation document in respect of this proposal.</p> <p>Further to this, the percentage of pupils transferring from Welsh-medium primary provision to Welsh-medium secondary provision in the Brecon catchment since 2013 is provided in the following table:</p>

- years
- The low number of year 6 pupils that have opted for Builth
- The numbers from Sennybridge that are starting to choose Brecon Welsh stream
- That 2/3 of Ysgol y Bannau will not continue with secondary Welsh medium education

	<b>Sept. 2013</b>	<b>Sept. 2014</b>	<b>Sept. 2015</b>	<b>Sept. 2016</b>
Sennybridge CP School	N/A	78%	75%	67%
Ysgol y Bannau	85%	94%	93%	65%

Throughout the consultation process, the authority has acknowledged that there are risks associated with the proposal, and these were outlined in the consultation document. These include the risk that ‘pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school’. The following risk management measures were outlined in the consultation document:

*‘In the short term, the authority would expect there to be some reduction in the proportion of pupils from the Brecon area continuing to access Welsh-medium provision in the secondary sector. However, the current Welsh-medium provision in Brecon High School is very limited, and there is no provision at all at Post-16. Retaining pupils within the Welsh-medium sector is one of the Welsh Government’s priorities, and the authority will work with the primary schools concerned to establish transition links with the alternative providers with the aim of reversing any reduction in transfer rates into KS3 in the longer term.’*

ii. Low numbers coming into Ysgol y Bannau’s new year intake

The authority provided factual information in the consultation document on pupil numbers at the time.

Throughout the consultation process, the authority has acknowledged that there are risks associated with the proposal, and these were outlined in the consultation document. These include the risk that ‘pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon.’ The following risk management measures were outlined in the consultation document:

*‘The authority acknowledges that there may be a reduction in pupil numbers at Ysgol y Bannau in the short term. However, the authority is committed to increasing the number of pupils accessing Welsh-medium, and would work with work with Ysgol y Bannau, Menter*

*Brycheiniog and other organisations to promote the benefits of Welsh-medium primary education in the Brecon area. The authority would hope that the greater clarity in relation to secondary arrangements for pupils from the Brecon area and the increased level of provision available would lead to an increase in pupil numbers in the future.'*

iii. 2/3 of children will not continue in Welsh-medium education

The current information held by the authority's admissions team for applications for school places in September 2017 is as follows:

<b>Ysgol y Bannau</b>	10 pupils to Brecon High School 6 pupils to Builth Wells High School 1 pupil to Ysgol Gyfun Ystalyfera 1 pupil to Gwernyfed 1 pupil to Llandovery
<b>Sennybridge CP School Welsh Stream</b>	3 pupils to Ysgol Gyfun Ystalyfera 1 pupil to Ysgol Maesydderwen 1 unknown
<b>Sennybridge CP School English Stream</b>	6 pupils to Brecon High School

Should the proposal to close the Welsh-medium stream at Brecon High School proceed, the authority would liaise with the school and the families who have applied for places at the Welsh-medium stream at Brecon High School to determine whether they wish for their children to attend English-medium provision at Brecon High School or to access Welsh-medium provision at alternative schools.

As stated in respect of point (i) above, the authority has acknowledged throughout the process that there is a risk that '*pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school*', and risk management measures have been identified.

iv. The numbers leaving Ysgol y Bannau throughout the years

Based on PLASC information, the number of pupils in each year group in Ysgol y Bannau since January 2012 is as follows:

	Jan 2012	Jan 2013	Jan 2014	Jan 2015	Jan 2016	Jan 2017
<b>R</b>	10	28	16	17	27	17
<b>Yr1</b>	21	10	28	16	17	28
<b>Yr2</b>	27	20	10	27	16	18
<b>Yr3</b>	19	24	21	10	26	15
<b>Yr4</b>	18	18	22	21	9	24
<b>Yr5</b>	23	17	18	20	19	10
<b>Yr6</b>	20	22	18	15	20	19
<b>Total</b>	138	139	133	126	134	131

The Objectors comment suggests that there has been a significant reduction in pupil numbers at Ysgol y Bannau throughout the period then the authority has been considering the future of the Welsh-medium stream at Brecon High School. However, this is not reflected in the figures provided above. However, as stated in respect of point (ii) above, the authority has acknowledged throughout the process the risk that *'pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon'*, and risk management measures have been identified.

v. The low number of year 6 pupils that have opted for Builth

Details of the applications received for September 2017 is provided in point (iii) above.

		<p><u>vi. The numbers from Sennybridge that are starting to choose Brecon Welsh stream</u></p> <p>The authority has no evidence that pupils from Sennybridge are starting to choose Brecon Welsh stream. As indicated on page 13 of the Consultation Document in respect of this proposal, no pupils from the Welsh-medium stream at Sennybridge CP School transferred to the Welsh-medium stream at Brecon High School in September 2016, and as indicated in the data provided in respect of point (ii) above, no pupils from the Welsh-medium stream at Sennybridge have applied for placed in the Welsh-medium stream at Brecon High School in September 2017.</p> <p><u>vii. That 2/3 of Ysgol y Bannau will not continue with secondary Welsh medium education</u></p> <p>As stated in respect of point (iii) above, should the proposal to close the Welsh-medium stream at Brecon High School proceed, the authority would liaise with the school and the families who have applied for places at the Welsh-medium stream at Brecon High School to determine whether they wish for their children to attend English-medium provision at Brecon High School or to access Welsh-medium provision at alternative schools.</p> <p>As stated previously, the authority has acknowledged throughout the process that there is a risk that <i>'pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'</i>, and risk management measures have been identified.</p>
1.5.14	Disappointed to read such a short list of people and organisations listed in the consultation report who have formally contacted you about this issue. Were there any other additional significant contributions taken on board when compiling the consultation report and if so who were they from?	<p>As stated in the consultation report, <i>'A total of 237 written responses were received to the consultation, including responses submitted using the online response form, via e-mail and other written responses.'</i></p> <p>The list of people and organisations included within the consultation report were the public figures / organisations that responded to the consultation. All other responses were received from parents, staff, governors, pupils and other members of the community.</p>
1.5.15	5.7.1 of consultation report – Has	The authority identified the following risks in the consultation document in respect of this

	any survey been taken out to establish whether or not this will prevent children being taught in Welsh?	<p>proposal: <i>'Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school' and 'Pupil numbers at Ysgol y Bannau decrease ...'</i> In addition, concern that implementation of the proposal would lead to a reduction in Welsh-medium pupil numbers was raised during the consultation period, the issues raised and the authority's response were provided in the consultation report in relation to the proposal which was taken into consideration by the Cabinet when determining how to proceed in relation to the proposal.</p> <p>However, no specific survey has been carried out to establish whether or not implementation of the proposal will prevent children being taught in Welsh.</p> <p>Concern about the impact on Welsh-medium pupil numbers has also been raised in the objections received, and therefore is also addressed in this report.</p>
1.5.16	5.7.2 of consultation report – Has any investigation been carried out to ascertain the validity of this claim, and if so, what were the findings?	No investigation has been carried out to ascertain the claim that was raised in issue 5.7.2 of the consultation report that the unsatisfactory provision at Brecon High School has had an impact on the number of pupils accessing Welsh-medium education.
1.5.17	12.1.1.5 of consultation report – Can you supply a better explanation to answer this statement?	<p>Issue 12.1.1.5 of the consultation report is as follows: <i>'Due to the lack of access to a designated Welsh-medium secondary school in Powys, Powys County Council is currently disadvantaging a significant proportion of learners, this is in contrast to other authorities across Wales.'</i> The authority's response to this issue was <i>'The authority notes this comment.'</i></p> <p>The issue was a statement made by a member of the public as part of the consultation and is their opinion alone. The authority is fully aware that there is currently no designated Welsh-medium secondary school in Powys. The aim of the proposal is to provide greater equality for Welsh-medium pupils compared with English-medium pupils in terms of the provision available. As stated in the consultation document in respect of this proposal, the intention is that this <i>'would provide a solid base which could be further developed in the future'</i>.</p>
1.5.18	The initial section of the	The two previous consultations were carried out when the stream had 57 and then 30

	<p>consultation response relies heavily on the contention that the stream contained only 19 pupils and is therefore (allegedly) not viable. Later in the document, it is stated that even if pupils had not moved out in 2015, the stream would not have been viable.</p>	<p>pupils. This indicates that the authority believed, at the time of the 2015 consultation, that centralising provision in one stream provided the best opportunities to enhance the curriculum for Welsh-medium pupils.</p>																
1.5.19	<p>Nowhere in the documentation is the 'critical mass' number stated despite the repeated contention that it has not been achieved. It is clear that there is no such thing as 'critical mass' when dealing with a stream within a larger school as has been demonstrated by Ceredigion's introduction of a stream in every school.</p>	<p>Ceredigion have not introduced streams in every secondary school. There are currently 7 providers of secondary provision in Ceredigion, and the linguistic make up of these schools is as follows:</p> <ul style="list-style-type: none"> <li>- 1 English-medium school</li> <li>- 2 Welsh-medium schools</li> <li>- 4 bilingual schools</li> </ul> <p>In the consultation report, the authority provided the following response to issue 4.6.4:</p> <p><i>In order for the Welsh-medium provision at Brecon High School to be considered 'viable', the school would need to provide an appropriate range of Welsh-medium provision for Welsh-medium pupils. The authority's view is that dual stream schools should be aiming to provide Welsh-medium provision which meets the Welsh Government definition for a category 2B school.</i></p> <p><i>Currently, Ysgol Uwchradd Caereinion is the only dual stream secondary provider in Powys which meets the Welsh Government definition of a category 2B school. The breakdown of year 7 – 11 pupils in this school in September 2016 was as follows:</i></p> <table border="1" data-bbox="848 1177 1832 1367"> <thead> <tr> <th><b>Year</b></th> <th><b>Welsh-medium</b></th> <th><b>English-medium</b></th> <th><b>Total</b></th> </tr> </thead> <tbody> <tr> <td><b>7</b></td> <td>47</td> <td>36</td> <td>83</td> </tr> <tr> <td><b>8</b></td> <td>40</td> <td>36</td> <td>76</td> </tr> <tr> <td><b>9</b></td> <td>58</td> <td>37</td> <td>95</td> </tr> </tbody> </table>	<b>Year</b>	<b>Welsh-medium</b>	<b>English-medium</b>	<b>Total</b>	<b>7</b>	47	36	83	<b>8</b>	40	36	76	<b>9</b>	58	37	95
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<b>11</b>	12	18	3																																			
1.5.20	Paragraph 7.3.2 of the Consultation Response demonstrates that BWHS has 4 feeder schools and BHS only 2. Despite the imbalance, it can be seen from the actual numbers that BHS was achieving similar pupil intake numbers to BWHS until the consultation was announced in 2015, yet the only numbers the Portfolio Holder is concerned with are those generated by his own three consultations and the uncertainty they created	<p>The current consultation is based on the actual number of pupils attending the Welsh-medium stream at Brecon High School.</p> <p>The authority acknowledged in the consultation document in respect of this proposal that <i>'It is acknowledged that it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.'</i></p>																																				
1.5.21	Llanfair Caereinion is repeatedly used as a comparator for both BHS and BWHS. Nowhere is it taken	The authority has used the travelling distance between Newtown and Ysgol Uwchradd Caereinion in the consultation report to illustrate a similar situation where pupils from one town travel 15 miles to a smaller town to access Welsh-medium provision. The authority is																																				



	<p>into account that Llanfair Caereinion has a much larger Welsh speaking population in the immediate and surrounding areas. It is a poor comparator because of its surrounding geography and should not have been considered appropriate</p>	<p>not comparing the areas in which the schools are located.</p> <p>As the authority's only Category 2B school, the authority also made reference to Ysgol Uwchradd Caereinion in the consultation report to describe a viable stream in terms of the range of provision available.</p>																																		
1.5.22	<p>The consultation response document refers to the number of subjects BWHS offers in Welsh (see paragraph 7.4.1 of the consultation response) but does not set out the number of subjects offered at BHS despite the report's contention that the provision at other schools is 'significantly greater' than BHS</p> <p>Having spoken to teachers at the school I am aware that BHS with current staff can offer Welsh language and literature, French, music, history, geography, drama, Spanish, science, business studies, DT, ICT, RE, PSC and Welsh Baccalaureate – please compare the provision properly and you will see that it is not so very different and could be improved with minimum investment</p>	<p>The consultation report includes information about the number of Welsh-medium and bilingual subjects offered at Builth Wells High School in the response to point 7.4.1, which asks 'How many subjects are currently taught through the medium of Welsh in Builth?'</p> <p>Information about the number of subjects taught through the medium of Welsh in Brecon High School was provided on page 14 of the consultation document in respect of this proposal. Information about the number of subjects provided in both schools during 2016-17 is provided below, for clarity:</p> <table border="1" data-bbox="848 804 1951 1120"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">Builth Wells High School</th> <th colspan="2">Brecon High School</th> </tr> <tr> <th>Number of WM subjects</th> <th>Number of bilingual subjects</th> <th>Number of WM subjects</th> <th>Number of bilingual subjects</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>12</td> <td>0</td> <td>6</td> <td>0</td> </tr> <tr> <td>8</td> <td>12</td> <td>0</td> <td>6</td> <td>0</td> </tr> <tr> <td>9</td> <td>12</td> <td>0</td> <td>6</td> <td>0</td> </tr> <tr> <td>10</td> <td>9</td> <td>5</td> <td>1</td> <td>0</td> </tr> <tr> <td>11</td> <td>9</td> <td>4</td> <td>2</td> <td>0</td> </tr> </tbody> </table> <p>The authority is satisfied that this table demonstrates that the Welsh-medium provision in Builth Wells High School is 'significantly greater' than the provision at Brecon High School.</p> <p>The authority notes the information in relation to the additional Welsh-medium subjects that could be offered at Brecon High School. It is likely that there are also additional subjects that could be offered by staff at Builth Wells High School. However, the authority's view is that the number of pupils currently accessing Welsh-medium secondary provision in mid</p>	Year	Builth Wells High School		Brecon High School		Number of WM subjects	Number of bilingual subjects	Number of WM subjects	Number of bilingual subjects	7	12	0	6	0	8	12	0	6	0	9	12	0	6	0	10	9	5	1	0	11	9	4	2	0
Year	Builth Wells High School			Brecon High School																																
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7	12	0	6	0																																
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9	12	0	6	0																																
10	9	5	1	0																																
11	9	4	2	0																																

		and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils.
1.5.23	The consultation report becomes even more negative towards BHS when it states that even if BHS succeeded in offering 80% of subjects and teaching time in Welsh, it would still not achieve 2B status. What it does not state is that this is true of BWHS also.	<p>The authority does not state in the consultation report that ‘even if BHS succeeded in offering 80% of subjects and teaching time in Welsh, it would still not achieve 2B status’.</p> <p>In the consultation report, the authority states that:</p> <p><i>‘In relation to the funding provided through the formula to support dual stream provision in key stage 4, the authority considers that Welsh-medium curriculum time is available when a minimum of 1 Welsh-medium options subject is available in each options block. For example, a dual stream school offering 1 Welsh-medium subject and 5 English-medium subjects in each options block, as well as all core subjects through the medium of Welsh, would receive the maximum funding available from the authority to support its dual stream provision, and would be providing 80% of curriculum time through the medium of Welsh. However, this school would not necessarily meet the Welsh government definition for a category 2B school, as the school would not be providing 80% of <b>subjects</b> through the medium of Welsh and English.’</i></p> <p>Should Brecon High School offer 80% of subjects in Welsh, the school would achieve 2B status. However in order to meet this definition, the school would need to provide an average of 80% of subjects through the medium of Welsh across years 7 – 11. This calculation would take into consideration all options subjects in years 10 and 11. In the example provided above, the school would not be providing 80% of subjects through the medium of Welsh as only one Welsh-medium options subject would be provided in each options block.</p> <p>The authority does not state that this is true of Builth Wells High School also because this process is about the future of Brecon High School and the issues raised during the consultation period referred to the language category of Brecon High School, not Builth Wells High School.</p>
1.5.24	PCC repeatedly refer to a meeting that took place in 2011 when PCC withdrew funding and support from	The authority disputes this comment, and has not <i>‘repeatedly referred to a meeting in 2011 when PCC withdrew funding and support from the stream because of the attitude of the then head and her team’</i> . The only meeting during 2011 which is referred to in the

	<p>the stream because of the attitude of the then head and her team. That meeting took place 5 years before the consultation process began. The management team at the school now is completely different and the school has repeatedly stated its commitment to the stream. The situation has changed yet the Portfolio Holder prefers to base his recommendation on a meeting that took place five years earlier with people no longer in post.</p>	<p>consultation report is the Cabinet meeting held on the 22<sup>nd</sup> November 2011, when following an informal consultation on secondary school modernisation, Cabinet agreed to provide additional investment and support to dual stream schools to achieve the target of a Category 2B school.</p> <p>The authority is not aware of any other meeting which took place in 2011 where <i>'PCC withdrew funding and support from the stream because of the attitude of the then head and her team.'</i></p> <p>The recommendation considered by Cabinet was not based on any meeting which took place five years ago, the reasons for the current proposal are clearly laid out in the consultation document, and relate to the current Welsh-medium provision and the current Welsh-medium pupil numbers at Brecon High School.</p>
1.5.25	<p>The consultation report is unbalanced and the Portfolio Holder has manipulated the information to suit his own predetermined purposes.</p>	<p>The authority does not agree with this statement. The report meets the requirements of the School Organisation Code, which states that:</p> <p><i>'Within 13 weeks of the end of the period allowed for responses (and in any event prior to the publication of the proposals), the proposer <b>must</b> publish a consultation report:</i></p> <ul style="list-style-type: none"> <li>• <i>Summarising each of the issues raised by consultees;</i></li> <li>• <i>Responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and</i></li> <li>• <i>Setting out Estyn's view...of the overall merits of the proposal.'</i></li> </ul> <p>The report includes an unbiased, unweighted list of the issues raised during the consultation period along with the authority's response to those issues.</p>
1.5.26	<p>The consultation document contains no discussion whatsoever of the impact on the community of Brecon and the surrounding areas despite an emphatic letter from the National Park Authority urging PCC</p>	<p>A draft community impact assessment was published with the consultation documentation in relation to the proposal and was available on the council's website throughout the consultation period. This assessment was updated following the consultation period to take account of issues raised, and the updated assessment was included in the papers considered by Cabinet on the 14<sup>th</sup> March 2017.</p>

	not to close the stream	All issues raised during the consultation period, including those raised in the response received from Brecon Beacons National Park, were incorporated into the 'Issues raised during the consultation period' section of the consultation report, which also included the local authority's response to each issue.
<b>1.6 Predetermination</b>		
1.6.1	Why has the whole of the Llandrindod and Builth consultation been based on the theory that Brecon Welsh stream will close, in particular the Welsh impact statement? This has pre-determination that the Brecon Welsh stream is closing	<p>The whole of the Llandrindod and Builth consultation was not based on the theory that Brecon Welsh stream will close.</p> <p>In relation to the impact assessments, the authority provided the following response to issue 5.2.1 in the Objection Report related to the proposal for Builth Wells High School and Llandrindod High School:</p> <p><i>'In accordance with the Welsh Government's Schools Organisation Code 2013, the authority published draft impact assessments (equality, community and Welsh language) as part of the formal consultation process that was held between April 6<sup>th</sup> and June 1<sup>st</sup> 2016. These were updated to include issues that were raised during the consultation process and were considered, alongside the Consultation Report, by cabinet on 27<sup>th</sup> September 2016.</i></p> <p><i>At the same time, the authority was also consulting on an associated proposal for Brecon and Gwernyfed High Schools, of which one element was as follows:</i></p> <p><b><i>c) 'From the 1<sup>st</sup> September 2017, Welsh-medium secondary education to be delivered at the Builth Wells site of the proposed new school in Mid Powys (provided that the Proposal is approved by cabinet following consultation).'</i></b></p> <p><i>The authority published a Welsh Language Impact Assessment (draft and final) that related to Welsh-medium provision across South and Mid Powys. However, the majority of issues raised during both consultations related to proposal c) above, and the impact of this proposal. This can evidenced in the Consultation Reports for both proposals.</i></p> <p><i>There was no pre-assumption that Brecon High School's Welsh stream would close in the impact assessments – the impact assessments were undertaken on the proposals that were put forward at that time.'</i></p>

1.6.2	<p>There is no evidence provided that would demonstrate the optimum intake that could be achieved by BHS if it could attract all Welsh-medium pupils within the catchment area, not to mention the lack of any suggestion of how the situation at Brecon High School could be improved to achieved this. This is demonstration of predetermination of the decision to close the stream. If there was no predetermination, there would have been an alternative option mooted.</p>	<p>Information about the total number of primary Welsh-medium pupils in the Brecon catchment area was provided on page 12 of the consultation document. This gives information about the maximum number of pupils that would attend the Welsh-medium stream at Brecon High School in future years.</p> <p>As stated in the consultation report: <i>'Financial support for the provision of education on a dual stream basis has been provided to Brecon High School for a number of years, in accordance with the authority's Fair Funding Formula. The same level of support has been provided to other dual stream high schools, including Builth Wells High School. Whilst other schools have used this funding to increase the level of Welsh-medium provision within the school, there has been no significant increase in Welsh-medium provision at Brecon High School.'</i></p> <p>An explanation of the alternative options that had been considered was provided on pages 19-21 of the consultation document issued in respect of this proposal.</p>
1.6.3	<p>Predetermination further evidenced by the fact that the CBC submitted to Welsh Government in March 2015 included no Welsh medium provision despite the building being billed as a 'fresh start for secondary education in Brecon'</p>	<p>The authority submitted an Outline Business Case to the Welsh Government in October 2016. This document clearly outlines the fact that a formal consultation process was underway relating to a proposal to close the Welsh stream.</p>
1.6.4	<p>By putting on free transport to BWHS just after the start of the first consultation, PCC sent a clear message to parents that the decision had been made – this has predetermined the whole consultation</p> <p>The decision to grant free transport to Builth and therefore reduce the</p>	<p>Transport to Builth Wells was provided to families following a successful transport appeal in May 2015. The applications for transport were initially refused by local authority officers at Stage 1 and 2, however the applications were taken to appeal and the appeal panel, chaired by the Portfolio Holder for Education, which took the decision to award transport, due to the enhanced level of Welsh-medium provision provided at Builth Wells High School compared with Brecon High School.</p> <p>The transport appeals process was carried out appropriately and the authority has not misled parents.</p>

	<p>numbers in Brecon Welsh stream was taken by the portfolio holder, whose aim has been to close the Welsh stream since before that decision was taken – this created the situation that was required to get the stream closed down – this is predetermination. Not talking about the transport appeals that were taken and heard also by the authority and not an independent body – talking about the decision to grant transport to all pupils</p> <p>Families who did not understand the consultation process took the implementation of free transport as Powys having made its decision to close the Welsh stream in Brecon – the council has deliberately misled families</p>	<p>The fact that transport is being provided to Builth Wells High School was clearly and transparently included in the consultation document. Section 8.1 on page 31 of the consultation document states the following: <i>'Following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area.'</i></p> <p>The authority states the following on page 13 of the consultation document: <i>'It is acknowledged that it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.'</i></p>
1.6.5	<p>Ysgol y Bannau has been changed to be a feeder school of BWHS in the admissions booklet 16/17 – at this point the consultation was still open – this also misled parents into believing the decision has already been made</p> <p>PCC officials have stated that Ysgol y Bannau is not a feeder school for BWHS and that the consultation process was not predetermined, however the</p>	<p>As stated in point 18.1.3 of the consultation report, Ysgol y Bannau has not been made an official feeder school for Builth Wells Welsh stream as no final decision has yet been made in relation to the future of the Welsh-medium stream at Brecon High School. However, a number of parents of pupils at Ysgol y Bannau have chosen for their children to attend Builth Wells High School, therefore it is not unreasonable that Ysgol y Bannau has developed links with Builth Wells High School in order to facilitate transition of these pupils to high school.</p> <p>It is correct that the Admissions Booklet for 2016/17 and 2017/18 includes Ysgol y Bannau as a feeder school for both Brecon and Builth Wells High Schools. This reflects the fact that pupils are able to attend both schools and home-to-school transport is provided.</p>

	<p>admissions literature for 2016/17 and 2017/18 which was produced some time ago lists Ysgol y Bannau as a feeder school for BWHS on page 49 and 51.</p> <p>18.1.3 – the authority states that Ysgol y Bannau has not been made a feeder school for Builth as no decision has yet been made, however Ysgol y Bannau pupils have been encouraged to attend Builth Welsh stream with transition events put on, teachers from Builth come to Brecon to champion their school and it is listed in the council's Admissions Book as a feeder school for Builth Wells</p>	
<b>2. ISSUES RELATING TO IMPACT ON THE BRECON AREA</b>		
<b>2.1 Impact on Ysgol y Bannau</b>		
2.1.1	<p>Concern about detrimental impact on the viability of / numbers at Ysgol y Bannau</p> <p>Concern about future impact on Ysgol y Bannau – the provision at the school will be compromised due to a negative impact on pupil numbers which will lead to multi-year group classes, reducing income, staff reductions and staff instability, which will lead to a long term reduction in the number of</p>	<p>The authority acknowledges that the proposal could have a negative impact on Ysgol y Bannau in the short term, and in the consultation document in respect of this proposal, the authority identified the risk that '<i>Pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon</i>'. The authority also outlined risk management measures in relation to this risk.</p> <p>However, whilst Welsh-medium pupil numbers in other parts of Powys have grown over recent years, this hasn't been the case at Ysgol y Bannau.</p> <p>There has been dissatisfaction with the Welsh-medium secondary provision available in Brecon for many years, since long before the authority mentioned the possibility that the Welsh-medium stream could close, which has resulted in a number of parents choosing for their children to attend alternative provision, instead of transferring to the Welsh-medium</p>

	<p>parents who may wish their child to be educated through the medium of Welsh</p> <p>Ysgol y Bannau numbers have reduced in the last 2 years, can only be as a direct result of the threat of closure of the Welsh stream</p> <p>Pupil numbers at Ysgol y Bannau are healthy, but they will now be subject to negative impact from the decision to close the provision at Brecon High</p> <p>If the proposal is implemented, only the Welsh speaking families will be left in Ysgol y Bannau, where at the moment 2/3 of children there have no Welsh at home</p> <p>The council needs to accept that they will be responsible for the decline in numbers in Ysgol y Bannau and the Welsh language in the Brecon area</p>	<p>stream at Brecon High School. The authority's view is that this uncertainty in relation to secondary progression has contributed to the lack of growth of Ysgol y Bannau.</p> <p>The authority's view is that closure of the Welsh-medium stream at Brecon High School would provide greater clarity in terms of the Welsh-medium provision available in the secondary sector. This would enable the authority to work with other organisations such as Mudiad Meithrin and Menter Brycheiniog a Maesyfed to promote the benefits of bilingualism and Welsh-medium education, with the aim that any reduction in pupil numbers could be reversed in the longer term, with the potential that they could increase.</p>
2.1.2	<p>The proposal would have a detrimental impact on the link between Ysgol y Bannau and Brecon High School and would isolate the school within the community</p>	<p>Ysgol y Bannau currently operates in isolation to some extent, this was one of the reasons why Clwstwr y Ffynnon was established, to strengthen links between Ysgol y Bannau and other Welsh-medium providers in south Powys.</p> <p>Should the proposal be implemented, Ysgol y Bannau would become a feeder school for Builth Wells High School, which would result in strengthened links with that school and other schools which feed the school's Welsh-medium stream.</p>



	Without the Welsh stream in Brecon High, Ysgol y Bannau would operate in isolation	
2.1.3	Ysgol y Bannau is directly opposite Brecon High School and is the most sensible option to provide a continuation of our learners' education on the Brecon High School site	Ysgol Dafydd Llwyd in Newtown has grown significantly in recent years despite there being no Welsh-medium secondary provision located in the town. Due to the growth in numbers at Ysgol Dafydd Llwyd, the council has recently invested in a new building for the school, which allows for further growth. The new school is located next door to Newtown High School, an English-medium secondary school.
2.1.4	PCC produced an impact assessment which stated no foreseeable issues that would affect Ysgol y Bannau	On page 17 of the consultation document issued in respect of this proposal, the authority identified a risk that <i>'pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon'</i> .
2.1.5	Reference to Y Gorlan, after school club in Ysgol y Bannau, employs Welsh speaking 6 <sup>th</sup> form students from Brecon High School. Implementation of the proposal would have a huge impact on Y Gorlan as children from Builth would not be back in time to work there, and they would struggle to find people to work these odd hours, 3.30 – 5.30	The authority notes this comment.
2.1.6	Consultation report acknowledges that numbers in Ysgol y Bannau will initially decrease because of the decision to close the provision at BHS, how long will it be before the Portfolio Holder decides that ysgol y Bannau does not have	The authority is not planning to close Ysgol y Bannau, or to change the provision from a Welsh-medium school to a Welsh-medium stream.  The authority is committed to Ysgol y Bannau as a provider of Welsh-medium education in Brecon, and would hope that the improved clarity with regard to secondary progression would lead to an increase in pupil numbers at the school in the long term.

	critical mass and suggests that Ysgol y Bannau reverts to a stream or, worse, we have to put our 5 year olds on buses to a 3-18 provision at Builth? These are very real fears that PCC has neglected to deal with	The authority's draft WESP for 2017-20 states the authority's aim to increase the number of Welsh-medium pupils in Powys, and Ysgol y Bannau will be a key partner for the authority in this work.
2.1.7	Ysgol y Bannau was making progress in terms of pupil numbers, however this has been ignored as the Portfolio Holder insists that numbers were not increasing but neither were they falling.	Factual information showing the number of pupils attending Ysgol y Bannau since 2010/11 were provided on page 12 of the consultation document in respect of this proposal. This information shows that the total number of pupils attending Ysgol y Bannau between 2010/11 and 2015/16 has remained fairly static during this period.
2.1.8	<p>Ysgol y Bannau is now facing a situation where families are re-thinking their commitment to Welsh-medium education because they know that the secondary provision will be in Builth.</p> <p>Current demographic at Ysgol y Bannau is non-Welsh speaking parents, therefore continuity and support of a local Welsh-medium secondary school is key to their choice of secondary school</p> <p>It's not the case that you will get a critical mass in Builth – parents are saying they won't send their children to Builth, they will go to the English stream in Brecon</p>	<p>The authority notes this concern, and acknowledges that any school reorganisation proposal leads to a period of uncertainty for those affected by the proposal.</p> <p>The authority has acknowledged the risk in relation to pupil numbers at Ysgol y Bannau should the proposal be implemented on page 17 of the consultation document. The authority has also included risk management measures, which include working with other organisations to promote the benefits of Welsh-medium education.</p> <p>Whilst the authority acknowledges this risk, the authority is committed to Ysgol y Bannau as a provider of Welsh-medium education in Brecon, and would hope that the improved clarity with regard to secondary progression would lead to an increase in pupil numbers at the school in the long term.</p>

2.1.9	<p>Concern about lack of follow through for pupils who attend Ysgol y Bannau – would be grateful to learn what planning the council has undertaken to ensure that the success of Ysgol y Bannau will not be affected by the proposal</p>	<p>The council has not undertaken any planning yet, as this would be pre-determining the decision of Cabinet.</p> <p>However, if the proposal is supported, the authority would expect a strong partnership to be formed between Ysgol y Bannau and Builth Wells High School / the New Mid Powys Secondary School, and with Mudiad Meithrin. The authority would support this partnership and assist in raising the profile of Welsh-medium education in the area, for example by ensuring that information about opportunities to access Welsh-medium education is provided to parents/prospective parents, and by facilitating events to raise awareness of Welsh-medium education.</p>
2.1.10	<p>What assessment has been carried out to determine the effect the proposal will have on parental demand for Welsh-medium education in the Brecon area and pupil numbers at Ysgol y Bannau?</p>	<p>The authority has acknowledged on numerous occasions throughout the process that there may be a risk to pupil numbers at Ysgol y Bannau in the short term. In particular, this risk is identified on page 17 of the consultation document issued in respect of this proposal, and risk management measures are also identified in order to mitigate this risk.</p> <p>No formal assessment has taken place to determine the impact on parental demand for Welsh-medium education and pupil numbers at Ysgol y Bannau, however the issue was raised as a concern during the consultation and was therefore included in the consultation report and considered by Cabinet at their meeting on the 14<sup>th</sup> March 2017.</p>
2.1.11	<p>Parents who are not Welsh speakers have made a huge commitment by putting their children in Welsh medium education</p> <p>Parents who are not Welsh speakers supported the Welsh Government's vision to increase the number of Welsh speakers in Wales by enrolling their children in Ysgol y Bannau, in anticipation that they would continue their Welsh in the Welsh stream at Brecon High</p>	<p>The authority is committed to providing access to Welsh-medium primary and secondary education to all pupils that request it and recognises that in an ideal world, Welsh-medium provision would be available to all pupils in their local school. However, the authority's view is that the small number of pupils currently accessing Welsh-medium provision at Brecon High School and the limited number of subjects currently provided means that this is not appropriate provision for Welsh-medium pupils.</p> <p>Should the proposal be implemented, the authority would continue to provide access to Welsh-medium secondary provision through the provision of home to school transport to the nearest alternative provider, however it is acknowledged that there would be implications to this. Should the proposal be implemented, the authority accepts that pupils and their parents would need to make difficult decisions with regard to pupils' future education, and that in some cases, this could result in pupils leaving Welsh-medium education and transferring to English-medium provision locally.</p>

	<p>School</p> <p>Parents would not have put their children in Ysgol y Bannau if they had known that there would be no Welsh-medium secondary provision in Brecon</p> <p>Parents chose Ysgol y Bannau for their children in the belief that they would be able to continue to access Welsh-medium education at Brecon High School</p> <p>Many families are now reconsidering their decision to start their children in Welsh-medium education if they will not be able to continue it locally into secondary age education</p>	
<p><b>2. 2 Impact on availability of/access to Welsh-medium education in the Brecon area</b></p>		
<p><b>2.2.1 Access to secondary Welsh-medium provision in Brecon</b></p>		
<p>2.2.1.1</p>	<p>Most parents in the Brecon area wanting Welsh-medium education for their children wish to access it locally.</p> <p>Welsh speakers in Wales should have a right to access Welsh-medium education locally.</p> <p>If the proposal is implemented,</p>	<p>The authority agrees that in an ideal world, pupils would be able to access Welsh-medium primary and secondary provision at their local school. However the current provision at Brecon High School does not offer comprehensive provision for pupils. In addition, the current arrangement of providing access to Welsh-medium secondary provision in Brecon has not led to any significant increase in Welsh-medium pupil numbers in the area over recent years.</p> <p>The authority agrees that as many people as possible should have access to Welsh-medium education, and is committed to providing access to Welsh-medium education to all that request it. Should the proposal be implemented, the authority would continue to provide</p>

	<p>Welsh speakers in Brecon will have less choice than other sections of the community</p> <p>Children deserve the opportunity to be taught in their native language without having to travel miles to obtain it</p> <p>Decision will deny our children the opportunity to continue their education in Welsh in their local school</p> <p>Welsh-medium education should be available in the community</p> <p>Every child should have access to Welsh-medium education</p> <p>Parents and families want their children to continue their education at Brecon High School and this should be supported</p> <p>No real or practical option for children or parents to attend a local Welsh or English medium school</p> <p>Removal of the Welsh stream from Brecon will give less children access to Welsh-medium education, and will not improve choice</p>	<p>access to Welsh-medium secondary provision through the provision of home to school transport to the nearest alternative provider, however it is acknowledged that there would be implications to this.</p> <p>The authority's view is that the small number of pupils currently accessing Welsh-medium provision at Brecon High School and the limited number of subjects currently provided at the school means that this is not appropriate provision for Welsh-medium pupils.</p> <p>As stated in the Welsh Government's Welsh-medium Education Strategy, '<i>It is generally accepted that at least around 70% of curricular time should be through the medium of Welsh if learners are to acquire a sufficiently sound command of the language to enable them to use it across a broad range of contexts with confidence and fluency.</i>' The current provision in Brecon High School does not offer Welsh-medium provision for at least 70% of curricular time to pupils in any year group.</p>
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2.2.1.2	The Brecon Welsh stream is an advert for Welsh-medium education in the Brecon area	The current arrangement of providing access to Welsh-medium secondary provision in Brecon has not led to any significant increase in Welsh-medium pupil numbers in the area over recent years.
2.2.1.3	Given the size of the catchment area, pupils wishing to continue their education in Welsh may attend a different school other than Builth Wells High School, which will further separate pupils who live in the area	It is true that pupils in some parts of the catchment area currently served by the Welsh-medium stream at Brecon High School would live closer to alternative out-of-county providers of Welsh-medium education than Builth Wells High School / the new Mid Powys Secondary School – the statutory notice states that pupils <i>‘who live in the catchment area currently served by the Welsh-medium stream at Brecon High School would be able to attend their closest alternative secondary Welsh-medium provision – either Builth Wells High School / the Builth Wells site of the New Mid Powys Secondary School or their closest out-of-county provider’</i> .
2.2.1.4	A great shame that Brecon, the third largest town in Powys, would have no Welsh-medium secondary education	<p>The authority notes this comment, however this is similar to the situation in other large towns in Powys, such as Newtown, Welshpool, Llandrindod Wells and Ystradgynlais.</p> <p>The current arrangement of providing access to Welsh-medium secondary provision locally in Brecon has not led to any significant increase in Welsh-medium pupil numbers in the area over recent years.</p>
2.2.1.5	Having two Welsh streams means all children have access to Welsh-medium education	<p>The authority agrees that in an ideal world, pupils would be able to access Welsh-medium primary and secondary provision at their local school. However the current provision at Brecon High School does not offer comprehensive provision for pupils. In addition, the current arrangement of providing access to Welsh-medium secondary provision in Brecon has not led to any significant increase in Welsh-medium pupil numbers in the area over recent years.</p> <p>The authority’s view is that the number of pupils currently accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.</p>
2.2.1.6	Whilst some parents demand for a certain % of their child’s education	The authority notes this comment, however the authority has a duty to provide access to Welsh-medium education to those pupils that wish to access it. The authority’s view is that

	<p>to be in Welsh, many would be happy to have only half of their education in Welsh, and many believe this is a better model of education</p> <p>100% Welsh secondary education is not a wish for the majority of children from Ysgol y Bannau who are from English speaking families</p>	<p>the current Welsh-medium provision at Brecon High School is not providing an appropriate educational experience for pupils, due to the small number of pupils accessing this provision and the limited subject provision available for pupils.</p> <p>As stated in the Welsh Government's Welsh-medium Education Strategy, <i>'It is generally accepted that at least around 70% of curricular time should be through the medium of Welsh if learners are to acquire a sufficiently sound command of the language to enable them to use it across a broad range of contexts with confidence and fluency.'</i> The current provision in Brecon High School does not offer Welsh-medium provision for at least 70% of curricular time to pupils in any year group.</p> <p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a category 4 school, which is described as a 'Predominantly English Medium Secondary School'.</p> <p>The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: <i>'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'</i></p> <p>Whether or not to provide the opportunity for pupils who study Welsh First Language or any other subjects through the medium of Welsh would be a decision for the school. There are examples of 'Predominantly English Medium Secondary Schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p> <p>The authority's priority is to provide greater equality of opportunity for Welsh-medium pupils and to ensure that they are able to access a comprehensive Welsh-medium curriculum. The current provision at Brecon High School does not provide this opportunity.</p>
2.2.1.7	3.8.4 in consultation report – Has any survey been taken out to show any other choices of WM education available, closer to those parents	No, the authority has not carried out a survey to show other choices of Welsh-medium education available in the wider area. Information about Welsh-medium provision is provided to all parents in the authority's admissions booklet.

	who have to travel the long distances to Ysgol y Bannau?	
2.2.1.8	8.11 in consultation report – This shows that there are other children in the catchment area who would consider coming to Brecon for their education if the Welsh stream was still available, and raised to a suitable level	Issue 8.11 in the consultation report is as follows: <i>‘Many Welsh-medium pupils at Sennybridge School have already decided that they will be going to Ystalyfera, and have visited the school’</i> . This does not suggest that these pupils would consider coming to Brecon for their education if the Welsh stream was still available.
2.2.1.9	A report by PCC in 2014 identified that the largest percentage of respondents who would prefer a designated Welsh-medium school were those in the Brecon catchment area, so why is the council deciding to centralise and make a start for a Welsh-medium school in Builth?	<p>The report referred to was the result of a survey carried out by the authority to assess the demand for designated Welsh-medium secondary provision across Powys. The question asked to parents was whether they would prefer for their children to attend a designated Welsh-medium secondary school or a Welsh-medium stream in a dual stream school.</p> <p>The report identified that the largest percentage of respondents who would prefer a designated Welsh-medium school were those in the Brecon catchment. However that isn't the same as saying that the greatest demand for Welsh-medium secondary provision is in the Brecon catchment.</p> <p>This proposal is not about establishing a designated Welsh-medium school.</p>
<b>2.2.2 Access to primary Welsh-medium provision in Brecon</b>		
2.2.2.1	Ysgol y Bannau can be too big a step for some families as it is 100% Welsh, a stream would encourage more families into Welsh-medium education	As places remain available in Ysgol y Bannau, the authority currently has no plans to establish additional Welsh-medium primary provision in the catchment area.
2.2.2.2	Ysgol y Bannau is at the top of a hill which can put some families off choosing WM education, particularly if they don't have a car	The authority notes this comment, and accepts that the location of Ysgol y Bannau could be a barrier to accessing Welsh-medium education for some families.



2.2.2.3	Currently only one choice for WM education in the catchment	There are currently two providers of Welsh-medium primary provision in the Brecon catchment area – Ysgol y Bannau and Sennybridge C.P. School
<b>2.3 Impact on Brecon / the community</b>		
2.3.1	<p>Concern about cultural impact on Brecon</p> <p>Concern about the impact on Brecon's identity</p> <p>Brecon and the surrounding area will suffer almost immediately and for years to come</p> <p>Brecon will lose the Welsh language, the culture and traditions as a result of this decision</p> <p>Disagree with the council that the Brecon area community will not be affected by the proposal</p> <p>Brecon will lose its soul</p> <p>The Brecon area is being disadvantaged, the council is pushing more children out of the area</p>	<p>Consideration was given to the proposal's impact on the community of Brecon in the community impact assessment in respect of this proposal. An initial assessment was carried out before the start of the consultation period, and this assessment was updated following the consultation period to take account of the issues raised.</p> <p>In addition, the issues relating to the proposal's impact on the community were listed in the consultation report in relation to this proposal, along with the authority's response. The consultation report was considered by Cabinet when determining how to proceed in relation to the proposal.</p>
2.3.2	Fewer families will come and live in this area, which will stop our communities growing and thriving	The authority has an obligation to provide Welsh-medium primary and secondary education to all pupils who request it. For pupils living in some parts of Powys, this is achieved through the provision of free home to school transport to their nearest provider.

	<p>There will be nothing left to attract people to Brecon</p> <p>Fewer families would come and live in the area which would affect local clubs, schools, facilities and would stop our communities growing and thriving</p> <p>There will be less reasons for people to move to the area</p> <p>People who are going to Builth or Llandrindod High School will move closer to that school</p>	<p>Should the proposal be implemented, the authority would transport pupils to their nearest provider of secondary Welsh-medium provision, regardless of where they live. However, parents can decide to move house so that they live closer to Welsh-medium secondary provision if they desire.</p>
2.3.3	<p>Concern about impact on links with sporting clubs within Brecon</p> <p>Concern that pupils will become disenfranchised from their community and will not be developing as fully engaged, participating citizens</p> <p>Talybont tennis club will be directly affected by this closure and would struggle with its viability should the Welsh stream close</p> <p>Brecon Swimming Club has seen a fall in numbers due to the threat of closure as children have already gone to Builth</p>	<p>The authority acknowledges that should the proposal be implemented, pupils currently attending the Welsh-medium stream at Brecon High School may need to change their routine in order to adapt to the new arrangements. However, the school day at Builth Wells High School runs from 8.50 until 3.15, therefore it is expected that learners living in the Brecon area would arrive in Brecon at or around 4pm, therefore they would still be able to attend clubs and other activities in the community.</p> <p>Pupils who live in the Brecon area will continue to be able to play an active part in the community and will be able to develop as fully engaged, participating citizens.</p>

	Losing children is affecting the viability of Brecon Swimming Club and means that prices will have to increase for the members left	
2.3.4	Brecon has more opportunities than Builth – MOD, National Parks and general government jobs, but also good opportunities for people to be successfully self-employed. To be successfully self-employed in Brecon you need to have been to school locally	The authority agrees that there are more large organisations in Brecon than in Builth Wells, however the authority does not agree with the statement about self-employment.
<b>2.4 Concern about the impact on the Welsh language in the area</b>		
2.4.1	<p>Concern about the impact on the Welsh language and the number of Welsh speakers in the area</p> <p>Would reduce opportunities to develop the Welsh language for future generations in Brecon and the community</p> <p>Concern about impact on Welsh language activities in local communities</p> <p>Concern about the implications to the Welsh language in the area – the council, national park etc. will be unable to recruit Welsh speakers</p>	<p>The current method of delivering Welsh-medium education in the area has not led to any significant increase in the number of Welsh-medium pupils, therefore the authority’s view is that change is needed to the method of delivery in order to encourage confidence and the system and a growth in Welsh-medium pupil numbers.</p> <p>Further to this, there was a decrease of 1.7% in the number of Welsh speakers in Brecon between the 2001 census and the 2011 census, which suggests that the proportion of Welsh speakers in the area was declining before the authority commenced any proposals to close the Welsh-medium stream.</p> <p>Should the proposal be implemented, pupils in the Brecon area would continue to have access to Welsh-medium education, at Ysgol y Bannau and Sennybridge CP School in the primary sector, and at alternative providers such as Builth Wells High School / the new Mid Powys Secondary School and Ysgol Gyfun Ystalyfera in the secondary sector. The improved choice and linguistic experience for Welsh-medium pupils at these alternative providers would enable them to be even more confident Welsh speakers.</p> <p>These pupils would continue to live in the Brecon area even if they were receiving their</p>

	Concern that Brecon will lose all of its links with the Welsh language	education elsewhere, and they would still be able to contribute to the development of the Welsh language in the Brecon area.
2.4.2	<p>The Welsh language has been growing in the Brecon area over the last 10 years which has led to an increased interest in Welsh for Adults courses. However Powys' decision has led to a drop in numbers and courses not running</p> <p>Since the consultations there has been a reduction in the number of people attending Welsh for Adults classes</p> <p>There are more Welsh language organisations in the community in Brecon than there are in Builth, these organisations need Brecon to have Welsh children learning and living in Brecon</p>	The authority notes the concerns in relation to the future of Welsh for Adults provision and other Welsh language organisations in the Brecon area. However, the authority's priority is to provide greater equality of provision for Welsh-medium pupils. The authority's view is that the current provision in Brecon High School does not offer this.
2.4.3	The Brecon community is largely bilingual, with the majority of people having a grasp of the Welsh language even if they are not fluent	This statement is not supported by the most recent census information in relation to the Welsh language skills of the Brecon population. According to the 2011 census, 21.6% of the population of Brecon have one or more skills in Welsh. This was a decrease of 1.7% between the 2001 census and the 2011 census.
2.4.4	It's upsetting how the number of people fluent in Welsh is continuing to decrease – we should be doing whatever we can to keep the language alive	The authority is committed to the Welsh Government aspiration to increase the numbers of Welsh speakers. However, the current model of delivering Welsh-medium education in the Brecon area has not led to any significant increase in the number of pupils accessing Welsh-medium education in the area.

<b>2.5 Impact on pupils in Brecon</b>		
2.5.1	Pupils have suffered greatly as a result of the long consultation process	The authority acknowledges that any school reorganisation proposal causes uncertainty for those affected, and that the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School has had an impact on current Welsh-medium pupils in Brecon High School and the primary schools that feed the Welsh-medium stream. The authority is keen to conclude this process as quickly as possible in order to bring this period of uncertainty to an end.
2.5.2	Pupil welfare must be paramount when considering the location of WM education	<p>The welfare of pupils is a primary consideration in all school reorganisation proposals taken forward.</p> <p>However, the authority's view is that the current provision at Brecon High School is not providing an appropriate educational experience for pupils, and the aim of the proposal is to provide greater equality for Welsh-medium pupils compared with English-medium pupils. It is acknowledged that there are some disadvantages and risks associated with the proposal and these are outlined in the consultation document that was issued in respect of this proposal.</p> <p>In addition, the authority responded to a number of issues in relation to pupil well-being / welfare which were raised during the consultation period in the consultation report in respect of this proposal, which was taken into consideration by the council's Cabinet when determining whether or not to proceed with the proposal.</p> <p>It is acknowledged that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, and that in some cases, this could result in pupils leaving Welsh-medium education and transferring to English-medium provision locally.</p>
2.5.3	<p>Concern about the impact on pupils' Welsh language skills if they have to transfer to English-medium provision</p> <p>Concern that pupils Welsh</p>	<p>The authority notes these concerns, and identified on page 22 of the consultation document issued in respect of this proposal that implementation of the proposal could have a negative impact on pupils' Welsh language skills should they transfer to English-medium provision at Brecon High School instead of transferring to alternative Welsh-medium provision.</p> <p>The authority is committed to providing Welsh-medium education to all pupils who request it,</p>

	<p>language skills will deteriorate if they move from Welsh-medium primary to English-medium secondary</p> <p>Pupils will lose their Welsh if they stay in Brecon and transfer to English-medium provision</p> <p>Pupils will lose out if they are unable to study through the medium of Welsh at secondary level</p>	<p>and through this proposal, is proposing to achieve this by providing free transport to the nearest provider, either Builth Wells High School / the New Mid Powys Secondary School or an out-of-county provider. The authority's view is that the increased level of Welsh-medium provision available at these providers would have positive benefits in terms of the development of pupils' Welsh language skills. However, parents are entitled to choose for their children to transfer to English-medium provision locally if they prefer.</p> <p>As stated in the Welsh Government's Welsh-medium Education Strategy, '<i>It is generally accepted that at least around 70% of curricular time should be through the medium of Welsh if learners are to acquire a sufficiently sound command of the language to enable them to use it across a broad range of contexts with confidence and fluency.</i>' The current provision in Brecon High School does not offer Welsh-medium provision for at least 70% of curricular time to pupils in any year group.</p>
2.5.4	Concern about impact on the well-being of pupils who would be forced to leave Brecon for their secondary education	Should the proposal be implemented, pupils currently attending the Welsh-medium stream at Brecon High School would not be 'forced' to transfer to another school. Pupils and their parents would need to make difficult decisions with regard to pupils' future education, which would include whether to transfer to alternative Welsh-medium or to access English-medium provision at Brecon High School.
2.5.5	Concern about the impact on pupils in younger year groups who have to transfer to English-medium provision – they will be under a disadvantage as Welsh is their first language	<p>Should the proposal be implemented, the council would continue to provide access to Welsh-medium provision through the provision of home to school transport to alternative providers of Welsh-medium education. It is acknowledged that implementation of the proposal would have an impact in terms of the additional travel that would be required, and that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, taking the additional travel into consideration, and that some may decide to transfer to English-medium provision instead of transferring to Welsh-medium provision.</p> <p>Should the proposal be implemented, the authority recognises that there would be a period of transition for any pupil choosing to transfer to English-medium provision in Brecon High School instead of alternative Welsh-medium provision, however the authority does not agree that pupils transferring to study through medium of English would be under a disadvantage.</p>

		The number of subjects provided through the medium of Welsh at Brecon High School is currently small, and reduces as pupils move through the school. In particular, no Welsh-medium subjects are offered in the sixth form, therefore it is not uncommon at the school for pupils to move from studying a subject through the medium of Welsh to studying it through the medium of English. Due to the limited number of Welsh-medium subjects currently provided at Brecon High School, it is likely that Welsh-medium pupils at the school already study a number of subjects through the medium of English.
2.5.6	<p>Decision will be taken too close to the closure date</p> <p>Children are in turmoil not knowing where they will end up going to high school</p> <p>Children are being asked to pay deposits on trips that take place after the 31<sup>st</sup> August 2017, some feel unable to commit until a decision is made</p>	Due to the local elections that was held in May 2017, it was not possible to bring the objection report to cabinet before now. However, the proposal will be considered by the new Cabinet at the earliest opportunity, in order to provide clarity for all.
2.5.7	Concern that you will not offer any support or transition for children that will have to change to English-medium provision	If the proposal is implemented, the authority would expect the schools involved to provide support to all pupils.
2.5.8	Pupils cannot be expected to do Welsh 2 <sup>nd</sup> language if they change to English-medium provision – if they cannot do Welsh 1 <sup>st</sup> language they should do some kind of higher level Welsh, 2 <sup>nd</sup> language A level for example	<p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a 'Predominantly English Medium secondary school'</p> <p>The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: <i>'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'</i></p>

		<p>Whether or not to provide the opportunity for pupils who study Welsh First Language would be a decision for the school. There are examples of 'Predominantly English Medium secondary schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p> <p>The authority's priority is to provide greater equality for Welsh-medium pupils and to ensure that they are able to access a comprehensive Welsh-medium curriculum. The current provision at Brecon High School does not provide this opportunity.</p>
2.5.9	<p>Impact assessments have acknowledged that the closure will have a negative impact on the physical and mental wellbeing of pupils, any such negative impact can only lead to a limitation of the ability of pupils to fulfil their potential (especially those with socio-economic challenges to face), and it cannot be said that removing Welsh speakers from Brecon in any way promotes and protects the culture</p>	<p>Should the proposal be implemented, the authority would not be 'removing Welsh speakers from Brecon'. Welsh speakers and those educated through the medium of Welsh in the primary sector would still live in Brecon and the surrounding area, and could choose to either alternative Welsh-medium provision at other schools, or access English-medium provision locally in Brecon.</p> <p>It is true that the authority, in the impact assessment produced in relation to this proposal, acknowledged that <i>'implementation of the proposal would involve additional travel for Welsh-medium pupils, which could have a negative impact on their well-being'</i>. This was taken into consideration by the Cabinet when determining how to proceed in relation to the proposal.</p>
<b>3. ISSUES RELATING TO TRAVEL AND TRANSPORT</b>		
<b>3.1 Impact of additional travel on pupils education, health and wellbeing</b>		
3.1.1	<p>Concern about additional length of school day if pupils have to travel to Builth, which will be more tiring for pupils.</p> <p>Concern about travel times for students to other sites</p>	<p>The authority acknowledges that should the proposal be implemented, there would be additional travel for pupils in the catchment area currently served by the Welsh-medium stream at Brecon High School. This was identified on several occasions in the consultation document in respect of this proposal, and the authority responded to this issue in the consultation report in respect of the proposal.</p> <p>As stated in the consultation document <i>'The council's view is that the current and proposed transport arrangements...are suitable'</i>. Further to this, the consultation document states that</p>




<p>Concern about additional travel of 1.5 – 2 hours a day</p> <p>Concern about wasted hours travelling to alternative provision</p> <p>Closure would leave some students with a 52 mile round trip on each school day – 1 hour 10 minutes in each direction – would be difficult for any child to cope with these travel times whilst also participating in school and family life</p> <p>Concern that the additional travel will impact on the time available for pupils to do homework</p> <p>Unfair that pupils will have to travel further to school</p> <p>Children will have to travel unacceptable distances to Builth and Ystalyfera</p> <p>Would be too far for pupils to travel to Builth Wells or Ystalyfera every day to continue to access Welsh-medium education</p> <p>Concern about pupils having to travel 17 miles to speak Welsh</p> <p>PCC has not satisfied the case</p>	<p><i>'The Learner Travel (Wales) Measure 2008 does not specify a time limit for journeys. However, local authorities are required to assess the individual needs of learners when considering if a journey time is reasonable. The old Learner Travel Operational Guidance April 2009 stated that Welsh Ministers considered that normal journey times should be no more than 60 minutes for secondary school aged pupils. This is reflected in the council's proposed new School Transport Policy.'</i></p> <p>The statutory notice in respect of this proposal which was published on the 23<sup>rd</sup> March 2017 acknowledges that should there be no Welsh-medium provision at Brecon High School, some pupils in the catchment area would live closer to alternative out-of-county providers of Welsh-medium education than Builth Wells High School / the new Mid Powys Secondary School – the notice states that pupils <i>'who live in the catchment area currently served by the Welsh-medium stream at Brecon High School would be able to attend their closest alternative secondary Welsh-medium provision – either Builth Wells High School / the Builth Wells site of the New Mid Powys Secondary School or their closest out-of-county provider'</i>. In the case of pupils living in the Sennybridge area, their nearest provider would be Ysgol Gyfun Ystalyfera not Builth Wells High School / the New Mid Powys Secondary School, and pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School may live closer to Ysgol Gyfun Gwynllyw or Ysgol Gyfun Rhydywaun. Providing access to these alternative providers would reduce journey times / distances for these pupils.</p>
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	<p>enough that pupils will be travelling less than 2 hours a day</p> <p>Decision does not concur with the authority's School Transport Policy which indicates pupils should not have to travel more than 45 minutes</p> <p>In the consultation report, less activity time, less homework time and additional tiredness are described as 'difficult' but necessary to ensure parity of provision that cannot really be achieved. Too little weight has been given to such vitally important considerations</p>	
3.1.2	<p>Travelling time to alternative provision is totally unrealistic from Talybont</p>	<p>The authority notes the comments in respect of the likely distance / travel time from Talybont.</p> <p>The statutory notice in respect of this proposal which was published on the 23<sup>rd</sup> March 2017 acknowledges that some pupils in the catchment area would live closer to alternative out-of-county providers of Welsh-medium education than Builth Wells High School / the new Mid Powys Secondary School – the notice states that pupils <i>'who live in the catchment area currently served by the Welsh-medium stream at Brecon High School would be able to attend their closest alternative secondary Welsh-medium provision – either Builth Wells High School / the Builth Wells site of the New Mid Powys Secondary School or their closest out-of-county provider'</i>.</p> <p>In the case of pupils living in Talybont, Ysgol Gyfun Gwynllyw would be their nearest provider of Welsh-medium secondary education. Providing access to this school would reduce the journey time / distance for pupils living in Talybont.</p>

3.1.3	<p>Secondary provision offered at Builth Wells will rely on parents who are willing for their child to travel this distance</p> <p>Concern about the impact of additional travel, as many families live to the south east of the town</p> <p>Builth will always be further away than pupils want to travel</p>	<p>The authority notes this concern. The authority has acknowledged that should the proposal be implemented, there would additional travel for pupils living in the catchment area currently served by the Welsh-medium stream at Brecon High School. The authority has also acknowledged the impact implementation of the proposal would have on parents / family life due to the additional travel for Welsh-medium pupils. Should the proposal be implemented, the authority acknowledges that pupils and their parents would need to make difficult decisions with regard to pupils' future education.</p> <p>However the number of pupils currently attending the Welsh-medium stream in Brecon High School is very small, which makes the provision unviable, and the authority's view is that this is not providing an appropriate educational experience for learners.</p> <p>Whilst the authority acknowledges that implementation of the proposal would lead to an increase in travel time for affected pupils, a number of pupils had already transferred to the provision at Builth Wells before the commencement of this consultation.</p>
3.1.4	<p>With the emphasis on health and well-being for children, the additional travel and the impact this would have on pupils does not bode well for the future.</p> <p>Concern about the impact of travelling 20 miles or more each way on pupils' health and well-being</p> <p>Concern about the impact of additional travel on pupil welfare</p> <p>Concern about the impact on pupils' health and well-being of having to travel over 2 hours a day</p>	<p>The authority notes this concern in relation to the impact of additional travel on pupils, and acknowledges that should the proposal be implemented, additional travel would be required for pupils in the Brecon area.</p> <p>The possibility that '<i>additional travel has an adverse impact on pupil well-being and attainment</i>' was identified as a risk on page 17 of the consultation document, and the authority responded to this issue in the consultation report published in respect of the proposal, which was considered by Cabinet when determining whether or not to proceed with the proposal.</p>

	The additional travel will have a negative impact on pupils' ability to learn	
3.1.5	Children only travel for something which is tangibly better	The current Welsh-medium provision at Brecon High School is very limited. The breadth of Welsh-medium provision offered at Builth Wells High School and the other schools pupils may transfer to is greater. In addition, Welsh-medium pupils would be part of a larger cohort of Welsh-medium pupils at the alternative providers.
3.1.6	Concern about children that suffer with travel sickness	The authority currently transports in excess of 5000 pupils on a daily basis, some of whom would suffer from travel sickness to varying degrees.
3.1.7	Concern about the impact on the council's carbon footprint due to the additional travel	The authority acknowledges that additional travel would have an environmental impact. However, following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. Should the proposal be implemented, the additional transport that would be required would be minimal.
3.1.8	Centralising provision in a rural county which will involve 11 year olds travelling 50 miles a day when similar provision could be made at the local high school is not the solution	The authority's view is that the number of pupils currently accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore whilst acknowledging the challenges associated with providing access to services in a rural county such as Powys, the authority's view is that continuing to provide two secondary Welsh-medium streams in mid and south Powys is not viable.
3.1.9	Pupils will be forced out of Welsh-medium education if the Brecon stream closes as they would have to travel over 2 hours a day to their nearest provision	Should the proposal be implemented, the authority would continue to provide access to Welsh-medium secondary provision through the provision of home to school transport to the nearest alternative provider, however it is acknowledged that additional travel would be required. Should the proposal be implemented, the authority accepts that pupils and their parents would need to make difficult decisions with regard to pupils' future education, and that in some cases, this could result in pupils choosing to leave Welsh-medium education and transfer to English-medium provision locally.
3.1.10	The document doesn't include journey times to Builth from the	As Ysgol y Bannau serves the catchment areas of Brecon, Gwernyfed and Crickhowell, it is the authority's expectation that some of the pupils would choose to transfer to closer schools

	many different rural locations where all the Ysgol y Bannau children live	in other authorities rather than Builth Wells High School. However it is the authority's expectation that the travel times required would be within the 1 hour maximum travel time to and from school for the vast majority of pupils currently attending Ysgol y Bannau.
3.1.11	<p>Have ascertained the distances pupils travel to schools in Powys using AA auto route – these are set out in the following table:</p> <p> Travel distances table.docx</p> <p>The distance between Ysgol Dafydd Llwyd and Llanfair Caereinion is 9.8 miles, which is significantly less distance than Brecon to Builth Wells. This shows that the comparator is inappropriate as Brecon pupils are travelling twice as far.</p> <p>Don't see how the council can compare the situation of Ysgol y Bannau and Builth Wells High School to that of Ysgol Dafydd Llwyd and Ysgol Uwchradd Caereinion:</p> <p>YDLI to Caereinion – 11.9 miles YyB to Builth – 20.5 miles Our home to Builth – 26 miles</p> <p>Response to parents' concerns</p>	<p>The authority's view is that these two situations can be compared. Whilst it is true that the mileage between Ysgol y Bannau and Builth Wells High School is greater than the mileage between Ysgol Dafydd Llwyd and Caereinion High School, the road between Brecon and Builth Wells is much better, therefore it is likely that the difference in terms of travel time would not be as great.</p> <p>The distance between Ysgol Dafydd Llwyd and Caereinion High School is greater than 9.8 miles. Based on the shortest journey between the two schools, the distance is approximately 12 miles. It is acknowledged that this is further than the distance from Brecon to Builth Wells, however as explained above, the road between Brecon and Builth Wells is much better, therefore it is likely that the difference in terms of travel time would not be as great.</p>

	<p>about transport has been to state that other pupils in Powys travel to school such as those to attend primary school in Welshpool and Llanfair Caereinion and from the surrounding streams to BWHS – this is used as evidence that people will continue to be willing to travel to Welsh-medium provision no matter where it is. However the distance between Ysgol John Beddoes and Llanfair Caereinion is 9.8 miles which is significantly less distance than Brecon to Builth Wells – the comparator is inappropriate as Brecon pupils are travelling twice as far.</p>	
3.1.12	<p>Pupils are travelling over 30 minutes to get to Brecon before embarking on their journey to Builth</p> <p>PCC is asking Brecon pupils to travel further than any other pupils in Powys</p>	<p>The authority's Home-to-School transport policy states that secondary school pupils should not normally travel more than an hour to school, and whilst most pupils in Powys get to school comfortably within an hour, the authority recognises that, due to the rural and sparse nature of the county, there are some pupils who take longer than an hour to reach their chosen school.</p> <p>It is likely that some pupils living in the current catchment area of Brecon High School's Welsh-medium stream would live closer to alternative out of county providers of Welsh-medium secondary education. Should the proposal be implemented, the authority would provide transport to enable pupils to access either Builth Wells High School / the New Mid Powys Secondary School or their nearest out of county provider. This would limit the travel time for pupils.</p>
3.1.13	<p>Boys seem to be less likely to choose to travel to Builth, and boys that had transferred to Builth are now leaving</p>	<p>The authority does not have any evidence to suggest that boys seem less likely to choose to travel to Builth Wells.</p>

3.1.14	Will the council be providing transport for pupils living on the outskirts of Builth to Ysgol y Bannau to access a Welsh-medium school, as the precedent has been set in terms of providing transport to schools which offer more Welsh-medium provision?	The current home to school transport policy does not differentiate between a Welsh-medium primary school and a primary school delivering the full curriculum through the medium of Welsh in a dual stream school such as Builth Wells CP School.
<b>3.2 Access to extra-curricular activities will be restricted</b>		
3.2.1	<p>Concern about ability to access after school clubs / play for school teams.</p> <p>Pupils will be unable to access extra-curricular activities, which will impact on their ability to socialise</p> <p>Concern that the additional travel will prevent children taking advantage of after school activities</p> <p>Pupils will have to choose between Welsh-medium education or extra-curricular activities</p> <p>Children will have to choose between continuing Welsh-medium education or being part of Brecon swimming club due to the timing of the training sessions</p>	The authority acknowledges that implementation of the proposal would impact on the ability of pupils to attend extra-curricular activities / activities that take place after school. This is identified on page 22 of the consultation document issued in respect of this proposal. Issues relating to access to extra-curricular activities were also addressed in the consultation report in respect of this proposal, which was considered by Cabinet when determining whether or not to proceed with the proposal.
3.2.2	The council does not give a	As stated in the Consultation Document and in the impact assessments, there could be a

	<p>solution to the issue of access to extra-curricular activities, other than that it is an issue for Builth High School and parents to sort out between themselves</p> <p>Builth have said that they are doing all they can in relation to travel and that Ysgol y Bannau pupils aren't the only pupils that travel to their school, so they can't give them any extra help. There isn't a solution to this problem that could be achieved without the council spending money. After the consultation I do not believe the council will work with and support YyB children to ensure they are not disadvantaged</p> <p>1.2.10 of consultation report – a much deeper investigation needs to be launched to take any disadvantageous effects of the decision into account</p>	<p>negative impact on pupils who will not be able to access after-school activity due to reliance on transport arrangements. The authority recognises that this is an issue that concerns a number of parents and is committed to finding a solution with Builth Wells High School and the new Mid Powys Secondary School, should the proposal be implemented.</p>
3.2.3	<p>No Welsh-medium stream in Brecon High School means that pupils would miss out on opportunities to take part in the Urdd</p>	<p>All schools can take part in Urdd activities, regardless of their language medium, therefore it is not true that implementation of the proposal would mean that pupils would be unable to take part in Urdd activities.</p> <p>Whether or not to take part in Urdd activities at a school level would be a matter for the school. However, even if the school decided not to participate in Urdd activities, pupils would still be able to take part as individual members of the Urdd.</p>
3.2.4	<p>Can the council explain how they will ensure that children who want</p>	<p>The authority notes this comment. As stated in the consultation report published in respect of this proposal, the possibility that activities could take place during lunchtime was one</p>



	<p>to be part of the drama production in Builth High School which required children to stay on at school every night for three weeks would be accommodated, and how children will be accommodated to stay on and do any other extra-curricular activities they choose to do – if you are unable to do this Welsh-medium children will be treated unequally to English-medium children who can easily access all extra-curricular activities at no or low cost to their families – no solution has been given to this specific circumstance Offering extra curriculum activities at lunchtime is not an adequate solution</p>	<p>suggestion offered in the consultation document to mitigate the proposal's impact on the ability of pupils to attend after school activities.</p> <p>The catchment area for Welsh-medium in Builth Wells already covers both the Builth and Llandrindod catchment areas and some existing pupils live significant distances away from the school in the Upper Ithon Valley. Access to extra-curricular activities for those on school transport has been facilitated by the use of parental transport. This is a common issue for schools that serve large catchment areas.</p>
3.2.5	<p>The Portfolio Holder has acknowledged that the distance between home and school will have a detrimental effect on pupils from less well-off families who are likely to be unable to travel to the alternative schools outside school hours and who will therefore have to rely solely on the PCC transport provided. In my view, the Portfolio Holder and by extension, the Cabinet, have failed to give sufficient weight to this argument. It is abundantly clear that the less well-off pupils will be less able to</p>	<p>This point was included in the Consultation Report and in the accompanying impact assessment that was considered by Cabinet on the 14<sup>th</sup> March.</p> <p>The impact assessment states: <i>'However, concern has been expressed that implementation of the proposal would mean that it would be more difficult for pupils from lower income backgrounds to access Welsh-medium education due to the additional travel that would be required of parents in order to attend activities at the school, or to collect pupils from after school activities'</i>.</p>

	access extra-curricular activities without transport and it is not good enough simply to shrug it off as an acceptable consequence; it is not an acceptable consequence. The distance created by this decision will have a detrimental effect on the well-being of these children and their families.	
3.2.6	The consultation report acknowledges that children will have to make a choice between accessing extra-curricular activities (including academic revision groups) and travelling for their Welsh-medium education. Had the Portfolio Holder and Cabinet given sufficient weight to this argument, and properly considered the impact on pupils, they could not have come to the conclusion that closing the provision in BHS is in their best interests.	<p>The consultation report in relation to this proposal, which lists the issues raised during the consultation period and the authority's response to those issues, was taken into consideration by the Cabinet at the meeting on the 14<sup>th</sup> March when determining how to proceed in relation to this proposal. This report lists a large number of issues relating to the impact of additional travel.</p> <p>In respect of consultation reports, the School Organisation Code states that authorities must publish a consultation report:</p> <ul style="list-style-type: none"> <li>• <i>'Summarising each of the issues raised by consultees;</i></li> <li>• <i>Responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons, and</i></li> <li>• <i>Setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal'</i></li> </ul> <p>There is no requirement for authorities to provide a weighting to the issues raised.</p>
3.2.7	<p>Working parents will be unable to cope with additional distance required to collect children from after-school activities</p> <p>Parents will be unable to commit to the extra travel to Builth Wells</p>	<p>The authority acknowledges that transferring to Builth Wells High School / the New Mid Powys Secondary School would have an impact on parents due to the additional travel that would be required to attend activities at the school and to collect pupils from after-school activities.</p> <p>However a significant proportion of pupils that previously attended the Welsh-medium stream at Brecon High School had already decided to transfer their children to Builth Wells High School prior to the commencement of this consultation period. As a result, the number</p>

	<p>Parents of children in Builth are having to travel to Builth and back a couple of times a week, are struggling with having their children in schools 20 miles apart from each other and how long the travelling time actually is for individual pupils</p> <p>Parents of pupils from the Brecon catchment attending BWHS are constantly having to pick them up from school e.g. when involved in school production, rugby, Urdd youth club provision. Causing strain on the family.</p> <p>Parents cannot be expected to travel 40 miles to pick their children up from after school activities.</p>	<p>of pupils currently attending the Welsh-medium stream in Brecon High School is very small, and the authority's view is that this is not providing an appropriate educational experience for learners.</p>
3.2.8	<p>Cannot afford for our children to go to Builth due to the extra fuel we would need for 1 or 2 extra 60 mile journeys</p> <p>PCC has offered no support to low income families to ensure their children will not be disadvantaged</p> <p>There is no assistance from PCC to lessen the impact on families</p>	<p>The authority recognises this issue. In the equality impact assessment produced in respect of this proposal, the authority identified that should the proposal be implemented, '<i>Some people on low incomes will be affected. Whilst free home to school transport would be provided to alternative provision, it is likely that the greater distance to travel to the school for other activities would have a greater impact on people on low incomes</i>'.</p> <p>However, the authority would not be able to provide any additional support to low income families.</p>
<b>3.3 Transport appeal 2015</b>		
3.3.1	Decision to grant free transport to	The provision of transport to Builth Wells was provided to families following a successful

	<p>Builth Wells during the initial consultation period had a negative impact on Brecon High School – this was a deliberate political decision on the part of the Cabinet member for Education</p> <p>There were 67 pupils in the stream before the threat of closure started and before free transport was put on for the Builth Welsh stream</p> <p>Granting free transport to Builth has had a negative impact on pupil numbers</p>	<p>transport appeal on the grounds that the breadth of the provision offered in Brecon was significantly below the breath of the provision offered at Builth.</p> <p>The applications for transport were initially refused at Stage 1 and 2, however the applications were taken to appeal and the appeal panel took the decision to award transport, due to the enhanced level of Welsh-medium provision provided at Builth Wells High School.</p> <p>The council recognises that the provision of funded transport to Builth has had an impact on the pupil numbers in the Welsh Stream at Brecon, however it is not true that the decision to grant free transport was ‘a deliberate political decision on the part of the Cabinet member for Education’.</p>
3.3.2	3.2.2 of consultation report states no minutes were taken of the transport appeal meeting – why were no minutes taken of this pivotal decision?	As stated in the authority’s response to 3.2.2, <i>‘No formal minutes are taken of transport appeals, however those appealing are informed in writing of the decision.’</i>
3.3.3	Ref to point 3.1.7 of consultation report – Why would the authority continue to provide transport if Brecon High School became a category 2B school? If the breadth of provision is no greater in Builth then transport is no longer required to be supplied. If only to take pupils away from Brecon this is unacceptable, if to minimise disruption to those pupils then the pupils currently in Brecon Welsh stream should continue to be	As stated in 3.1.7 of the consultation report, if Brecon High School became a category 2B school from September 2017, the authority would not provide transport for new pupils, however it would continue to meet the transport costs for pupils currently being transported to alternative provision until they had completed their studies.

	provided with Welsh medium education	
3.3.4	How can the person proposing the consultation be the person deciding on providing free transport and also the person who can vote the proposal through? That person is not independent of the consultation	<p>The Council's Schools Reorganisation Policy 2015 clearly states the responsibility of the Portfolio Holder for Education in bringing proposals forward to Cabinet in the first instance. On September 27<sup>th</sup> 2016, Cllr Arwel Jones put forward to Cabinet recommendations relating to Brecon and Gwernyfed High Schools. One of these was to re-consult on a proposal to close the Welsh stream at Brecon. Cabinet approved this recommendation. Cabinet again approved Cllr Arwel Jones' recommendation following consultation to publish statutory notices for the closure of the stream. Cabinet will be making the final decision following the objection period.</p> <p>The Portfolio Holder for Education has a statutory responsibility to determine transport appeals. The appeals process is clearly defined and is independent of any school reorganisation process.</p>
3.3.5	Has the council ever published anything official to say that the buses that were put on for pupils to go to Builth does not mean that Powys had decided to close the Welsh stream?	<p>The authority has not 'published anything official to say that the buses that were put on for pupils to go to Builth does not mean that Powys has decided to close the Welsh stream'. However, all communications provided by the council in relation to this issue have explained that this is a 'proposal' and that a statutory process is underway.</p>
3.3.6	The reason the provision in Builth is superior in terms of the number of subjects and the pupils participating is because the council agreed to provide free transport – this decision did not give the two schools a level playing field to develop their provision	<p>Whilst it is true that the provision of free transport to Builth Wells has led to an increase in the number of pupils accessing the Welsh-medium stream at Builth Wells High School, it is not true that the number of Welsh-medium subjects provided at the school is greater than the number provided at Brecon High School because the council agreed to provide free transport.</p> <p>The provision of transport to Builth Wells was provided to families following a successful transport appeal on the grounds that the breadth of the provision offered in Brecon was significantly below the breadth of the provision offered at Builth – therefore the level of Welsh-medium provision at Builth Wells High School was greater than the level of provision at Brecon High School before the decision was made to award transport.</p>

		The applications for transport were initially refused at Stage 1 and 2, however the applications were taken to appeal and the appeal panel took the decision to award transport, due to the enhanced level of Welsh-medium provision provided at Builth Wells High School.																																																								
<b>4. ISSUES RELATING TO PUPIL NUMBERS</b>																																																										
<b>4.1 Impact of previous consultations on Welsh-medium pupil numbers at Brecon High School</b>																																																										
4.1.1	<p>It is stated in the report that there were 67 pupils in the stream in 2010/11 and then 19 in 2016/17. Nowhere does it set out the number of pupils in the stream in 2015 when the first consultation was announced or how that number would have been increase had the 9 additional Ysgol y Bannau pupils not transferred to BWHS before the September intake. No figure available for the number of Sennybridge pupils that had intended to come to Brecon High School before the consultation was announced. Presumably these figures were omitted because they would demonstrate that there was parity in numbers between Brecon High School and Builth Wells High School, and would remove the portfolio holder's ability to use low numbers as a reason for his recommendation.</p>	<p>Historical information about the number of pupils attending the Welsh-medium stream at Brecon High School was provided on page 11 of the consultation document issued in respect of this proposal. The information provided was as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Year 7</th> <th>Year 8</th> <th>Year 9</th> <th>Year 10</th> <th>Year 11</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2010/11</td> <td>12</td> <td>17</td> <td>14</td> <td>12</td> <td>12</td> <td>67</td> </tr> <tr> <td>2011/12</td> <td>6</td> <td>11</td> <td>19</td> <td>14</td> <td>17</td> <td>67</td> </tr> <tr> <td>2012/13</td> <td>10</td> <td>7</td> <td>13</td> <td>18</td> <td>15</td> <td>63</td> </tr> <tr> <td>2013/14</td> <td>19</td> <td>10</td> <td>8</td> <td>13</td> <td>13</td> <td>63</td> </tr> <tr> <td>2014/15</td> <td>14</td> <td>13</td> <td>9</td> <td>8</td> <td>13</td> <td>57</td> </tr> <tr> <td>2015/16</td> <td>3</td> <td>7</td> <td>4</td> <td>8</td> <td>8</td> <td>30</td> </tr> <tr> <td>2016/17</td> <td>2</td> <td>3</td> <td>5</td> <td>3</td> <td>6</td> <td>19</td> </tr> </tbody> </table> <p>As identified in the consultation document, this data is based on information provided by the school in its Welsh-medium return, which is provided annually in the autumn term. Therefore, the figure of 57 provided for the 2014/15 academic year is the number of pupils attending the stream in the autumn term 2014, which is before the council announced that consultation on closure of the stream would take place.</p> <p>It is true that no figure is provided for the number of Sennybridge pupils that had intended to come to Brecon High School before the consultation was announced. The consultation document provides factual information in accordance with the requirements of the Welsh Government's School Organisation Code. The authority did not purposely omit any information.</p> <p>In 2015, the authority used EMS to administer school admissions, however the authority no longer uses this system. Therefore the authority is unable to access information about the</p>		Year 7	Year 8	Year 9	Year 10	Year 11	Total	2010/11	12	17	14	12	12	67	2011/12	6	11	19	14	17	67	2012/13	10	7	13	18	15	63	2013/14	19	10	8	13	13	63	2014/15	14	13	9	8	13	57	2015/16	3	7	4	8	8	30	2016/17	2	3	5	3	6	19
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		number of Sennybridge pupils that had intended to come to Brecon High School before the consultation was announced.
4.1.2	<p>The fact numbers have dwindled in recent years is because of Powys's dithering.</p> <p>The small numbers are due to the previous consultations</p> <p>Uncertainty in relation to the provision at Brecon over a number of years has led to pupils being educated elsewhere.</p> <p>Reduction in numbers in the Welsh stream is directly related to the two previous consultations and the constant undermining and lack of support for the development of the Welsh stream at Brecon High School in attaining 2B status as promised by the council – this has been publicly admitted by officers during the consultation process</p> <p>The figures Brecon High School are being judged on in terms of pupil transfer have been created by the lack of clarity and direction by the council.</p> <p>The decrease in Welsh-medium pupil numbers may have been pre-empted by earlier rumours,</p>	<p>The information provided in the consultation document issued in respect of this proposal is factual data which reflects the position at the time of writing.</p> <p>It is true that the number of pupils attending the Welsh-medium stream at Brecon High School has reduced in recent years, and this is evidenced in the information provided on page 11 of the consultation document.</p> <p>It is also true that two previous consultations have taken place on the future of the Welsh-medium stream since 2015. Information about these previous consultations and the reasons why these processes did not proceed is provided on pages 7 – 9 of the consultation document. The consultation document also acknowledges on page 13 that <i>'it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.'</i></p> <p>18 months or so ago, following the initial Cabinet decision to carry out consultation on closure of the Welsh-medium stream at Brecon High School, a number of parents of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education.</p> <p>As an admissions authority, the council cannot refuse places to children if there is a place available at the school to which they apply. When parents applied for places at Builth Wells High School, there were places available, therefore the authority was unable to reject the applications, however transport was refused at Stage 1 and 2 of the transport application process. Following this, the applications were taken to appeal, and the appeal panel took the decision to award transport.</p> <p>Whilst the authority acknowledges that the previous consultations have impacted on Welsh-medium pupil numbers at Brecon High School, the authority does not agree that the stream would be viable had pupils not transferred to alternative providers. The authority's view is that the number of pupils accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate</p>

	<p>creating a self-fulfilling prophecy</p> <p>Many parents have already voted with their feet and sent their children to Builth purely because of the continuing uncertainty at Brecon – the plan to close the Welsh stream in Brecon has become a self-fulfilling prophecy</p> <p>The figures are skewed in favour of closing the Welsh stream at Brecon, however they do not show a fall in demand but reflect the effect of the council's actions</p> <p>The proposal has had a devastating effect on Welsh-medium pupils numbers at Brecon High School – only 3 left in year 10 out of 24 or so in the past</p>	<p>curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.</p>
4.1.3	<p>The numbers in Brecon Welsh stream currently does not show the real demand for the Welsh stream in Brecon and are only low because this is the 3<sup>rd</sup> consultation that is happening – this has not been made obvious enough to Cabinet members</p>	<p>Cabinet members were fully aware of the background to the current process in relation to the Welsh-medium stream at Brecon High School.</p>
4.1.4	<p>4.2.6 in consultation report – Has any survey been conducted to establish the reasons pupils in the Welsh-medium stream 'jumped</p>	<p>No survey has been undertaken to establish the reasons why parents in the Welsh stream at Ysgol y Bannau and Brecon High School chose to move their children to Builth Wells High School in 2015.</p>



	ship'?	
4.1.5	Use of statistics related to pupil numbers in the stream has been inconsistent, with the sole purpose of being distorted to support the Portfolio Holder's recommendation. Has been designed to confuse any person considering the decision.	This statement is untrue. The pupil numbers used are factual numbers which reflect the position at the time of writing.
4.1.6	Brecon Welsh stream currently has 21 pupils in it, not the 19 the council has incorrectly stated	Based on information received from the school, 19 pupils are attending the Welsh-medium stream at Brecon High School during the 2016-17. This is also supported by information from the authority's Teacher Centre database.
<b>4.2 Prospective Welsh-medium pupils numbers at Brecon High School</b>		
4.2.1	<p>If the Welsh stream at Brecon High School is retained, thus finally ending the uncertainty, numbers will start to increase again which will enable the level of provision to increase.</p> <p>If you invested in the Welsh stream at Brecon, the stream would easily have the viable number needed to run a good robust Welsh medium education</p> <p>Should the Welsh stream be saved and strengthened, with more subjects available through Welsh, pupil numbers would grow to a point where they would exceed the previous totals.</p>	The authority notes this comment, however even if all Welsh-medium pupils in the catchment area transferred to a Welsh-medium stream at Brecon High School, the number of pupils attending the stream would remain small, which would make it difficult for the school to significantly increase the Welsh-medium provision offered. The authority's view is that the current number of Welsh-medium pupils in mid and south Powys is not large enough to maintain secondary provision in two locations and to provide appropriate curriculum choice for pupils.

4.2.2	<p>Expected to be a 500% increase in the number of Welsh-medium pupils in Year 7 in September – a sign of confidence in the school and the desire for local pupils to attend their local school. 2 pupils from the year 6 in Sennybridge would also go to Brecon High School if the Welsh stream remains open</p> <p>Ysgol y Bannau is a sizeable primary school, if all children attended the Welsh stream, there would surely be enough pupils to make it a viable option</p>	<p>Even if all pupils attending Ysgol y Bannau transferred to the Welsh-medium stream at Brecon High School, the number of pupils attending the stream would remain small, which would make it difficult for the school to significantly increase the Welsh-medium provision offered.</p>
4.2.3	<p>Based on the numbers in the previous consultation document, the numbers in Builth are decreasing year on year and the numbers in Brecon are increasing</p>	<p>As stated in the consultation document in relation to this proposal, the reasons for this proposal are:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The proposal is due to the current provision at Brecon High School, not the provision at Builth Wells High School. The number of pupils accessing Welsh-medium provision in Builth Wells High School is greater than the number accessing provision at Brecon High School, and the breadth of provision offered to Welsh-medium pupils is greater.</p>
	<p>'Ffeit am y Ffrwd' group have carried out research into the numbers of YyB children who would have entered the stream at Brecon High School, and the</p>	<p>The authority notes this information. The authority is satisfied that the figures used throughout the process have been accurate and reflect the situation at the time.</p>

	<p>numbers are provided in the following table:</p> <p> Pupil numbers table.docx</p> <p>These numbers show that the numbers used by the Portfolio Holder are seriously flawed and cannot form an appropriate basis for any decision.</p>	
4.2.4	Certainty of provision in Brecon would result in an increase in the number of pupils choosing Welsh-medium education	The number of pupils accessing Welsh-medium provision at Brecon High School has been decreasing over time, with pupils choosing to travel elsewhere for Welsh-medium provision – this doesn't suggest that if there was a certainty of provision in Brecon that it would automatically lead to an increase in number of pupils.
<b>4.3 Concern about pupils transferring from Welsh-medium provision to English-medium provision</b>		
4.3.1	<p>Pupils will not continue in WM education on transfer to secondary school – will be a drop in pupil numbers</p> <p>If there is no Welsh stream at Brecon High School, pupils will still go there and access English-medium provision. Many parents are already sending their children elsewhere or into English-medium education</p> <p>Parents will not send their children</p>	<p>On page 16 of the consultation document in respect of this proposal, the council has identified the following as a risk of the proposal:</p> <p><i>'Pupils choose to access English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school.'</i></p> <p>The authority's view is that the Welsh-medium provision currently available at Brecon High School does not provide appropriate linguistic continuity for Welsh-medium pupils, and the aim of the proposal is to provide greater equality in terms of the provision available to Welsh-medium pupils. However as stated in the consultation document, <i>'in the short term, the authority would expect there to be some reduction in the proportion of pupils from the Brecon area continuing to access Welsh-medium provision in the secondary sector.'</i></p> <p>Retaining pupils within the Welsh-medium sector is one of the Welsh Government's</p>

	<p>to Builth, they will send them to English streams</p> <p>PCC cannot ensure that this will raise the numbers of children choosing secondary Welsh medium education</p>	<p>priorities, and the authority is required to monitor pupil progression within Welsh-medium education annually, and report this information to Welsh Government. As stated in the consultation document, <i>'should the proposal be implemented, the authority would work with the primary schools concerned to establish transition links with the alternative providers, with the aim of reversing any reduction in transfer rates into KS3 in the longer term'</i>.</p>
4.3.2	<p>Pupils will be forced to move to English-medium provision</p> <p>Children will have to leave Welsh-medium education following the closure of the Welsh stream in Brecon</p> <p>The proposal is making families and children leave Welsh-medium education</p>	<p>It is not true that pupils would be 'forced' out of Welsh-medium education should the proposal be implemented. However, the authority acknowledges that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education.</p> <p>Should the Welsh-medium stream at Brecon High School close, pupils currently attending the Welsh-medium stream at Brecon High School and other Welsh-medium primary providers in the catchment area could choose to transfer to their nearest alternative provider of Welsh-medium secondary education, which in some cases would be out of county, or they could choose to access English-medium provision locally.</p>
4.3.3	<p>Do not agree with the council's statement that 'there may be a reduction in the number of pupils transferring to Welsh-medium secondary provision in the short term, the authority's expectation is that this would be reversed in the longer term, through the development of close links between Ysgol y Bannau and Builth Wells High School.'</p>	<p>Noted.</p>
4.3.4	<p>Choices of the present year 6 at Ysgol y Bannau – 6 going to Builth,</p>	<p>The current information held by the authority's admissions team for applications for school places in September 2017 is as follows:</p>

	<p>1 to Ystalyfera, 1 to Llandovery, 1 to Gwernyfed and 10 to Brecon Welsh stream</p> <p>Figures from the present year 6 in Ysgol y Bannau are vital to the consultation and should be used as an indicator – 10 pupils are going to Brecon Welsh-medium stream</p>	<table border="1"> <tr> <td data-bbox="846 229 1301 400"><b>Ysgol y Bannau</b></td> <td data-bbox="1301 229 1850 400">10 pupils to Brecon High School 6 pupils to Builth Wells High School 1 pupil to Ysgol Gyfun Ystalyfera 1 pupil to Gwernyfed 1 pupil to Llandovery</td> </tr> <tr> <td data-bbox="846 400 1301 501"><b>Sennybridge CP School Welsh Stream</b></td> <td data-bbox="1301 400 1850 501">3 pupils to Ysgol Gyfun Ystalyfera 1 pupil to Ysgol Maesydderwen 1 unknown</td> </tr> <tr> <td data-bbox="846 501 1301 571"><b>Sennybridge CP School English Stream</b></td> <td data-bbox="1301 501 1850 571">6 pupils to Brecon High School</td> </tr> </table>	<b>Ysgol y Bannau</b>	10 pupils to Brecon High School 6 pupils to Builth Wells High School 1 pupil to Ysgol Gyfun Ystalyfera 1 pupil to Gwernyfed 1 pupil to Llandovery	<b>Sennybridge CP School Welsh Stream</b>	3 pupils to Ysgol Gyfun Ystalyfera 1 pupil to Ysgol Maesydderwen 1 unknown	<b>Sennybridge CP School English Stream</b>	6 pupils to Brecon High School																																																									
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4.3.5	<p>There is no mention of the continuing stream of children leaving Welsh-medium education because of the proposed closure of Brecon Welsh stream</p>	<p>Based on PLASC information, the number of pupils in each year group in Ysgol y Bannau since January 2012 is as follows:</p> <table border="1"> <thead> <tr> <th data-bbox="846 743 1010 810"></th> <th data-bbox="1010 743 1173 810"><b>Jan 2012</b></th> <th data-bbox="1173 743 1337 810"><b>Jan 2013</b></th> <th data-bbox="1337 743 1500 810"><b>Jan 2014</b></th> <th data-bbox="1500 743 1664 810"><b>Jan 2015</b></th> <th data-bbox="1664 743 1827 810"><b>Jan 2016</b></th> <th data-bbox="1827 743 1991 810"><b>Jan 2017</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="846 810 1010 880"><b>R</b></td> <td data-bbox="1010 810 1173 880">10</td> <td data-bbox="1173 810 1337 880">28</td> <td data-bbox="1337 810 1500 880">16</td> <td data-bbox="1500 810 1664 880">17</td> <td data-bbox="1664 810 1827 880">27</td> <td data-bbox="1827 810 1991 880">17</td> </tr> <tr> <td data-bbox="846 880 1010 951"><b>Yr1</b></td> <td data-bbox="1010 880 1173 951">21</td> <td data-bbox="1173 880 1337 951">10</td> <td data-bbox="1337 880 1500 951">28</td> <td data-bbox="1500 880 1664 951">16</td> <td data-bbox="1664 880 1827 951">17</td> <td data-bbox="1827 880 1991 951">28</td> </tr> <tr> <td data-bbox="846 951 1010 1021"><b>Yr2</b></td> <td data-bbox="1010 951 1173 1021">27</td> <td data-bbox="1173 951 1337 1021">20</td> <td data-bbox="1337 951 1500 1021">10</td> <td data-bbox="1500 951 1664 1021">27</td> <td data-bbox="1664 951 1827 1021">16</td> <td data-bbox="1827 951 1991 1021">18</td> </tr> <tr> <td data-bbox="846 1021 1010 1091"><b>Yr3</b></td> <td data-bbox="1010 1021 1173 1091">19</td> <td data-bbox="1173 1021 1337 1091">24</td> <td data-bbox="1337 1021 1500 1091">21</td> <td data-bbox="1500 1021 1664 1091">10</td> <td data-bbox="1664 1021 1827 1091">26</td> <td data-bbox="1827 1021 1991 1091">15</td> </tr> <tr> <td data-bbox="846 1091 1010 1161"><b>Yr4</b></td> <td data-bbox="1010 1091 1173 1161">18</td> <td data-bbox="1173 1091 1337 1161">18</td> <td data-bbox="1337 1091 1500 1161">22</td> <td data-bbox="1500 1091 1664 1161">21</td> <td data-bbox="1664 1091 1827 1161">9</td> <td data-bbox="1827 1091 1991 1161">24</td> </tr> <tr> <td data-bbox="846 1161 1010 1232"><b>Yr5</b></td> <td data-bbox="1010 1161 1173 1232">23</td> <td data-bbox="1173 1161 1337 1232">17</td> <td data-bbox="1337 1161 1500 1232">18</td> <td data-bbox="1500 1161 1664 1232">20</td> <td data-bbox="1664 1161 1827 1232">19</td> <td data-bbox="1827 1161 1991 1232">10</td> </tr> <tr> <td data-bbox="846 1232 1010 1302"><b>Yr6</b></td> <td data-bbox="1010 1232 1173 1302">20</td> <td data-bbox="1173 1232 1337 1302">22</td> <td data-bbox="1337 1232 1500 1302">18</td> <td data-bbox="1500 1232 1664 1302">15</td> <td data-bbox="1664 1232 1827 1302">20</td> <td data-bbox="1827 1232 1991 1302">19</td> </tr> <tr> <td data-bbox="846 1302 1010 1366"><b>Total</b></td> <td data-bbox="1010 1302 1173 1366">138</td> <td data-bbox="1173 1302 1337 1366">139</td> <td data-bbox="1337 1302 1500 1366">133</td> <td data-bbox="1500 1302 1664 1366">126</td> <td data-bbox="1664 1302 1827 1366">134</td> <td data-bbox="1827 1302 1991 1366">131</td> </tr> </tbody> </table>		<b>Jan 2012</b>	<b>Jan 2013</b>	<b>Jan 2014</b>	<b>Jan 2015</b>	<b>Jan 2016</b>	<b>Jan 2017</b>	<b>R</b>	10	28	16	17	27	17	<b>Yr1</b>	21	10	28	16	17	28	<b>Yr2</b>	27	20	10	27	16	18	<b>Yr3</b>	19	24	21	10	26	15	<b>Yr4</b>	18	18	22	21	9	24	<b>Yr5</b>	23	17	18	20	19	10	<b>Yr6</b>	20	22	18	15	20	19	<b>Total</b>	138	139	133	126	134	131
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		<p>The Objectors comment suggests that there has been a significant reduction in pupil numbers at Ysgol y Bannau throughout the period then the authority has been considering the future of the Welsh-medium stream at Brecon High School, however this is not reflected in the figures provided above.</p> <p>The authority has acknowledged throughout the process the risk that ‘pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon’, and risk management measures have been identified.</p>
4.3.6	There are strong indications that 10 year 6 pupils from Ysgol y Bannau will transfer to Brecon High School regardless of the outcome of this process – therefore the projected critical mass will not be achieved	Based on the number of applications that have been received by the authority, there will be 25 year 7 pupils in the Welsh stream at Builth Wells High School in September 2017. This is significantly more than the number that have applied for a place at Brecon High School’s Welsh stream.
<b>4.4 Welsh-medium primary pupil numbers</b>		
4.4.1	Numbers in Ysgol y Bannau are really good apart from the present year 5, and up until these consultations, the majority were going to go to Brecon Welsh stream	Even if all pupils attending Ysgol y Bannau transferred to the Welsh-medium stream at Brecon High School, the number of pupils attending the stream would remain small, which would make it difficult for the school to significantly increase the Welsh-medium provision offered.
4.4.2	<p>The authority has not created the conditions for the Welsh stream in Brecon High School to grow, and has not considered how the feeder provision could increase beyond the 2 feeder schools in the local area</p> <p>With Ysgol y Bannau across the road you have the numbers to feed</p>	<p>There has been no significant growth in pupil numbers at Ysgol y Bannau in recent years, therefore there is no evidence that there is demand for any additional Welsh-medium streams in the Brecon area at the current time.</p> <p>A Welsh-medium work stream was established as part of the Gwernyfed Area Review that was carried out a few years ago, however this work stream concluded that there was no demand for Welsh-medium primary provision in that area at the time.</p>

	and nurture a good Welsh stream, but the funding was not forthcoming and uncertainty grew	
4.4.3	You mention that numbers in Ysgol y Bannau have stayed the same, you do not mention that across the whole of Wales, numbers in Welsh-medium education have declined	In the draft Welsh in Education Strategic Plan (WESP) for 2017-20, the council acknowledges that <i>'over the period of the authority's previous Welsh in Education Strategic Plan (2014-17), the percentage of pupils assessed in Welsh first language at the end of the Foundation Phase decreased.'</i> However, as stated in the consultation document in respect of the proposal to close the Welsh-medium stream at Brecon High School, <i>'Whilst Welsh-medium pupil numbers at Sennybridge C.P. School have increased slightly, this has not been the case at Ysgol y Bannau. This is contrast with the two other designated Welsh-medium primary schools in Powys, Ysgol Dafydd Llwyd in Newtown and Ysgol Gymraeg Dyffryn y Glowyr in the Ystradgynlais area, where pupil numbers have increase over the same period.'</i>
4.4.4	<p>Concern about the impact on the number of pupils opting for Welsh-medium primary education</p> <p>Moving the stream from Brecon would be detrimental to Ysgol y Bannau and Sennybridge Primary School – pupil numbers are bound to decline</p> <p>The proposal would lead to a decline in the number of people learning through the medium of Welsh</p> <p>If you proceed with the proposal you will lose a large % of Ysgol y Bannau to English-medium</p>	<p>On page 17 of the consultation document, the council has identified the following as a risk of the proposal:</p> <p><i>'Pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon'.</i></p> <p>The document goes on to state that <i>'The authority acknowledges that there may be a reduction in pupil numbers at Ysgol y Bannau in the short term. However, the authority is committed to increasing the number of pupils accessing Welsh-medium education, and would work with Ysgol y Bannau, Menter Brycheiniog and other organisations to promote the benefits of Welsh-medium primary education in the Brecon area. The authority would hope that the greater clarity in relation to secondary arrangements for pupils from the Brecon area and the increased level of provision available would lead to an increase in pupil numbers in future.'</i></p>
<b>4.5 General issues relating to Welsh-medium pupil numbers</b>		

4.5.1	The council is looking for pupil numbers equivalent to an urban education model, this is not realistic.	<p>The council is not looking for pupil numbers equivalent to an urban education model.</p> <p>In its Schools Organisation Policy (2015), the council states the following in relation to its 'Aspiration for size of schools in Powys':</p> <p><i>'It must be recognised that in some situations, geographic or linguistic issues make the aspirational targets for size of schools difficult to achieve, and consideration to the specific circumstances of each school under consideration.'</i></p> <p>Further to this, the policy states that <i>'in a rural county as diverse as Powys there is no one size fits all approach to school organisation. Consideration will be given to the specific circumstances of each school/s and community.'</i></p> <p>The number of pupils currently accessing the Welsh-medium stream at Brecon High School are very small, which means that the school is unable to provide an appropriate educational experience for Welsh-medium pupils.</p>
4.5.2	Pupils will lose out on Welsh-medium education if PCC closes Brecon Welsh stream in their bid to establish its first category 2A school in the county	<p>The authority has a duty to provide access to Welsh-medium education to those pupils that choose it. The authority's view is that the current provision Brecon High School does not provide equality for Welsh-medium pupils due to the limited Welsh-medium curriculum available, and the authority's view is that the only way to improve this is to centralise provision in the area in order to provide access to an increased Welsh-medium curriculum.</p> <p>The authority has acknowledged in the consultation document in respect of this proposal that there are a number of risks associated with the proposal, which include a potential impact on Welsh-medium pupil numbers in the short term.</p> <p>The authority is not currently proposing to establish a Welsh-medium secondary school in the mid/south Powys area. However, as stated on page 21 of the consultation document, <i>'the authority's view is that closure of the Welsh-medium stream at Brecon High school is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.'</i></p>



4.5.3	<p>Before the consultations there were 167 pupils in the Brecon and Builth Welsh streams, after only 2 years of the Builth stream operating as the council wish it to, numbers by Sept 17 will have dropped to 132 pupils, this does not bode well for the council improving the amount being educated through the medium of Welsh</p> <p>Centralising provision in Builth will not lead to a suitable critical mass</p>	<p>Based on information provided by the two schools in their Welsh-medium returns, which are submitted in the autumn term each year, the number of pupils attending the Welsh-medium stream at each school over the last three years has been as follows:</p> <table border="1" data-bbox="846 363 2040 671"> <thead> <tr> <th><b>Brecon High School</b></th> <th><b>2014/15</b></th> <th><b>2015/16</b></th> <th><b>2016/17</b></th> </tr> </thead> <tbody> <tr> <td>Year 7</td> <td>14</td> <td>3</td> <td>2</td> </tr> <tr> <td>Year 8</td> <td>13</td> <td>7</td> <td>3</td> </tr> <tr> <td>Year 9</td> <td>9</td> <td>4</td> <td>5</td> </tr> <tr> <td>Year 10</td> <td>8</td> <td>8</td> <td>3</td> </tr> <tr> <td>Year 11</td> <td>13</td> <td>8</td> <td>6</td> </tr> <tr> <td><b>Total</b></td> <td><b>57</b></td> <td><b>30</b></td> <td><b>19</b></td> </tr> </tbody> </table> <table border="1" data-bbox="846 703 2040 1027"> <thead> <tr> <th><b>Builth Wells High School</b></th> <th><b>2014/15</b></th> <th><b>2015/16</b></th> <th><b>2016/17</b></th> </tr> </thead> <tbody> <tr> <td>Year 7</td> <td>18</td> <td>28</td> <td>32</td> </tr> <tr> <td>Year 8</td> <td>23</td> <td>23</td> <td>26</td> </tr> <tr> <td>Year 9</td> <td>28</td> <td>31</td> <td>23</td> </tr> <tr> <td>Year 10</td> <td>21</td> <td>27</td> <td>30</td> </tr> <tr> <td>Year 11</td> <td>17</td> <td>20</td> <td>27</td> </tr> <tr> <td><b>Total</b></td> <td><b>107</b></td> <td><b>129</b></td> <td><b>138</b></td> </tr> </tbody> </table> <p>Welsh-medium pupil numbers at Builth Wells High School are significantly higher than pupil numbers at Brecon High School.</p> <p>In the consultation document in respect of this proposal, the authority identified a risk that <i>'Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'</i>. The authority's view is that the current Welsh-medium provision in Brecon High School is not providing an appropriate educational experience for Welsh-medium pupils, due to the small number of pupils accessing this provision and the limited subject provision available.</p>	<b>Brecon High School</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	Year 7	14	3	2	Year 8	13	7	3	Year 9	9	4	5	Year 10	8	8	3	Year 11	13	8	6	<b>Total</b>	<b>57</b>	<b>30</b>	<b>19</b>	<b>Builth Wells High School</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	Year 7	18	28	32	Year 8	23	23	26	Year 9	28	31	23	Year 10	21	27	30	Year 11	17	20	27	<b>Total</b>	<b>107</b>	<b>129</b>	<b>138</b>
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4.5.4	<p>The first consultation document alleged that ‘centralising the provision at one school would create a larger Welsh-medium stream of approximately 150 pupils in years 7-11, which would enable the school to provide increased Welsh-medium opportunities to learners and move towards becoming a category 2B school’ but there were 247 pupils in the BWHS Welsh medium catchment alone and 164 in the BHS catchment thereby demonstrating that the Portfolio Holder does not have an accurate grasp of the figures. PCC should be asking why less than 50% of pupils go on to Welsh medium secondary education and ensuring provision instead of removing it; the foundations are in place but PCC is failing to build on them.</p>	<p>It is true that the initial consultation document in relation to the Welsh-medium stream at Brecon High school, issued in June 2015, stated that <i>‘Centralising the provision at one school would create a larger Welsh-medium stream of approximately 150 pupils in years 7 – 11, which would enable the school to provide increased Welsh-medium opportunities to learners, and move towards becoming a category 2B school, in line with the Authority’s aspiration as stated in the WESP.’</i></p> <p>The figure of ‘approximately 150 pupils’ was based on the fact that there were 107 pupils attending the Welsh-medium stream at Builth Wells High School at the time, and 57 pupils attending the Welsh-medium stream at Brecon High School at the time. Therefore the authority’s expectation was that closure of the Welsh-medium stream at Brecon High School would initially lead to a stream of approximately 150 pupils at Builth Wells High School following implementation of the proposal.</p> <p>It is also correct that there were 247 Welsh-medium primary pupils in the Builth Wells catchment and 164 Welsh-medium primary pupils in the Brecon catchment at the time – this information was provided on page 8 and 9 of the consultation document issued at that time.</p> <p>It is correct that there are currently 247 pupils in Welsh-medium education in the Builth Wells catchment area, and a further 170 in the Brecon High School catchment area. If all these pupils transferred to, and remained in, the same Welsh-medium secondary provision, then by September 2021 there could be a maximum of 280 pupils in a Welsh stream (years 7-11), increasing to 325 by September 2023. However, the majority of pupils from the Sennybridge Welsh stream transfer to Ysgol Gyfun Ystalyfera.</p> <p>Details of the number of pupils attending Welsh-medium primary provision in the Brecon and Builth Wells catchment areas are provided below, for information:</p> <table border="1" data-bbox="846 1177 2042 1390"> <thead> <tr> <th></th> <th>Recep.</th> <th>Year 1</th> <th>Year 2</th> <th>Year 3</th> <th>Year 4</th> <th>Year 5</th> <th>Year 6</th> </tr> </thead> <tbody> <tr> <td>Ysgol y Bannau</td> <td>16</td> <td>28</td> <td>17</td> <td>15</td> <td>23</td> <td>10</td> <td>18</td> </tr> <tr> <td>Sennybridge CP School</td> <td>9</td> <td>6</td> <td>11</td> <td>5</td> <td>5</td> <td>2</td> <td>5</td> </tr> <tr> <td>Builth CP</td> <td>24</td> <td>11</td> <td>16</td> <td>14</td> <td>21</td> <td>19</td> <td>14</td> </tr> </tbody> </table>		Recep.	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Ysgol y Bannau	16	28	17	15	23	10	18	Sennybridge CP School	9	6	11	5	5	2	5	Builth CP	24	11	16	14	21	19	14
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4.5.5	<p>Page 10 of the first consultation document states ‘the proportion of pupils remaining in Welsh-medium education in the Builth Wells and Llandrindod Wells catchment is lower than the proportion in the Brecon catchment area, but the overall numbers are higher.’ This is evidenced by looking at the number of pupils transferring to Welsh-medium secondary education – only 24 from 40 year 5 pupils transferred to Welsh-medium education and only 18 from 28 year 6 pupils continued.</p>	<p>The transfer rates from Year 6 Welsh-medium provision at the primary schools in the current catchment areas of the Welsh-medium stream at Brecon High School and Builth Wells High School over the last 4 years are listed below. This information shows that the percentage of pupils transferring from Welsh-medium primary provision to Welsh-medium secondary provision at the five schools is varied.</p> <table border="1"> <thead> <tr> <th></th> <th><b>Sept. 2013</b></th> <th><b>Sept. 2014</b></th> <th><b>Sept. 2015</b></th> <th><b>Sept. 2016</b></th> </tr> </thead> <tbody> <tr> <td><b>Builth Wells CP School</b></td> <td>100%</td> <td>91%</td> <td>93%</td> <td>85%</td> </tr> <tr> <td><b>Rhayader CiW School</b></td> <td>100%</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> <tr> <td><b>Sennybridge CP School</b></td> <td>N/A</td> <td>78%</td> <td>75%</td> <td>67%</td> </tr> <tr> <td><b>Ysgol Trefonnen</b></td> <td>78%</td> <td>55%</td> <td>56%</td> <td>17%</td> </tr> <tr> <td><b>Ysgol y Bannau</b></td> <td>85%</td> <td>94%</td> <td>93%</td> <td>65%</td> </tr> </tbody> </table> <p>The reasons for the current proposal in relation to the Welsh-medium stream at Brecon High School are clearly outlined in the consultation document issued, and are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul>		<b>Sept. 2013</b>	<b>Sept. 2014</b>	<b>Sept. 2015</b>	<b>Sept. 2016</b>	<b>Builth Wells CP School</b>	100%	91%	93%	85%	<b>Rhayader CiW School</b>	100%	100%	100%	100%	<b>Sennybridge CP School</b>	N/A	78%	75%	67%	<b>Ysgol Trefonnen</b>	78%	55%	56%	17%	<b>Ysgol y Bannau</b>	85%	94%	93%	65%		
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<b>5.1 Welsh Government Policy</b>																																		

5.1.1	<p>Goes against the Assembly's target of one million Welsh speakers.</p> <p>The proposal is counter intuitive to the Welsh Government aim to increase Welsh speakers</p> <p>Proposal is inconsistent with the WG ambition to see one million Welsh speakers</p> <p>Decision flies in the face of Welsh Government strategy to increase the number of Welsh speakers</p> <p>Undermines the Welsh Assembly Government's commitment to increasing the number of Welsh speakers in Wales by 2050</p> <p>The decision to close the stream means that PCC is pulling in the opposite direction to the rest of Wales.</p>	<p>The council's draft WESP for 2017-20 takes account of the Welsh Government strategy to create a million Welsh speakers by the year 2050. The draft WESP was approved by the council's Cabinet on the 21<sup>st</sup> March 2017.</p> <p>The current method of delivering Welsh-medium education in Powys has not led to an increase in the number of pupils educated through the medium of Welsh. In the draft WESP for 2017-20, the authority recognises that 'a fundamental change is required in Powys to ensure all learners can access high quality, robust provision from the early years onwards' and that 'significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers'.</p> <p>The draft WESP also acknowledges that the authority's plans to provide access to more equitable provision for Welsh-medium pupils may a negative impact on Welsh-medium pupil numbers in Powys in the short term, however the authority's aim is that this would be reversed in the longer term.</p>
5.1.2	<p>Has the council assessed the impact closing the Welsh stream at Brecon will have on the Welsh Government's ambition to achieve one million Welsh speakers by 2050</p>	<p>The council's draft WESP for 2017-20 takes account of the Welsh Government strategy to create a million Welsh speakers by the year 2050. The draft WESP was approved by the council's Cabinet on the 21<sup>st</sup> March 2017.</p> <p>The current method of delivering Welsh-medium education in Powys has not led to an increase in the number of pupils educated through the medium of Welsh. In the draft WESP for 2017-20, the authority recognises that '<i>a fundamental change is required in Powys to ensure all learners can access high quality, robust provision from the early years onwards</i>' and that '<i>significant changes are needed to the way Welsh-medium education is delivered</i></p>

		<p><i>within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers’.</i></p> <p>The draft WESP also acknowledges that the authority’s plans to provide access to more equitable provision for Welsh-medium pupils may have a negative impact on Welsh-medium pupil numbers in Powys in the short term, however the authority’s aim is that this would be reversed in the longer term.</p> <p>The impact of the current proposal on the Welsh language was assessed in the integrated impact assessment carried out in respect of the proposal. In addition, a separate Welsh language impact assessment was carried out, in line with the guidance outlined in the School Organisation Code.</p>
5.1.3	In an interview with the BBC in January, Welsh Language Minister Alun Davies said: ‘We are currently developing the new #Cymraeg2050 Language Strategy which will include a series of indicators that will enable us to monitor progress towards achieving that goal...it will build on the current Welsh Medium Education Strategy and include targets for expanding and improving education provision’	As stated above, the council’s draft WESP for 2017-20 takes account of the Welsh Government strategy to create a million Welsh speakers by the year 2050.
5.1.4	Reference to Welsh-medium Education Strategy which outlines the expectation that local authorities identify how they will provide sufficient / appropriate places for children who desire Welsh-medium education – how will PCC fulfil this expectation	The authority’s view is that the Welsh-medium provision currently available at Brecon High School does not provide appropriate linguistic continuity for Welsh-medium pupils, and the aim of the proposal is to provide greater equality in terms of the provision available to Welsh-medium pupils. However, the authority has acknowledged that there are risks and disadvantages associated with the proposal to close the Welsh-medium stream at Brecon High School. As stated in the consultation document, <i>‘in the short term, the authority would expect there to be some reduction in the proportion of pupils from the Brecon area continuing to access Welsh-medium provision in the secondary sector.’</i>

	should the proposal go ahead?	<p>The current method of delivering Welsh-medium education in Powys has not led to an increase in the number of pupils educated through the medium of Welsh. In the draft WESP for 2017-20, the authority recognises that <i>'a fundamental change is required in Powys to ensure all learners can access high quality, robust provision from the early years onwards' and that 'significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers'.</i></p> <p>The draft WESP also acknowledges that the authority's plans to provide access to more equitable provision for Welsh-medium pupils may have a negative impact on Welsh-medium pupil numbers in Powys in the short term, however the authority's aim is that this would be reversed in the longer term.</p>
5.1.5	<p>The council are working in opposition to the Welsh Language Measure</p> <p>The proposal goes against Welsh Government legislation</p>	The authority disagrees with this statement.
5.1.6	Unbelievable that this is happening in a country that is doing its best to promote the Welsh language and increase learners	<p>The council's draft WESP for 2017-20 takes account of the Welsh Government strategy to create a million Welsh speakers by the year 2050. The draft WESP was approved by the council's Cabinet on the 21<sup>st</sup> March 2017.</p> <p>The current method of delivering Welsh-medium education in Powys has not led to an increase in the number of pupils educated through the medium of Welsh. In the draft WESP for 2017-20, the authority recognises that <i>'a fundamental change is required in Powys to ensure all learners can access high quality, robust provision from the early years onwards' and that 'significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers'.</i></p>

		<p>The draft WESP also acknowledges that the authority's plans to provide access to more equitable provision for Welsh-medium pupils may have a negative impact on Welsh-medium pupil numbers in Powys in the short term, however the authority's aim is that this would be reversed in the longer term.</p>
5.1.7	<p>Formal complaints have been made to the Welsh Government and specifically Alun Davies who is spearheading the "iaith fyw, iaith byw" campaign to increase the number of Welsh speakers by one million by 2020.</p>	<p>The authority notes this comment, however the authority has not been made aware of any formal complaints to Welsh Government in relation to this matter.</p> <p>The council's draft WESP for 2017-20 takes account of the Welsh Government strategy to create a million Welsh speakers by the year 2050. The draft WESP was approved by the council's Cabinet on the 21<sup>st</sup> March 2017.</p> <p>The current method of delivering Welsh-medium education in Powys has not led to an increase in the number of pupils educated through the medium of Welsh. In the draft WESP for 2017-20, the authority recognises that 'a fundamental change is required in Powys to ensure all learners can access high quality, robust provision from the early years onwards' and that 'significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers'.</p> <p>The draft WESP also acknowledges that the authority's plans to provide access to more equitable provision for Welsh-medium pupils may have a negative impact on Welsh-medium pupil numbers in Powys in the short term, however the authority's aim is that this would be reversed in the longer term.</p>
5.1.8	<p>Proposal goes against the well-being goals of the Well-being of Future Generations (Wales) Act 2015</p> <p>Reference to Well-being of Future Generations Act, which states that Powys must maximise its contribution to "a Wales of vibrant</p>	<p>The authority has carried out an Integrated Impact Assessment in respect of this proposal, which takes account of the Well-being of Future Generations Act. The Assessment was updated to reflect issues raised during the consultation period and was taken into consideration by Cabinet when determining how to proceed in respect of this proposal.</p>

	<p>culture and thriving Welsh language” – this decision appears to contradict the Act</p> <p>Have not received any assurance that the Well-being Goals set out in the Well-being of Future Generations Act 2015 have been considered as part of the proposals, or what the council expects the impact on the well-being of learners to be</p>	
5.1.9	It is bizarre that the education secretary can allow this to happen in her own ward	The Welsh Government is not the decision maker in respect of this matter.
<b>5.2. Criticism of the council’s treatment of the Welsh language / Welsh-medium education</b>		
5.2.1	<p>Other parts of Wales are doing a great deal to improve the Welsh-medium provision available, this is in contrast to Powys</p> <p>Gwent have shown far greater support for Welsh-medium children</p> <p>There are thriving Welsh schools in surrounding South Wales counties, but the council has decided to close the only provision in the south of the county</p> <p>Don’t understand why the decision has been made to close the Welsh</p>	<p>The authority has recognised that the current method of delivering Welsh-medium education in Powys is not successful, and is taking action to address this situation, to ensure that the provision available in Powys is more comparable to the provision offered in other authorities. However, Powys is a very different area to areas such as Gwent and Cardiff which are referred to. The authority recognises the difficulties associated with delivering equitable Welsh-medium provision in a rural and sparse county such as Powys.</p> <p>The current method of delivering Welsh-medium education in Powys has not led to an increase in the number of pupils educated through the medium of Welsh. In the draft WESP for 2017-20, the authority recognises that ‘a fundamental change is required in Powys to ensure all learners can access high quality, robust provision from the early years onwards’ and that ‘significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers’.</p>



	<p>stream in Brecon when Welsh-medium education is on the rise in the north, west and Cardiff</p> <p>In all other counties parents choose WM education because it is the best, and this is because counties have invested in it. PCC have never invested in WM education in the Brecon area, then they ask why Ysgol y Bannau doesn't grow</p>	<p>The draft WESP also acknowledges that the authority's plans to provide access to more equitable provision for Welsh-medium pupils may have a negative impact on Welsh-medium pupil numbers in Powys in the short term, however the authority's aim is that this would be reversed in the longer term.</p> <p>The authority is not currently proposing to establish a Welsh-medium secondary school in the mid/south Powys area. However, as stated on page 21 of the consultation document, 'the authority's view is that closure of the Welsh-medium stream at Brecon High school is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.'</p>
5.2.2	<p>Places like Monmouth are actively surveying and researching their present families with 2 year olds to see what demand for Welsh will be required in the future – why are you not doing this?</p> <p>12.3.1 – the authority has been prepared to carry out a survey since 2014 (3 years!) however there have been difficulties with accessing the information required – this is unreasonable and demonstrates that the authority is not taking the issue seriously if it cannot access information required by Welsh assembly guidelines in 3 years</p> <p>The council has not considered future demand for Welsh-medium education in the Brecon area</p>	<p>The last survey to assess the demand for Welsh-medium education took place in 2010, and the results have helped to inform the primary and secondary modernisation programmes. The authority has been prepared to carry out a further survey since 2014 in line with the requirements of the 2013 Regulations, however there have been difficulties with accessing the information required to conduct this survey due to the fact that babies living in Powys are born in hospitals located in a number of local authority areas, and therefore their births are registered by these authorities. The authority remains committed to carrying out this work, and will focus on carrying out assessments of individual areas as part of any work to establish new Welsh-medium provision.</p> <p>The authority has also been looking at alternative methods of assessing potential latent demand for Welsh-medium education. This work remains at an early stage, however information provided by this work will be taken into consideration when planning future developments.</p>

5.2.3	<p>The council should be promoting Welsh not killing it</p> <p>Saddened that Powys County Council do not share Cylch Meithrin Aberhonddu's enthusiasm for the Welsh language and the benefits of bilingualism</p> <p>The council is not showing a positive commitment to the Welsh language</p> <p>PCC is letting Wales down and undermining the Welsh Assembly's massive investment in promoting the Welsh language</p> <p>PCC is undermining the Welsh Government's investment in the Welsh language</p> <p>The Cabinet must demonstrate an ambitious plan for education and our language</p> <p>If the council had worked to strengthen the Welsh language in the area numbers in the Welsh medium sector would be rising</p>	<p>The authority's WESP 2014 – 17 and the draft WESP 2017 -2020 clearly shows that the authority recognises the difficulties associated with delivering equitable Welsh-medium provision a rural and sparse county such as Powys, and illustrates its commitment to addressing these issues and meeting the Welsh Government's target of a million Welsh speakers by 2050.</p>
5.2.4	<p>The council is promoting the Welsh language in the north of the county but completely ignoring it in the</p>	<p>This statement is untrue. The authority is committed to developing Welsh-medium education across the whole of Powys. However, it must be acknowledged that the current situation in terms of Welsh-medium education is very different in north and south Powys, therefore the</p>

	south	starting point is different. The authority's draft WESP for 2017-20 includes objectives relating to both north and south Powys.
5.2.5	<p>It's disgusting how our Welsh children are being treated</p> <p>Amazed at the lack of commitment PCC is showing to the Welsh speaking community in Brecon.</p>	The authority's view is that the proposal will improve the provision for Welsh-medium pupils in South Powys.
5.2.6	You say you will help to promote Welsh-medium through Twf and Menter Brycheiniog, but if there has been more you could have done in the past, why was this not done before?	The authority has been working, and continues to work with, organisations such as Twf, Urdd, Mentrau Iaith and Mudiad Meithrin to promote Welsh-medium education.
5.2.7	<p>A number of complaints have been made to the Welsh Language Commissioner on the basis that PCC has acted contrary to its Compliance Notice in relation to the Welsh Language Measure 2011</p> <p>I believe that PCC is acting in contravention of the Compliance Measure and the Measure by treating Welsh less favourably than English – the overall conclusion that Welsh-medium pupils must travel or make the 'difficult decision' to exit Welsh-medium education can only be unlawful in light of the measure</p>	<p>The authority does not agree that the proposal is contrary to the Compliance Notice in relation to the Welsh Language Measure.</p> <p>The authority's view is that the Welsh-medium provision at Brecon High School is not providing an appropriate educational experience for pupils, due to the small number of pupils accessing this provision and the limited range of provision available, and therefore the authority's view is that the limited Welsh-medium provision available in Brecon High School is treating Welsh less favourably than English. The reasons for this proposal were clearly stated in the consultation document in respect of this proposal, and are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The authority has also acknowledged throughout the process that as with all proposals, there are risks and disadvantages associated with this proposal. These were also outlined in the consultation document in respect of the proposal.</p>

		<p>The proposal's impact in relation to the Welsh Language Standards has been considered in the Impact Assessment produced in respect of the proposal.</p> <p>The authority is committed to providing access to Welsh-medium education to pupils through the provision of home to school transport, however the authority acknowledges that some pupils may prefer to transfer to attend English-medium provision locally. The authority is confident that the alternative Welsh-medium provision available will provide greater equality to pupils compared with the current provision at Brecon High School in terms of the breadth of Welsh-medium provision available to pupils, and as stated on page 21 of the consultation document in respect of this proposal, 'this would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area'.</p>
5.2.8	<p>I am fed up of the suppression of our country and all that comes with it – what nationality are the people making these decisions?</p> <p>The Cabinet member that presented the report to remove Welsh from Brecon to council, and both of the senior officers involved are Welsh speakers. Both English and Irish immigrant councillors voted to keep Welsh in Brecon</p>	<p>The linguistic background and nationality of Cabinet members and officers is not relevant to the consultation. The authority has a duty to provide access to Welsh-medium education to pupils who request it. The authority's view is that the current Welsh-medium provision is not providing an appropriate educational experience to Welsh-medium pupils.</p>
<b>5.3 Reference to the council's WESP</b>		
5.3.1	<p>The current WESP states that the authority would raise Brecon Welsh stream to 2B schools, however the council state that due to the financial challenging situation faced by the council, no additional financial support could be provided</p>	<p>The fair funding formula uplift in respect of a dual stream school is based on the number of subjects and % of the curriculum being delivered in both languages in each year group, with the funding for the financial year being based on the activity undertaken in the school year that started in the September prior to the start of the financial year. If the school had increased the number of subjects being delivered through both English and Welsh medium, then this increase would have recognised through the fair funding formula, and the funding increased accordingly. At no time did the school significantly increase the number of</p>

	– this statement should be examined by the council's auditors	subjects offered through the medium of Welsh.
5.3.2	The draft WESP is mentioned many times in the document, however we are still under the current WESP	Whilst the authority is still awaiting feedback from Welsh Government on the WESP for 2017-20, the WESP was approved by the council's Cabinet on two occasions, in draft form in November 2016, and a post-consultation version was approved on the 14 <sup>th</sup> March.
5.3.3	If as stated in ref 14.1.7 the vote on 27 <sup>th</sup> January 2015 was to move to an alternative model, is this classed as the point at which the 2014-17 WESP was abandoned and if so did the Welsh Government agree this new WESP (alternative model)?	<p>Updates on progress in relation to the WESP are provided to Welsh Government annually. Although the WESP did not change following the cabinet decision in January 2015, the ongoing work was reflected in the Progress Reports provided to Welsh Government.</p> <p>The most recent Progress Report, submitted to Welsh Government in December 2015, provides the following update:</p> <p><i>'The Council is also carrying out a review of secondary provision in mid and south Powys, which includes consideration of Welsh-medium provision in this area. The authority carried out consultation on closure of the Welsh-medium stream at Brecon High School during the summer of 2015, and a Consultation Report was prepared and published in accordance with the requirements of the School Organisation Code. However, a number of alternative ideas were suggested in relation to the future of Welsh-medium secondary provision in mid and south Powys, therefore the authority is now considering Welsh-medium provision as part of the reviews of secondary provision in mid and south Powys, which are ongoing.'</i></p>
5.3.4	The draft WESP that has been brought up as answers to many points has been classed as not good enough by Welsh Government and needs to be changed – is this the case?	The draft WESP for 2017-20 was initially approved by the council's Cabinet in November 2016, and a post-consultation version was approved by the council's Cabinet on the 20 <sup>th</sup> March 2017. The post-consultation version has been sent on to Welsh Government for feedback in line with the requirements of the Welsh in Education Strategic Plans (Wales) Regulations 2013, however no feedback has yet been received.
5.3.5	Aled Roberts who has been reviewing Powys' WESP has been made aware of its potential to force students out of Welsh-medium	The authority notes this comment. No feedback has yet been received from Welsh Government on the post-consultation version of the WESP for 2017-20 which was approved by the council's Cabinet on the 20 <sup>th</sup> March 2017.

	education	
5.3.6	<p>All through the consultation report, the council refers to how this will support the draft WESP document – this document has now been returned to the council and has not been accepted – it should never have been used to support the consultation as it has not been approved, the only WESP the council should be referring to in the consultation is the current, approved WESP which says that Brecon Welsh stream should have support to be made a 2B provision</p>	<p>The council's WESP for 2017-20 was approved by the council's Cabinet on the 20<sup>th</sup> March 2017, and was sent on to Welsh Government for feedback in line with the requirements of the Welsh in Education Strategic Plans (Wales) Regulations 2013, however no feedback has yet been received.</p> <p>Prior to receiving Cabinet approval on the 20<sup>th</sup> March 2017, a pre-consultation version of the WESP was approved by the Cabinet in November 2016. Whilst the WESP has not been approved by the Welsh Government, it has been supported by the council's Cabinet and therefore represents the council's strategic direction in relation to Welsh-medium education.</p> <p>Updates on progress in relation to the WESP are provided to Welsh Government annually. Although the WESP did not change following the cabinet decision in January 2015, the ongoing work was reflected in the Progress Reports provided to Welsh Government.</p> <p>The most recent Progress Report, submitted to Welsh Government in December 2015, provides the following update:</p> <p><i>'The Council is also carrying out a review of secondary provision in mid and south Powys, which includes consideration of Welsh-medium provision in this area. The authority carried out consultation on closure of the Welsh-medium stream at Brecon High School during the summer of 2015, and a Consultation Report was prepared and published in accordance with the requirements of the School Organisation Code. However, a number of alternative ideas were suggested in relation to the future of Welsh-medium secondary provision in mid and south Powys, therefore the authority is now considering Welsh-medium provision as part of the reviews of secondary provision in mid and south Powys, which are ongoing.'</i></p>
5.3.7	<p>Why are you consulting on rewriting the WESP at the same time as closure of the Welsh stream in Brecon?</p>	<p>The timescale for re-writing and consulting on the revised WESP for 2017-20 is set by the Welsh Government and is included in the Welsh in Education Strategic Plans (Wales) Regulations 2013.</p>
<b>5.4 Criticism of RhAG</b>		

5.4.1	The whole episode stems from RhAG giving the authority direction on the future of Welsh medium education in the county	<p>RhAG is a national organisation which has significant experience in terms of the development of Welsh-medium education, and as such is a key stakeholder in terms of developments relating to Welsh-medium provision across Powys and nationwide.</p> <p>However, the strategic direction in terms of the development of Welsh-medium education within Powys is set by the council's Cabinet, not by RhAG.</p>
5.4.2	<p>Criticism of RhAG survey</p> <p>RhAG's loaded survey that states that 120 responses would prefer a full Welsh medium school pails into insignificance compared to the 1711 people that have signed a petition in support of retaining Brecon Welsh stream</p>	RhAG's response was one response received to the consultation on the proposal to close the Welsh-medium stream at Brecon High School. The issues raised in the responses were included in the consultation report, in line with the requirements of the School Organisation Code, however no weighting was given to these issues compared with any other issues raised.
5.4.3	There are in the region of 1000+ parents of Welsh-medium pupils in Builth and Brecon catchment areas, so it is clear that the majority did not complete the questionnaire, and only a very small number were in favour of a designated Welsh-medium school	<p>The authority notes the comment, however the authority would not agree that there are in the region of 1000+ parents of Welsh-medium pupils in the area. Whilst it is true that there are approximately 650 Welsh-medium pupils in primary and secondary schools in the area, many of these pupils have one or more siblings, which would reduce the total number of parents.</p> <p>According to RhAG's report, the survey was distributed to parents of pupils attending Welsh-medium primary provision in mid and south Powys through the primary providers and Mudiad Meithrin. As with all surveys of this type, it is not possible to force parents to complete it.</p> <p>The current process in relation to the Welsh-medium stream at Brecon High School is not proposing the establishment of a designated Welsh-medium school.</p>
5.4.4	RhAG fighting to get a Welsh medium secondary school, but this shouldn't be at the cost of stopping children have access to Welsh-	The authority has a duty to provide access to Welsh-medium education to those pupils that choose it. The authority's view is that the current provision in mid and south Powys does not provide equality for Welsh-medium pupils due to the limited Welsh-medium curriculum available, and the authority's view is that the only way to improve this is to centralise

	medium education	<p>provision in the area in order to provide access to an increased Welsh-medium curriculum.</p> <p>The authority has acknowledged in the consultation document that there are a number of risks associated with the proposal, which include a potential impact on Welsh-medium pupil numbers in the short term. The authority is not currently proposing to establish a Welsh-medium secondary school in the mid/south Powys area, however, as stated on page 21 of the consultation document, ‘the authority’s view is that closure of the Welsh-medium stream at Brecon High school is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.’</p>
5.4.5	<p>What weight is given to RhAG? PCC have included a lot of RhAG quotes and have not challenged them at all. PCC is quoted as saying they have been using RhAG’s questionnaire results to base numbers on. It seems you are giving a lot of weight to RhAG. Where are the results of the last questionnaire RhAG sent out in November, did the results from this not support your centralization of Welsh-medium education?</p>	<p>Due to the open and public nature of the consultation exercise carried out in respect of the proposal to close the Welsh-medium stream in Brecon High School, RhAG were entitled to respond to the consultation. However, no greater weighting is given to the response received from RhAG than any other response received.</p> <p>Any issues raised by RhAG have also been treated in the same manner as issues raised by all consultees.</p> <p>The findings of the RhAG questionnaire that was carried out in November 2016 were submitted by RhAG as a consultation response, and the issues raised were reflected in the consultation report.</p>
5.4.6	<p>12.1.1.3 in consultation report – Did you investigate how many people took part in the RhAG survey, rather than base the evidence on percentages</p>	<p>The consultation response received from RhAG, which outlined the findings of the survey carried out in November 2016, did not indicate the number of surveys distributed, however the response stated that 87 questionnaires were completed and returned.</p>
<b>6. ISSUES RELATING TO BRECON HIGH SCHOOL</b>		
<b>6.1 Impact on the viability and financial situation of Brecon High School</b>		



6.1.1	<p>Closing the Welsh stream will not improve Brecon High's financial situation</p> <p>Any savings to Brecon High School will be negated by the loss of its Welsh-medium uplift and potential loss of pupils</p> <p>Brecon High School is in a difficult financial position, withdrawal of provision from Brecon will further damage the school</p>	<p>A financial analysis shared and agreed with the governing body of the school has shown that based on the current pupil numbers and provision, if the Welsh-medium provision was withdrawn from the school, and all pupils transferred to other schools, there would be a net benefit to the school's financial position of approximately £50,000, which would improve the school's overall ability to balance the budget.</p>
6.1.2	<p>Closure of the Welsh stream will have a negative impact on the number of pupils who could attend Brecon High School – first consultation determined that a viable school was around 600 pupils. Therefore, important that the school has the numbers of pupils in its catchment area to ensure these numbers are achievable. Closure of the stream would lead to a significant reduction in the possible number of pupils who may attend Brecon High School – how will the authority enable the school to achieve a roll of at least 600 pupils if the pupils in the catchment area is being reduced?</p>	<p>The authority recognises that the closure of the Welsh-medium stream would reduce the number of pupils in the school, however the school has over recent years not attracted the expected number of pupils from its feeder primary schools. If the transfer rate of English-medium pupils from its feeder primary schools rose to the expected 90%+ then a school of 600 pupils would be achieved. The new school building is currently being planned for a capacity of 750.</p>

6.1.3	5.2.2 in consultation report – What was done with the savings from not having to pay the maths teacher that left, why was this money not available for a new replacement teacher?	The governors and management team of Brecon High School are responsible for deploying the school's budget, and this is a question for the school itself.
6.1.4	5.7.7 in consultation report – Can you confirm if this statement was taken into account when deciding to withdraw Welsh-medium education from Brecon High School?	<p>Issue 5.7.7 in the consultation report states:</p> <p><i>'Some parents are under the impression that the current arrangement at Brecon High School provides sufficient Welsh-medium provision and will enable pupils to become fully bilingual, however this is not the case.'</i></p> <p>No final decision has yet been made to withdraw Welsh-medium education from Brecon High School. When deciding whether or not to proceed with the proposal, the Cabinet considered the consultation report, which included this issue, however no specific reference was made to this point during the Cabinet meeting.</p>
6.1.5	6.2.13 in consultation report – The response provides a very pessimistic view. A new school in Brecon would be an ideal opportunity for WM standards to be raised to the highest level, would re-establish the appetite for parents to send their children back to Brecon, and would attract pupils from other areas	<p>Issue 6.2.13 in the consultation report states:</p> <p><i>'A Welsh stream would enhance the new build'</i></p> <p>The authority notes this comment, however the authority is satisfied that the response provided to point 6.2.13 remains valid. The response provided is as follows:</p> <p><i>'The authority notes this comment. However, the authority's priority is to ensure equality of provision for Welsh-medium learners compared with English-medium learners. The current small number of Welsh-medium pupils at Brecon High School means that the Welsh-medium provision offered is limited and does not provide equality for Welsh-medium learners compared with English-medium learners. Whilst a new building for Brecon High School would be a fresh start for secondary education in Brecon, there would be no significant increase in Welsh-medium pupil numbers, therefore it would be difficult for the school to offer any more Welsh-medium subjects than are currently offered.'</i></p>
<b>6.2 Issues relating to Welsh-medium provision at Brecon High School</b>		

6.2.1	<p>The current Welsh speaking staff at Brecon High School continue to provide a high quality education to the loyal remaining pupils</p> <p>Many of the best teachers in Brecon High School are Welsh speakers, would be awful for their jobs to be at risk as the language is unneeded</p>	<p>The authority notes this comment and notes the concern in relation to the impact on the jobs of Welsh-medium teachers. The quality of the Welsh-medium teachers at Brecon High School are not the reason for this proposal.</p>
6.2.2	<p>School's curriculum for the Welsh stream in Key Stage 3 had to be reduced to make it more financially viable due to the reduction in numbers and the resultant impact on the school income</p> <p>An increase in pupil numbers would enable the school to develop the curriculum again</p> <p>The school still has staff that could provide a fuller Welsh-medium curriculum if funding were provided</p> <p>There is capability at Brecon High School to provide more subject provision through the medium of Welsh if there were sufficient numbers</p>	<p>The authority acknowledges that the school has had to reduce the Welsh-medium curriculum provided due to the small number of pupils currently accessing the provision, and that the school could increase the provision offered should pupils' numbers increase sufficiently.</p> <p>However, the fact remains that the number of pupils accessing the stream is currently very small, and the Welsh-medium provision offered to these pupils is very limited. The authority's view is that that the number of pupils accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.</p>
6.2.3	<p>Through agreement of the South Powys Post 16 Consortium post 16</p>	<p>The authority notes this comment. The south Powys consortium for post-16 education is a collaborative model that has been developed jointly by the authority and schools. For a</p>

	<p>provision has been centered on Builth Wells High School, this is not the failing of the school</p> <p>It is stated that no A levels are offered through the medium of Welsh at BHS but it is well known that PCC has an agreement with BWHS that the provision is to be offered there which actually prevents BHS offering the subjects – this cannot be a sound basis on which to decide to close the provision at BHS</p>	<p>number of years, since before the establishment of the South Powys Consortium, Builth Wells High School has provided a number of Welsh-medium post-16 courses, however Brecon High School has not provided any Welsh-medium post-16 courses. Whilst it is true that Welsh-medium pupils could choose to study Welsh-medium subjects at other schools, no pupils have chosen this option.</p>
6.2.4	<p>Previous pupils of the Welsh-medium stream have had success because of the Welsh-medium education they had at Brecon</p> <p>Welsh-medium provision at Brecon is of a high standard and pupils have gone to achieve very highly</p> <p>Pupils in the Welsh stream are achieving above average results</p>	<p>The authority is pleased to note the successes of previous pupils who have attended the Welsh-medium stream at Brecon High School. However, the authority's view is that the current small number of pupils currently accessing the Welsh-medium stream at Brecon High School and the limited Welsh-medium provision available to pupils at the school is not providing an appropriate educational experience for pupils.</p>
6.2.5	<p>Brecon High School has a fantastic Welsh ethos, children have constant opportunities to use their Welsh and their standard of Welsh is really good</p> <p>Reference to opportunities to use Welsh in Brecon High School</p>	<p>The authority is pleased to note the positive comments relating to Brecon High School's Welsh language ethos and the opportunities for pupils to use Welsh within the school. However, the fact remains that the number of pupils currently attending the Welsh-medium stream at the school is very small. The number of Welsh-medium pupils in the alternative providers which pupils would be expected to transfer to, is significantly greater, therefore the authority's view is that this would lead to increased opportunities for pupils to use their Welsh.</p>

6.2.6	Pupils who have been to Ystalyfera have said that they have more opportunities to use Welsh in Brecon than they did in Ystalyfera	Ysgol Gyfun Ystalyfera is a Welsh-medium secondary school which provides a full Welsh-medium curriculum to pupils. In addition, Welsh is the main language used in the school, and extra-curricular activities are provided in Welsh. The authority does not agree that more opportunities are provided for pupils to use Welsh in Brecon High School than at Ystalyfera.
6.2.7	Brecon has the perfect set up to run a successful Welsh stream, the headteacher and teachers are in support of the stream, the Welsh-medium teachers are of a very high standard, Welsh ethos of the school is particularly high	The authority is pleased to note the positive comments in relation to the support of the headteacher and staff of Brecon High School to the Welsh-medium stream. However, the fact remains that the number of pupils currently attending the Welsh-medium stream at the school is very small, which makes the provision unviable.
6.2.8	<p>There have been many opportunities to identify the lack of satisfactory Welsh-medium education at Brecon High School, more effort should have been put into raising standards, to prevent the current situation</p> <p>5.7.3 in consultation report – If Brecon High School’s provision was only classed as category 3, was any action taken to raise it, before parents decided to take their children to alternative schools?</p> <p>Much is made in the consultation report of the part played by the management team of BHS in the decline in numbers, teachers, subjects and cultural ethos at BHS.</p>	<p>In the Cabinet minutes of a meeting held on the 22<sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p> <p>Discussions took place with all schools about their Welsh-medium provision at the time and how they would develop this in order to move towards achieving the target of a Category 2B school. Whilst the Cabinet minutes refer to ‘additional investment’, it was not possible to fulfil this due to the challenging financial situation facing the council.</p> <p>The authority established a Welsh-medium learning partnership, ‘Clwstwr y Ffynnon’ a few years ago, which included all Welsh-medium providers in mid and south Powys. Improving transfer rates into Welsh-medium secondary provision was one of the objectives of that partnership. Events were held in a number of schools to promote progression from Welsh-medium primary education into Welsh-medium secondary education</p>

	<p>5.7.4 in consultation report – If this comment is true, there should have been far more effort into raising standards, rather than letting the situation get worse. If other schools can do it, why can't Brecon?</p> <p>PCC failed to produce the promised support for 2B status, then downgraded this to advice, which also failed to materialise.</p>	
6.2.9	<p>Untrue that BHS have not been 'strengthening and increasing the WM provision available' – in summer of 2013 the then head appointed a new teacher specifically as part of the drive towards 2B status. This member of staff completed the WAG National Training Programme and Sabbaticals Scheme for teaching through the medium of Welsh. The intention was to send other Welsh-speaking members of staff, who were not currently teaching through Welsh, on the scheme to increase their confidence. This headteacher also instigated the appointment of a Welsh-speaking maths teacher.</p>	<p>Whilst the level of Welsh-medium provision at Brecon High School improved briefly in 2013/14, this was not sustained and has now been reversed.</p>
6.2.10	<p>The benefits of a truly bilingual high school can clearly be seen at BWHS – why should BHS not aspire to the same level of</p>	<p>The authority has a duty to provide access to Welsh-medium education to those pupils that choose it. The authority's view is that the current provision in Brecon High School does not provide equality for Welsh-medium pupils due to the small number of pupils accessing this provision and the limited Welsh-medium curriculum available. It is the authority's view that</p>

	integration?	the only way to improve this is to centralise provision in the area in order to provide access to an increased Welsh-medium curriculum, and to provide greater equality for Welsh-medium pupils. As stated on page 21 of the consultation document issued in respect of this proposal, 'this would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.'
6.2.11	The decision would be irreversible as the staff with the expertise to deliver through the medium of Welsh would be lost	<p>The authority does not agree that a decision to close the Welsh-medium stream at Brecon High School would be irreversible.</p> <p>The authority has a duty to provide access to Welsh-medium education to all pupils that request it. The current Welsh-medium provision at Brecon High School is not providing an appropriate educational experience to Welsh-medium pupils, due to the small pupil numbers and the limited Welsh-medium provision available.</p>
6.2.12	5.7.5 in consultation report – If this is true can you explain why this would be, and how other schools have found a solution?	<p>Issue 5.7.5 of the consultation report states: 'Historically, Brecon High School has struggled to recruit Welsh-medium teachers to teach in the stream at Brecon'.</p> <p>Recruiting Welsh language teachers, especially specialist teachers in the secondary sector, is a challenge for most schools in Powys, and across Wales. Some schools have addressed the issue by sharing teachers between schools, or sharing courses (at post-16), or linking with other schools via video-conferencing for certain subjects.</p>
6.2.13	At paragraphs 4.3.1, 4.4.1, 5.1.1, 5.1.4, 5.2.1 and many more of the consultation report, it has been stated that BHS was not 'strengthening and increasing the Welsh-medium provision available'. This is not true.	<p>The response provided for these issues included the following:</p> <p>'The same level of support is provided to all dual stream secondary schools. Some schools have succeeded in strengthening and increasing the Welsh-medium provision available, however this has not been the case at Brecon High School.'</p> <p>The authority stands by this response. The authority receives information from all schools on an annual basis about their Welsh-medium provision, this information shows that the level of provision at Brecon High School remains limited.</p>
<b>6.3 Impact on English-medium pupils</b>		

6.3.1	<p>The presence of a Welsh stream benefits all pupils in the high school – many past pupils from the English stream have said they were helped in their own Welsh studies by the first language pupils, and that hearing their friends speaking in Welsh made them want to learn</p> <p>The Welsh stream provides significant benefits to English-medium pupils</p> <p>All pupils should celebrate their Welshness, even if they are not Welsh speaking themselves</p>	<p>The notes these comments. However, authority's view is that the limited Welsh-medium curriculum currently available and the small number of Welsh-medium pupils is not providing an appropriate educational experience for Welsh-medium pupils at Brecon high School.</p> <p>All secondary schools in Wales are encouraged to develop a Welsh language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2<sup>nd</sup> language to pupils, and would be expected to maintain a Welsh ethos and provide opportunities for pupils to use incidental Welsh.</p>
6.3.2	<p>What opportunities would the council expect Brecon High School to provide to Welsh second language students to use Welsh by taking away the core of fluent Welsh speakers from the school</p>	<p>All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2<sup>nd</sup> Language to all pupils and would be expected to provide opportunities for pupils to use Welsh outside the classroom. The actual opportunities offered would depend on the school.</p>
6.3.3	<p>The English pupils in Brecon are not being disadvantaged by having a Welsh stream in Brecon</p>	<p>The authority agrees with this comment.</p> <p>The authority considered the proposal's impact on English-medium pupils in the consultation document in respect of this proposal. On page 23 of the consultation document, the authority noted that <i>'the proposal could have a negative impact on the Welsh language skills of English-medium pupils attending Brecon High School'</i>.</p> <p>On pages 25 and 26 of the consultation document, the authority identified that the proposal could have a positive impact on the English-medium provision at the school, due to the fact that the school would be able to focus solely on its English-medium provision, however this</p>



		is not the same as saying that English-medium pupils are being disadvantaged by there being a Welsh-medium stream being at the school.
6.3.4	What message would this send to English-medium pupils, who are effectively being prevented from integrating with their Welsh-medium counterparts	English-medium pupils at Brecon High School will not be prevented from integrating with their Welsh-medium counterparts.
6.3.5	<p>Children from Ysgol y Bannau have been a large part of the Orchestra, drama performances and sporting achievements at Brecon high School – taking away the Welsh stream will take away an important jigsaw piece in the school’s success.</p> <p>Concern about impact on the cultural life of Brecon High School</p> <p>Although the number of Welsh-medium pupils at Brecon High School is small, they punch above their weight academically, socially and creatively and their loss will be a huge blow to the school.</p>	The authority acknowledges the involvement of Welsh-medium pupils in a range of sports and cultural activities at Brecon High School, and the academic achievements of these pupils. However the authority’s priority is to provide greater equality of opportunity for Welsh-medium pupils and to ensure that they are able to access a comprehensive Welsh-medium curriculum. The current Welsh-medium provision at Brecon High School does not offer this.
<b>6.4 Criticism of the council’s treatment of Brecon High School</b>		
6.4.1	<p>Brecon High School’s current situation is Powys County Council’s fault</p> <p>The extended period of uncertainty</p>	The authority acknowledges that the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School has impacted on pupil numbers at the stream since 2015/16. However, details of pupil numbers at the Welsh-medium stream since 2010/11 are provided on page 11 of the consultation document, and this information shows that pupil numbers decreased between 2010/11 and 2014/15, before the council began any

	has been disastrous for Brecon High School	consultation in relation to the future of the stream.
6.4.2	Let down by the council's lack of vision and ambition regarding the provision of Welsh-medium education at Brecon High School	The authority's vision for Welsh-medium education is set out in its Welsh in Education Strategic Plan. The authority has recently carried out consultation on a revised Plan for 2017-20. The draft Plan sets out the authority's aim ' <i>To provide equality of provision for Welsh-medium learners in Powys</i> '. The current provision at Brecon High School does not provide equality of provision for Welsh-medium learners in Powys.
6.4.3	<p>Still waiting for recognition from the council to Brecon High School for coming out of special measures</p> <p>PCC has not publicly praised Brecon High School for all the work it has done and the improvements made to come out of special measures. When Builth went into Special Measures, Arwel Jones was very quick to publicly say 'Don't worry Builth will not be in special measures for long'</p>	<p>In the consultation document, the council acknowledges that '<i>there has been a good improvement trajectory of performance in recent years</i>' at Brecon High School. In addition, officers congratulated the school on the school's improvement at the end of the meeting for parents and the community held at Brecon High School as part of the recent consultation on closure of the Welsh-medium stream.</p> <p>The current proposal is not a reflection on the headteacher and staff of Brecon High School. As stated in the consultation document, the reasons for the proposal are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The authority does not issue a press release when a school is removed from special measures, however schools are able to issue something themselves. However, the Schools Service Management Team will consider whether press releases should be issued as a matter of course when schools are removed from the category of special measures.</p>
6.4.4	Fair Funding Formula does not take into account the size of the school compared to the Welsh stream, so Brecon has always been the poorer stream of the two. In order to create a Welsh ethos across the school with all letters bilingual, it's going to incur extra	<p>The fair funding formula is based on various elements which include premises allowances. Additional funding to support the teaching element of provision is provided by the language uplift.</p> <p>The language uplift is based on the number of subjects and % of the curriculum delivered through both languages, with the number of pupils within each stream being funded through the age weighted pupil unit. Therefore, the language uplift is not dependent on the number of pupils in each stream.</p>

	costs. The formula should have meant that BHS got more money when its pupils were sitting 8 GCSEs each through the medium of Welsh, but instead it gave more money to Builth because they were offering more breadth, but had less pupils taking less GCSEs	
6.4.5	Not happy that the consultation document hardly mentions that Brecon is and has improved and that Builth is in Special Measures – in previous consultations Brecon being in special measures was mentioned nearly every other word.	At the time of writing the consultation document, both Brecon High School and Builth Wells High School were in Special Measures, and this information is included in the consultation document in respect of this proposal.  It is true that Brecon High School was removed from Special Measures in December 2016, which was during the consultation period, and this is stated on numerous occasions in the Consultation Report.
<b>6.5. Issues relating to the new school build for Brecon High School</b>		
6.5.1	The decision would be irreversible as there would be no physical capacity in the school to deliver through the medium of Welsh following the move to a new building  Decision could not be reversed as the planning for the new building would be undertaken based on the decision  6.2.3 in consultation report – I would like to know if the plans for the new school are designed only with English-medium lessons	The new school for Brecon is being designed for 750 pupils and the brief to the contractor included a requirement that the design could be extended, in order to future-proof it for any increase in pupil numbers.

	allowed for?	
6.5.2	<p>Unfair that local Welsh-medium children will have no opportunity to be part of the brand new school that Brecon will be having.</p> <p>Unfair that Welsh medium pupils will not be able to study in the new school which will be built in Brecon</p> <p>Would be more forward thinking of Powys to include Welsh speaking pupils in a flagship, future proof school</p> <p>The planned rebuild and investment in the high school is an excellent opportunity to revitalise Welsh-medium education in Brecon</p> <p>The new building is an opportunity to provide a dual stream school that can serve as a beacon for the promotion of the Welsh language, and would draw pupils into Welsh-medium education that might not otherwise consider it.</p> <p>The new school building will be a significant draw for new pupils wishing to learn through Welsh medium</p>	<p>Should this proposal be implemented, there would be no Welsh-medium stream in Brecon High School, and therefore there would be no Welsh-medium stream at the new school building. However Welsh speaking pupils / pupils who have accessed Welsh-medium primary provision would still be able to apply for a place in Brecon High School, should that be their preference, and places would be allocated in accordance with the authority's Admissions Policy.</p> <p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a category 4 school, which is described as a 'Predominantly English Medium Secondary School'.</p> <p>The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: 'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'</p> <p>This category would allow the school to teach one or two subjects through the medium of Welsh, which could include Welsh first language, however this would be a decision for the school. There are examples of 'Predominantly English Medium secondary schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p>

	<p>Welsh-medium pupils will be excluded from the new building which will undoubtedly attract excellent teachers which will enable it to continue to improve</p> <p>Astounding that the consultation report says that in order to access the new facilities planned for Brecon, pupils must make the 'difficult decision' to leave Welsh-medium education</p>	
6.5.3	<p>Would result in a 21<sup>st</sup> Century school that accepts students from most backgrounds, including Nepalese and eastern European, but telling local Welsh-speaking stakeholders that they are excluded</p>	<p>Should this proposal be implemented, there would be no Welsh-medium stream in Brecon High School, and therefore there would be no Welsh-medium stream at the new school building. However, Welsh speaking pupils / pupils who have accessed Welsh-medium primary provision would still be able to apply for a place in Brecon High School, should that be their preference, and places would be allocated in accordance with the authority's Admissions Policy.</p>
6.5.4	<p>Clear from the plans that the new building has plenty of capacity for a Welsh-medium stream now that PCC has changed its plans to close Gwernyfed and I would urge the council to allow the Welsh stream to have its own fresh start in the new building</p>	<p>Whilst a new building for Brecon High School would be a fresh start for secondary education in Brecon, there would be no significant increase in Welsh-medium pupil numbers in the short term, therefore it would be difficult for the new school to offer any more Welsh-medium subjects than are currently offered.</p>
<b>7. FINANCIAL ISSUES</b>		
<b>7.1 Issues relating to the cost of providing category 2B provision at Brecon High School</b>		
7.1.1	Using figures provided by the	Whilst initial financial information in relation to the estimated savings should the proposal be

<p>council, it was shown that the cost of bringing Brecon up to 2B status was less than the cost of transporting pupils away from Brecon, yet at the Cabinet meeting of 14<sup>th</sup> March, officers produced completely different figures, i.e. much higher, which would be required to achieve 2B status</p> <p>Shocked that new figures were presented by officers at the Cabinet meeting that Cabinet and members had not been made aware of before – unacceptable for decisions to be taken when so many of the decision makers are uninformed of critical facts</p> <p>At the Cabinet meeting, new financial information presented with no apparent supporting evidence – surely this would render the process null and void as stakeholders were not given the opportunity to challenge this</p> <p>Officer who agreed the figure of £40,000 in the consultation meeting went back on his word, then brought new figures out in the decision meeting on the 14<sup>th</sup> March which are not and had not been agreed to be correct by Brecon High School</p>	<p>implemented were included in the consultation document in respect of this proposal, further information was requested during the consultation process. In line with the statutory process outlined in the School Organisation Code, any queries raised during the consultation period in respect of this proposal were addressed in the consultation report. However, there is also an opportunity for Cabinet members to ask questions when determining how to proceed. These questions will reflect their own concerns in relation to the proposal, and won't necessarily be matters that were already included in the Consultation Report. The information provided in the Cabinet meeting was provided in response to a question from a Cabinet member.</p> <p>The following provides a summary of the financial information that was provided throughout the process, as recorded in the documentation:</p> <p><b>Consultation Document – page 31:</b></p> <p><i>'In accordance with the authority's Funding Formula, dual stream schools receive funding based on the proportion of the curriculum delivered through both the medium of Welsh and English in separate streams.</i></p> <p><i>For the 2016/17 financial year, Brecon High School received £58,475 through the formula to support the additional cost of operating as a dual stream school. Should the Welsh-medium stream close, this funding would not transfer with pupils to their alternative schools or streams, therefore this would be a saving to the authority.</i></p> <p><i>Following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. As this transport is already provided, implementation of the proposal would not incur any additional transport costs.</i></p> <p><i>The total saving to the authority should the proposal be implemented is estimated to be £58,475.'</i></p> <p><b>Consultation Report – page 41:</b></p> <p><i>'During the recent consultation period on the proposal to close the Welsh-medium stream at</i></p>
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	<p>Had previously been informed that the cost of bringing Brecon High School up to 2B status would be an additional £47,000, making the provision of WM education far cheaper than moving the pupils to Builth Wells, however in the meeting, officers for the first time came up with additional figures in the region of £200,000 in order to bring the school up to 2B status – why were these figures not included in the consultation document so that they could be challenged?</p>	<p><i>Brecon High School, a county councillor requested details of the additional funding that would be required for the Welsh-medium provision at Brecon High School to meet the definition of a Category 2B school. The figure provided was £47000, which is the additional funding that would be provided to the school through the authority’s funding formula to support the provision of Welsh-medium subjects for 80% of curriculum time in years 7 to 11.</i></p> <p><i>However, whilst the funding provided to dual stream schools through the authority’s funding formula is based on the % of curriculum time where Welsh-medium options are available to pupils, the Welsh Government’s definition of a category 2B school is as follows: ‘At least 80% of <b>subjects</b> (excluding Welsh and English) are taught through the medium of Welsh but are also taught through the medium of English.’</i></p> <p><i>In relation to the funding provided through the formula to support dual stream provision in key stage 4, the authority considers that Welsh-medium curriculum time is available when a minimum of 1 Welsh-medium options subject is available in each options block. For example, a dual stream school offering 1 Welsh-medium subject and 5 English-medium subjects in each options block, as well as all core subjects through the medium of Welsh, would receive the maximum funding available from the authority to support its dual stream provision, and would be providing 80% of curriculum time through the medium of Welsh. However, this school would not necessarily meet the Welsh government definition for a category 2B school, as the school would not be providing 80% of <b>subjects</b> through the medium of Welsh and English.</i></p> <p><i>Therefore, whilst the figure of £47000 provided during the consultation is the maximum additional funding that would be provided to support dual stream provision at Brecon High School based on the authority’s funding formula, this would not be sufficient to enable the school to provide Welsh-medium provision which would meet the definition for a category 2B school.’</i></p> <p><b>Cabinet meeting 14<sup>th</sup> March 2017:</b>  During the Cabinet meeting, Gareth Jones explained how much funding would be required for a category 2B school, which is recorded in the minutes of the meeting as follows:</p> <p><i>‘The Cabinet also sought clarification on the cost of bringing Brecon High School up to Category 2B status. Officers explained that £106k would come to the school from the fair</i></p>
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		<p><i>funding formula dual stream uplift, £54k which the school already received and an additional £47k, plus the per pupil funding of £2,500 per pupil giving a total of approximately £160k. However, to deliver 80% of the curriculum in Welsh, there would need to be 5-6 additional teachers at a cost of approximately £270k cost to the schools delegated budget. This meant that an additional £110k would have to be found in the school's budget which was already in deficit with the sum having to come from the English stream.'</i></p>
7.1.2	<p>Query re GJ statement that it would cost between £2-300000 to make Brecon High School category 2B, based on the need to employ five teachers – however Brecon High School already have teachers able to teach the majority of Welsh-medium subjects, ready and willing to teach a broad curriculum</p> <p>An education officer said it would cost between £200,000 and £300,000 to lift Brecon High School to 2B school based on it requiring around 5 Welsh-medium teachers, however Brecon already has many teachers with the ability to teach in Welsh, therefore it would not need to employ these additional teachers</p> <p>Figures provided in the meeting were based on employing 5 teachers to be able to provide 2B status, however Brecon high School would not need to employ an extra 5 teachers to implement 2B status, therefore this comment and cost were incorrect – the</p>	<p>The authority recognises that the school may have teachers with the skills to deliver through the medium of Welsh, however if the school was to extend its offer of Welsh-medium subjects, this would necessitate the requirement for an additional tutor group.</p> <p>The basis of the figures quoted is that for each of the 5 year groups between year 7 and 11 you would need a minimum of 1 FTE per year group to provide the direct teaching. In addition, the school would need to meet management and PPA requirements, which would add approximately an additional 20% per year group, making a total of 6 teachers. Using the school's current average teacher cost, this would equate to a teaching cost figure of approximately £280,000. In addition, the school would be required to provide admin and other support to the stream, but the cost of this could be met from within the school's existing support structure.</p> <p>It is recognised by the authority that the impact of increased Welsh-medium provision may reduce the number of teaching groups in the English stream, and this would reduce the above figure.</p>



	Cabinet made their decision having been misled on the actual costs	
7.1.3	<p>PCC has not been able to properly quantify the amount of investment that would be required to improve BHS to a 2B school.</p> <p>How much would it cost to bring Brecon up to 2B standard? – this has not been investigated fully during the consultation</p> <p>The different amount of costs throughout the consultation and in the meeting have shown that the actual cost of Brecon High School becoming a category 2B school is not known</p>	<p>To be a category 2B school, the school would require a minimum of 1 FTE for each of the 5 year groups between year 7 and 11. In addition, the school would need to meet management and PPA requirements, which would add approximately an additional 20% per year group, making a total of 6 teachers. Using the school's current average teacher cost, this would equate to a teaching cost figure of approximately £280,000. In addition, the school would be required to provide admin and other support to the stream, but the cost of this could be met from within the school's existing support structure.</p> <p>It is recognised by the authority that the impact of increased Welsh-medium provision may reduce the number of teaching groups in the English stream, and this would reduce the above figure.</p>
7.1.4	<p>Brecon High School would welcome the opportunity to discuss with appropriate officers the cost of Brecon High achieving 2B status as the figures quoted at the Cabinet meeting were not included in the consultation document</p> <p>Why have the council not sat down with Brecon high School and worked out exactly how much it would cost for them to implement Brecon into a 2B status?</p>	<p>The authority notes this comment.</p> <p>To be a category 2B school, the school would require a minimum of 1 FTE for each of the 5 year groups between year 7 and 11. In addition, the school would need to meet management and PPA requirements, which would add approximately an additional 20% per year group, making a total of 6 teachers. Using the school's current average teacher cost, this would equate to a teaching cost figure of approximately £280,000. In addition, the school would be required to provide admin and other support to the stream, but the cost of this could be met from within the school's existing support structure.</p> <p>It is recognised by the authority that the impact of increased Welsh-medium provision may reduce the number of teaching groups in the English stream, and this would reduce the above figure.</p> <p>Whilst officers have not specifically discussed the cost of becoming a category 2B school</p>

		with Brecon High School, officers from the authority have discussed the development of the Welsh-medium stream with governors and staff at the school on numerous occasions over the years. Costings would have been part of these discussions.
7.1.5	Portfolio Holder had indicated during the consultation period that whilst the authority had previously decided that Brecon High should be brought up to 2B status, it was up to the school to achieve that and, in doing so, would then receive appropriate funding, where did the portfolio holder think Brecon High was going to find the amount of money quoted at the Cabinet meeting in order to achieve 2B status prior to receiving any additional funds?	<p>The fair funding formula uplift in respect of a dual stream school is based on the number of subjects and % of the curriculum being delivered in both languages in each year group, with the funding for the financial year being based on the activity undertaken in the school year that started in the September prior to the start of the financial year. If the school had increased the number of subjects being delivered through both English and Welsh medium, then this increase would have recognised through the fair funding formula, and the funding increased accordingly. At no time did the school significantly increase the number of subjects offered through the medium of Welsh.</p> <p>Within the fair funding formula arrangements, the governing body is responsible for planning and setting a balanced budget to ensure that the required curriculum is delivered.</p>
7.1.6	Had the authority given Brecon High School the appropriate finances to bring the school up to 2B status, the school would have been able to retain the WM curriculum in KS3	The funding provided to Brecon High School to support its Welsh-medium provision is in line with the funding provided to other schools.
7.1.7	The consultation report admits that a language subsidy is paid for every pupil educated through the medium of Welsh, it is therefore not the case (as suggested by a member of the Cabinet during the debate immediately before the decision) that English-medium pupil funding subsidises the Welsh-	The authority's fair funding formula is based on various elements which include premises allowances. Additional funding to support the teaching element of provision is provided by the language uplift.

	medium provision																																																					
7.1.8	<p>What is the viable number of pupils for the Welsh stream to continue in Brecon High School? This has not been answered correctly, please provide a breakdown of costings for this – the council should have sat down with Brecon High School to work out the real figure for this</p>	<p>In the consultation report, the response to issue 4.6.4 is as follows:</p> <p>In order for the Welsh-medium provision at Brecon High School to be considered 'viable', the school would need to provide an appropriate range of Welsh-medium provision for Welsh-medium pupils. The authority's view is that dual stream schools should be aiming to provide Welsh-medium provision which meets the Welsh Government definition for a category 2B school.</p> <p>Currently, Ysgol Uwchradd Caereinion is the only dual stream secondary provider in Powys which meets the Welsh Government definition of a category 2B school. The breakdown of year 7 – 11 pupils in this school in September 2016 was as follows:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Welsh-medium</th> <th>English-medium</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>47</td> <td>36</td> <td>83</td> </tr> <tr> <td>8</td> <td>40</td> <td>36</td> <td>76</td> </tr> <tr> <td>9</td> <td>58</td> <td>37</td> <td>95</td> </tr> <tr> <td>10</td> <td>49</td> <td>38</td> <td>87</td> </tr> <tr> <td>11</td> <td>43</td> <td>43</td> <td>86</td> </tr> <tr> <td><b>Total</b></td> <td><b>237</b></td> <td><b>190</b></td> <td><b>427</b></td> </tr> </tbody> </table> <p>During 2016-17, Caereinion High School is providing the following number of subjects through the medium of Welsh, English and bilingually to pupils in years 7 – 11:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Welsh-medium</th> <th>English-medium</th> <th>Bilingual</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>14</td> <td>15</td> <td>0</td> </tr> <tr> <td>8</td> <td>16</td> <td>17</td> <td>0</td> </tr> <tr> <td>9</td> <td>16</td> <td>18</td> <td>0</td> </tr> <tr> <td>10</td> <td>13</td> <td>17</td> <td>4</td> </tr> <tr> <td>11</td> <td>12</td> <td>18</td> <td>3</td> </tr> </tbody> </table>	Year	Welsh-medium	English-medium	Total	7	47	36	83	8	40	36	76	9	58	37	95	10	49	38	87	11	43	43	86	<b>Total</b>	<b>237</b>	<b>190</b>	<b>427</b>	Year	Welsh-medium	English-medium	Bilingual	7	14	15	0	8	16	17	0	9	16	18	0	10	13	17	4	11	12	18	3
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<b>7.2 Cost of transport</b>		
7.2.1	<p>Cost of upgrading Brecon High School to 2B status would only be £47,000, therefore spending £110,976 on transport is a waste of public resources</p> <p>Cost of transport to Builth publicised at £110000 – this would be better spent covering the costs to make Brecon High School a 2B school – no child would then need to travel anywhere else as we would have our ‘critical mass’.</p> <p>The council’s own figures show that it would cost less to upgrade Brecon to 2B Welsh medium stream than it already costs to transport pupils from Brecon to Builth and Ystalyfera, these costs are only likely to rise further in future</p> <p>Don’t see the sense in spending double the cost of employing additional teaching staff on expensive door to door transport</p> <p>It was agreed by the PCC officer at the consultation meeting on Thursday 1<sup>st</sup> December 2016 that it</p>	<p>As stated in the consultation report:</p> <p><i>‘The authority is not proposing to change the transport arrangements in relation to Ysgol y Bannau. The current cost of transport provision for secondary aged pupils from the Brecon catchment area to Builth and Ystalyfera is £111,000.</i></p> <p><i>The provision of home to school transport is an essential element of the budget requirement to ensure access to the appropriate curriculum for learners wishing to study through the language of their choice, particularly so in a rural area such as Powys. Over the last 2 – 3 years, the authority has retendered all of its home to school transport provision, and has realised significant efficiencies through this work.’</i></p> <p>The authority acknowledged in the consultation report in respect of this proposal that should the proposal be implemented, it is likely that transport costs would increase from the current figure as the numbers accessing the Welsh-medium provision in Builth Wells increase. However, the authority is committed to providing greater equality in terms of the provision available to Welsh-medium pupils compared with the provision available to English-medium pupils. The authority’s view is that the current number of Welsh-medium pupils in mid and south Powys is not large enough to maintain secondary provision in two locations and to provide appropriate curriculum choice for pupils.</p> <p>The reference to the claim that £40,000 would be sufficient to uplift Brecon’s Welsh-medium stream to 2B status has been addressed elsewhere, both in this report and previously in the consultation report. This sum would not enable the school to provide a curriculum that would meet the Welsh Government definition for a category 2B school.</p>

	<p>would cost £40,000 to uplift Brecon Welsh stream to 2B status – this is less than the cost of transporting pupils to Ystalyfera / Builth</p> <p>Cost implications of providing transport to Builth is more than bringing Brecon High School up to 2B status</p> <p>The cost of transport is more than twice as much year on year as the cost of investing in BHS to bring it up to 2B status, therefore using the money to transport the pupils does not constitute best use of resources by PCC</p> <p>Unhappy that the council is wasting so much money transporting children from the area when you could be spending less money providing the right provision in Brecon</p> <p>Financially it is more viable to maintain and improve the Welsh stream at Brecon High School than to transport Brecon children across and out of the county</p> <p>The cost of transporting pupils to out of county schools and Builth Wells High School would easily provide sufficient funds to employ 3</p>	
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	<p>Welsh teachers in Brecon High School</p> <p>Estimated savings of £58,475, which is the amount of money Brecon High currently receive to provide Welsh-medium education, however this does not include the additional transport costs which amount to some £116,000</p> <p>The travel costs negate any savings made by closing the Welsh stream at Brecon High School</p> <p>It will cost more to send people on a bus to Builth than it would cost to keep the Welsh stream open</p> <p>Regarding transport, the savings made by closing the Welsh stream are far outweighed by the daily cost of transporting pupils to Builth Wells – this has not been considered in the consultation report and summary</p>	
7.2.2	<p>This decision will not provide savings to the authority as transport costs will rise over time.</p> <p>PCC has no control over how much offering transport to Builth will cost the taxpayer in the future</p>	<p>The consultation document in respect of this proposal identified an estimated saving to the authority compared with the current position, although it is recognised that additional transport costs have been incurred following the successful transport appeal.</p> <p>However the main reasons for this proposal are not financial. The reasons for the proposal were outlined on page 11 of the consultation document in respect of this proposal and are as follows:</p>

	<p>Transporting to Builth Wells would be a costly option for the Education Dept.</p> <p>The cost of transport will obviously increase if more pupils continue to choose Welsh-medium secondary education</p> <p>Implementation of the proposal would mean a long term commitment to one Welsh-medium stream in South/Mid Powys which will mean a long term commitment to additional transport costs</p> <p>Transport costs are only going to escalate</p>	<ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The authority's view is that the current number of Welsh-medium pupils in mid and south Powys is not large enough to maintain secondary provision in two locations and to provide appropriate curriculum choice for pupils.</p> <p>The authority has a robust transport procurement process, however it is recognised that these costs could increase over the years due to inflationary pressures in relation to transport related factors.</p>
7.2.3	<p>28 pupils currently travel to Builth from the Brecon area at a cost of £110,000, which is £4000 per pupil. If Brecon High School was funded an extra £4000 per pupil, they could offer more subjects than Builth do</p>	<p>Funding to support Brecon High School's Welsh-medium provision is provided to the school in accordance with the authority's Fair Funding Formula, and the funding provided is in line with the funding provided to other dual stream secondary schools. Whilst some schools have succeeded in increasing the breadth of provision offered within the funding provided, this has not been the case at Brecon High School.</p> <p>The figure of £110,000 includes transport for pupils to Builth Wells and Ysgol Gyfun Ystalyfera. This transport was provided following successful transport appeals from parents, due to the increased breadth of Welsh-medium provision offered at Builth Wells High School and Ysgol Gyfun Ystalyfera compared with the breadth of provision offered at Brecon High School.</p>
7.2.4	<p>The council would be willing to pay up to £38,000 to transport one pupil to Pontypool – ridiculous that this is being considered when all</p>	<p>Under the Learner Wales Travel Measure, the authority is required to transport children to their closest suitable school delivering through the language of choice. In accordance with this measure, the authority would be required to provide transport to Ysgol Gyfun Gwynllyw in Pontypool to any child living in Powys who wished to access the school, if this was their</p>

	secondary schools have large debts	<p>nearest provider of Welsh-medium secondary education.</p> <p>As stated in point 3.4.8 of the consultation report in respect of this proposal:</p> <p><i>'If dedicated transport was provided, this could cost up to £200 per day (£38,000 per annum). However, should the proposal be implemented, the authority would look to work with Torfaen and Monmouthshire councils in order to ensure that transport was provided as efficiently as possible.'</i></p> <p>Therefore it is likely that the actual cost would be less than this.</p>
7.2.5	If you make Sennybridge a feeder school for Ystalyfera, you will have to provide a designated bus for the children as parents are not happy with the present solution of children going on a public bus that has no seatbelts	<p>The current regulations state that dedicated home to school transport must be fitted with seatbelts and that all passengers must be seated and wear the seatbelt. However, this regulation, together with the requirement to be seated, does not apply to learners who travel to school on a public service bus.</p> <p>The authority is currently undertaking a review of its Home to School Transport Policy, and will be undertaking consultation on the proposed revisions to the policy. The review will consider if the authority should continue to use public service buses to transport pupils.</p>
7.2.6	3.4.3 in consultation report – could you create a more detailed projection of the potential transport costs for the next 1, 2, 5 and 10 years, so that a more informed comparison can be made of any real future savings?	The authority currently plans its medium term financial strategy over a 3 year period, and within this strategy, the transport costs from Brecon to Builth Wells and Ystalyfera have been projected to increase only in line with the inflationary factors. The authority has not done any further projections beyond a 3 year period.
7.2.9	The consultation response acknowledges that there will be a decrease in the number of pupils choosing Welsh-medium secondary education. The cost per pupil will therefore increase and, while low pupil numbers at BHS	The authority has a duty to provide access to Welsh-medium provision to all pupils that request it. Should the proposal to close the Welsh-medium stream at Brecon High School proceed, the authority would continue to provide transport to enable pupils to access alternative provision. This transport would continue to be provided, regardless of the number of pupils requiring this transport.



	are stated not to be financially viable, how long will it be until transporting those lower numbers is no longer financially viable?	
<b>8. ISSUES RELATING TO BUILTH WELLS HIGH SCHOOL / THE NEW MID POWYS SECONDARY SCHOOL</b>		
<b>8.1 Uncertainty about future of Builth Wells High School</b>		
8.1.1	<p>There is uncertainty about the future of Builth High School</p> <p>There is uncertainty with the future of the school in Builth / Llandrindod</p> <p>There are rumours about the future of the school in Builth, which makes the idea even less tempting</p> <p>The future of Builth HS is still uncertain – we refuse to subject our children to more consultations and campaigns</p> <p>Concern that the provision in Builth remains vulnerable</p>	<p>The authority recognises that the consultation took place at a time when a separate proposal related to Builth Wells and Llandrindod High Schools was also undergoing the statutory school reorganisation process.</p> <p>At the same time that Cabinet decided to re-consult on the proposal to close the Welsh stream (27<sup>th</sup> September 2016) Cabinet also agreed to publish statutory notices for the closure of Builth Wells and Llandrindod High Schools, in order to establish a new dual-sited school. This process was completed on the 28<sup>th</sup> February 2017, prior to the date that Cabinet decided to publish a Statutory Notice proposing closure of the Welsh-medium stream at Brecon High School.</p>
8.1.2	<p>The proposal is a risk for the council as there is no guarantee that Builth Wells will attract students from the Brecon catchment which will be needed to ensure sustainability provision.</p>	<p>The authority notes this concern. In the consultation document in respect of this proposal, the authority identified a risk that <i>'Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'</i>. The authority also stated that <i>'Retaining pupils within the Welsh-medium sector is one of the Welsh Government's priorities, and the authority will work with the primary schools concerned to establish transition links with the alternative providers with the aim of reversing any reduction in transfer rates into KS3 in the longer term.'</i></p>

8.1.3	<p>Unclear whether the proposed amalgamation of Builth and Llandrindod will result in a new school being built in Llandrindod, Builth or a neutral site – a site in Llandrindod would involve greater travelling for children from Brecon</p> <p>Concern that there is more uncertainty being generated by the closures planned for BWHS and Llandrindod High School</p> <p>The authority has clearly stated that the decision as to where lessons at the ‘new dual sited school’ in mid/south Powys will be held will ultimately be made by the governing body of the new school, so the authority cannot guarantee that Welsh-medium provision will be at the Builth site</p> <p>Welsh-medium education could be undertaken in Llandrindod if the governing body decide – travel to Llandrindod would far, far exceed the council’s transport guidelines</p> <p>There are too many variables at the moment for the council to make an informed decision on this issue</p>	<p>On February 27<sup>th</sup> 2017, Cabinet approved a recommendation to merge Builth Wells and Llandrindod Wells High Schools to create a dual-sited, dual-stream school (the “New Mid Powys Secondary School”) with the Welsh stream based in Builth Wells. There are no proposals for a single-sited school. If this was to be proposed in future, there would need to be another consultation process.</p> <p>It is correct that the responsibility for curriculum delivery is that of the governors of the New School and they could choose to locate the Welsh stream on either, or both, sites. However, if this was to be proposed by the governors of the New School, then further discussions would be required with the authority about the financing of any increased costs.</p>
8.1.4	<p>Uncertainty in relation to the legal challenge to the decision to close</p>	<p>The authority has not received any further information about a legal challenge in relation to the proposal to merge the two schools, and the timescale for bringing forward judicial review</p>

	Builth and Llandrindod schools and reopen them as a single school on two sites	proceedings has now passed.
<b>8.2 Provision at Builth Wells High School</b>		
8.2.1	Only two A level subjects available through the medium of Welsh in Builth Wells, Cymraeg and one other	Builth Wells High School is currently delivering Cymraeg (Welsh 1 <sup>st</sup> language); Hanes (History) and Daearyddiaeth (Geography) through the medium of Welsh. It is expected that, should the proposal be implemented, there would be greater demand for Welsh-medium subjects at Builth Wells High School / the New Mid Powys Secondary School.
8.2.2	You will not achieve the critical mass in Builth High School as outlined in your documentation	<p>The authority identified in the consultation document in respect of this proposal that there are a number of risks linked to implementation of the proposal. These include the risk that <i>'pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'</i> and that <i>'pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon'</i>. These risks acknowledge the uncertainty in relation to the number of pupils that could be attending provision in Builth Wells in the future, and that it is likely that not all Welsh-medium learners will transfer to Builth Wells.</p> <p>However, more Welsh-medium secondary provision is currently provided in Builth Wells compared with the provision at Brecon High School, therefore the authority is satisfied that even if less pupils than expected from the Brecon area transfer to Builth Wells High School / the New Mid Powys Secondary School, more Welsh-medium provision will continue to be available to them compared with the provision at Brecon High School.</p>
8.3.3	The consultation report states that centralising provision will make it easier to recruit teachers. No evidence has been offered in support of this contention and no mention is made of the fact that Brecon's geography means that it is easier to access than BWHS and therefore has a wider commuter	There are well known difficulties with recruiting Welsh-medium teachers across Wales. The authority acknowledges that Brecon High School may be more accessible to some areas of Wales than Builth Wells High School, however historically, Brecon High School has had greater difficulty in recruiting Welsh-medium teachers than Builth Wells High School.

	community available to it	
8.3.4	12.1.3.4 of consultation report – If the Welsh stream does cease, can you confirm whether there are plans to either raise, maintain or decrease the standards of Welsh medium education in Builth Wells High School?	<p>There are currently no plans to change the Welsh-medium provision in Builth Wells High School, however the authority's expectation would be that an increase in pupil numbers would enable the school to increase the Welsh-medium provision offered.</p> <p>From the 31<sup>st</sup> August 2018, Builth Wells High School will close and the site will reopen as part of the New Mid Powys Secondary School from the 1<sup>st</sup> September 2018. Whilst the level of Welsh-medium provision offered will ultimately be a decision for the school's Management Team and Governing Body, the authority would monitor the level of provision closely, to ensure that the level of provision offered to pupils is maintained.</p>
8.3.5	It is stated in the consultation report that closing the provision will not save money, but will ensure equality of provision. Given that BWHS does not have parity of provision, this statement is clearly untrue.	<p>As stated in the consultation report, the authority's view is that the current provision is unequal and unfair to Welsh-medium pupils due to the limited Welsh-medium curriculum available at Brecon High School. The aim of the proposal is to provide greater equality to Welsh-medium pupils in terms of the Welsh-medium curriculum available to them.</p> <p>The authority agrees that even at Builth Wells High School, there is still inequality in terms of the number of subjects available to Welsh and English pupils. However, by increasing the pupil numbers in a single Welsh stream rather than split between two smaller streams, there is an opportunity to move towards full equality of provision.</p> <p>As stated in the consultation document in respect of this proposal:</p> <p><i>'Having considered the strengths and weaknesses associated with each option, the authority's view is that closure of the Welsh-medium stream at Brecon High School is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.'</i></p>
<b>9. ISSUES RELATING TO THE QUALITY OF PROVISION</b>		
<b>9.1 Standards at Builth Wells High School</b>		

9.1.1	<p>Unfair that local Welsh-medium children will be sent to a school that is in Special Measures.</p> <p>Brecon High School are now out of Special Measures</p> <p>Likely that pupil attainment will decrease as Builth remains in special measures whilst Brecon is now out of special measures</p> <p>Wrong for Welsh-medium children to be forced to travel unacceptable distances to a school that is in special measures</p> <p>The plans would hold more weight if the decision was going to result in a positive transition to a successful Welsh-medium provision, however you are asking us to send our children to a school in special measures</p> <p>The last Estyn report for Builth Wells was awful and put Builth into special measures</p> <p>Consultation document referred to the fact Brecon High School was in Special Measures, however following the Estyn inspection in the Autumn Term, Brecon High School was taken out of Special</p>	<p>It is true that Builth Wells High School is currently in Special Measures, following an inspection which took place in October 2015. This is stated on page 36 of the consultation document in respect of this proposal. However, the authority is confident that the school is making good progress.</p> <p>It is also true that Brecon High School was removed from Special Measures in December 2016.</p> <p>Both Builth Wells High School and Brecon High School were placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017.</p> <p>As stated in the proposal outlined on page 3 of the consultation document, should the proposal be implemented <i>'Pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School that live closer to alternative Welsh-medium secondary provision outside Powys would have the opportunity to transfer to these schools.'</i> A proportion of pupils living in the current catchment area of the Welsh-medium stream would live closer to Ysgol Gyfun Ystalyfera, which is not in special measures.</p>
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	Measures	
9.1.2	<p>PCC cannot ensure the standard of education will be of a high quality</p> <p>The proposal will not improve the pupils' standard of education beyond which they are receiving</p>	<p>Estyn's view on the proposal was included in the consultation report in respect of the proposal. In respect of this proposal, Estyn concluded that: <i>'It is Estyn's view that the proposer appears to have suitably demonstrated that, given the small numbers of pupils in the Welsh medium stream, that overall the proposal is likely to at least maintain the current standards of education in the area.'</i></p>
9.1.3	<p>In Summer 2014, 81.4% of Welsh-medium pupils at Brecon High School achieved A*-C grades at GCSE level, above the Powys average of 77.3%</p>	<p>The authority notes this comment.</p>
9.1.4	<p>Reference to Estyn's recently cited view that sacrificing local provision for critical mass and breadth of choice is not necessarily conducive to raising standards – surely this applies as much to Welsh-medium provision as it does to English-medium</p> <p>Reference to Estyn's comments in consultation report – removal of the stream will neither improve or worsen the education for the children</p>	<p>The authority notes this comment. However, the number of pupils currently accessing the Welsh-medium stream at Brecon High School is very small, which makes the provision unviable.</p> <p>Estyn's view on the proposal was included in the consultation report in respect of the proposal. In respect of this proposal, Estyn concluded that: <i>'It is Estyn's view that the proposer appears to have suitably demonstrated that, given the small numbers of pupils in the Welsh medium stream, that overall the proposal is likely to at least maintain the current standards of education in the area.'</i></p>
9.1.5	<p>Do not agree that the education of my child in Brecon High School is a poor standard – the standard of education is excellent, previous GCSE and A level grades support</p>	<p>The quality of education provided to Welsh-medium pupils is not the reason for this proposal. However, the authority's view is that the small number of pupils currently accessing the Welsh-medium stream at Brecon High School is not providing an appropriate educational experience for pupils.</p>

	this comment	
9.1.6	<p>Reference to quote from Builth Estyn Report:</p> <p>‘Performance in the level 3 threshold, including English or Welsh and mathematics, has not improved over the past four years and has placed the school in the bottom 25% of similar schools for three of the past four years. The proportion of pupils achieving the level 2 threshold, including English or Welsh and mathematics, has been consistently well below modelled outcomes based on eligibility for free school meals for the past three years. Performance in this indicator has been below the average for the family of schools for three of the past four years. The percentage of pupils gaining five A* to A grades at GCSE has declined over the past four years and is below the average for the family of schools.’</p>	<p>Builth Wells High School, with 65.5% of pupils’ attaining their level 2 threshold including English / Welsh and mathematics at key stage 4, is performing above the national average, but below that of similar schools. Nearly all pupils achieve the level threshold of 5 GCSE qualifications (or equivalent) at grade A* - C, which is above the national average and that of similar schools.</p> <p>In 2016, performance at key stage 4 is higher than at the time of the core inspection in the majority of indicators. Overall, performance at this key stage, compares slightly more favourably to that of similar schools according to eligibility for free school meals, than at the time of the core inspection. However, performance in the indicators that include English or Welsh and mathematics, continues to be lower or much lower than the average performance in similar schools. Over the period 2013 to 2015, pupils made less progress than expected from previous key stages in many indicators, and significantly less in close to a half.</p> <p>Performance in the level 2 threshold including English or Welsh and mathematics, improved in 2016. However, it remains well below modelled outcomes and places the school in the bottom 25% of similar schools for the fourth year running. Similarly, performance in the core subject indicator, and in English, also improved but continue to place the school in the bottom 25% of similar schools. In contrast, improved performance in the wider indicators of the level 2 threshold and capped points score places the school in the top 25% of similar schools in 2016 after being in the lower 50% at the time of the core inspection, as does performance in the level 1 threshold. Performance in science, improved in 2016 and moves the school up into the upper 50% of similar schools while performance in mathematics remained unchanged but drops the school into the lower 50% of similar schools.</p> <p>At key stage 3, the proportion of pupils achieving the core subject indicator increased in 2016 and is higher than at the time of the core inspection. However, this performance remains below modelled outcomes and places the school in the bottom 25% of similar schools for the fourth year running.</p> <p>In 2016, the performance of pupils in the sixth form is strong in the level 3 threshold. The proportion of pupils achieving three A levels at grades A* or A dipped but remains close to</p>

		the average for similar schools and schools nationally. The proportion of those achieving three A level grades A* to C improved in 2016 and is above the average for similar schools and schools nationally.
9.1.7	Surely it is illegal to close a stream not in special measures to make children go somewhere that is in special measures	<p>The School Organisation Code requires that all school reorganisation proposals consider the likely impact on the quality of:</p> <ul style="list-style-type: none"> <li>- Outcomes (standards and wellbeing);</li> <li>- Provision (learning experiences, teaching, care support and guidance, and learning environment); and</li> <li>- Leadership and management.</li> </ul> <p>The proposal's impact on these aspects is considered in the consultation document in respect of this proposal. In addition, the Code requires authorities to consult with Estyn on any school reorganisation proposals, and to include Estyn's response in the consultation report. Estyn's response is provided on page 13 of this report.</p> <p>In their response, Estyn conclude that:</p> <p><i>'the proposer appears to have suitably demonstrated that, given the small numbers of pupils in the Welsh medium stream, that overall the proposal is likely to at least maintain the current standards of education in the area.'</i></p> <p>Whilst it is true that Builth Wells High School is currently in Special Measures, the authority is confident that the school is making good progress.</p>
9.1.8	Reference to Estyn report re Builth Wells – classroom control is poorer in Builth Wells than Brecon	It is true that Estyn identified that 'Pupils in a few classes display poor behaviour' in the core inspection of Builth Wells High School carried out in 2015. However, in Estyn's monitoring visit in June 2016, they judged that 'Most pupils behave well in lessons.'
9.1.9	Work in Builth High School isn't as challenging as Brecon High School	The authority notes this comment. However the number of pupils accessing the Welsh-medium stream at Brecon High School, which make the provision unviable.
9.1.10	Results from Ystalyfera and Builth compared to Brecon show that	Due to the small number of pupils currently accessing the Welsh-medium stream in Brecon High School, the authority's view is that it is not valid to compare the results of these pupils



	fuller immersion in Welsh does not mean better results	with those of pupils at the other schools. This view was supported by Estyn, who stated in their response to the consultation that the authority 'reasonably makes the statement that as numbers are small in Brecon High School, it would not be valid to compare the performance of Welsh-medium pupils in these schools'.																																
9.1.11	National School Categorisation System – Brecon High School is now on a par with Ystalyfera and above Builth having achieved 2B and moved from Amber to Yellow	<p>The National School Categorisation System shows that all three affected schools have improved since last year.</p> <table border="1"> <thead> <tr> <th>2015/16</th> <th>Standards Group</th> <th>Improvement Capacity</th> <th>Support Category</th> </tr> </thead> <tbody> <tr> <td>Brecon High School</td> <td>3</td> <td>C</td> <td>Amber</td> </tr> <tr> <td>Builth Wells High School</td> <td>3</td> <td>D</td> <td>Red</td> </tr> <tr> <td>Ysgol Gyfun Ystalyfera</td> <td>2</td> <td>B</td> <td>Yellow</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>2016/17</th> <th>Standards Group</th> <th>Improvement Capacity</th> <th>Support Category</th> </tr> </thead> <tbody> <tr> <td>Brecon High School</td> <td>2</td> <td>B</td> <td>Yellow</td> </tr> <tr> <td>Builth Wells High School</td> <td>2</td> <td>C</td> <td>Amber</td> </tr> <tr> <td>Ysgol Gyfun Ystalyfera</td> <td>1</td> <td>A</td> <td>Green</td> </tr> </tbody> </table>	2015/16	Standards Group	Improvement Capacity	Support Category	Brecon High School	3	C	Amber	Builth Wells High School	3	D	Red	Ysgol Gyfun Ystalyfera	2	B	Yellow	2016/17	Standards Group	Improvement Capacity	Support Category	Brecon High School	2	B	Yellow	Builth Wells High School	2	C	Amber	Ysgol Gyfun Ystalyfera	1	A	Green
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10. REFERENCE TO ALTERNATIVE OPTIONS		
10.1	<p>Should have shared Welsh-medium teaching staff between the two sites, to allow the schools to offer more subjects. This would lead to an increase in uptake of WM education. Have not heard a convincing argument as to why this would not work.</p> <p>Suggestion that teachers should travel between Brecon and Builth – this has never been researched, looked at, investigated</p>	<p>The authority agrees that sharing teaching staff between schools could potentially enable more subjects to be delivered. However, the number of pupils on each site would remain small, at least in the short term, therefore these shared teachers would be teaching small groups of learners.</p>
10.2	<p>A third way should be considered and presented to the new Cabinet when they come together</p>	<p>A number of alternative options were included within the consultation report that cabinet considered in March. Any other alternative options that have been suggested in the objection period will be included for Cabinet's consideration.</p>
10.3	<p>Not asking for 100% subject commitment, but for the opportunity and the right to be able to continue with the Welsh language stream</p>	<p>The authority has a duty to ensure that full Welsh-medium provision is available for those pupils who choose it, to ensure that pupils have the best possible opportunities to continue to develop their Welsh language skills during their time in secondary school, so that they are confidently bilingual when they leave school. The current provision at Brecon High School does not provide this.</p> <p>As stated in the Welsh Government's Welsh-medium Education Strategy, <i>'It is generally accepted that at least around 70% of curricular time should be through the medium of Welsh if learners are to acquire a sufficiently sound command of the language to enable them to use it across a broad range of contexts with confidence and fluency.'</i> The current provision in Brecon High School does not offer Welsh-medium provision for at least 70% of curricular time to pupils in any year group.</p> <p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a category 4 school, which is described as a 'Predominantly English Medium</p>

		<p>Secondary School’.</p> <p>The Welsh Government document ‘Defining Schools according to Welsh medium provision’ (2007) provides the following definition for the curriculum provision of this type of school: ‘Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.’</p> <p>This category would allow the school to teach one or two subjects through the medium of Welsh, which could include Welsh first language, however this would be a decision for the school. There are examples of ‘Predominantly English Medium secondary schools’ in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p>
10.4	<p>With the support of the LA, the provision at Brecon High could be developed to become a viable and sustainable quality provision</p> <p>Investing in the provision at Brecon makes financial sense and would address the council’s concerns over breadth of provision</p> <p>With a clear commitment from the council to retaining and building up the Welsh stream in Brecon, this could reverse the fall in numbers and also lead to an increase in uptake, which would also address the budget issues</p> <p>If a stream were to remain in Brecon, offering the same educational security that Builth is</p>	<p>The authority’s view is that the current number of Welsh-medium pupils in mid and south Powys is not sufficient to support two Welsh-medium streams and to provide a comprehensive Welsh-medium curriculum for pupils.</p>

	<p>advertising, you will have the whole class remaining in the Welsh stream</p> <p>Urge you to work with BHS and the community to improve and secure Welsh-medium provision in south Powys to bring BHS and BWHS to a 2B provision of which the county can be proud</p>	
10.5	<p>Propose that you bring Brecon Welsh stream, Ysgol y Bannau and Sennybridge together as one through school, operating from their individual sites but working together to achieve a strong Welsh-medium provision. The initial numbers would be 140 (YyB), 47 (Sennybridge), 21 (Brecon high School), a total of 208, but in 6 years time it would be up to 412 pupils. This proposal has not been investigated / researched by the council.</p>	<p>The authority acknowledges the benefits of a Welsh-medium school compared with dual stream provision, and that the suggested model would succeed in establishing a school of this type. Whilst this model would strengthen transition from Sennybridge to the provision at Brecon, there would be no significant increase in secondary pupil numbers compared with the numbers that were attending the Welsh-medium stream in Brecon High School in 2014/15, therefore the authority's view is that this provision would not be viable.</p>
10.6	<p>The council should be looking at starting a Welsh stream in other primary schools to feed Brecon High School rather than looking to take Welsh away from the area</p>	<p>There has been no significant growth in pupil numbers at Ysgol y Bannau in recent years, therefore there is no evidence that there is demand for any additional Welsh-medium streams in the Brecon area at the current time. A Welsh-medium work stream was established as part of the Gwernyfed Area Review that was carried out a few years ago, however this work stream concluded that there was no demand for Welsh-medium primary provision in that area at the time.</p>
10.7	<p>Nowhere in the consultation documentation is there any</p>	<p>The option of retaining the stream at Brecon High School was considered in the consultation document.</p>

	suggestion that an alternative way forward would have been to invest in and improve BHS	
<b>11. ISSUES RELATING TO EQUALITY / DISCRIMINATION</b>		
11.1	Inequality that children are being asked to choose between Welsh-medium and extra-curricular activities	<p>Throughout the consultation, the authority has clearly stated that the proposal may have a detrimental impact on some pupils who live further away from the school in terms of accessing extra-curricular activities or after-school clubs.</p> <p>The authority has a duty to provide access to Welsh-medium education to those pupils that choose it. The authority's view is that the current provision in mid and south Powys does not provide equality for Welsh-medium pupils due to the limited Welsh-medium curriculum available, and the authority's view is that the only way to improve this is to centralise provision in the area in order to provide access to an increased Welsh-medium curriculum.</p>
11.2	<p>Lack of Welsh medium education in the new building in Brecon is further inequality – pupils choosing to be educated through the medium of Welsh are being discriminated against</p> <p>Discrimination to build a new school in Brecon for non-Welsh speaking pupils and to bus the Welsh speaking children to another town</p>	<p>The authority has a duty to provide access to Welsh-medium education to those pupils that choose it. The authority's view is that the current provision in mid and south Powys does not provide equality for Welsh-medium pupils due to the limited Welsh-medium curriculum available, and the authority's view is that the only way to improve this is to centralise provision in the area in order to provide access to an increased Welsh-medium curriculum.</p> <p>Should this proposal be implemented, there would be no Welsh-medium stream in Brecon High School, and therefore there would be no Welsh-medium stream at the new school building. However Welsh-medium pupils would still be able to apply for a place in Brecon High School, should that be their preference, and places would be allocated in accordance with the authority's Admissions Policy.</p>
11.3	Hard not to see the proposal as racist	The authority does not agree with this statement. The authority's view is that the current provision is unequal and unfair to Welsh-medium pupils due to the limited Welsh-medium curriculum available at Brecon High School. The aim of the proposal is to provide greater equality to Welsh-medium pupils in terms of the Welsh-medium curriculum available to them, however it is acknowledged that there are disadvantages and risks associated with this, in particular the additional transport that would be required.

		Should this proposal be implemented, there would be no Welsh-medium stream in Brecon High School. However Welsh-medium pupils will still be able to attend Brecon High School, should that be their preference, and places would be allocated in accordance with the authority's Admissions Policy.
11.4	<p>Pupils from low income families will be excluded from WM education as their parents won't have access to a vehicle</p> <p>Proposal discriminates against children wishing to pursue their education through the medium of Welsh, particularly those from lower income families</p> <p>The proposal will prevent families from certain demographic groups from accessing Welsh-medium education – this is elitist</p> <p>Less well-off families will be even less well-off or their children will miss out on attending extra activities outside school</p> <p>10.1.3 of consultation report – the authority notes that families accessing Builth are from more advantaged families while those unable to go are the less well off – this is discrimination</p> <p>Equalities Impact Assessment</p>	<p>The authority recognises this issue. The proposal's impact on low income families has been considered throughout the process in the impact assessments carried out in relation to the proposal.</p> <p>Should the proposal be implemented, free home to school transport would be provided to all pupils wishing to access Welsh-medium provision at alternative schools, regardless of their socio-economic background, however it is recognised that there would be an impact on families in terms of additional travel required to the alternative providers, particularly in relation to access to extra-curricular activities. As stated in the equality impact assessment carried out in relation to the proposal:</p> <p><i>'Free School Meals / Low Income Families – Free home to school transport will be provided to the alternative provision for qualifying pupils, this will ensure that the proposal does not have an adverse impact on pupils from lower income families. The alternative schools pupils would transfer to in order to access Welsh-medium secondary provision serve large catchment areas, and are experienced in meeting the needs of pupils who are reliant on home to school transport and pupils and families from a range of socio-economic backgrounds. Should the proposal be implemented, the authority would work with the alternative schools to ensure that families from lower income backgrounds are not disadvantaged compared with other pupils at the school, and that an appropriate range of extra-curricular activities is available to them. However it is acknowledged that it would not be possible to totally mitigate the impact on pupils and their families.'</i></p>

	1.2.4 the authority acknowledges that people on low incomes will be disadvantaged – this is discrimination	
11.5	Pupils wanting to receive an education through the medium of Welsh do not face barriers to their learning which can only be described as discrimination	The authority has a duty to provide access to Welsh-medium education to those pupils that choose it. The authority's view is that the current provision in mid and south Powys does not provide equality for Welsh-medium pupils due to the limited Welsh-medium curriculum available, and the authority's view is that the only way to improve this is to centralise provision in the area in order to provide access to an increased Welsh-medium curriculum.
11.6	If you close the Welsh stream, my Welsh speaking children will not be able to read, write or talk in Welsh in any of their subjects in school, how is this any different to the 'Welsh Not'?	The authority's view is that the current Welsh-medium provision at Brecon High School is discriminating against Welsh-medium pupils in the Brecon area. The aim of the proposal is to provide greater equality to Welsh-medium pupils compared with English-medium pupils.
11.7	The suffering of pupils is seen as a necessary evil in an attempt to create equality of provision, but how can there be equality of provision if some of the provision is inaccessible for a proportion of the pupils who have to travel?	The authority does not agree that Welsh-medium provision would be inaccessible for pupils should the Welsh-medium stream close. The authority is committed to providing Welsh-medium education to all pupils who request it, and through this proposal, is proposing to achieve this by providing free transport to the nearest provider, either Builth Wells High School / the New Mid Powys Secondary School or an out-of-county provider. The authority's view is that the increased level of Welsh-medium provision available at these providers would have positive benefits in terms of the development of pupils' Welsh language skills. However, parents are entitled to choose for their children to transfer to English-medium provision locally if they prefer.
11.8	PCC's Impact Assessment Toolkit (Feb 2016) – quote from page 5:  'It is in everyone's interest that the council's focus is on driving up the attainment and ambition of the majority of its pupils with a special	The proposal's impact on a range of groups has been considered throughout the process in the impact assessments produced. These impact assessments have been considered by Cabinet when making decisions as part of the process.  The authority's view is that the current Welsh-medium provision at Brecon High School is not providing an appropriate educational experience to pupils, due to the small number of pupils accessing the provision and the limited subject provision available.

	<p>emphasis on those from more disadvantaged backgrounds. We must also provide stimulating learning environments for our able and gifted students and provide improved access to Welsh-medium education’</p> <p>The proposal goes against this.</p>	
<b>12. GENERAL CRITICISM OF THE COUNCIL</b>		
12.1	Families are talking about moving out of Powys because of the secondary schools here – lack of Welsh-medium provision, lack of subject choice, too many schools in special measures	Noted.
12.2	Want the council to admit that the proposal affects not only the children left behind in Brecon High School but also those attending Ysgol y Bannau, the children travelling to Builth and to Ystalyfera and all future children in the Brecon area whose parents would have considered Welsh-medium education if there was the opportunity to attend a school in the area	All of these groups have had the opportunity to let the council know their views on the proposal during the consultation period in respect of this proposal.
12.3	Nobody in the Brecon area supports this decision – who are	The authority has not received an objection from all residents in the Brecon area.



	the council working for?	
12.4	PCC has done this now because if they had left it for a few more years Brecon would have more pupils than Builth and number wise it would not have looked financially sound	This statement is untrue. The proposal is based on the current Welsh-medium pupil numbers and provision at Brecon High School and the need for the council to provide more robust Welsh-medium provision for learners in south Powys.
12.5	The Welsh-medium stream in Brecon is something that is being cut for cut's sake as it won't save any money	<p>As stated in the consultation document in relation to the proposal, the total saving to the authority should the proposal be implemented is estimated to be £58,475.</p> <p>However, the main reasons for the proposal aren't financial.</p> <p>The reasons for proposing to close the Welsh-medium stream, as outlined in the consultation document, are:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul>
12.6	A number of applications for admission to BHS stream "went missing", resulting in those numbers being missed from the first consultation and thereby causing a high degree of inaccuracy in the consultation document. PCC issued email apologies to those affected by this error.	The information in the consultation document issued in 2015 is factual information based on the actual numbers that were attending the stream at the time, and the information in relation to pupil transfer provided in the consultation document referred to pupils that had already transferred to secondary provision. Any issue with receiving admission applications relating to the Welsh-medium stream at Brecon High School did not impact the consultation document.
12.7	The council needs to start listening to the views and needs of residents, visitors, shops and	This comment is noted. All issues raised during the consultation period were listed in the consultation report and were taken into consideration by the Cabinet when determining how to proceed in relation to this proposal, and the issues raised in the Objections received will

	businesses of the county. Their policies are inefficient and not what people want.	be taken into consideration by the Cabinet in due course.
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# Proposal to close the Welsh-medium stream at Brecon High School

## Appendix B – Impact Assessments

### Updated following Objection Period

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**Impact Assessment (IA)**

*The integrated approach to support effective decision making*

**1. Integrated Impact Assessment**

This **Impact Assessment (IA)** toolkit incorporating Welsh Language, Equalities, Well-being of Future Generations Act, Sustainable Development Principles, Communication and Engagement, Safeguarding, Corporate Parenting, Community Cohesion and Risk Management supporting effective decision making and ensuring compliance with respective legislation.

<b>Service Area</b>	Schools Service	<b>Head of Service</b>	Gareth Jones	<b>Strategic Director</b>	Jeremy Patterson	<b>Portfolio Holder</b>	Cllr Myfanwy Alexander
<b>Policy / Change Objective / Budget Saving</b>		School Transformation Policy					
<b>Outline Summary</b>							
This Impact Assessment relates to a proposal to close the Welsh-medium stream at Brecon High School.							

1. Version Control (services should consider the impact assessment early in the development process and continually evaluate)

Version	Author	Job Title	Date
1	Sarah Astley	Project Manager, Schools Transformation	10/11/16
2	Sarah Astley	Project Manager, Schools Transformation	27/02/17
3	Sarah Astley	Project Manager, Schools Transformation	21/06/17

2. How does your policy / change objective / budget saving impact on the council’s strategic vision?

Council Priority	How does the policy / change objective impact on this priority?	<u>Inherent Judgement</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>Residual Judgement</u> Please select from drop down box below	Source of Outline Evidence to support judgement
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<p><b>Supporting people in the community to live fulfilled lives</b></p>	<p>Implementation of the proposal would mean that no secondary Welsh-medium provision would be provided in Brecon, therefore additional travel would be required for pupils in order to attend Welsh-medium provision. This could impact on the ability of pupils to access extra-curricular activities, particularly where these take place after school. In addition, the additional travel could impact on pupils' ability to take part in other activities in the community when they return from school.</p> <p>Whilst home to school transport would be provided to pupils in accordance with the council's policy, it is acknowledged that there would be additional travel and time pressures on parents to collect children from activities or to attend meetings and other activities at the school.</p>	<p>Poor</p>	<p>The alternative schools pupils would be expected to attend should the proposal be implemented already serve large catchment areas and are experienced in meeting the needs of pupils who are reliant on home to school transport.</p> <p>Should the proposal be implemented, the authority would work with the alternative schools to ensure that pupils reliant on home to school transport are not disadvantaged compared with other pupils at the school, and that an appropriate range of extra-curricular activities is available to them. This could mean providing access to activities during lunchtime instead of after school. However it is acknowledged that it would not be possible to totally mitigate the impact on pupils and their families.</p>	<p>Poor</p>	<p>Consultation Document / Consultation Report / Objection Report</p>
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<p><b>Developing the economy</b></p>	<p>During the consultation period, concern was expressed that implementation of the proposal would lead to a reduction in Welsh speakers locally and would make it more difficult for employers such as the Brecon Beacons National Park to recruit Welsh speakers.</p>	<p>Neutral</p>	<p>Should the proposal be implemented, Welsh-medium pupils would attend alternative provision where they would be part of a larger cohort of Welsh-medium learners, and would receive an increased level of subject provision through the medium of Welsh. This would enable them to continue to develop their Welsh language skills through their time in secondary school, and are better equipped to use Welsh in the workplace when they leave education.</p> <p>Should the proposal be implemented, the authority would work with organisations such as Menter Brycheiniog a Maesyfed and Mudiad Meithrin to promote Welsh-medium education in the Brecon area, to ensure that pupils in the Brecon area continue to access Welsh-medium education to ensure that local employers can recruit Welsh speaking employees in the future.</p>	<p>Good</p>	<p>Consultation Document / Consultation report / Objection report</p>
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<p><b>Improving learner outcomes for all, minimising disadvantage</b></p>	<p>The proposal aims to provide access to improved Welsh-medium secondary provision in mid and south Powys.</p> <p>Since the start of the consultation period, Brecon High School has been removed from Special Measures. However, the number of pupils accessing the stream remains very small. Builth Wells High School remains in Special Measures, however it is showing signs of improvement. Estyn’s response to the consultation document concluded: ‘the proposer appears to have suitably demonstrated that, given the small numbers of pupils in the Welsh medium stream, that overall the proposal is likely to at least maintain the current standards of education in the area.’</p> <p>Concern was expressed during the consultation period that pupils from low income families would be disadvantaged and would be unable to continue to access Welsh-medium provision should the proposal be implemented. Whilst home to school transport would be provided to all eligible pupils, concern was expressed about the impact on families and the additional travel costs required in order to attend activities at the alternative schools.</p>	<p>Neutral</p>		<p>Neutral</p>	<p>Consultation Document / Consultation Report / Objection Report</p>
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<p><b>Remodelling council services to respond to reduced funding</b></p>	<p>The proposal will provide better value for money for the council in the long term, by ensuring more equitable distribution of funding.</p> <p>The current number of pupils attending the Welsh-medium stream at Brecon High School is small. Closure of the stream and centralising provision for mid and south Powys in Builth Wells would ensure that provision was delivered in a more cost effective manner.</p>	<p>Good</p>		<p>Good</p>	<p>Consultation Document / Consultation Report / Objection Report</p>
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3. How does your policy / change objective / budget saving impact on the Welsh Assembly’s well-being goals?

<p><b>Well-being Goal</b></p>	<p><b>How does the policy / change objective contribute this goal?</b></p>	<p><b><u>Inherent Judgement</u></b> Please select from drop down box below</p>	<p><b>What will be done to better contribute to positive or mitigate any negative impacts?</b></p>	<p><b><u>Residual Judgement</u></b> Please select from drop down box below</p>	<p><b>Source of Outline Evidence to support judgement</b></p>
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<p><b>A prosperous Wales:</b></p> <p>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.</p>	<p>The proposal will provide better value for money for the council in the long term, by ensuring more equitable distribution of funding.</p> <p>During the consultation period, concern was expressed that implementation of the proposal would lead to a reduction in Welsh speakers locally and would make it more difficult for employers such as the Brecon Beacons National Park to recruit Welsh speakers.</p> <p>In addition, concern has been expressed about the environmental impact of increased reliance on home to school transport.</p>	<p>Neutral</p>	<p>Should the proposal be implemented, WM pupils would attend alternative provision where they would be part of a larger cohort of WM learners, and would receive an increased level of subject provision through the medium of Welsh. This would enable them to continue to develop their Welsh language skills through their time in secondary school, and are better equipped to use Welsh in the workplace when they leave education.</p> <p>The authority would work with organisations such as Menter Brycheiniog a Maesyfed and Mudiad Meithrin to promote WM education in the Brecon area, to ensure that pupils in the area continue to access WM education to ensure that local employers can recruit Welsh speaking employees in the future.</p> <p>It is acknowledged that additional travel would have an environmental impact. However transport to alternative providers is already provided, therefore the additional transport that would be required would be minimal.</p>	<p>Good</p>	<p>Consultation document / Consultation report / Objection report</p>
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<p><b>A resilient Wales:</b></p> <p>A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<p>Concern has been expressed about the environmental impact of increased reliance on home to school transport, and the potential impact of increases in Welsh-medium pupil numbers in the future.</p>	<p>Poor</p>	<p>A large number of secondary Welsh-medium pupils from the Brecon catchment area are already travelling to alternative schools due to parental choice, and transport is provided by the authority, therefore the additional transport that would be required would be minimal. However, it is acknowledged that the transport required could increase in the future should there be an increase in Welsh-medium pupil numbers from the Brecon area.</p>	<p>Neutral</p>	<p>Consultation document / Consultation report / Objection report</p>
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<p><b>A healthier Wales:</b></p> <p>A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p>	<p>Implementation of the proposal would involve additional travel for Welsh-medium pupils, which could have a negative impact on their well-being.</p> <p>In addition, reliance on home to school transport could impact on pupils’ ability to take part in sports activities in the community outside school.</p>	<p>Poor</p>	<p>A large number of pupils from the Brecon catchment have already chosen to travel to alternative provision instead of attending the Welsh-medium stream at Brecon High School. The number of pupils accessing the Welsh-medium stream at Brecon High School is very small, and the authority’s view is that the very small class sizes are not providing an appropriate educational experience for pupils.</p> <p>Should the proposal be implemented, the authority would work with the alternative schools to ensure that pupils reliant on home to school transport are not disadvantaged compared with other pupils at the school, and that an appropriate range of extra-curricular activities is available to them. This could mean providing access to activities during lunchtime instead of after school. However it is acknowledged that it would not be possible to totally mitigate the impact on pupils.</p>	<p>Neutral</p>	<p>Consultation document / Consultation report / Objection report</p>
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<p><b>A Wales of cohesive communities:</b></p> <p>Attractive, viable, safe and well-connected Communities.</p>	<p>Implementation of the proposal would mean that no secondary Welsh-medium provision would be provided in Brecon, therefore there would be additional travel required for pupils in order to attend Welsh-medium provision. This could impact on the ability of pupils to access extra-curricular activities, particularly where these take place after school. In addition, the additional travel could impact on pupils' ability to take part in other activities in the community when they return from school.</p> <p>Concern has also been expressed that pupils living in the Brecon community but attending school elsewhere would be less integrated into the Brecon community by not attending school in Brecon.</p>	<p>Poor</p>	<p>The alternative schools pupils would be expected to transfer to already serve large catchments and are experienced in meeting the needs of pupils who are reliant on home to school transport.</p> <p>Should the proposal be implemented, the authority would work with the schools to ensure that pupils reliant on home to school transport are not disadvantaged compared with other pupils at the school, and that an appropriate range of activities is available to them. This could mean providing activities during lunchtime instead of after school. However it is acknowledged that it would not be possible to totally mitigate the impact on pupils and their families.</p> <p>BW High School already serves a large catchment area, and has links with town and villages across the area. Should the proposal be implemented, the school / the new Mid Powys Secondary School would aim to establish links within the Brecon community, initially by strengthening links with Ysgol y Bannau.</p>	<p>Neutral</p>	<p>Consultation document / Consultation report / Objection report</p>
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<p><b>A globally responsible Wales:</b></p> <p>A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p>	<p>The authority's view is that the proposal seeks to improve the opportunities available for Welsh-medium learners in mid and south Powys, and that the proposal has the best interests of the child at heart. However, concern has been expressed about the proposal's impact on pupil well-being due to the additional travel that would be required and the impact on the ability of pupils to access after-school activities.</p>	<p>Good</p>		<p>Good</p>	<p>Consultation document / consultation report / objection report</p>
<p><b>A Wales of vibrant culture and thriving Welsh language:</b> A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.</p>					

<p><i>Opportunities for persons to use the Welsh language</i></p>	<p>The number of pupils accessing the Welsh-medium stream at Brecon High School is very small, which limits the Welsh-medium opportunities the school can provide for these pupils. Implementation of the proposal would mean that pupils would be able to access greater level of Welsh-medium provision, would be part of a larger group of Welsh-medium learners and would benefit from increased opportunities to use Welsh.</p> <p>Brecon High School would continue to teach Welsh as a Second Language and would be expected to provide appropriate opportunities for pupils to use their Welsh outside the classroom.</p> <p>Concern has been expressed that closure of the stream would lead to a reduction in the number of pupils accessing Welsh-medium provision in the Brecon area. The following risks are also identified by the authority in the consultation document:</p> <ul style="list-style-type: none"> <li>i) Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school</li> <li>ii) Pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon.</li> </ul>	<p>Good</p>	<p>The authority has provided risk management measures in respect of the risks outlined in the consultation document. These are as follows:</p> <ul style="list-style-type: none"> <li>i) Retaining pupils within the Welsh-medium sector is one of the Welsh Government's priorities, and the authority will work with the primary schools concerned to establish transition links with the alternative providers with the aim of reversing any reduction in transfer rates into KS3 in the longer term</li> <li>ii) Work with Ysgol y Bannau, Menter Brycheiniog and other organisations to promote the benefits of Welsh-medium primary education in the Brecon area.</li> </ul>	<p>Good</p>	<p>Consultation document / consultation report / objection report</p>
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<p><i>Treating the Welsh language no less favourably than the English language</i></p>	<p>Should the proposal be implemented, there would no Welsh-medium secondary provision in Brecon – pupils wishing to access Welsh-medium secondary provision would need to travel to access provision elsewhere.</p> <p>Concern has been expressed during the consultation period that the council is treating the Welsh language less favourably than the English language, and that the proposal is discriminating against the Welsh language.</p> <p>However, the number of pupils accessing the Welsh-medium stream at Brecon High School has decreased in recent years as parents have chosen for their children to attend alternative provision. As a result, the level of Welsh-medium provision available at Brecon High School has decreased, and the Welsh-medium provision currently provided is limited. The authority’s view is that the current situation does not provide equality for Welsh-medium pupils, and does in fact treat the Welsh language and Welsh-medium education less favourably than the English language / English-medium education</p>	<p>Good</p>	<p>N/A</p>	<p>Good</p>	<p>Consultation document / consultation report / objection report</p>
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<p><i>Opportunities to promote the Welsh language</i></p>	<p>Should the proposal be implemented, there would be no Welsh-medium secondary provision in Brecon. However, this would be the same as in other Powys towns, such as Newtown, Llandrindod and Ystradgynlais. However Ysgol y Bannau would continue to provide primary Welsh-medium provision in the town.</p> <p>In contrast to other Welsh-medium schools in Powys, pupil numbers at Ysgol y Bannau have remained fairly stagnant over recent years. It is hoped that greater clarity and a greater level of Welsh-medium provision in the secondary provision will provide a new opportunity to promote Welsh-medium education in the area, and the authority will work in partnership with organisations such as Menter Brycheiniog a Maesyfed to do this.</p>	<p>Good</p>	<p>N/A</p>	<p>Good</p>	<p>Consultation document / consultation report / objection report</p>
<p><i>Welsh Language impact on staff</i></p>	<p>It is acknowledged that the proposal could impact on staff currently teaching through the medium of Welsh at Brecon High School.</p>	<p>Poor</p>	<p>If a decision is made to proceed with the proposal, any implications for changes to staff employment will be taken forward by the school in accordance with the authority's Management of Change procedures.</p>	<p>Poor</p>	<p>Consultation document / consultation report / objection report</p>



<p><i>People are encouraged to do sport, art and recreation.</i></p>	<p>Implementation of the proposal would involve additional travel for Welsh-medium pupils via home to school transport, which could impact on their ability to take part in extra-curricular activities, especially where these take place after school. In addition, the reliance on home to school transport could impact on pupils' ability to take part in sport, art and recreation outside school.</p>	<p>Poor</p>	<p>The alternative schools pupils would be expected to transfer to already serve large catchments and are experienced in meeting the needs of pupils who are reliant on home to school transport.</p> <p>Should the proposal be implemented, the authority would work with the schools to ensure that pupils reliant on home to school transport are not disadvantaged compared with other pupils at the school, and that an appropriate range of activities is available to them. This could mean providing activities during lunchtime instead of after school. However it is acknowledged that it would not be possible to totally mitigate the impact on pupils and their families.</p>	<p>Poor</p>	<p>Consultation document / consultation report / objection report</p>
<p><b>A more equal Wales:</b> A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).</p>					
<p><i>Age</i></p>	<p>Please see separate Equality Impact Assessment</p>	<p>Choose an item.</p>		<p>Choose an item.</p>	
<p><i>Disability</i></p>	<p>As above</p>	<p>Choose an item.</p>		<p>Choose an item.</p>	
<p><i>Gender reassignment</i></p>	<p>As above</p>	<p>Choose an item.</p>		<p>Choose an item.</p>	

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<i>Marriage or civil partnership</i>	As above	Choose an item.		Choose an item.	
<i>Race</i>	As above	Choose an item.		Choose an item.	
<i>Religion or belief</i>	As above	Choose an item.		Choose an item.	
<i>Sex</i>	As above	Choose an item.		Choose an item.	
<i>Sexual Orientation</i>	As above	Choose an item.		Choose an item.	
<i>Pregnancy and Maternity</i>	As above	Choose an item.		Choose an item.	
<i>Equality Impact on PCC Staff</i>	As above	Choose an item.		Choose an item.	

4. How does your policy / change objective / budget saving impact on the council’s other key guiding principles?

<b>Principle</b>	<b>How does the policy / change objective impact on this principle?</b>	<b><u>Inherent Judgement</u></b> Please select from drop down box below	<b>What will be done to better contribute to positive or mitigate any negative impacts?</b>	<b><u>Residual Judgement</u></b> Please select from drop down box below	<b>Source of Outline Evidence to support judgement</b>
<b>Sustainable Development Principle</b>					

<p><b>Long Term:</b> <i>The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.</i></p>	<p>This proposal will provide better value for money for the council in the long term, by ensuring more equitable distribution of funding.</p> <p>Pupils will be able to access Welsh-medium provision in alternative schools which offer more Welsh language provision for pupils, and Brecon High School would be able to run more efficiently as a single stream school.</p>	<p>Good</p>		<p>Good</p>	
<p><b>Collaboration:</b> <i>Acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.</i></p>	<p>Should the proposal be implemented, Ysgol y Bannau would become a feeder school for Builth Wells High School / the new Mid Powys Secondary School. Strong links would be established between the two schools, to ensure effective transition arrangements for pupils and to ensure the well-being of all pupils.</p>	<p>Neutral</p>		<p>Neutral</p>	
<p><b>Involvement:</b> <i>The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves.</i></p> <p><b>Communication and Engagement</b></p>	<p>Full consultation on the proposal has taken place in accordance with the School Organisation Code which has given all interested parties the opportunity to submit their views on the proposal. All views expressed during the consultation period will be taken into consideration by Cabinet when determining how to proceed in relation to the proposal.</p>	<p>Neutral</p>		<p>Neutral</p>	

**Impact Assessment (IA)**

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<p><b>Prevention:</b> <i>How acting to prevent problems occurring or getting worse may help public bodies meet their objectives.</i></p>	<p>The number of pupils currently accessing the Welsh-medium stream at Brecon High School is small. As a result the Welsh-medium opportunities available to pupils are limited, and do not meet the aspirations of the council's Welsh in Education Strategic Plan (WESP).</p> <p>Should the proposal be implemented, pupils would be able to access a greater level of Welsh-medium provision in alternative schools, and Brecon High School would be able to run more efficiently as a single stream school.</p>	<p>Good</p>		<p>Good</p>	
<p><b>Integration:</b> <i>Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.</i></p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	

<p><b>Preventing Poverty:</b> Prevention, including helping people into work and mitigating the impact of poverty.</p>	<p>Free transport will be provided to all qualifying pupils to their closest alternative provider.</p> <p>However, concern has been expressed that implementation of the proposal would mean that it would be more difficult for pupils from lower income backgrounds to access Welsh-medium education due to the additional travel that would be required of parents in order to attend activities at the school, or to collect pupils from after school activities.</p>	<p>Poor</p>	<p>Should the proposal be implemented, free home to school transport would be provided to all eligible pupils, regardless of their socio-economic background.</p> <p>The schools pupils would be expected to transfer to serve large catchment areas and are experienced in meeting the needs of pupils and families from a range of backgrounds.</p> <p>Should the proposal be implemented, the authority would work with the Headteacher and Governing Body of the named receiving school and other schools pupils may wish to transfer to, to ensure that participation in all school activity is maximised for all learners and their families. However, it is acknowledged that it would not be possible to totally mitigate the impact on pupils and their families.</p>	<p>Neutral</p>	
<p><b>Safeguarding:</b> Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.</p>	<p>Safeguarding is of the utmost importance and safeguarding measures are in place in any other school pupils may wish to transfer to.</p>	<p>Neutral</p>		<p>Neutral</p>	

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<p><b>Corporate Parenting:</b> Enabling our looked after children to fulfil their potential.</p>	<p>The authority has no concerns about looked after children moving to any of the other schools they may wish to transfer to.</p>	<p>Neutral</p>		<p>Neutral</p>	
<p><b>Impact on Workforce</b></p>	<p>Staff at Brecon High School may be adversely affected by the proposal. In addition, it is possible that the proposal would have an adverse impact on staff at Ysgol y Bannau, should pupil numbers reduce significantly as a result of the proposal.</p>	<p>Poor</p>	<p>Staff with 2 years or more continuous service would be entitled to a redundancy payment. The authority will also attempt to identify alternative employment for staff through the redeployment process.</p>	<p>Neutral</p>	

5. Achievability of Policy / Change Objective / Budget Saving?

Impact on Service / Council	Deliverability of Policy / Change Objective / Budget Saving	Inherent Risk
<p>Low</p>	<p>Low</p>	<p>Low</p>

6. What are the risks to service delivery or the council following implementation of this Policy / Change Objective / Budget Saving?

Description of risks
<p>Risks associated with this proposal are outlined in the consultation document, along with risk management measures. The risks that have been identified in relation to this proposal are:</p> <ol style="list-style-type: none"> <li>1 Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school</li> <li>2 Pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon</li> <li>3 The alternative schools are unable to accommodate additional pupils</li> </ol>

4 Additional travel has an adverse impact on pupil well-being and attainment			
<b>Judgement (to be included in service risk register)</b>			
<b>Very High Risk</b>	<b>High Risk</b>	<b>Medium Risk</b>	<b>Low Risk</b>
			X
<b>Mitigating Actions</b>			<b>Residual Risk</b>
Risk management measures in respect of each individual risk are provided in the consultation document.			Choose an item.
			Choose an item.
			Choose an item.
<b>Does the Policy / Change Objective / Budget Saving have potential to impact on another service area?</b>			
No			

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7. Overall Summary and Judgement of this Impact Assessment?

<b>Outline Assessment (to be inserted in cabinet report)</b>	<b>Cabinet Report Reference:</b>	
The proposal aims to provide improved Welsh-medium provision for pupils living in mid and south Powys, and aims to establish a sustainable provision which can be further developed in the future. The negative impact of the proposal is related to additional travel requirements for learners and potential difficulties with accessing after school activities.		

8. Is there additional evidence to support the Impact Assessment (IA)?

<b>What additional evidence and data has informed the development of your proposal?</b>
Consultation document, consultation report, objection report

9. On-going monitoring arrangements?

<b>What arrangements will be put in place to monitor the impact over time?</b>
<p>The School Transformation Programme Board is responsible for overseeing the strategic direction of the modernisation agenda: setting direction, implementing change, monitoring and reporting to the Cabinet of the Council.</p> <p>Equality monitoring will form an integral part of the County Council’s arrangements for any school reorganisation and will be undertaken where a significant or material change in provision is proposed.</p> <p>The Head of Schools Service will be responsible for on-going monitoring.</p>
<b>Please state when this Impact Assessment will be reviewed.</b>
<p>If it is decided to proceed with the publication of Statutory Notices in respect of closure of the Welsh-medium stream at Brecon High School, the Impact Assessment will be reviewed if required to take account of any additional issues raised during the Objection Period.</p>

10. Sign Off

Position	Name	Signature	Date
<b>Service Manager:</b>	Marianne Evans		28/02/17
<b>Head of Service:</b>	Gareth Jones		01/03/17
<b>Strategic Director:</b>	Jeremy Patterson		06/03/17
<b>Portfolio Holder:</b>	Cllr Myfanwy Alexander		02/03/17



### 3. Equalities Impact Assessment



#### /Equality Impact Assessment (EqIA) – Decision Assessment reporting template

This EqIA reporting template is designed to assist in the analysis of gathered data and evidence, to determine the equality impact of a proposal to change existing practices of a Council service. Once complete, the template should be made fully accessible to the public e.g. inclusion with publicly available Cabinet reports and/or publication on the Powys County Council website. For confidential matters, this should be made available once a decision has been taken.

***N.B. Please contact the Council's Organisational Development Officer (Equalities) early on in the process if you require advice to conduct an assessment.***

<b>Proposal</b>	To close the Welsh-medium stream at Brecon High School from the 31 <sup>st</sup> August 2017	<b>Lead Person undertaking the assessment</b>	Sarah Astley
<b>Service Area</b>	Schools Service	<b>Relevant Head of Service who has agreed this assessment</b>	Gareth Jones Interim Head of Schools
<b>Date of Assessment</b>	November 2016 Updated 27 <sup>th</sup> February 2017 Updated 21 <sup>st</sup> June 2017		

The Equality Act 2010, requires that public sector organisations in the exercise of their functions, pay due regard to the following 'general duty':

- (a) Eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;**
- (b) Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- (c) Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it.**

*The protected characteristics include: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, marriage and civil partnership, sex and sexual orientation. This assessment also includes a consideration of impact upon people and communities whose language of choice is Welsh.*

The specific regulations for Wales [Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011] require public sector bodies to monitor relevant policy and practises and then assess and report on the impact based upon an analysis of relevant data and evidence.

<b>1. AIM or PURPOSE</b>	
Briefly describe the aim or purpose of the change proposal being assessed.	<p>Powys County Council recently carried out consultation on the following:</p> <ul style="list-style-type: none"> <li>- To close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, with Brecon High School becoming an English-medium school from the 1<sup>st</sup> September 2017.</li> </ul> <p>Should the Welsh-medium stream at Brecon High School close, Welsh-medium secondary provision for pupils who live in the catchment area currently served by the Welsh-medium stream of Brecon High School would be able to attend Builth Wells High School or their closest secondary Welsh-medium provision.</p> <p>From the 1<sup>st</sup> September 2018, all pupils wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream of Brecon High School would be able to access provision at the Builth Wells site of the New Mid Powys Secondary School or their closest Welsh-medium provision.</p>
<b>2. OBJECTIVES</b>	
Please state the current business objectives of the change proposal.	<p>The reasons why the authority is proposing to close the Welsh-medium stream at Brecon High School are:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages</li> </ul>
<b>3. BENEFITS and OUTCOMES</b>	
i) What are the intended benefits or outcomes from the change proposal?	<p>The benefits of the proposal, as outlined in the consultation document, are:</p> <ul style="list-style-type: none"> <li>- Creation of a critical mass of Welsh-medium secondary learners in Mid / South Powys</li> <li>- Additional Welsh-medium opportunities to be provided to Welsh-medium pupils from Brecon through access to a wider range of Welsh-medium subjects</li> <li>- Would enable the development of increased Welsh-medium provision at post-16</li> <li>- A larger group of Welsh-medium pupils will enable Builth Wells High School to build on the progress already made in relation to developing Welsh-medium provision</li> <li>- An increased number of Welsh-medium pupils would enable Builth Wells High School to further develop its Welsh</li> </ul>

	<p>ethos</p> <ul style="list-style-type: none"> <li>- Social and emotional benefits to Welsh-medium pupils from being part of a larger group of Welsh-medium pupils</li> <li>- More opportunity for pupils to take part in extra-curricular activities through the medium of Welsh</li> <li>- More financially efficient model of delivery for secondary Welsh-medium provision in Mid and South Powys</li> <li>- Would enable Brecon High School to run more efficiently as a single stream school</li> <li>- Welsh-medium pupil numbers could grow to a point where a Welsh-medium secondary school could be considered viable</li> </ul>
<b>4. CORPORATE RELEVANCE</b>	
How does this change proposal relate to the Powys Change Plan and/or Powys One Plan?	<p>The proposal supports Powys County Council's vision for education, which is outlined within the One Powys Plan for 2014-17. 'Transforming Learning and Skills' is one of the priorities within this plan, and the authority's aim is to ensure that 'All children and young people are supported to achieve their full potential.'</p> <p>Within this priority, the Plan states that</p> <p><i>'We need to re-organise schools (primary, secondary and post 16) to ensure affordability, sustainability and appropriate leadership capacity'</i></p> <p>In addition, the proposal supports the strategic aim stated in the council's Welsh in Education Strategic Plan (WESP) for 2014-17 to 'Provide more robust linguistic progression for Welsh-medium learners'</p>
<b>5. DATA USED</b>	
<b>5.1. What data has been used to conduct this assessment?</b>	Profiling of service users, providing a breakdown of who uses the service by the protected characteristics. ✓
Tick/shade boxes as appropriate.	Service user satisfaction rates, broken down by the protected characteristics.
	Qualitative data (analysed against the protected characteristics) which provides evidence about current services users experience accessing the service.

	Qualitative data gathered from those that are not currently using the service.	
	Complaints monitoring against the protected characteristics	
	Wider research reports and findings.	
	Relevant service based Equality Impact Assessment	
<b>5.2. Are there any gaps in the data?</b>	<b>Yes</b> <input type="checkbox"/> <input checked="" type="checkbox"/> Please state the gaps: N/A How will the gaps be addressed going forward? N/A	<b>No</b> <input type="checkbox"/> <input checked="" type="checkbox"/>
<b>6. DATA ANALYSIS</b>		
<b>6.1 Quantitative</b>	<u>Brecon High School Welsh Stream</u>	
<b>Summarise the key quantitative data analysis results, providing key headline statistics.</b>  Include data that relates to existing provision and also data relating to proposal. E.g. statistics generated from a consultation questionnaire.  <b>Key questions:</b> i) Are certain groups currently underrepresented in service user figures? Will a change affect this? ii) How do satisfaction levels compare	<p>At the time of the consultation period, there were 19 pupils in the Welsh stream at Brecon High School. The following pupils belonged to the protected characteristic groups:</p> <ul style="list-style-type: none"> <li>- Free school meals: 5% of pupils in the Welsh-medium stream receives free school meals</li> <li>- SEN: 21% of pupils have special educational needs. 0% of pupils have statements, 10.5% of pupils are on School Action and 10.5% of pupils are on School Action Plus</li> <li>- English as an Additional Language – Welsh or English is the first language of all pupils in the Welsh stream</li> <li>- Ethnicity: The ethnic group of 95% of pupils in the Welsh stream is White British. 5% of pupils have an ethnic group other than White British</li> </ul> <p>The number of pupils currently accessing the Welsh-medium stream at Brecon High School is very small, therefore the number of pupils belonging to the protected characteristic groups that would be affected by the proposals is very small.</p>	

across the protected characteristic groups? How will a change affect this?

#### Ysgol y Bannau

The following shows the profile of pupils attending Ysgol y Bannau according to PLASC information provided in January 2016 for 142 pupils in total, which includes 108 pupils aged 5 and over:

- Free school meals: 6% of pupils are eligible for free school meals
- SEN: 1% of pupils have a Statement of Special Educational Needs. 8% of pupils are on School Action
- English as an Additional Language: English or Welsh is the first language of all children
- Ethnicity: PLASC only provides information about the ethnic group of the 108 pupils aged 5 and over. The ethnic group of 98% of pupils is White British. The ethnic group of the remaining pupils is as follows: Other mixed background – 1%, White other – 1%

#### Sennybridge CP School

At the time of the consultation period, there were a total of 45 pupils in the Welsh-medium stream at Sennybridge CP School. The following pupils belonged to the protected characteristic groups:

- Free school meals: 2 pupils in the Welsh stream receive free school meals
- SEN: 2 pupil has special educational needs. Of these, 0 pupils have a statement, 1 pupils are on School Action and 1 pupil is on School Action Plus
- English as an Additional Language – Welsh or English is the first language of all pupils in the Welsh stream
- Ethnicity: The ethnic group of 100% of pupils in the Welsh-medium stream is White British. The ethnic group of the remaining 2% of pupils is White Asian

This information shows that the number of pupils that will be affected by this proposal that belong to the protected characteristic groups is small. A number of pupils that have additional learning needs will be affected by the proposal, and a number of pupils who are in receipt of free school meals will be affected by the proposal.

As the proposal relates to changing Welsh medium secondary provision in Brecon, all of the pupils affected are fluent Welsh speakers, who are educated through the medium of Welsh, therefore Welsh speakers are

	the key group that will be affected by this proposal.
<p><b><u>6.2 Qualitative</u></b></p> <p><b>Summarise the key qualitative data analysis, providing key themes or patterns.</b></p> <p>Include data that relates to existing provision and also data relating to proposal. E.g. protected characteristics focus group on the proposal.</p> <p><b>Key questions:</b></p> <p><b>i)</b> Do certain groups have a different service user experience? How will a change affect this?</p> <p><b>ii)</b> Have any areas for improvement been communicated by particular groups? Will a change have an impact upon these views?</p> <p><b>iii)</b> What are the reasons behind some groups not using the service? How will a change affect this position?</p> <p><b>iv)</b> What has consultation on your proposals revealed about impact on the protected characteristics?</p>	<p>Consultation on the closure of the Welsh-medium stream was carried out in accordance with the requirements of the School Organisation Code (2013), and included meetings with pupils at the affected schools. This provided qualitative data in respect of the proposal, and the impact on pupils that belong to the protected characteristic groups.</p> <p>The following issues were raised in relation to the proposal’s impact on those in the protected characteristic groups:</p> <p><b><u>Impact on pupils with additional needs</u></b></p> <ul style="list-style-type: none"> <li>- The proposal will affect children with learning difficulties and medical problems</li> <li>- Concern about how the council will support pupils with additional needs</li> <li>- Concern about pupils with additional needs who don’t travel well</li> <li>- Concern about the impact of additional travel on pupils with learning difficulties</li> <li>- Concern that pupils with special needs will be unable to carry on in Welsh-medium education</li> <li>- Concern about the impact on dyslexic pupils who attend extra classes after school – they wouldn’t be able to do so if they were reliant on school transport</li> <li>- There is inadequate provision for pupils with additional learning needs – a school day is already tiring for pupils on the Autistic Spectrum, added travel either side on a noisy crowded bus will mean that the school day will become overwhelming and they will be unable to meet their potential in school or at home</li> <li>- Some pupils with additional needs might be happier in a smaller class, as they are in the Welsh stream at Brecon High School</li> <li>- Concern about wheelchair access on school transport for wheelchair users</li> </ul>
<p><b>7. EqIA RESULT</b></p>	

Based on an analysis of the available qualitative and quantitative data, please tick/shade the appropriate box opposite to provide the EqIA assessment result.	<b>The proposal does not present any adverse impact on equality.</b> [Proceed to question 10]	
	<b>The proposal presents some adverse impact on equality.</b> [Proceed to question 8]	✓
	<b>The proposal presents significant impact on equality</b> [Proceed to question 8]	
<b>8. AREAS for IMPROVEMENT</b>		
<p><b>Please provide detail of weak or sensitive areas of the proposal identified by the assessment.</b></p> <p>i) Which protected characteristic groups are particularly affected?  ii) Will people on low incomes be affected?  iii) Will Welsh speakers be affected?</p>	<p>i) The protected characteristic group that will be mostly affected by the proposal is those with disabilities / additional learning needs</p> <p>ii) Some people on low incomes will be affected. Whilst free home to school transport would be provided to alternative provision, it is likely that the greater distance to travel to the school for other activities would have a greater impact on people on low incomes</p> <p>iii) As this proposal is to close the Welsh-medium stream at Brecon High School, the proposal will impact on Welsh speakers. This aspect is considered in the Integrated Impact Assessment and in the Welsh Language Impact Assessment</p>	
<b>9. EQUALITY IMPROVEMENT</b>		
<p><b>9.1 Having identified problematic aspects to the proposal, how will this now be addressed?</b></p> <p><i>i.e. Are you able to involve (in some capacity) people from protected characteristic groups, Welsh Speakers, people on low incomes, to assist you in this process?</i></p>	<p>The consultation paper related to this proposal sets out how the authority will provide alternative provision that meets the needs of pupils that would have accessed the Welsh-medium stream at Brecon High School:</p> <p>‘From the 1<sup>st</sup> September 2017, there would be no Welsh-medium provision in Brecon High School for pupils in years 7, 8, 9 and 10. However, Welsh-medium provision would continue to be</p>	

<p>i) Can the impact be mitigated, and how will this be done?</p> <p>ii) Does the proposal require modification to reduce or remove this impact?</p> <p>iii) Should the proposal be considered for removal, owing to the degree of impact it is likely to have?</p>	<p>provided at Brecon High School for those pupils who would be entering year 11 in September 2017. This provision would continue until July 2018.</p> <p>From the 1<sup>st</sup> September 2017, pupils in years 7, 8, 9 and 10 wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream of Brecon High School would be able to attend Builth Wells High School or their closest secondary Welsh-medium provision.</p> <p>From the 1<sup>st</sup> September 2018 all pupils wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream of Brecon High school would be able to access provision at the Builth Wells site of the new dual-sited secondary school in Mid Powys (“the New Mid Powys Secondary School”) or their closest secondary Welsh-medium provision.</p> <p>From the 1<sup>st</sup> September 2018, there would be no Welsh-medium provision at Brecon High School.</p> <p>Pupils living in the Sennybridge area would continue to be able to access Welsh-medium provision at Ysgol Gyfun Ystalyfera.</p> <p>Pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School that live closer to alternative Welsh-medium secondary provision outside Powys would have the opportunity to transfer to these schools.’</p> <p><u>Disability</u> – the authority is confident that any of the other schools pupils may access should the proposal be implemented can meet the needs of all pupils currently receiving Welsh-medium education in the Brecon area, including those with additional learning needs. Any pupil with a disability is assessed on an individual basis and relevant modifications, adaptations or reasonable adjustments are made where applicable. The authority’s specific responses to the individual issues raised during the consultation period relating to the proposal’s impact on pupils with additional needs are provided in the consultation report in respect of the proposal.</p> <p><u>Free School Meals / Low Income Families</u> – Free home to school transport will be provided to the alternative provision for qualifying pupils, this will ensure that the proposal does not have an adverse impact on pupils from lower income families. The alternative schools pupils would transfer</p>
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	<p>to in order to access Welsh-medium secondary provision serve large catchment areas, and are experienced in meeting the needs of pupils who are reliant on home to school transport and pupils and families from a range of socio-economic backgrounds. Should the proposal be implemented, the authority would work with the alternative schools to ensure that families from lower income backgrounds are not disadvantaged compared with other pupils at the school, and that an appropriate range of extra-curricular activities is available to them. However it is acknowledged that it would not be possible to totally mitigate the impact on pupils and their families.</p> <p><u>Welsh language</u> – the number of pupils currently accessing the Welsh-medium stream at Brecon High School is very small, which limits the Welsh-medium provision the school can offer. The Welsh-medium provision available at the alternative providers would be greater than the provision that is currently available at Brecon High School. The authority is confident that all pupils, including those in the protected characteristic groups, would benefit from the enhanced level of provision available.</p>	
<p><b>9.2 Will the management of the impact as outlined in 9.1, be included in the Service Improvement Plan?</b></p>	<p>Yes <input type="checkbox"/></p> <p>Date added.....</p> <p>Reference.....</p>	<p>No <input checked="" type="checkbox"/></p> <p>If no, please explain why not:</p> <p><b>Need was not identified at time of writing Service Strategy</b></p>
<p><b>10. ONGOING MONITORING</b></p>		
<p><b>How will the decision now be monitored on an ongoing basis to consider its impact over time?</b></p>		<p><b>Please tick/shade</b></p>
	<p>Equality monitoring of uptake of the service within which the decision was made</p>	
	<p>Satisfaction monitoring of service users (broken down by protected characteristic)</p>	
	<p>Recording and analysing complaints/requests/compliments</p>	

	Targeted periodic focus groups/service user interviews/feedback sessions	
	Other (please specify)	
<b>Monitoring arrangements</b>		
<p>The Learning in the Community Programme Board is responsible for overseeing the strategic direction of the modernisation agenda: setting direction, implementing change, monitoring and reporting to the Cabinet of the Council.</p> <p>Equality monitoring will form an integral part of the County Council's arrangements for any school reorganisation and will be undertaken where a significant or material change in provision is proposed.</p> <p>The Head of Schools Service will be responsible for on-going monitoring.</p>		
<b>Publication of results of the impact assessment</b>		
The results of the impact assessment will be published on the Council's website		
<b>Equality Impact Assessment Action Plan</b>		
Any actions identified as a result of this impact assessment will be taken forward for inclusion in the Schools Service Business Plan.		

## **4. Community Impact Assessment – Final**

### **Background**

A draft Community Impact Assessment was published as part of the Formal Consultation on the following proposal:

To close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, with Brecon High School becoming an English-medium school from the 1<sup>st</sup> September 2017.

The consultation was held between the 21<sup>st</sup> November 2016 and the 9<sup>th</sup> January 2017.

This community impact assessment has been updated where appropriate to take account of any issues or information raised during consultation about the impact on the community.

#### **4.1 Current use of Brecon High School buildings as a community resource**

The facilities of Brecon High School are hired out by a number of organisations, including the South Powys Youth Orchestra, Brecon Athletic Club and Brecon Basketball Club. The facilities have also been made available for Road Safety events, and are let for use by Caravan Clubs based in Gwent. NPTC Group of Colleges also have two rooms based on the school site.

#### **4.2 Other facilities provided by Brecon High School**

A number of extra-curricular activities are organised by teaching staff at different points during the year. These include the following:

Music activities: Ensembles, Performance opportunities, School Musical

Sports activities: Rugby, Netball, Basketball, Athletics, Hockey, Cricket, Football, Swimming

Other clubs: Domino Club, Revision Club, Additional Maths Club

In addition, the school's facilities are used for different events such as the cross country championships and events such as 'Race to the Sun'.

#### **4.3 Information/issues raised during consultation**

A number of concerns in relation to the proposal's impact on the community were raised during the consultation period on this proposal. These included the following:

- The proposal would have a negative impact on the community
- The impact on organisations in the community such as Brecon Swimming Club
- Impact on the economy of the community
- Impact on Welsh culture, tourism and attraction to foreign visitors
- Issues relating to the rural nature of the area

A number of concerns were also raised relating to the proposal's impact on the ability of pupils to access extra-curricular activities. These included the following:

- Children will miss out on being able to attend after school activities due to the additional travel
- Pupils will be forced out of Welsh-medium education because they don't want to give up activities out of school
- Pupils travelling to school will miss out on being able to attend clubs in Brecon

In addition, issues were raised in relation to the impact of additional travel for pupils. These included the following:

- Concern about the additional travel time that would be required, and that this would be a waste of pupil's time
- Concern that the additional travel would put pupils at a disadvantage compared to other students
- Concern that pupils would be tired due to the additional travel that would be required
- Concern about the impact of the additional travel on the health and well-being of pupils

These issues, along with the local authority's response to these issues, are listed in the consultation report in respect of this proposal. Issues relating to the impact on the community are listed in section 14 of the list of issues, issues relating to the ability of pupils to access extra-curricular activities are listed in section 1.2 of the list of issues raised, and issues relating to the impact of additional travel on pupils are listed in section 1.3.

#### **4.4 Conclusion**

Following the consultation period, the authority's view on the impact of the proposal on the community remains the same.

The number of pupils currently attending the Welsh-medium stream at Brecon High School is small. As the proposal does not involve closure of Brecon High School, it is not anticipated that the proposal will have an adverse impact on the facilities available to the community.

It is acknowledged that implementation of the proposal would lead to additional travel for Welsh-medium pupils from the Brecon catchment, however a significant proportion of pupils are already travelling out of Brecon to access Welsh-medium secondary provision elsewhere. It is acknowledged that this additional travel could have an impact on pupils' ability to access extra-curricular activities, particularly those that take place after school, however should the proposal be implemented, the council would work with the schools pupils might choose to transfer to in order to ensure that an appropriate range of extra-curricular activities are available to all pupils. All schools pupils might choose to transfer to instead of Brecon already serve large catchment areas, and are experienced in meeting the needs of pupils who are reliant on home to school transport, including in terms of ensuring access to an appropriate range of extra-curricular activities.

Should the proposal be implemented, pupils could either transfer to alternative Welsh-medium provision at other schools or they could access English-medium provision at Brecon High School. The authority acknowledges that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, taking the additional travel into consideration.

## 5. Welsh Language Impact Assessment

### Background

A draft Welsh Language Assessment was published as part of the Formal Consultation on the following proposal:

To close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, with Brecon High School becoming an English-medium school from the 1<sup>st</sup> September 2017.

The consultation was held between the 21<sup>st</sup> November 2016 and the 9<sup>th</sup> January 2017.

This Welsh language impact assessment has been updated where appropriate to take account of any issues or information raised during consultation about the impact on the Welsh language.

This Welsh Language Impact Assessment should be read in conjunction with the Integrated Impact Assessment and Equality Impact Assessment earlier on in this document.

### 5.1 Standards in Welsh

The following tables provide information about Standards in Welsh First Language at Brecon High School and the schools the alternative schools pupils would be expected to transfer to should the proposal be implemented for the last 3 years.

Whilst this is useful as background information, the relatively small number of pupils in each year group at each school mean that it is difficult to draw any firm conclusions from this information with regard to standards in Welsh at the two schools.

#### i) End of Key Stage 3

##### Brecon High School

	2012	2013	2014	2015	2016
Total number of Year 9 pupils assessed in Welsh First Language	19	13	8	10	4

Number of pupils that achieved Level 5+	19	10	8	10	4
% of pupils that achieved Level 5+	100%	76.9%	100%	100%	100%

### **Builth Wells High School**

	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Total number of Year 9 pupils assessed in Welsh First Language	17	17	22	26	30
Number of pupils that achieved Level 5+	15	16	20	23	28
% of pupils that achieved Level 5+	88.2%	94.1%	90.9%	88.5%	93.3%

### **Ysgol Gyfun Ystalyfera**

	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Total number of Year 9 pupils assessed in Welsh First Language	173	159	150	173	191
Number of pupils that achieved Level 5+	139	136	129	147	176
% of pupils that achieved Level 5+	80.3%	85.5%	86.0%	85.0%	92.1%

5+

ii) End of Key Stage 4

**Brecon High School**

	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b> (Provisional)
Total number of GCSE Welsh First Language entries	18	12	18	12	8
Number of pupils that achieved grades A* - C	7	6	14	9	8
% of pupils that achieved grades A* - C	38.9%	50%	77.8%	75%	100%

**Builth Wells High School**

	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b> (Provisional)
Total number of GCSE Welsh First Language entries	13	22	17	16	19
Number of pupils that achieved grades A* - C	10	13	13	11	11
% of pupils that achieved grades A* - C	76.9%	59.1%	76.5%	68.8%	57.9%

**Ysgol Gyfun Ystalyfera**

<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
-------------	-------------	-------------	-------------	-------------



(Provisional)					
Total number of GCSE Welsh First Language entries	142	156	170	145	143
Number of pupils that achieved grades A* - C	99	112	135	100	97
% of pupils that achieved grades A* - C	69.7%	71.7%	79.4%	69.4%	67.8%

## 5.2 Welsh language activities provided by the schools

### Brecon High School

The majority of extra-curricular activities at Brecon High School are carried out through the medium of English, however some activities take place in Welsh or bilingually, depending on which member of staff is responsible and which pupils are taking part. The impact of the previous Welsh Medium consultations on the certainty of future provision, had led to an impact on the overall number of Welsh-medium pupils at the school. This has limited the provision that could be offered. The Welsh Department has developed links with the Urdd to offer opportunities such as camping events, as part of their wider provision.

The south Powys Urdd Eisteddfod is held in Brecon High School each year.

### Builth Wells High School

A number of the school's extra-curricular activities and clubs are Welsh or bilingual, depending on which member of staff is responsible and which pupils are taking part.

In addition, the school provides a range of additional opportunities for pupils to use Welsh outside the classroom. The school choir takes part in Urdd competitions, and pupils also take part in written competitions. Workshops are arranged with Welsh speakers from speciality areas, as well as workshops with Welsh poets and Welsh bands. The school holds an annual Eisteddfod, which gives additional opportunities for pupils to use their Welsh. The school puts on a musical every two years, and this is always bilingual, with some of the songs being in Welsh.

The school also supports the local 'papur bro', 'Y Fan a'r Lle', by submitting information to be included in the paper, and also supports the local Eisteddfod held annually in Llanwrtyd Wells.

Welsh for Adults lessons are held at the school on a weekly basis.

### **Ysgol Gyfun Ystalyfera**

Ysgol Gyfun Ystalyfera is a Welsh-medium school, therefore all extra-curricular activities provided by the school take place through the medium of Welsh. These activities include the following:

- Activities provided by Urdd Gobaith Cymru,
- Music and drama activities, including whole school productions, drama productions, religious services both within the school and the community, school choirs, school orchestra and various ensembles
- Sports activities
- Duke of Edinburgh award
- Other clubs, including Reading Club, Handwriting Club, Chess Club, Art Club, Numeracy Club
- Fundraising activities

### **5.3 Information/issues raised during consultation**

A number of concerns in relation to the proposal's impact on the Welsh language were raised during the consultation period on this proposal. These included the following:

- Concern about the impact on pupils' Welsh language skills if they transfer to English-medium provision
- Concern about the impact on the Welsh language skills of English-medium pupils
- The proposal is discriminating against the Welsh language
- Concern about Welsh-medium pupil numbers
- Concern that the proposal is limiting access to Welsh-medium provision
- Concern that the proposal would have a detrimental impact on the Welsh language / Welsh language organisations and activities in the Brecon area
- Criticism of the council's treatment of the Welsh language
- Impact on the ability of employers in the local area to employ Welsh speakers
- The proposal goes against various policies and strategies relating to the Welsh language, e.g. the Welsh in Education Strategic Plan, A Million Welsh Speakers by 2050, the Welsh-medium Education

These issues, along with the local authority's response to these issues, are listed in the consultation report in respect of this proposal.

#### **5.4 Conclusion**

Following the consultation period, the authority's view on the impact of the proposal on the Welsh language remains the same.

It is acknowledged that implementation of the proposal would mean that Welsh-medium secondary provision would not be available in the town of Brecon. This could be perceived to be detrimental to the Welsh language in the area. However, provision would continue to be provided to pupils living in the current catchment area of the Welsh-medium stream of Brecon High School through the provision of home to school transport to alternative providers. The continued presence of Ysgol y Bannau in Brecon, along with the Welsh-medium stream at Sennybridge C.P. School, will continue to provide local access to Welsh-medium primary provision in the Brecon area. Should the proposal be implemented, these schools would establish transition links with the alternative secondary providers to ensure a clear pathway for Welsh-medium pupils.

Whilst Welsh-medium pupils would be leaving Brecon to access Welsh-medium secondary provision, they would continue to live in the town and surrounding areas, and will continue to be able to participate in Welsh language activities in the local community. The authority's view is that the increased level of Welsh-medium provision available to them will enable all Welsh-medium pupils to become more confident Welsh speakers, who will be able to play a greater role in terms of the Welsh language in the community.

The authority's view is that the proposal will provide positive benefits for the Welsh language and Welsh-medium education through improved linguistic progression and through providing additional opportunities for Welsh-medium pupils to use their Welsh through all key stages of education. The Welsh-medium subject provision at the alternative schools which pupils are likely to attend to continue to access Welsh-medium secondary provision should the proposal be implemented is greater than that at Brecon High School, and the Authority's view is that accessing a greater level of subjects through the medium of Welsh will enable the learners to become more confident Welsh speakers.

In addition, pupils would be part of a larger group of Welsh-medium pupils at the alternative schools, which would ensure that there would be more opportunities for pupils to use their Welsh outside the classroom, further

strengthening their confidence in using the language. However, the authority accepts that it might be more difficult for pupils from the Brecon area to access after school activities at the alternative schools, due to their reliance on home to school transport.

As with all proposals, it is acknowledged that there are risks associated with this proposal. Risks relating to the proposal's impact on Welsh-medium pupil numbers were identified on pages 16 and 17 of the consultation document, along with proposed risk management measures.



**POWYS COUNTY COUNCIL**

**CONSULTATION DOCUMENT**

**Brecon High School  
Welsh-medium Stream**

**Consultation dates: 21<sup>st</sup> November 2016 – 9<sup>th</sup> January 2017**

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A Welsh language version of this document is available on the council's website – <http://www.powys.gov.uk/en/corporate/find-out-about-consultations-in-powys/brecon-high-school-welsh-medium-stream/>.

If you require a hard copy of the document, or the document in a different format, please contact the Schools Transformation Team on 01597 826954 or [school.consultation@powys.gov.uk](mailto:school.consultation@powys.gov.uk)

# 1. Introduction

## 1.1 The Proposal

The purpose of this consultation exercise is to seek views on the following proposal:

***To close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, with Brecon High School becoming an English-medium school from the 1<sup>st</sup> September 2017.***

From the 1<sup>st</sup> September 2017, there would be no Welsh-medium provision in Brecon High School for pupils in years 7, 8, 9 and 10. However, Welsh-medium provision would continue to be provided at Brecon High School for those pupils who would be entering year 11 in September 2017. This provision would continue until July 2018.

From the 1<sup>st</sup> September 2017, pupils in years 7, 8, 9 and 10 wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream of Brecon High School would be able to attend Builth Wells High School or their closest secondary Welsh-medium provision.

From the 1<sup>st</sup> September 2018 (without prejudice to the decision of Powys Cabinet in relation to a separate proposal related to Builth Wells and Llandrindod High Schools), all pupils wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream of Brecon High School would be able to access provision at the Builth Wells site of the proposed new dual-sited secondary school in Mid Powys (“the New Mid Powys Secondary School”)<sup>1</sup> or their closest secondary Welsh-medium provision.

From the 1<sup>st</sup> September 2018, there would be no Welsh-medium provision at Brecon High School.

Pupils living in the Sennybridge area would continue to be able to access Welsh-medium provision at Ysgol Gyfun Ystalyfera.

Pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School that live closer to alternative Welsh-medium secondary provision outside Powys would have the opportunity to transfer to these schools.

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<sup>1</sup> On the 18<sup>th</sup> October 2016, Powys County Council published a Statutory Notice proposing the establishment of a new dual-sited dual-stream school that will operate from the current sites of Builth Wells and Llandrindod High Schools from the 1<sup>st</sup> September 2018. The Objection Period closes on the 8<sup>th</sup> December 2016, and the Objection Report will be considered by Cabinet in due course. **All references to the New Mid Powys Secondary School in this consultation document are made without prejudice to Cabinet’s decision following the Objection Period.**

## 1.2 Who will we consult with?

Consultation will follow the guidelines set out by the Welsh Government in the School Organisation Code 2013 (“the Code”), which can be found on the council’s website<sup>2</sup>.

The council will consult with stakeholders in line with the requirements of the School Organisation Code, which will include the following:

- Pupils (including School Councils), Parents (and where possible prospective parents), carers and guardians, staff members of any schools likely to be affected by the proposals
- Parents of pupils attending primary schools from which pupils normally transfer to the affected secondary school
- The Governing Body of any school which is the subject of the proposals and of any other schools likely to be affected by the proposals, including those that might receive any displaced pupils
- Any other local authority likely to be affected by the proposal
- The Church in Wales and Roman Catholic Diocesan Authority for the area in which any school likely to be affected is located
- The Welsh Ministers
- Assembly Members (AMs) and Members of Parliament (MPs) representing the area served by any school which is the subject of the proposal
- Estyn
- Teaching and staff trade unions representing teachers and other staff at any school which is the subject of the Proposal
- The relevant Regional Education Consortium
- The relevant Regional Transport Consortium
- The Police and Crime Commissioner for the area
- Any community or town council for the area served by any school which is the subject of the Proposal
- Any further education institutions serving the area of the school

## 1.3 How to respond to the Consultation

Responses to the consultation can be provided in writing, or by attending the consultation meeting in respect of this proposal. Further details are provided below:

### 1.3.1 Written responses

A feedback form is attached to this document in Appendix A, and is also available on the council’s website. You can also respond in writing.

All responses should be sent to the following address:

School Transformation Team  
Powys County Council  
County Hall  
Llandrindod Wells  
Powys  
LD1 5LG

E-mail: [school.consultation@powys.gov.uk](mailto:school.consultation@powys.gov.uk)

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<sup>2</sup> <http://www.powys.gov.uk/en/schools-students/plans-for-powys-schools/>



All correspondence should be received by the **9<sup>th</sup> January 2017**.

### **1.3.2 Consultation meetings**

The following consultation meeting has been arranged for parents and members of the community:

#### **Brecon High School, Thursday 1<sup>st</sup> December, 6.30pm – 8.30pm**

The event will be ticketed to ensure compliance with health and safety regulations.

Tickets are free, and are available online via Powys County Council's website (<http://www.powys.gov.uk/en/corporate/find-out-about-consultations-in-powys/brecon-high-school-welsh-medium-stream/>), or by phoning 01597 826954.

Separate consultation meetings will be held with governors, staff and pupils.

## **1.4 What will happen next?**

This consultation is part of the statutory process for making changes to school provision, as outlined in the Welsh Government's School Organisation Code (2013). The process is summarised below:

### **1.4.1 Consultation**

Consultation will start on the 21<sup>st</sup> November 2016 and will end on the 9<sup>th</sup> January 2017. Feedback from the consultation will be collated, and a Consultation Report will be prepared, which will summarise the issues raised during the consultation and will provide the authority's response to these issues.

Stakeholders will be notified of the publication of the consultation report in line with the requirements of the School Organisation Code. If you would like to be notified of the publication of the Consultation Report, or to receive a copy, please ring 01597 826954 or email [school.consultation@powys.gov.uk](mailto:school.consultation@powys.gov.uk).

The Consultation Report will be presented to the council's Cabinet during the spring term 2017. The Cabinet will consider the report, and will decide whether to proceed with the proposal, to make changes to the proposal or to not proceed with the proposal. If the Cabinet decides not to proceed, that will be the end of this proposal for the foreseeable future.

### **1.4.2 Statutory Notices**

If the Cabinet decides to proceed, a Statutory Notice will be published, which will give a period of 28 days for people to submit written objections.

If there are objections, the council will publish an Objection Report providing a summary of the objections and the authority's response to them. Only written objections submitted during the statutory notice period will be considered in this report. Comments submitted as part of the consultation period will need to be re-submitted in writing during the statutory notice period if they are to be considered as objections.

The Objection Report will be considered by the council's Cabinet, who will determine whether or not to approve the proposal.

### **1.4.3 Implementation**

If the Cabinet approves the proposal, it will be implemented in accordance with the date given in the Statutory Notice or any subsequently modified date.

## 2. Background and Policy Context

### 2.1 Background to the Proposal

In January 2015, Powys County Council commenced a Secondary School Reorganisation programme, which intended to transform the secondary and post-16 sector across the county. The main aims of the Programme were:

- Reconfiguration of secondary and post-16 education to create a sustainable infrastructure of schools and sixth forms across Powys, enabling a broader range of subjects to be provided from each school site, whilst minimising the need for inter-school travel and transport
- Reconfiguration of Welsh-medium education with the aim of establishing at least one Welsh-medium secondary school in the county, and the consolidation of other Welsh-medium streams into larger units. This will enable schools to provide the appropriate curriculum offer and progression routes for Welsh-medium learners.

This reflects the authority's Welsh in Education Strategic Plan (WESP) for 2014-17. One of the Strategic Aims stated in the WESP is 'to provide robust linguistic continuity of Welsh-medium provision across all key phases of education'<sup>3</sup>.

Welsh-medium secondary provision in Powys is currently provided at 6 dual stream schools, where the curriculum is delivered through separate Welsh-medium and English-medium streams.

In South Powys, there are currently 2 Welsh-medium secondary streams:

- The Welsh-medium stream at Brecon High School provides Welsh-medium subjects for pupils in years 7 – 11
- The Welsh-medium stream at Builth Wells High School provides Welsh-medium subjects in years 7 – 13

However, the number of Welsh-medium pupils and the Welsh-medium provision available varies significantly between schools.

In some areas of Powys, pupils transfer out of county to receive Welsh-medium secondary provision within another local authority, most notably from the Ystradgynlais area to Ysgol Gyfun Ystalyfera, located within Neath Port Talbot County Borough. Although historically it is mainly pupils from the Ystradgynlais catchment area that have transferred to Ysgol Gyfun Ystalyfera, in recent years there has been an increase in the number of pupils from the Welsh-medium stream at Sennybridge C.P. School who have transferred to Ysgol Gyfun Ystalyfera rather than the Welsh-medium stream at Brecon High School, due to parental preference.

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<sup>3</sup> <http://www.powys.gov.uk/en/schools-students/apply-for-a-school-place/use-of-the-welsh-language-in-powys-schools/>

In March 2015, the council's Cabinet considered and approved a report which identified four priorities to be taken forward in respect of the Secondary School Reorganisation programme, which were as follows:

- Priority 1 – Beacons Learning Campus
- Priority 2 – To review Secondary Education in Mid Powys
- Priority 3 – To review Post-16 Provision in Ystradgynlais
- Priority 4 – To review Secondary Education in North Powys

The initial recommendation in respect of Priority 1 was to carry out consultation on closure of Brecon and Gwernyfed High Schools, with the opening of a new English-medium school. Formal consultation on the closure of the Welsh-medium stream at Brecon High School was carried out in the summer of 2015, and a Consultation Report was produced and received by Cabinet on the 29<sup>th</sup> September 2015. At this meeting, Cabinet resolved to 'note the content of the consultation report and that a further report will be brought back to Cabinet for decision at a later date'.

The School Organisation Code states that 'Proposals must be published within 26 weeks of the end of the period allowed for consultation responses, otherwise the proposals will lapse and a new consultation document must be issued to revive them'. No further report was taken to Cabinet with proposals, and therefore no proposals were published within the 26 week period.

During the consultation period, concerns were raised that the proposal to close the Welsh-medium stream could not be considered in isolation to the work that was ongoing in respect of secondary provision in Mid Powys and South Powys (Priorities 1 and 2). Therefore it was agreed to re-consider the future of Welsh-medium secondary provision in the area as part of these reviews.

A business case in respect of Mid and South Powys was considered by Cabinet on the 23<sup>rd</sup> February 2016, when Cabinet determined:

- To approve the commencement of formal consultation on the closure of Builth Wells High School and Llandrindod High School and to establish a new dual-stream 11-18 secondary school that will operate across the current sites of the two schools
- To approve the commencement of formal consultation on the closure of Brecon High School and Gwernyfed High School, and to establish a new English-medium school to operate from the current sites of the two schools initially, before transferring to the new campus in Brecon.

Consultation on these proposals took place later in the year. Consultation reports were published in line with the requirements of the School Organisation Code, and were considered by Cabinet on the 27<sup>th</sup> September 2016. At this meeting, Cabinet determined the following:

- To publish a statutory notice for the closure of Builth Wells and Llandrindod High Schools on the 31<sup>st</sup> August 2018 and the establishment of a new dual-sites dual-stream 11-18 school that will operate on the current campuses of Builth Wells and Llandrindod High Schools with effect from 1<sup>st</sup> September 2018

- To abandon the elements of the proposal with regard to Brecon High School and Gwernyfed High School relating to closure of the two schools and the establishment of a new school, and to re-consult on the closure of the Welsh-medium stream at Brecon High School from September 2017.

## 2.2 Policy Context

### 2.2.1 Powys County Council's aspiration for education

Powys County Council is committed to ensuring that all children and young people have an equal opportunity to receive the best possible education. The council aspires to have an educational infrastructure that:

- Provides all learners with opportunities to achieve high standards of achievement and attainment;
- Provides for first class teaching and learning provision reflecting national, regional and local priorities;
- Has high quality resilient leadership and management;
- Provides robust linguistic continuity and progression;
- Improves cost-effectiveness and efficiency;
- Has the right number of schools in the right place for the current and future pupil population of Powys;
- Has school buildings and blocks that are assessed as condition A or B;
- Minimises dependency on temporary accommodation; and
- Reduces overall surplus places in schools.

The council has a duty to ensure that school buildings, teaching resources and pupils' learning experiences are shaped to develop competencies which allow children and young people to engage confidently with the challenges of their future lives. The challenge faced by the council is to ensure that schools provide an appropriate, fit-for-purpose learning environment that will facilitate the delivery of a curriculum, as defined in "Successful Futures"<sup>4</sup> to ensure children and young people develop as;

- ambitious, capable learners ready to learn throughout their lives;
- enterprising, creative contributors, ready to play a full part in life and work;
- ethical and informed citizens of Wales and the world; and
- healthy, confident individuals, ready to lead fulfilling lives as valued members of society.

In order to establish an infrastructure of schools that meet the council's aspirations for education, the council will need to consider new models of delivering educational provision in the county. In a rural county as diverse as Powys there is no one size fits all approach to school organisation. Consideration will be given to the specific circumstances of each school and community.

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<sup>4</sup> Independent Review of Curriculum and Assessment Requirements in Wales. Professor Ian Donaldson February 2015

## 2.2.2 Welsh-medium Education

In 2010, the Welsh Government published its Welsh-medium Education Strategy<sup>5</sup>, which sets the national strategic direction for Welsh-medium education. This strategy states that *‘Welsh-medium education from the early years, with robust linguistic progression through every phase of education offers the best conditions for developing future bilingual citizens.’* The strategy also states that *‘Where a pupil from a Welsh-speaking background attends a bilingual school, a balanced curriculum through the medium of Welsh and English can be effective in ensuring fluency in both languages...However, where learners’ linguistic skills in Welsh are not reinforced by family or community, they are unlikely to achieve full fluency and confidence in Welsh when learning in a bilingual setting. Bilingual provision, therefore, does not always ensure that an individual becomes a bilingual speaker.’*

Following the publication of this strategy, local authorities were required to prepare Welsh in Education Strategic Plans (WESPs), setting out how they would contribute to achieving the outcomes outlined in the strategy. This became a statutory requirement in 2013.

One of the Strategic Aims stated in Powys’ current WESP for 2014-17<sup>6</sup> is ‘to provide linguistic continuity of Welsh-medium provision across all key phases of education’, to enable all children and young people across Powys to experience the cultural and cognitive benefits of bilingualism. The WESP states the authority’s policy in respect of Welsh-medium secondary education at the time, which was to aim that all dual stream secondary schools became category 2B secondary schools by September 2020, to ensure that pupils would be able to access sufficient Welsh-medium provision to enable them to continue to develop their Welsh-medium skills during their time at secondary school. However, progress towards achieving this aim has been limited, particularly in respect of Key stage 4 provision, and this is compounded by the challenging financial situation faced by the authority, which will make it increasingly difficult to achieve this target by 2020.

The authority is currently working on the production of a new WESP for 2017-20 which will build on the work that has taken place during the period of the current WESP.

The Welsh Government has recently launched an ambitious new strategy to create a million Welsh speakers by the year 2050. The council acknowledges the key role Welsh-medium education will play in the achievement of this aim, and the new WESP will seek to build on the work that has taken place during the period of the current WESP, with the aim of providing equality for Welsh-medium pupils in Powys.

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<sup>5</sup> <http://gov.wales/topics/educationandskills/publications/guidance/welshmededstrat/?lang=en>

<sup>6</sup> <http://www.powys.gov.uk/en/schools-students/apply-for-a-school-place/use-of-the-welsh-language-in-powys-schools/>

### 3. Reasons for the Proposal

The reasons why the authority is proposing to close the Welsh-medium stream at Brecon High School are as follows:

- Low pupil numbers in the Welsh-medium stream at Brecon High School
- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education

These issues are examined in more detail below.

#### 3.1 Low pupil numbers in the Welsh-medium stream at Brecon High School

Pupil numbers in the Welsh-medium stream at Brecon High School have decreased significantly in recent years, and the number of Welsh-medium pupils at the school is now very small.

The current number of Welsh-medium pupils at Brecon High School is as follows<sup>7</sup>:

Year	Number of pupils
7	2
8	3
9	5
10	3
11	6
<b>Total</b>	<b>19</b>

The following table shows the total number of year 7 – 11 pupils attending the Welsh-medium stream at Brecon High School since 2010<sup>8</sup>:

	Year 7	Year 8	Year 9	Year 10	Year 11	Total
2010/11	12	17	14	12	12	67
2011/12	6	11	19	14	17	67
2012/13	10	7	13	18	15	63
2013/14	19	10	8	13	13	63
2014/15	14	13	9	8	13	57
2015/16	3	7	4	8	8	30
2016/17	2	3	5	3	6	19

This shows that the number of Welsh-medium pupils at the school has decreased over this period. Pupil numbers have now decreased to such a low level that the provision of a Welsh-medium stream is unviable.

The Welsh-medium stream at Brecon High School has two feeder primary schools. These are Ysgol y Bannau, a Welsh-medium primary school located in Brecon, and Sennybridge C.P. School, a dual stream school located in the village of Sennybridge.

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<sup>7</sup> Teacher Centre, October 2016

<sup>8</sup> Information from Welsh-medium returns provided annually by the school

The current number of Welsh-medium pupils in reception to year 6 in the two schools is as follows<sup>9</sup>:

<b>Year</b>	<b>Ysgol y Bannau</b>	<b>Sennybridge C.P. School</b>	<b>Total</b>
<b>R</b>	17	8	25
<b>1</b>	28	6	34
<b>2</b>	18	11	29
<b>3</b>	15	5	20
<b>4</b>	24	5	29
<b>5</b>	10	2	12
<b>6</b>	19	5	24
<b>Total</b>	<b>131</b>	<b>42</b>	<b>173</b>

The following table shows the total number of Welsh-medium pupils in reception to year 6 that have attended the two schools since 2010/11<sup>10</sup>.

<b>Year</b>	<b>Ysgol y Bannau</b>	<b>Sennybridge C.P. School</b>	<b>Total</b>
2010/11	141	35	176
2011/12	138	33	171
2012/13	139	32	171
2013/14	141	39	180
2014/15	137	38	175
2015/16	135	42	177

This shows that Welsh-medium pupil numbers in the area have remained fairly stagnant over the last few years. Whilst Welsh-medium pupil numbers at Sennybridge C.P. School have increased slightly, this has not been the case at Ysgol y Bannau. This is in contrast with the two other designated Welsh-medium primary schools in Powys, Ysgol Dafydd Llwyd in Newtown and Ysgol Gymraeg Dyffryn y Glowyr in the Ystradgynlais area, where pupil numbers have increased over the same period.

Changes in the destinations of Welsh-medium pupils when they transfer to secondary school have also impacted on Welsh-medium pupil numbers in Brecon High school. In July 2016, there were 20 Welsh-medium pupils in year 6 at Ysgol y Bannau and 6 Welsh-medium pupils in year 6 at Sennybridge C.P. School. In September 2017, they transferred to the following schools:

<b>Ysgol y Bannau</b>	<b>Sennybridge C.P.</b>
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<sup>9</sup> Teacher Centre, October 2016

<sup>10</sup> PLASC data



		School
<b>Total Year 6 Welsh-medium pupils during 2015/16</b>	20	6
<b>Number of pupils transferring to Welsh-medium secondary provision in September 2016</b>	13	4
	Brecon High School – 2 Builth Wells High School – 9 Ysgol Gyfun Ystalyfera – 2	Ysgol Gyfun Ystalyfera – 4
<b>Number of pupils transferring to English-medium secondary provision in September 2016</b>	7	2
	Brecon High School – 1 Christ College – 2 Crickhowell High School – 2 Gwernyfed High School – 2	Brecon High School – 2

As is shown in this table, increasing numbers of parents of Welsh-medium pupils in the Brecon catchment area are choosing for their children to transfer to alternative provision, instead of the Welsh-medium stream at Brecon High School. This is a pattern that has developed over time, particularly in the case of Welsh-medium pupils attending Sennybridge C.P. School, where parents have chosen for their children to attend Ysgol Gyfun Ystalyfera for their secondary provision, partly due to the greater level of Welsh-medium provision available.

This means that, in reality, Ysgol y Bannau is the only primary school which is now feeding the Welsh-medium stream at Brecon High School. As the numbers in the Welsh-medium stream at Brecon High School have decreased, parents of pupils that attended Ysgol y Bannau have increasingly chosen for their children to attend alternative providers, such as Builth Wells High School. This has resulted in the Welsh-medium provision at Brecon High School becoming unviable.

It is acknowledged that it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.

### **3.2 Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education**

One of the Strategic Aims stated in the authority's Welsh in Education Strategic Plan for 2014-17 is 'to provide robust linguistic continuity of Welsh-medium provision across all key phases of education', to enable all children and young people across Powys to experience the cultural and cognitive benefits of bilingualism. The council aims to ensure that all Powys learners have the opportunity to become confident bilingual citizens.

In its Welsh-medium Education Strategy (2010), the Welsh Government states that 'Bilingual / dual stream settings should aim to provide as much provision through the

medium of Welsh as is necessary for learners to achieve fluency in two languages.’ However, the current small number of pupils attending the Welsh-medium stream at Brecon High School is making it increasingly difficult for the school to offer an appropriate Welsh-medium curriculum for pupils.

During 2016/17, the following Welsh-medium subjects are provided at Brecon High School<sup>11</sup>:

<b>Year</b>	<b>Welsh-medium subjects</b>
<b>7</b>	6 – Science, History, Geography, RE, French, IT
<b>8</b>	6 – Science, History, Geography, RE, French, IT
<b>9</b>	6 – Science, History, Geography, RE, French, IT
<b>10</b>	1 – Science
<b>11</b>	2 – Science, History

No post-16 subjects are provided through the medium of Welsh at Brecon High School.

The current small number of pupils accessing the Welsh-medium stream at Brecon High School will make it increasingly difficult for the school to offer Welsh-medium subjects for pupils, and to provide a level of provision which will enable learners to achieve and maintain fluency in both English and Welsh. This is particularly the case in Key Stage 4.

The alternative schools which pupils currently in the catchment of the Welsh-medium stream at Brecon High School would be expected to attend would offer a greater level of Welsh-medium provision compared to that currently available at Brecon High School – there are more Welsh-medium pupils at Builth Wells High School, therefore the school is able to provide a greater number of Welsh-medium subjects, providing a better opportunity for learners to continue to develop their Welsh language skills through their secondary education, whilst Ysgol Gyfun Ystalyfera is a Welsh-medium school, where all subjects are provided through the medium of Welsh.

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<sup>11</sup> Information provided by Brecon High School, November 2016

## **4. Benefits and Risks**

### **4.1 Benefits of the Proposal**

The authority's view is that centralising Welsh-medium secondary provision in the Mid and South Powys area will enable the provision available to be further developed, thus meeting the aspiration stated in the council's Welsh in Education Strategic Plan for 2014-17 to provide 'more robust Welsh-medium provision for Welsh-medium learners'. The authority's view is that the improved subject choice available to learners will enable them to become more confident Welsh speakers. These Welsh-medium pupils would continue to live in Brecon and the surrounding area, therefore although they would not be attending secondary school in Brecon, they will still be able to contribute to the development of the Welsh language in this area.

As well as the benefits that are associated with the proposal, the authority acknowledges that there would also be some disadvantages. The advantages and disadvantages of the proposal are listed below:

#### **Advantages**

- Creation of a critical mass of Welsh-medium secondary learners in Mid / South Powys
- Additional Welsh-medium opportunities to be provided to Welsh-medium pupils from Brecon through access to a wider range of Welsh-medium subjects
- Would enable the development of increased Welsh-medium provision at post-16
- Social and emotional benefits to Welsh-medium pupils from being part of a larger group of Welsh-medium pupils
- More opportunity for pupils to take part in extra-curricular activities through the medium of Welsh
- More financially efficient model of delivery for secondary Welsh-medium provision in Mid and South Powys
- Would enable Brecon High School to run more efficiently as a single stream school
- Welsh-medium pupil numbers could grow to a point where a Welsh-medium secondary school could be considered viable

#### **Disadvantages**

- Loss of Welsh-medium secondary provision in Brecon
- May have a negative impact on pupil numbers at Ysgol y Bannau
- Possible reduction in transfer rates from Welsh-medium primary provision to Welsh-medium secondary provision for pupils from the Brecon catchment in the short term
- Increased travel times for Welsh-medium learners from the Brecon catchment
- Lack of Welsh-medium provision in new building in Brecon
- Welsh-medium pupils will be unable to access the new building in Brecon

- Powys based provision would still be in a dual stream school, rather than a designated Welsh-medium school

## 4.2 Risks associated with the Proposal

As with every proposal, the authority acknowledges that there a number of risks associated with the proposal to close the Welsh-medium stream at Brecon High School.

The risks identified by the authority are listed below, along with measures the authority will take to mitigate the risks.

Risk Ref.	Risk	Likelihood	Impact	Risk Management Measures
1	Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school	Medium	Medium	<p>In the short term, the authority would expect there to be some reduction in the proportion of pupils from the Brecon area continuing to access Welsh-medium provision in the secondary sector.</p> <p>However, the current Welsh-medium provision in Brecon High School is very limited, and there is no provision at all at Post-16.</p> <p>Retaining pupils within the Welsh-medium sector is one of the Welsh Government's priorities, and the authority will work with the primary schools concerned to establish transition links with the alternative providers with the aim of reversing any reduction in transfer rates into KS3 in the longer term.</p>

2	Pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon	Medium	High	<p>The authority acknowledges that there may be a reduction in pupil numbers at Ysgol y Bannau in the short term.</p> <p>However, the authority is committed to increasing the number of pupils accessing Welsh-medium, and would work with work with Ysgol y Bannau, Menter Brycheiniog and other organisations to promote the benefits of Welsh-medium primary education in the Brecon area. The authority would hope that the greater clarity in relation to secondary arrangements for pupils from the Brecon area and the increased level of provision available would lead to an increase in pupil numbers in the future.</p>
3	The alternative schools are unable to accommodate the additional pupils	Low	High	<p>There is sufficient capacity at the current site of Builth Wells High School and Ysgol Gyfun Ystalyfera to accommodate the additional pupils from the Brecon area.</p>
4	Additional travel has an adverse impact on pupil well-being and attainment	Low	High	<p>The council's view is that the current and proposed transport arrangements for these pupils are suitable because the journey would not take an unreasonable amount of time.</p> <p>The Learner Travel (Wales) Measure 2008 does not specify a time limit for journeys. However, local authorities are required to assess the individual needs of learners when considering if a journey time is reasonable.</p> <p>However, the old Learner Travel Operational Guidance April 2009 stated that Welsh Ministers considered that normal journey times should</p>

be no more than 60 minutes for secondary school aged pupils. This is reflected in the council's proposed new School Transport Policy.

It is acknowledged that the additional travel may impact on pupils' ability to access extra-curricular activities, particularly those that take place after school. However, the alternative schools pupils would be likely to attend to access Welsh-medium secondary provision already serve large catchment areas and are experienced in meeting the needs of pupils who are reliant on home to school transport.

Should the proposal be implemented, the council would work with the relevant schools to ensure that pupils who travel to school on home to school transport are not disadvantaged, and that they are able to access an appropriate range of extra-curricular activities. This could include providing access to activities during lunchtime.

## 5. Alternative Options

Consideration of the future of the Welsh-medium stream at Brecon High School has taken place over a number of years. The council previously carried out consultation on closure of the stream during the summer of 2015, and a range of possible options were listed in the consultation document issued at this time.

Following the conclusion of that consultation period, a Consultation Report was produced and was received by the council's Cabinet on the 29<sup>th</sup> September 2015. At the meeting, Cabinet were advised that the statutory procedure in relation to the Welsh-medium stream could not proceed in isolation from the wider review of secondary provision in Mid and South Powys, therefore a further report would be brought back to Cabinet at a later date. However, the Welsh Government's School Organisation Code requires local authorities to publish any proposals within 26 weeks of the end of the period allowed for consultation responses. As no proposal was published within this timeframe, the original consultation exercise in relation to closure of the Welsh-medium stream at Brecon High School lapsed.

In order to find a potential solution to the issues in relation to secondary provision across Mid and South Powys, including the issues relating to Welsh-medium provision, a number of possible options were evaluated. This included a number of options relating to Welsh-medium provision, including the establishment of a designated Welsh-medium secondary school to serve Mid and South Powys.

The business case concluded that the most appropriate option at the current time is to centralise Welsh-medium secondary provision across the Mid and South Powys region. The authority's view is that this would ensure a larger critical mass of learners, which would improve the level of provision that can be offered to the Welsh-medium pupils currently attending Builth Wells High School and Brecon High School, and would provide a solid base which could be further developed in the future.

The authority is currently going through the statutory process to close Builth Wells High School and Llandrindod Wells High School and establish a new secondary school across two sites. The proposal is that the new school will be a dual stream school, with the current dual stream provision being retained on the Builth Wells site. Therefore, the only options now available to the authority in relation to the Welsh-medium provision at Brecon High School is whether or not to retain this provision.

The strengths and weaknesses of these two options are outlined in the following table:

Option	Strengths	Weaknesses
<b>Option 1: Status Quo – retention of Welsh- medium stream in Brecon High School</b>	<ul style="list-style-type: none"> <li>- Provides access to Welsh-medium secondary provision in Brecon</li> <li>- Limits travel time for Welsh-medium pupils</li> <li>- Reduces transport costs to the authority</li> <li>- Positive impact on the Welsh language skills of English-medium pupils at Brecon High School</li> </ul>	<ul style="list-style-type: none"> <li>- Does not create a larger mass of Welsh-medium secondary pupils in Mid and South Powys</li> <li>- Does not provide more robust linguistic progression for Welsh-medium pupils</li> <li>- Does not provide opportunities to offer enhanced Welsh-medium opportunities at post-16 level</li> <li>- Does not ensure more cost effective delivery of Welsh-medium secondary provision</li> <li>- Does not achieve viable sized option groups due to small number of pupils</li> </ul>
<b>Option 2: Closure of Welsh- medium stream at Brecon High School</b>	<ul style="list-style-type: none"> <li>- Creation of a larger critical mass of Welsh-medium learners in Mid / South Powys</li> <li>- Additional Welsh-medium opportunities to be provided to Welsh-medium pupils from Brecon through access to a wider range of Welsh-medium subjects</li> <li>- Would enable the development of increased Welsh-medium provision at post-16</li> <li>- A larger group of Welsh-medium pupils will enable the provision in Builth Wells to be further developed</li> <li>- Social and emotional benefits to Welsh-medium pupils from being part of a larger group of Welsh-medium pupils</li> <li>- More opportunity for pupils to take part in extra-curricular activities through the medium of Welsh</li> <li>- More financially efficient model of delivery for secondary Welsh-medium provision in Mid and South</li> </ul>	<ul style="list-style-type: none"> <li>- Loss of Welsh-medium secondary provision in Brecon</li> <li>- May have a negative impact on pupil numbers at Ysgol y Bannau</li> <li>- Possible reduction in transfer rates from Welsh-medium primary provision to Welsh-medium secondary provision for pupils from the Brecon catchment in the short term</li> <li>- Increased travel times for Welsh-medium learners from the Brecon catchment</li> <li>- Lack of Welsh-medium provision in new building in Brecon</li> <li>- Welsh-medium pupils will be unable to access the new building in Brecon</li> <li>- Powys based provision would still be in a dual stream school, rather than a designated Welsh-medium school</li> <li>- Welsh-medium pupils will continue to be in the minority, especially if the proposal to establish the</li> </ul>



	<p>Powys</p> <ul style="list-style-type: none"> <li>- Would enable Brecon High School to run more efficiently as a single stream school</li> <li>- Welsh-medium pupil numbers could grow to a point where a Welsh-medium secondary school could be considered viable</li> </ul>	<p>New Mid Powys Secondary School is implemented</p>
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Having considered the strengths and weaknesses associated with each option, the authority's view is that closure of the Welsh-medium stream at Brecon High School is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.

## **6. Impact on Pupils**

The authority acknowledges that the proposal to close the Welsh-medium stream at Brecon High School will have an impact on pupils, including Welsh-medium pupils currently attending Brecon High School, pupils currently being educated through the medium of Welsh in feeder primary schools in the Brecon catchment, pupils attending schools pupils may choose to transfer to should the proposal be implemented and English-medium pupils at Brecon High School.

The impact on pupils has been a key consideration for the authority in formulating this proposal. The authority's view on the proposal's likely impact on these groups of pupils is outlined below.

### **6.1 Impact on pupils currently attending Brecon High School**

Implementation of the proposal would have the greatest impact on the Welsh-medium pupils currently attending Brecon High School. The authority acknowledges that the proposal would have an impact on Welsh-medium pupils currently in years 7, 8 and 9 at Brecon High School. Should they transfer to alternative Welsh-medium secondary provision, this would result in additional travel time, although free home to school transport would be provided to enable them to continue to access Welsh-medium provision. It is acknowledged that the reliance on home to school transport could make it more difficult for pupils to access extra-curricular activities, particularly when these take place after school. However, the schools pupils are likely to transfer to in order to continue to access Welsh-medium secondary provision already serve large catchment areas, and are very experienced in meeting the needs of pupils who travel to school on home to school transport. Should the proposal be implemented, the authority would work with the schools the pupils would transfer to in order to ensure that an appropriate range of extra-curricular activities are available to all pupils.

The authority also acknowledges that some disruption would be caused to pupils in the short term if they were to move schools, as this could mean that they would be separated from their friends in the English-medium stream. This could have a negative impact on the well-being of these pupils.

Should the proposal be implemented, it is possible that some pupils would transfer to English-medium provision at Brecon High School rather than transferring to an alternative school to continue to access Welsh-medium provision. Whilst this would mitigate the impact of additional travel and separation from friends, this could have a negative impact on pupils' Welsh language skills.

Despite this, the authority's view is that the small number of Welsh-medium pupils and limited Welsh-medium curriculum provision at Brecon High School is not acceptable. The number of pupils and subject choice at the alternative schools pupils would attend in order to access Welsh-medium secondary provision is larger than what is provided at Brecon High School, and would provide greater equality for Welsh-medium pupils.

It is also acknowledged that the proposal could have a negative impact on the Welsh language skills of English-medium pupils attending Brecon High School. However, the school would continue to teach Welsh as a Second Language, and would be expected to continue to provide opportunities for these pupils to use their Welsh outside the classroom.

## **6.2 Impact on pupils currently attending Welsh-medium primary provision in the current catchment area of the Welsh-medium stream at Brecon High School**

The authority acknowledges that implementation of the proposal would lead to an increase in travel time for pupils living in the current catchment of Brecon High School to enable them to access Welsh-medium secondary provision, however free home to school transport would be provided to enable them to continue to access Welsh-medium provision. It is acknowledged that the reliance on home to school transport could make it more difficult for pupils to access extra-curricular activities, particularly when these take place after school. However, the schools pupils are likely to transfer to in order to continue to access Welsh-medium secondary provision already serve very large catchment areas, and are very experienced in meeting the needs of pupils who travel to school on home to school transport. Should the proposal be implemented, the authority would work with the schools the pupils transfer to in order to ensure that an appropriate range of extra-curricular activities are available to all pupils.

The authority also acknowledges that implementation of the proposal would mean that pupils living in Brecon and the surrounding area would be unable to access Welsh-medium provision at the new building, currently planned to open in Brecon in 2020.

Despite this, the authority's view is that the small number of Welsh-medium pupils and limited Welsh-medium curriculum provision at Brecon High School is not acceptable. The number of pupils and subject choice at the alternative schools pupils would attend in order to continue to access Welsh-medium secondary provision is larger than what is provided at Brecon High School, and would provide greater equality for Welsh-medium pupils.

Should the proposal be implemented, Ysgol y Bannau would become a feeder school for Builth Wells High School, or the New Mid Powys Secondary School should that proposal be implemented, and transition arrangements would be put in place to ensure the well-being of all pupils on transfer to secondary school. Transition arrangements would also be put in place for any pupils transferring to any other Welsh-medium providers.

## **6.3 Impact on pupils attending other schools to which pupils may wish to transfer**

The number of pupils currently attending the Welsh-medium stream at Brecon High School is small, therefore should the proposal be implemented, and should these pupils transfer to other Welsh-medium secondary providers, the impact on pupils currently attending these schools would be small.

In the case of Builth Wells High School, or the New Mid Powys Secondary School should that proposal be implemented, implementation of the proposal would lead to a larger group of Welsh-medium pupils at the school, which would enable the school to continue to develop the Welsh-medium provision available. In addition, the school would be able to provide an increased number of extra-curricular activities through the medium of Welsh, which would provide additional opportunities for pupils to use their Welsh outside school.

From September 2018 (dependent on whether Cabinet approve the proposal to establish the New Mid Powys Secondary School), implementation of the proposal would lead to a larger group of Welsh-medium pupils at the Builth Wells site of the new school, which would enable the school to continue to develop the Welsh-medium provision available. In addition, the school would be able to provide an increased number of extra-curricular activities through the medium of Welsh, which would provide additional opportunities for pupils to use their Welsh outside school.

#### **6.4 Impact on vulnerable pupils, including children with Special Educational Needs or Additional Learning Needs (ALN)**

All schools in Powys are responsible for meeting a child's special educational needs, in accordance with the council's ALN Strategy and Operational Guidance, referencing the 1996 Education Act. Funding from the council is delegated to individual schools to support pupils within significant needs. The council will work in partnership with pupils with additional learning needs, parents and the schools to support an effective transition to the new learning environments.

Any change of school and any disruption not of the learner or their family's choosing is going to have some impact on feelings of wellbeing. Mitigation of the negative effects of this, especially for those with additional needs with need to be well planned and allow for individual plans of support to be in place.

Those with difficulties in managing change, many of whom may be on the autistic spectrum, will be of particular concern. However, with careful planning and professional support, the process of change to what will be a new and better environment may be seen as a potential for learning that will enable those young people to cope better with adult life.

The school would be encouraged to conduct person-centred reviews, and planning which will be very helpful in providing the circles of support and hearing the voice of the young people during this period.

## 7. Impact on Affected Schools

The Welsh Government's School Organisation Code 2013 states that the following information should be included within a consultation document:

*'The likely impact of the Proposals on the quality of the following:*

- a) *outcomes (standards and wellbeing)*
- b) *provision (learning experiences, teaching, care support and guidance, and learning environment)*
- c) *leadership and management (leadership, improving quality, partnership working and resource management)'*

In addition, the Code requires local authorities to consider *'the ability of the school or schools which are the subject of the proposals to deliver the full curriculum at...each key stage of education'*.

The authority's view on the likely impact of the proposal on these aspects at Brecon High School and other schools that may be affected by the proposal is outlined below.

### 7.1 Impact on Brecon High School

#### 7.1.1 Impact on Outcomes

It is not anticipated that the proposal would have a negative impact on outcomes at Brecon High School. There has been a good improvement trajectory of performance in recent years at the school which is expected to be at least maintained. The number of Welsh-medium pupils at the school is very small, therefore it is not anticipated that removal of the Welsh-medium school would impact on this.

In previous consultations, it has been noted that the attainment of pupils in the Welsh-medium stream has been better than pupils in the English-medium stream, and that loss of these pupils would have a negative impact on outcomes at the school. However, the number of Welsh-medium pupils at the school has reduced significantly. The small number of pupils currently attending the Welsh-medium stream means that this impact will now be significantly reduced, therefore losing these pupils from the school would not have a significant impact on overall outcomes.

Implementation of the proposal would enable the school to focus solely on delivering through the medium of English, which could have a positive impact in terms of outcomes for English-medium pupils.

#### 7.1.2 Impact on Provision

The proposal would mean that Brecon High School would no longer offer Welsh-medium subjects, which would mean that this provision would no longer be available at the school. Should the proposal be implemented, the school would become an English-medium school, and would be able to focus solely on its English-medium provision. This would lead to increased capacity in terms of English-medium

curriculum time, and greater flexibility in terms of timetabling, which would improve the school's ability to deliver a full English-medium curriculum in all key stages.

Changing the school's language category could reduce the use of the Welsh language in the school. However, the school would continue to teach Welsh as a Second Language, and all schools are expected to provide opportunities for pupils to use Welsh outside the classroom, therefore the school would be expected to maintain a bilingual ethos. The proposals of the 'Successful Futures' curriculum will enhance this.

In earlier consultations, it has been noted that pupils attending the Welsh-medium stream make a significant contribution to extra-curricular activities within the school, and that it would be difficult for these activities to continue without the Welsh-medium pupils. However, the number of Welsh-medium pupils at the school has reduced significantly, and the small number of pupils currently attending the Welsh-medium stream means that this impact will now be reduced.

It is not anticipated that closure of the stream would have a negative impact on the teaching, care, support and guidance available at the school, as the school would continue to provide these to the pupils who remained at the school.

In the short term, the proposal would lead to an improvement in the learning environment for Welsh-medium pupils as the current buildings at Brecon High School are in a poor condition. However, plans are underway for a replacement building for the school, which is expected to open in 2020. It is acknowledged that implementation of the proposal would mean that pupils would be unable to access Welsh-medium provision at the new facility.

### **7.1.3 Impact on Leadership and Management**

The proposal is likely to have an impact on current leadership roles within some departments at Brecon High School, however there will be no impact on the general leadership and management of the whole school. The proposal would enable the school leadership to focus on the delivery of a single stream school, which may have a positive impact on the school's leadership and management.

The current small number of pupils in the Welsh-medium stream at Brecon High School means that the school's current dual stream delivery model is expensive and financially inefficient. In terms of the school's resource management, the proposal would enable the school to run more efficiently as a single stream school.

The school would no longer have a partnership with Ysgol y Bannau as this school would become a feeder school of Builth Wells High School, or the New Mid Powys School should Cabinet approve that proposal.

### **7.1.4 Impact on the school's ability to deliver the full curriculum in each key stage of education**

The proposal would enable Brecon High School to focus on its English-medium curriculum. As a result of increased capacity in terms of English-medium curriculum time and greater flexibility in terms of timetabling, the proposal would improve the

school's ability to deliver the full curriculum through the medium of English in each key stage.

## **7.2 Impact on secondary schools that may receive displaced pupils**

The main secondary school that may be affected by this proposal is Builth Wells High School. The authority is currently proposing that Builth Wells High School is merged with Llandrindod High School to create the New Mid Powys Secondary School operating as a dual-sited school for 11 – 18 year olds from September 2018. If the proposal is approved by Cabinet, the New Mid Powys Secondary School's Welsh-medium provision would continue to be provided from the Builth Wells site. Whilst the numbers that would be expected to transfer to the school following implementation of the proposal would be small, the proposal would have an impact on the school in the longer term due to the increased number of Welsh-medium pupils that would be expected to attend.

Welsh-medium pupils living in the Sennybridge area that would previously have attended the Welsh-medium stream at Brecon High School would transfer to Ysgol Gyfun Ystalyfera, therefore this school would also be affected by the proposal to some extent. However, there has been an increase in the number of pupils from the Sennybridge area attending Ysgol Gyfun Ystalyfera in recent years, due to parental preference, therefore should the proposal be implemented, there would be no change to the current arrangements.

Should there be no Welsh-medium stream at Brecon High School, it is possible that some pupils living in the catchment area of Ysgol y Bannau would be closer to other Welsh-medium providers out of county, such as Ysgol Gyfun Gwynllyw and Ysgol Gyfun Rhydywaun. However the number of additional pupils that would attend these two schools would be very small, therefore the authority's view is that this would not impact on the schools.

The proposal's impact on the schools that will be affected by the proposal is outlined below:

### **7.2.1 Builth Wells High School / the New Mid Powys Secondary School**

(without prejudice to Cabinet's decision following consideration of the Objection Report for the current proposal relating to Builth Wells and Llandrindod High Schools)

#### **i) Impact on Outcomes**

Having a larger group of Welsh-medium pupils would enable the school to set pupils for some subjects, which could have a positive impact on outcomes. There is no evidence to suggest that implementation of the proposal would have a detrimental impact on outcomes at Builth Wells High School / the New Mid Powys Secondary School.

The proposal could have some negative impact on pupil well-being at Builth Wells High School / the New Mid Powys Secondary School due to the additional pupils that would be reliant on home to school transport.

**ii) Impact on Provision**

It is expected that implementation of the proposal would lead to an increase in the number of pupils in the Welsh-medium stream at Builth Wells High School / the New Mid Powys Secondary School. This would enable the school to offer greater choice, flexibility and access to Welsh-medium courses to pupils at all key stages, enhancing the learning experiences of these pupils.

However, pupils living in the Brecon area may find it more difficult to access extra-curricular activities, particularly those that take place after school, due to their reliance on home to school transport. Should the proposal be implemented, the council would work with the school to explore solutions to this problem, e.g. scheduling extra-curricular activities during the school day. Builth Wells High School already serves a large catchment area, and is experienced in meeting the needs of pupils who are reliant on home to school transport.

**iii) Impact on Leadership and Management**

It is possible that implementation of the proposal may place some additional pressure in terms of leadership and management in the short term, as the school may need to make arrangements to accommodate additional pupils. However, the proposal is not expected to have a negative impact in the longer term.

**iv) Impact on the school's ability to deliver the full curriculum in each key stage of education**

It is expected that implementation of the proposal would lead to an increase in the number of pupils in the Welsh-medium stream at Builth Wells High School / the New Mid Powys Secondary School. This should improve the school's ability to deliver the full curriculum through the medium of Welsh in each key stage of education, and should enable the school to offer a more comprehensive curriculum to Welsh-medium pupils, particularly in key stage 4 and post-16. It is not expected that the proposal would impact on the school's ability to deliver the full curriculum to English-medium pupils in each key stage of education.

**7.2.2 Ysgol Gyfun Ystalyfera**

**i) Impact on Outcomes**

The majority of Welsh-medium pupils from Sennybridge C.P. School already transfer to Ysgol Gyfun Ystalyfera, therefore implementation of the proposal would not have an impact on outcomes at the school.

**ii) Impact on Provision**

The majority of Welsh-medium pupils from Sennybridge C.P. School already transfer to Ysgol Gyfun Ystalyfera, therefore implementation of the proposal would not have an impact on provision at the school.



**iii) Impact on Leadership and Management**

The majority of Welsh-medium pupils from Sennybridge C.P. School already transfer to Ysgol Gyfun Ystalyfera, therefore implementation of the proposal would not have an impact on leadership and management at the school.

**iv) Impact on the school's ability to deliver the full curriculum in each key stage of education**

The majority of Welsh-medium pupils from Sennybridge C.P. School already transfer to Ysgol Gyfun Ystalyfera, therefore implementation of the proposal would not have an impact on the school's ability to deliver the full curriculum in each key stage of education.

**7.3 Impact on Welsh-medium primary providers in the Brecon catchment**

The main Welsh-medium primary provider in the Brecon catchment is Ysgol y Bannau, a Welsh-medium primary school located in Brecon. This school serves a large catchment area, and in previous consultations, concern has been expressed that closure of the Welsh-medium stream at Brecon High School would have a negative impact on pupils numbers at the school.

However, as illustrated on page 12 pupil numbers at Ysgol y Bannau have remained fairly stagnant in recent years, despite there being access to secondary provision locally at Brecon High School. This is in contrast to other areas of Powys, where pupil numbers in designated Welsh-medium schools have grown. Whilst the authority acknowledges that implementation of the proposal could have an impact on pupil numbers at the school in the short term, the authority would expect pupil numbers to recover and even increase in the longer term, due to the greater clarity in relation to secondary provision and the increased level of Welsh-medium provision available for pupils.

The only other school providing access to Welsh-medium primary provision in the Brecon catchment is Sennybridge C.P. School, a dual stream school located in the village of Sennybridge. The majority of Welsh-medium pupils from this school already transfer to Ysgol Gyfun Ystalyfera, therefore it is not anticipated that the proposal would impact on Welsh-medium pupil numbers at the school.

**7.3.1 Ysgol y Bannau and Sennybridge C.P. School**

**i) Impact on Outcomes**

It is not anticipated that the proposal would have any significant impact on outcomes at Ysgol y Bannau or Sennybridge C.P. School. The proposal does not involve any changes to the way education is delivered at either school.

**ii) Impact on Provision**

It is not anticipated that the proposal would have any significant impact on provision at Ysgol y Bannau or Sennybridge C.P. School. The proposal does not involve any changes to the way education is delivered at either school.

However, it is possible that implementation of the proposal could lead to a change in pupil numbers, therefore the schools would need to be flexible to ensure that it continues to offer appropriate provision to pupils.

**iii) Impact on Leadership and Management**

The proposal does not involve any changes to the way education is delivered at Ysgol y Bannau or Sennybridge C.P. School, therefore it is not anticipated that the proposal will have any significant impact on leadership and management at either of these schools.

**iv) Impact on the school's ability to deliver the full curriculum in each key stage of education**

It is not anticipated that the proposal would have any significant impact on the ability of Ysgol y Bannau or Sennybridge C.P. School to deliver the full curriculum in each key stage of education. The proposal does not involve any changes to the way education is delivered at either school. However, it is possible that implementation of the proposal could lead to a change in pupil numbers, therefore the schools would need to be flexible to ensure that it continues to offer appropriate provision to pupils.

## **8. Other Considerations**

### **8.1 Financial Implications**

In accordance with the authority's Funding Formula, dual stream schools receive funding based on the proportion of the curriculum delivered through both the medium of Welsh and English in separate streams.

For the 2016/17 financial year, Brecon High School received £58,475 through the formula to support the additional cost of operating as a dual stream school. Should the Welsh-medium stream close, this funding would not transfer with pupils to their alternative schools or streams, therefore this would be a saving to the authority.

Following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. As this transport is already provided, implementation of the proposal would not incur any additional transport costs.

The total saving to the authority should the proposal be implemented is estimated to be £58,475.

### **8.2 Implications for Staff**

If a decision is made to proceed with closure of the Welsh-medium stream at Brecon High School, any implications for changes to staff employment will be taken forward by the school in accordance with the authority's Management of Change procedures.

### **8.3 School Transport**

The authority acknowledges that closure of the Welsh-medium stream at Brecon High School would lead to an increase in school transport costs and an increase in travel for pupils who live in the current catchment area of the Welsh-medium stream at Brecon High School and who wish to access Welsh-medium secondary provision.

Should the proposal be implemented, home to school transport would be provided in accordance with the council's School Transport Policy and the Learner Travel (Wales) Measure 2008<sup>12</sup>. The council's current School Transport Policy can be found at <http://www.powys.gov.uk/en/schools-students/apply-for-school-transport/>.

Pupils are eligible for free home to school transport if they live more than 3 miles from their nearest school offering provision in the language of their choice. For some pupils, the nearest Welsh-medium provision could be located outside Powys.

### **8.4 Walking routes to school**

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<sup>12</sup> <http://gov.wales/topics/educationandskills/allsectorpolicies/learner-travel/?lang=en>

Should the proposal be implemented, there would be no available walking routes to alternative providers of Welsh-medium secondary education for pupils affected by this proposal.

## **8.5 Admissions**

Admissions for Brecon High School and Builth Wells High School are administered by the authority. Should the proposal to establish the New Mid Powys Secondary School be implemented, admissions to this school would also be administered by the authority.

In the event of closure of the Welsh-medium stream at Brecon High School, parents of pupils currently attending the Welsh-medium stream would be allocated places at Builth Wells High School. Alternatively, they would need to apply for a place in another chosen school in accordance with the authority's admissions process, which is as follows:

- i) Parents to complete an application form, which will be provided by the authority
- ii) Admissions forms to be returned to the authority
- iii) authority to inform parents whether admission to the chosen school has been granted

For pupils wishing to transfer to schools located in other authorities, parents would need to follow the same procedure, and would need to apply via their home authority. Whilst it is expected that there would be sufficient capacity for pupils, priority would be given to pupils living in the official catchment area of these schools.

## **8.6 Impact assessments**

The authority has carried out a number of impact assessments in relation to this proposal, in line with the requirements of the School Organisation Code (2013) and the authority's own requirements. These include:

- i) Equality Impact Assessment
- ii) Community Impact Assessment
- iii) Welsh Language Impact Assessment
- iv) Integrated Impact Assessment (which includes consideration of how the proposal impacts on the seven well-being goals outlines in the Well-being of Future Generations (Wales) Act, along with the council's own objectives.

These assessments are available on the council's website:

<http://www.powys.gov.uk/en/corporate/find-out-about-consultations-in-powys/brecon-high-school-welsh-medium-stream/>

These initial impact assessments have been carried out based on the data and information currently available to the authority and provided by the affected schools. Following the consultation period, they will be updated and finalised, to incorporate

relevant information presented during the consultation period, and the updated versions will be considered by Cabinet when determining how to proceed in relation to this proposal.

## 9. Key Data

The following section provides data on Brecon High School and other schools which may be affected by the proposal as they may receive displaced pupils.

The data provided is in-line with the requirements of the School Organisation Code.

### 9.1 General School Information

School	School Type	Language Category	Admission Number	Capacity	Pupil numbers PLASC Jan 2016	Age Range
Brecon High School	Community	Dual Stream (Cat. 3)	148	872	556	11-18
Builth Wells High School	Community	Dual Stream (Cat. 2C)	110	659	554	11-18
Ysgol Gyfun Ystalyfera	Community	Welsh-medium (Cat. 1)	206	1285	1046	11-18

### 9.2 Current and Historical Pupil Numbers (including Sixth Form)

School	October 2016 <sup>13</sup>	January 2016	January 2015	January 2014	January 2013	January 2012
Brecon High School	505	556	647	714	761	767
Builth Wells High School	554	554	546	564	578	585
Ysgol Gyfun Ystalyfera	1092	1046	1022	1026	993	996

<sup>13</sup> Teacher Centre, October 2016

### 9.3 Projected Pupil Numbers (including Sixth Form)

School	January 2017	January 2018	January 2019	January 2020	January 2021	January 2022
Brecon High School	538	537	523	528	556	565
Builth Wells High School	550	544	548	564	544	555
Ysgol Gyfun Ystalyfera <sup>14</sup>	1101	1334	1423	1488	1521	1560

### 9.4 School Building Condition

The Welsh Government's 21<sup>st</sup> Century Schools Survey identified that the quality of accommodation at the affected schools is as follows:

School	Condition	Suitability	Sustainability
Brecon High School	D	B/C	D
Builth Wells High School	B	B	B
Ysgol Gyfun Ystalyfera <sup>15</sup>	D	C	C

### 9.5 Quality of Education

The information provided in respect of the quality of education at the affected schools is in-line with the requirements of the School Organisation Code.

Brecon High School and Builth Wells High School are both dual stream schools. Official Welsh Government data sets relating to the school's performance relates to all pupils at the school, rather than pupils in the Welsh-medium stream alone. The number of Welsh-medium pupils at each school, particularly Brecon High School, is small, therefore it would not be

<sup>14</sup> Ysgol Gyfun Ystalyfera will close on the 31<sup>st</sup> August 2017, as will Ysgol Gynradd Gymraeg Y Wern. A new 3-19 school will open in their place. The projected pupil numbers for January 2018 onwards include the projected pupil numbers for Ysgol Gynradd Gymraeg Y Wern and Ysgol Gyfun Ystalyfera. Initially, the school will continue to occupy the current sites of Ysgol Gyfun Ystalyfera and Ysgol Gynradd Gymraeg Y Wern. In September 2018, primary aged pupils will move onto the Ystalyfera site, and pupils in Years 7 and 8 residing in the south of the county will attend a new campus in Port Talbot.

<sup>15</sup> Capital work is currently being undertaken to improve the quality of accommodation at Ysgol Gyfun Ystalyfera. The condition will be reassessed after the first phase of 21<sup>st</sup> Century Schools investment, when the condition grading will improve.

valid to compare the performance of Welsh-medium pupils in these schools. In addition, 2016 information for Key Stage 4 has not been finalised.

### 9.5.1 Estyn

	<b>Brecon High School</b>	<b>Builth Wells High School</b>	<b>Ysgol Gyfun Ystalyfera</b>
<b>Date of Inspection</b>	May 2012	October 2015	March 2013
<b>School's Current Performance</b>	Adequate	Unsatisfactory	Good
<b>Prospects for Improvement</b>	Adequate	Unsatisfactory	Good
<b>Follow up activity</b>	<p>Following the inspection, the school was placed in the category of 'In need of significant improvement'.</p> <p>A monitoring visit took place in February 2014, which found that the school had made insufficient progress in relation to the action plan, and it was determined that the school was now in need of 'Special Measures'</p>	Special Measures	N/A

### 9.5.2 National School Categorisation System

The National School Categorisation system gives a clear and fair picture of how well a school is performing compared with other schools across Wales and helps to identify the schools that need the most help, support and guidance to improve.

The system has been developed collectively between regional education consortia and Welsh Government. Its primary function is to identify, across Wales, the schools that need the most support. The colour category of support allocated to a school will trigger a bespoke, tailored support programme.



The system is based on three steps. It is not purely data-driven and takes into account the quality of leadership, teaching and learning in schools.

- **Step one – Standards group:** A range of information is used to make a judgement about the school's standards, resulting in a standards group
- **Step two – Improvement capacity:** An evaluation of the school's capacity to improve further, taking account of the evidence about the standards and the quality of leadership, teaching and learning, resulting in an improvement capacity
- **Step three – Support category:** Bringing the judgement on the standards group and improvement capacity together to decide on the school's support category, colour coded either green, yellow, amber or red, with the schools in the green category needing the least support and those in the red category needing the most intensive support.

The affected schools were categorised as follows during 2015/16:

School	Standards Group	Improvement Capacity	Support Category
Brecon High School	3	C	Amber
Builth Wells High School	3	D	Red
Ysgol Gyfun Ystalyfera	2	B	Yellow



2. Please indicate who you are (e.g. parent, member of staff, governor)

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3. Name

---

4. Address

---

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5. E-mail address

---

6. Would you like to be informed of the publication of the consultation report?

Yes  No

Completed questionnaires should be sent to the following address, to arrive **no later than the 9<sup>th</sup> January 2017**:

*Schools Transformation Team, Powys County Council, County Hall, Llandrindod Wells, LD1 5LG*

*E-mail: [school.consultation@powys.gov.uk](mailto:school.consultation@powys.gov.uk)*

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# **Welsh-medium stream at Brecon High School**

## **Consultation Report**

**March 2017**

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## **Consultation on the proposal to close the Welsh-medium stream at Brecon High School**

### **1. Overview of the consultation**

Powys County Council consulted on a proposal to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017 during the period 21<sup>st</sup> November 2016 to the 9<sup>th</sup> January 2017.

#### **1.1 Consultation methods**

The consultation documentation was available on the council's website throughout the consultation period, and was distributed to stakeholders, as required by the School Organisation Code (2013). A separate version for young people and a version for primary aged pupils was also available and distributed to pupils, and was also available on the council's website throughout the consultation period.

Consultees were invited to respond to the consultation by either completing an online consultation form, filling in a paper copy of the form and returning it to the School Transformation Team at County Hall, or by writing to the School Transformation Team.

Meetings were also held with the following:

- Brecon High School Staff – 29<sup>th</sup> November 2016
- Brecon High School Governors – 29<sup>th</sup> November 2016
- Parents and the community – 1<sup>st</sup> December 2016
- Welsh-medium pupils at Brecon High School – 6<sup>th</sup> December 2016
- English-medium pupils at Brecon High School – 6<sup>th</sup> December 2016
- School Council at Ysgol y Bannau – 6<sup>th</sup> December 2016
- School Council at Sennybridge CP School – 12<sup>th</sup> December 2016

#### **1.2 Responses received**

A total of 237 written responses were received to the consultation, including responses submitted using the online response form, via e-mail and other written responses. However, 71 responses were received from one individual respondent, and another 26 were received from another individual respondent. In addition, during the consultation period, individuals were encouraged to e-mail the council with the statement 'All I want for Christmas is for the Welsh stream to stay open in Brecon High School'. 39 responses were received which only included this statement.

The written responses received included 39 responses from pupils.

In addition to the written responses, a copy of an online petition was received, which was signed by 236 people and included 67 written comments.

In addition to responses from parents, staff, governors, pupils and other members of the community affected by the proposal, responses were received from the following:

Kirsty Williams AM  
Brecon Beacons National Park  
Brecon Community Council  
Talybont-on-Usk Community Council  
Maescar Community Council  
Brecon & District Swimming Club  
Cylch Meithrin Aberhonddu  
County Councillor Gillian Thomas  
County Councillor David Meredith

The written responses received included a response from Estyn, which is provided on page 13, in-line with the requirements of the School Organisation Code.

The consultation responses also included a copy of a newspaper article from the Brecon and Radnor Express, and a video of a news story produced by BBC Cymru Fyw.

In addition, a report was received from RhAG (Rhieni dros Addysg Gymraeg / Parents for Welsh-medium Education), entitled 'Report on the findings of the RhAG survey of South Powys'. This report outlines the findings of a survey carried out by RhAG during the consultation period to identify potential demand for a designated Welsh-medium secondary school to serve mid and south Powys.

### **1.3 Summary of issues raised**

A wide range of issues were raised during the consultation period. All of the issues raised in the written responses received and in the consultation meetings held during the consultation period are listed in detail in section 5 of this report, along with the authority's response to the issue.

The following is a summary of the main themes of the issues raised:

#### **1. Concern about the impact on pupils**

- Impact on pupil well-being
- Access to extra-curricular activities
- Impact of additional travel
- Impact on friendship groups
- Impact on Welsh language skills
- Impact of transferring to English-medium provision
- Impact on quality of education provided to pupils
- Impact on pupils with additional needs
- Impact on pupil attendance
- Impact on English-medium pupils
- Links with the community

#### **2. Concern about the impact on parents and families**

- Financial impact
- Ability to attend school activities
- Inconvenience to parents / families
- Parents feel let down



- Families are moving from the area

### **3. Issues relating to travel / transport**

- Issues relating to the provision of transport to other Welsh-medium providers
- Transport appeal process
- Travel distance / time to alternative provision
- Cost of additional transport
- Concern about pupil safety
- Environmental impact of additional travel
- The council's Transport Policy
- Issues relating to travel to a designated Welsh-medium secondary school

### **4. Welsh-medium pupil numbers at Brecon High School**

- Impact of provision of transport to alternative schools
- Impact of previous consultations
- Reference to category 2B categorisation
- Criticism of the council's treatment of Welsh-medium provision at Brecon High School
- Prospective pupil numbers

### **5. Welsh-medium provision at Brecon High School**

- Category 2B categorisation
- Funding for Welsh-medium provision at Brecon High School
- Quality of Welsh-medium provision at Brecon High School
- Brecon High School's Welsh ethos and commitment to Welsh-medium education
- Contribution of Welsh-medium pupils to Brecon High School
- Provision that could be offered at Brecon High School should the Welsh-medium stream close
- Criticism of the current Welsh-medium provision at Brecon High School

### **6. General issues relating to Brecon High School**

- Quality of education at Brecon High School
- Issues relating to the planned new building
- Staff at Brecon High School

### **7. Issues relating to Builth Wells High School**

- Quality of education at Builth Wells High School
- Comparisons between Builth Wells High School and Brecon High School
- Welsh-medium pupil numbers at Builth Wells High School
- Welsh-medium provision at Builth Wells High School

### **8. Issues relating to Ysgol Gyfun Ystalyfera**

### **9. Impact on Ysgol y Bannau**

- Pupil numbers at Ysgol y Bannau

- Threat of closure of Ysgol y Bannau
- Issues relating to parental preference
- Impact on staff

#### **10. Issues relating to equality / discrimination**

- Discrimination against poorer families
- Discrimination against Welsh-medium pupils
- Discrimination against the Welsh language
- Issues relating to racism

#### **11. Welsh-medium pupil numbers and access to Welsh-medium provision**

- Current Welsh-medium pupils will transfer to English-medium provision
- Parents won't choose Welsh-medium primary education in the first place
- Suggestions to increase Welsh-medium pupil numbers
- Access to Welsh-medium education
- Issues relating to parental choice

#### **12. General issues relating to Welsh-medium education**

- Issues relating to the establishment of a Welsh-medium secondary school in South Powys
- Reference to the benefits of bilingualism and Welsh-medium education
- Reference to other local authorities
- Criticism of RhAG

#### **13. Issues relating to the Welsh language**

- Detrimental impact on the Welsh language
- Impact on Welsh language organisations / activities
- General criticism of the council's treatment of the Welsh language
- Impact on the ability of employers in the local area to employ Welsh speakers

#### **14. Policies / strategies relating to the Welsh language**

- Powys County Council's Welsh in Education Strategic Plan (WESP)
- A Million Welsh Speakers by 2050
- Welsh-medium Education Strategy
- The Welsh Language (Wales) Measure 2011
- The Welsh Language Standards
- General comments relating to Welsh Government Language Strategy

#### **15. Issues relating to the community / the rural nature of the area**

#### **16. Financial issues**

- Queries about the estimated savings
- Funding provided for transport
- Fair Funding Formula
- General issues relating to the council's budget

## **17. Alternative Options**

- Improve the Welsh-medium provision in Brecon
- Establish a category 2A Welsh-medium school
- Shared teachers
- Increase primary pupil numbers
- Use of modern technology
- Bring current schools together
- Keep two Welsh-medium streams

## **18. Issues relating to the consultation process**

- Pre-determination
- Issues relating to the timing of the consultation
- Issues relating to the consultation meetings
- Issues relating to the minutes of the consultation meetings
- Issues relating to who the council has consulted with
- Comparisons with previous consultations
- Queries relating to the process going forward
- This consultation is not being taken seriously

## **19. Issues relating to the consultation documentation**

- Information not included in the consultation document
- Inaccurate information
- Language used in the consultation document
- Other issues with the consultation documentation

## **20. General criticism of the council**

- Criticism of the council's treatment of Brecon High School
- Issues relating to indecision by the council
- Issues relating to the council's financial situation

## **21. Reference to other proposals**

- Proposals for Builth Wells High School and Llandrindod High School
- Reference to previous proposals

## **2 Consultation with pupils**

A pupil version of the consultation document was available throughout the consultation period and was distributed to pupils. In addition, officers from the local authority met with pupil representatives at the schools affected by the proposal.

The issues raised by pupils are listed below.

### **2.1 Written responses from pupils**

39 written responses were received from pupils. 31 of these responses only included the statement 'All I want for Christmas is for the Welsh stream to stay open in Brecon High School'.

The issues raised in the other written responses from pupils are listed below:

- Closing the Welsh stream will make pupils sad
- Pupils will lose their Welsh if the Welsh stream closes
- Pupils will be forced out of Welsh-medium education because they don't want to give up activities they are involved with outside school
- The teachers in Brecon High School are very good
- Not a good idea to move pupils from a really good school to a school in special measures
- Most of Brecon High School's Welsh stream are in the top set for most subjects
- Pupils' work levels will drop if they move to a school in special measures
- Pupils don't want to travel out of their community to another school
- Pupils don't want to travel to school by bus every day
- Pupils are concerned that they won't see their friends again as they all go to different schools
- Pupils won't be able to take part in after school activities
- Ysgol y Bannau might close as parents won't want to send their children there
- The Welsh teachers will move to a different school or they might lose their jobs
- Pupils will be tired from the additional travel
- Pupils won't have any spare time
- Pupils whose parents don't speak Welsh will forget their Welsh

### **2.2 Meetings with pupils**

Officers from the local authority met with the pupil representatives at the schools affected by the proposal on the 6<sup>th</sup> December and the 12<sup>th</sup> December 2016. The issues raised in the meetings are summarised below:

#### **i) Welsh-medium pupils at Brecon High School – 6<sup>th</sup> December 2016**

- Lots of our friends have already moved to Builth Wells High School
- Work is a lot harder when we have to do subjects in English
- If the Welsh stream closes next year, will pupils already in the school be able to do subjects in Welsh until they finish school?
- Some pupils have gone to Ystalyfera because Builth Wells High School is in Special Measures

- Speaking Welsh is harder because of the lack of lessons through the medium of Welsh
- If the Welsh stream closed, a lot of the Welsh-medium pupils would stay in the school anyway
- Closing the Welsh stream will affect the number of pupils going to Ysgol y Bannau
- The Welsh stream in Brecon High School is like a family
- People are like sheep – if one goes, everyone goes, that’s why the numbers decreased
- Lots of year 6 pupils at Ysgol y Bannau will be coming here if the Welsh stream stays
- If the stream closes we will have to choose between staying with our friends or keeping the Welsh language
- It would be more difficult to attend appointments and we would have to miss more school when we have them
- If we move to the English stream we will have to do Welsh second language
- We would miss out on education because of the travelling
- It would be easier to close the Welsh stream at Builth Wells High School because there isn’t a Welsh-medium school there like there is in Brecon
- This area is very Anglicised, there is no future for Welsh here if the stream closes
- If the stream moves to Builth would we have to go to Llandrindod?
- Builth is in special measures but Brecon is improving
- The booklet says that the Welsh stream won’t be in the new building, this suggests that you’ve made the decision already
- You are splitting up friendships
- The ethos of the school will change if there is no Welsh stream
- If there isn’t a Welsh stream in Brecon, parents won’t choose Welsh-medium education for their children
- What will happen to the teachers who only teach subjects in Welsh?
- How much money are you spending on transport to Builth?
- If you hadn’t made it so obvious that you were going to close the Welsh stream here, parents wouldn’t have moved their children from the Welsh stream
- It would be hard to go to after school revision classes if we moved to Builth Wells School
- We would have to stop going to after school clubs and activities
- Apart from the size of the Welsh stream, what is the problem with the Welsh stream here?
- When we were in year 7 we had lots of lessons in Welsh, now we only have 2
- Teachers have moved because of the consultation
- Have you been to Ysgol y Bannau to speak with pupils there?
- If there was a Welsh stream in the new school, do you think the numbers would increase?

**ii) English-medium pupils at Brecon High School – 6<sup>th</sup> December 2016**

- It’s important for the town of Brecon to keep the Welsh language local
- It would have a massive impact on the school if the Welsh stream was closed
- If pupils missed the bus to Builth, parents would have to pay to transport them there
- When Powys started the consultations, the numbers in the Welsh stream started to decrease
- There would be a big impact on the school if there were no Welsh stream here
- If there were no Welsh stream, there would be less Welsh events in the school – it would have an impact on the cultural side of the school

- Lots of Welsh stream pupils have left already which has impacted on sports teams and other activities
- If the stream stayed in the school, more people would come here
- If more Welsh students came here there would be more choice for them
- Closing the Welsh stream would restrict choice for Welsh-medium pupils
- It would be harder for Welsh-medium pupils if they had to move schools – they would have to travel and that would affect their learning
- Due to the additional travel, pupils would have to leave early and would be tired
- Some pupils suffer from travel sickness
- Pupils won't have time to do after school activities
- Parents will have to pay for pupils to travel to after school clubs
- Having more subjects in Welsh won't be as good for pupils if the travelling affects their learning and study
- If the Welsh stream goes from the school, the Welshness will go as well
- A Welsh stream would enhance the new build
- If the Welsh stream has to move to Builth, it would be like saying "You can't come here"
- All schools in Wales should have a Welsh stream or the opportunity to have a Welsh stream
- If the Welsh stream closed no one would send their children to Ysgol y Bannau
- If there was a Welsh stream in the new build, the Welsh stream would appeal to more parents
- If parents wanted their children to go to Builth Wells High School they would have sent their children to primary school in Builth Wells to start with
- Some of the current pupils in the Welsh stream would go to a different school, some would move to the English stream
- Pupils would have to choose between losing friends and losing their Welsh
- Pupils should be able to choose between going to Brecon High School and Builth Wells High School
- If Builth Wells can have a Welsh stream and more subjects, why can't Brecon?

**iii) School Council of Ysgol y Bannau – 6<sup>th</sup> December 2016**

- It's unfair that you are spending millions on a new school but you are not letting Welsh-medium pupils come into it
- If pupils play musical instruments, there won't be time for them to have lessons before going to school if we have to go to another school
- What will happen to Ysgol y Bannau? If the Welsh stream goes from the high school, parents will think there's no point sending their children to Welsh-medium education and the numbers will go down
- It's good that there is a Welsh stream next door in Brecon High School, but if it moves we won't have Welsh next door
- People in Brecon still want to speak Welsh
- The teachers in Brecon High School like the children in Ysgol y Bannau
- Less people in the community will speak Welsh if there is no Welsh stream in Brecon High School
- More pupils from Ysgol y Bannau will be going to the Welsh stream in Brecon High School this year
- If the Welsh stream was to close, you wouldn't hear Welsh in the corridor in the high school

- If there was no Welsh stream at Brecon High School, most pupils from Ysgol y Bannau would still go there but would transfer to the English stream
- Concern that pupils would be split up from their friends
- Concern that pupils would have to go to a school in a new place with new people
- If pupils go to a high school that is further away and are ill, it would be really far for parents to come and get them
- Parents might not want their children to have to travel to school
- Pupils attend clubs and activities after school, they might not be able to attend these if they had to travel to Builth
- If the Welsh stream closed, Welsh-medium pupils would have to get used to having lessons in English
- Prefer the model of a Welsh-medium school to a dual stream school – in a dual stream school not everyone understands Welsh so you have to speak English
- In a dual stream school Welsh-medium pupils can help other pupils speak Welsh
- Concern about the extra fumes if more pupils were travelling by bus to school
- Concern about the number of pupils that will come to Ysgol y Bannau in the future
- The consultations are making parents send their children elsewhere
- Welsh-medium pupil numbers in the area are decreasing and teachers are losing their jobs
- Worried that Ysgol y Bannau will have to move

**iv) School Council of Sennybridge CP School – 12<sup>th</sup> December 2016**

- The Welsh stream in Brecon High School is good because pupils in the Welsh stream can teach Welsh to English-medium pupils
- It's good that pupils can learn in two languages in Brecon High School
- It's good that Welsh-medium education is available locally by having a stream in Brecon
- It's good that you can go to the same high school as friends in the English stream
- Concern that pupils would have to travel further to Ystalyfera
- If there is no Welsh stream in Brecon, pupils will probably go to the English stream in Brecon
- There will be less people speaking Welsh in Brecon if the Welsh stream closes
- Concern that the number of pupils in the Welsh stream in Brecon is small
- The additional travel would be inconvenient for parents
- There would be less Welsh in Brecon
- The number of Welsh-medium pupils would go down
- Closing the Welsh-medium stream would affect the Welsh language
- Pupils would have to travel more
- Pupils might not be back in time for after school activities
- Pupils would have to make new friends if they went to a different school to their friends
- Friends would live a long way away
- There are more Welsh-medium pupils in Builth so Welsh-medium pupils would hear more Welsh
- Pupils would have more Welsh speaking friends in a Welsh school like Ystalyfera
- Some pupils, such as pupils with additional needs, might be happier in smaller classes like in the Welsh stream at Brecon High School
- Concern about parents who can't travel to Builth or Ystalyfera
- Closing the Welsh stream will have an effect on the Welsh language in Brecknockshire

- If the Welsh stream closes, English stream pupils won't have the opportunity to learn and practice their Welsh.
- Welsh-medium pupils have already decided that they will be going to Ysgol Gyfun Ystalyfera, and have already visited the school.



## **4 ESTYN**

Estyn's response to the consultation is provided below:

### **Estyn response to the proposal to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017**

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer and other additional information such as data from Welsh Government and the views of the Regional Consortia which deliver school improvement services to the schools within the proposal.

#### **Introduction**

The proposal is from Powys County Council.

The proposal is to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017, with Brecon High School becoming an English-medium school from the 1<sup>st</sup> September 2017.

#### **Summary/ Conclusion**

It is Estyn's view that the proposer appears to have suitably demonstrated that, given the small numbers of pupils in the Welsh medium stream, that overall the proposal is likely to at least maintain the current standards of education in the area.

#### **Description and benefits**

The rationale for the proposal is clear. It is to address the issue of declining numbers in the Welsh-medium stream at Brecon High School and for pupils to continue their Welsh-medium education elsewhere. Numbers of pupils in the Welsh-medium stream have decreased from 67 in 2010-2011 to just 19 in 2016-2017. The proposer reasonably asserts that these low numbers make the provision of a Welsh-medium stream unviable. In addition, the proposer recognises that the decline in numbers could be related to the uncertainty caused by the two previous consultation exercises on the closure of the Welsh-medium stream at the school.

The proposer appears to relate the main benefit of the proposal suitably to its Welsh in Education Strategic Plan for 2014-2017. This is mainly to provide 'more robust Welsh-medium provision for Welsh-medium learners through improved subject choice'. In addition, the proposer has listed advantages and disadvantages related

to the proposal. The advantages include the creation of a critical mass of Welsh-medium secondary learners in Mid / South Powys, enabling the development of increased Welsh-medium provision at post-16 and more financially efficient model of delivery for secondary Welsh-medium provision. The disadvantages include the loss of Welsh-medium secondary provision in Brecon, the potential negative impact on pupil numbers in Welsh-medium primary provision and increased travel times for pupils to attend Welsh-medium secondary provision. The analysis appears to be valid and reasonable. The proposer also reasonably concludes that alternative schools which pupils currently in the catchment of the Welsh-medium stream at Brecon High School would be expected to attend would offer a greater level of Welsh-medium provision compared to that currently available at Brecon High School. For example, there are more Welsh-medium pupils at Builth Wells High School, therefore the school is able to provide a greater number of Welsh-medium subjects whilst Ysgol Gyfun Ystalyfera is a Welsh-medium school, where all subjects are provided through the medium of Welsh. In addition, there appears to be sufficient capacity within the alternative schools to accommodate any extra pupils from the Brecon area.

The risks identified by the proposer appear to be relevant together with how the proposer broadly intends to manage these risks. These include the risk that more pupils will choose English-medium provision in Brecon rather than travel to alternative Welsh-medium secondary provision and also potential reduction in numbers in primary provision in the Brecon area.

The proposer has suitably considered alternative options and refers to previous consultations and a business case that concluded that the most appropriate option is to centralise Welsh-medium secondary provision across the Mid and South Powys region. In respect of this, the authority is currently going through the statutory process to close Builth Wells High School and Llandrindod Wells High School and establish a new secondary school across two sites. The proposal is that the new school will be a dual stream school. Therefore, the proposer reasonably considers that the only options now available in relation to the Welsh-medium provision at Brecon High School is whether or not to retain this provision.

The proposer asserts that should the proposal be implemented, home to school transport would be provided in accordance with the council's School Transport Policy and the Learner Travel (Wales) Measure 2008. This is to enable pupils to continue to access Welsh-medium provision. However, the proposer acknowledges that additional travel may impact on pupils' ability to access extra-curricular activities, particularly those that take place after school. In order to address this, the proposer intends to work with the relevant schools to ensure that pupils who travel to school on home to school transport are not disadvantaged, and that they are able to access an appropriate range of extra-curricular activities. This could include providing access to activities during lunchtime. This appears to be valid and reasonable.

### **Educational aspects of the proposal**

The proposer has suitably considered the impact of the proposals on the quality of outcomes, provision and leadership and management at the affected schools. It has reasonably identified the overall positive impact that the proposal could have on English-medium education in Brecon High School.

The proposer has not provided any performance data on standards in the Welsh medium stream in any of the affected schools, but reasonably makes the statement that as numbers are small in Brecon High School, it would not be valid to compare the performance of Welsh-medium pupils in these schools. The proposer reasonably considers that the proposal would enable Brecon High School to improve its ability to deliver the full curriculum through the medium of English in each key stage.

The proposer appears to have suitably considered the impact of the proposals on vulnerable groups including children with Special Educational Needs. In addition, it has undertaken a range of comprehensive impact assessments which include an integrated impact assessment and an equality impact assessment.

#### 4 ISSUES RAISED DURING THE CONSULTATION PERIOD

The following tables list the issues raised during the consultation period, including the issues raised by consultees and the issues raised in the consultation meetings held in relation to this proposal.

REF	ISSUE	LOCAL AUTHORITY RESPONSE
<b>1. IMPACT ON PUPILS</b>		
<b>1.1 Impact on pupil well-being</b>		
1.1.1	<p>Concern about the impact on pupils from having to endure the worry and uncertainty over the 3 consultations undertaken in the last 2 years</p> <p>Uncertainty about the future of Welsh-medium secondary education since March 2015 until today has been a cause for concern for Ysgol y Bannau pupils</p> <p>Pupils have been off sick due to the stress of the consultation</p> <p>The proposal is, and will continue to have an in impact on the welfare of pupils at Ysgol y Bannau</p> <p>This is causing distress to children at a time of transferring to secondary schools</p> <p>Don't think the council has thought about the feelings of pupils</p>	<p>The authority acknowledges that any school reorganisation proposal causes uncertainty for those affected, and that the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School has had an impact on current Welsh-medium pupils in Brecon High School and the primary schools that feed the Welsh-medium stream. The authority is keen to conclude this process as quickly as possible in order to bring this period of uncertainty to an end.</p>
1.1.2	<p>The proposal would cause huge disruption and upset to the children involved</p>	<p>The authority accepts that implementation of the proposal would cause disruption to the pupils currently in the Welsh-medium stream in Brecon High School, and this is acknowledged on page 22 of the consultation document.</p>

	Closing the Welsh stream will make pupils sad	However, the number of Welsh-medium pupils in Brecon High School is currently very small, which makes this provision unviable.
1.1.3	<p>This is not the best option in terms of pupil well-being</p> <p>The commute to Builth would have a negative impact on pupils social, mental and emotional well-being</p> <p>Concern about the proposal's impact on emotional well-being</p>	<p>The possibility that additional travel should the proposal be implemented could have an adverse impact on pupil well-being and attainment was identified as a risk on page 17 of the consultation document in respect of the proposal.</p> <p>Whilst the authority acknowledges that the additional travel involved could have an adverse impact on pupil well-being, the number of Welsh-medium pupils in Brecon High School is currently very small, which makes the provision unviable.</p>
1.1.4	Concern that pupils would have to go to a school in a new place with new people	The authority acknowledges that implementation of the proposal would mean that pupils currently attending the Welsh-medium stream at Brecon High School would have to move to a new school to continue to access Welsh-medium education, which would mean that they would have to get to know a new school and new people. However, the receiving school would provide full transition support to the pupils involved to ensure that they become settled in their new school. In addition, a number of Welsh-medium pupils have already transferred from Brecon High School to Builth Wells High School, therefore it is likely that any pupils transferring should the current proposal be implemented would already know some pupils in the Welsh-medium stream at Builth Wells High School / the New Mid Powys Secondary School.
1.1.5	If pupils are ill, it would be really far for their parents to come and get them	Builth Wells High School and Ysgol Gyfun Ystalyfera already serve large catchment areas, and are well equipped to meet the needs of learners who travel to school and to deal with any problems that may arise during the course of the school day.
1.1.6	The well-being of the pupils should be foremost in your decision making	The well-being of pupils is a primary consideration in all school reorganisation proposals taken forward. The authority's view is that the current provision at Brecon High School is not providing an appropriate educational experience for pupils, and the aim of the proposal is to provide greater equality for Welsh-medium pupils compared with English-medium pupils. It is acknowledged that

		there are some disadvantages and risks associated with the proposal and these are outlined in the consultation document. It is acknowledged that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, and that in some cases, this could result in pupils leaving Welsh-medium education and transferring to English-medium provision locally.
<b>1.2 Access to extra-curricular activities</b>		
1.2.1	<p>Children will miss out on being able to attend after school activities</p> <p>It will be hard for pupils to go to after school revision classes if they moved to Builth Wells School</p> <p>Pupils will have to stop going to after school clubs and activities</p> <p>Pupils will have to choose between continuing in Welsh-medium education or taking part in extra-curricular activities</p> <p>Additional travel would preclude pupils from participating in after school events, clubs, sports etc</p>	The authority acknowledges that implementation of the proposal would impact on the ability of pupils to attend activities that take place after school, and this is identified on page 22 of the consultation document.
1.2.2	<p>The suggestion that extra-curricular activities could be offered at lunchtime is not an adequate answer</p> <p>Lunchtimes are too short for extra-curricular activities</p>	<p>The authority notes these comments. The possibility that activities could take place during lunchtime was one suggestion offered in the consultation document to mitigate the proposal's impact on the ability of pupils to attend after school activities.</p> <p>The authority acknowledges that implementation of the proposal would impact on the ability of pupils to attend activities that take place after school, and this is identified on page 22 of the consultation document.</p>

1.2.3	<p>The council will need to provide more transport to enable pupils to take part in extra-curricular activities</p> <p>Will the council be supplying later buses for pupils who have been taking part in activities after school?</p> <p>There is no solution to the issue of accessing extra-curricular activities that could be achieved without the council spending money</p>	<p>The council currently has no plans to provide additional home to school transport for pupils who have been taking part in activities after school.</p>
1.2.4	<p>This will have a greater impact on pupils from less well-off families as their parents won't be able to afford additional journeys to collect them from after-school activities</p> <p>What will the council and Builth High School do to make sure that pupils from low income families will not miss out on being able to take part in extra-curricular activities?</p> <p>Pupils whose parents can't provide transport for their children to attend extra-curricular activities will be disadvantaged</p>	<p>In the Equalities Impact Assessment carried out in relation to this proposal, the authority acknowledged that 'some people on low incomes will be affected. Whilst free home to school transport would be provided to alternative provision, it is likely that the greater distance to travel to the school for other activities would have a greater impact on people on low incomes.'</p> <p>The impact assessments will be updated to reflect the issues raised during the consultation period, and the updated impact assessments will be considered by Cabinet when determining how to proceed.</p> <p>The alternative schools pupils would transfer to in order to access Welsh-medium secondary provision should the proposal be implemented serve large catchment areas, and are experienced in meeting the needs of pupils who are reliant on home to school transport, this includes in relation to access to extra-curricular activities.</p>
1.2.5	<p>Pupils will be forced out of Welsh-medium education because they don't want to give up activities out of school</p> <p>The council hasn't given a real solution to ensure that Welsh-medium children do not miss out in</p>	<p>The authority notes this comment and accepts that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education.</p>

	terms of extra-curricular activities	
1.2.6	<p>Brecon pupils travelling to Builth will miss out on being able to attend clubs in Brecon</p> <p>Pupils would miss out on the opportunity to take part in after school activities in their community</p> <p>Pupils won't have time to attend after school activities due to the additional time they will spend travelling to and from school</p>	<p>The authority acknowledges that should the proposal be implemented, pupils currently attending the Welsh-medium stream at Brecon High School may need to change their routine in order to adapt to the new arrangements. However, the school day at Builth Wells High School runs from 8.50 until 3.15, therefore it is expected that learners living in the Brecon area would arrive in Brecon at or around 4pm, therefore they would still be able to attend clubs and other activities in the community.</p>
1.2.7	<p>Builth High School are holding their presentation evening on the same evening that there is a service at the cathedral which Ysgol y Bannau take part in, so pupils with siblings at Builth are unable to take part</p>	<p>The authority notes this comment, however arrangements for community activities held in Brecon are beyond the council's control. Should the proposal be implemented, Ysgol y Bannau would become a feeder school for the Welsh-medium stream at Builth Wells High School / the New Mid Powys Secondary School, and the authority would expect that discussion would take place between the two schools to try to avoid clashes such as these.</p>
1.2.8	<p>If pupils play musical instruments, there won't be time for them to have lessons or to practice before going to school</p>	<p>The authority notes this concern and accepts that should the proposal be implemented, pupils would need to change their routine in order to adapt to the new arrangements.</p>
1.2.9	<p>How can the council guarantee that Welsh-medium students will not be at a disadvantage in taking part in extra-curricular activities because of the travel implications?</p>	<p>The authority acknowledges that implementation of the proposal would impact on the ability of pupils to take part in extra-curricular activities. However, the number of pupils currently attending the Welsh-medium stream at Brecon High School is small, which makes the provision unviable.</p>
1.2.10	<p>After the consultation I do not believe that the council will work with and support pupils to ensure they are not disadvantaged</p>	<p>The authority notes this comment.</p>
<b>1.3 Impact of additional travel</b>		



1.3.1	<p>Concern about wasted childhood hours as children from Sennybridge make a daily 60 mile round trip and pupils from Brecon make a 40 mile round trip to attend school</p> <p>Concern about pupils being forced to waste time travelling around the country when they should be doing their homework at home</p> <p>Pupils will be unable to do their homework due to the additional travel</p> <p>Additional travel to school would impact on pupils' social lives</p> <p>An extra two hours of travelling a day would mean two hours less for homework, relaxation, extra-curricular activities</p> <p>Concern that pupils will be unable to continue their Welsh-medium education without being forced to spend one and a half to two hours on a bus every day</p>	<p>The authority acknowledges that should the proposal be implemented, there would be additional travel for pupils in the catchment area currently served by the Welsh-medium stream at Brecon High School. This is identified on several occasions in the consultation document in respect of this proposal.</p> <p>However, as stated in the consultation document 'The council's view is that the current and proposed transport arrangements...are suitable'. Further to this, the consultation document states that 'The Learner Travel (Wales) Measure 2008 does not specify a time limit for journeys. However, local authorities are required to assess the individual needs of learners when considering if a journey time is reasonable. The old Learner Travel Operational Guidance April 2009 stated that Welsh Ministers considered that normal journey times should be no more than 60 minutes for secondary school aged pupils. This is reflected in the council's proposed new School Transport Policy.'</p> <p>The authority's proposal acknowledges that some pupils living in the catchment area currently served by the Welsh-medium stream at Brecon High School live closer to alternative Welsh-medium secondary provision outside Powys – in the case of pupils living in the Sennybridge area, their nearest provider would be Ysgol Gyfun Ystalyfera not Builth Wells High School / the New Mid Powys Secondary School, and pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School may live closer to Ysgol Gyfun Gwynllyw or Ysgol Gyfun Rhydywaun. In these cases, pupils would have the opportunity to access these schools in order to access Welsh-medium secondary provision, which would reduce their journey times.</p>
1.3.2	<p>Travelling will put pupils at a disadvantage compared to other students</p> <p>The additional travel would affect their learning</p>	<p>Should the proposal be implemented, the schools pupils would be expected to transfer to in order to continue to access Welsh-medium secondary provision already serve very large catchment areas, and are experienced in meeting the needs of these pupils. The authority's view is that the additional travel would not put pupils at a disadvantage compared to other students attending those schools.</p>

1.3.3	Pupils will not be able to cope with the additional travel so will not be able to proceed with their education in Welsh	Should the proposal be implemented, the authority would continue to provide access to Welsh-medium secondary provision through the provision of home to school transport to the nearest alternative provider, however it is acknowledged that additional travel would be required. Should the proposal be implemented, the authority accepts that pupils and their parents would need to make difficult decisions with regard to pupils' future education, and that in some cases, this could result in pupils leaving Welsh-medium education and transferring to English-medium provision locally.
1.3.4	<p>Pupils will be tired due to the additional travel</p> <p>Additional travel would have a terrible impact on the health and well-being of pupils</p> <p>Additional travel would make children unhappy</p> <p>Having more Welsh-medium subjects available won't be as good for pupils if the travelling affects their learning and study</p>	<p>The authority notes this concern in relation to the impact of additional travel on pupils, and acknowledges that should the proposal be implemented, additional travel would be required for pupils in the Brecon area.</p> <p>The possibility that 'additional travel has an adverse impact on pupil well-being and attainment' has been identified as a risk on page 17 of the consultation document.</p>
1.3.5	Pupils who have already transferred to Builth are missing out due to the additional travel	The authority notes this concern and acknowledges that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, taking the additional travel into consideration.
1.3.6	Concern that some pupils suffer from travel sickness	The authority currently transports in excess of 5000 pupils on a daily basis, some of whom would suffer from travel sickness to varying degrees.
<b>1.4 Impact on friendship groups</b>		
1.4.1	<p>Concern that pupils will be split from their friendship groups</p> <p>Friendship groups have been split and children have been sent all around Powys in an attempt to</p>	The authority acknowledges that the proposal has had and will continue to have an impact on friendship groups as pupils have transferred to different schools. However the authority would expect the receiving school to provide full support to any pupils moving schools to ensure they are integrated quickly and successfully into their new environment.

	<p>try and continue their Welsh-medium education</p> <p>Pupils will have to choose between staying with their friends or keeping the Welsh language</p> <p>Pupils have already been split up as many have already moved to Builth Wells High School</p>	<p>Should the proposal be implemented, Ysgol y Bannau would become a feeder school for Builth Wells High School / the New Mid Powys Secondary School and the Welsh-medium stream at Sennybridge CP School would become a feeder school for Ysgol Gyfun Ystalyfera. A transition programme would be put in place to support pupils on transfer to secondary school.</p>
1.4.2	<p>Pupils won't be able to see their friends much outside school hours as they would live far away from them</p> <p>Pupils will not be able to socialise fully with friendship groups if they attend Builth or Ystalyfera</p> <p>Would be difficult to maintain friendships due to the additional travel</p>	<p>Many of the authority's high schools serve wide catchment areas, therefore this is an issue in the majority of secondary schools in Powys to some extent. However, it is noted that the inclusion of pupils from the Brecon area within Builth Wells High School / the New Mid Powys Secondary School and pupils from the Sennybridge area within Ysgol Gyfun Ystalyfera will potentially increase the distances between the home locations of pupils.</p>
1.4.3	<p>The proposal would isolate Welsh-medium pupils</p>	<p>The authority's view is that the current small number of pupils in the Welsh-medium stream at Brecon High School is isolating Welsh-medium pupils. Should the proposal be implemented, pupils could either transfer to alternative Welsh-medium provision, where they would be part of a larger cohort of Welsh-medium pupils, or they could transfer to English-medium provision at Brecon High School, where they would again be part of a larger cohort of pupils.</p>
<b>1.5 Impact on Welsh language skills</b>		
1.5.1	<p>Want children to leave high school with confidence in Welsh so that they can apply for jobs where Welsh language skills are necessary</p> <p>Concern that fluent Welsh speaking children will have lost their Welsh by the time they leave high</p>	<p>The authority notes these concerns, and identified on page 22 of the consultation document that implementation of the proposal could have a negative impact on pupils' Welsh language skills should they transfer to English-medium provision at Brecon High School instead of transferring to alternative Welsh-medium provision.</p>

	<p>school, when they need it most for job opportunities</p> <p>Concern that pupils will leave high school unable to hold a conversation in Welsh</p> <p>Pupils will lose their Welsh if the Welsh stream closes</p> <p>Non Welsh speaking families will be unable to maintain their children's confidence in Welsh</p>	<p>The authority is committed to providing Welsh-medium education to all pupils who request it, and through this proposal, is proposing to achieve this by providing free transport to the nearest provider, either Builth Wells High School / the New Mid Powys Secondary School or an out-of-county provider. The authority's view is that the increased level of Welsh-medium provision available at these providers would have positive benefits in terms of the development of pupils' Welsh language skills. However, parents are entitled to choose for their children to transfer to English-medium provision locally if they prefer.</p> <p>As stated in the Welsh Government's Welsh-medium Education Strategy, 'It is generally accepted that at least around 70% of curricular time should be through the medium of Welsh if learners are to acquire a sufficiently sound command of the language to enable them to use it across a broad range of contexts with confidence and fluency.' The current provision in Brecon High School does not offer Welsh-medium provision for at least 70% of curricular time to pupils in any year group.</p>
1.5.2	<p>Concern that pupils will have to do Welsh second language if they move to the English-medium stream</p>	<p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a 'Predominantly English Medium secondary school' stream</p> <p>The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: 'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'</p> <p>Whether or not to provide the opportunity for pupils who study Welsh First Language would be a decision for the school. There are examples of 'Predominantly English Medium secondary schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p>
<p><b>1.6 Impact of transferring to English-medium provision</b></p>		

1.6.1	<p>Pupils who have to transfer to English-medium will be disadvantaged</p> <p>The council should provide support to help with transition to English-medium for children that will have to leave Welsh-medium education – this should not be left to the high school to sort out</p> <p>Pupils would have to get used to having lessons in English</p>	<p>Should the proposal be implemented, the council would continue to provide access to Welsh-medium provision through the provision of home to school transport to alternative providers of Welsh-medium education. It is acknowledged that implementation of the proposal would have an impact in terms of the additional travel that would be required, and that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, taking the additional travel into consideration, and that some may decide to transfer to English-medium provision instead of transferring to Welsh-medium provision.</p> <p>However, the number of subjects provided through the medium of Welsh at Brecon High School is currently small, and reduces as pupils move through the school. In particular, no Welsh-medium subjects are offered in the sixth form, therefore it is not uncommon at the school for pupils to move from studying a subject through the medium of Welsh to studying it through the medium of English.</p>
1.6.2	<p>Prospect of not being taught through the medium of Welsh where this is all pupils have ever known is leaving pupils disheartened, feeling unsure and lacking the confidence they have always had</p>	<p>The authority acknowledges that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, taking the additional travel into consideration, and that some may decide to transfer to English-medium provision instead of transferring to Welsh-medium provision.</p>
1.6.3	<p>It's harder for pupils to do subjects in English when they have always done them in Welsh</p>	<p>Should the proposal be implemented, the authority recognises that there would be a period of transition for any pupil choosing to transfer to English-medium provision in Brecon High School instead of alternative Welsh-medium provision, however the authority does not agree that studying through the medium of English would not be harder for pupils.</p> <p>The number of subjects provided through the medium of Welsh at Brecon High School is currently small, and reduces as pupils move through the school. In particular, no Welsh-medium subjects are offered in the sixth form, therefore it is not uncommon at the school for pupils to move from studying a subject through the medium of Welsh to studying it through the medium of</p>

		English.
<b>1.7 Impact on quality of education provided to pupils</b>		
1.7.1	<p>Unfair to move Welsh-medium pupils from Brecon just as the school is coming out of special measures and to force them to go to a school that is just going into special measures</p> <p>PCC should not transfer Welsh-medium education from a school recently taken out of special measures to one recently placed in special measures – our children do not deserve a substandard level of education for an extended period</p> <p>Welsh-medium pupils have worked hard to help improve Brecon High School, which has now been removed from special measures – it is unfair to tell these pupils that they are no longer welcome in the school and must move to a failing school with inadequate prospects for improvement</p>	<p>It is true that Brecon High School was removed from Special Measures in November 2016. Cabinet members will be made aware of this when they are determining how to proceed in relation to this proposal.</p> <p>It is also true that Builth Wells High School is currently in Special Measures, following an inspection which took place in October 2015. This is stated on page 36 of the consultation document in respect of this proposal. However, the authority is confident that the school is making good progress.</p> <p>Both Builth Wells High School and Brecon High School were placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017.</p> <p>Should the proposal be implemented, pupils currently attending the Welsh-medium stream at Brecon High School would not be ‘forced’ to transfer to another school. Pupils and their parents would need to make difficult decision with regard to pupils’ future education, which would include whether to transfer to alternative Welsh-medium or to access English-medium provision at Brecon High School.</p> <p>As stated in the proposal outlined on page 3 of the consultation document, should the proposal be implemented ‘Pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School that live closer to alternative Welsh-medium secondary provision outside Powys would have the opportunity to transfer to these schools.’ A proportion of pupils living in the current catchment area of the Welsh-medium stream would live closer to Ysgol Gyfun Ystalyfera, which is not in special measures.</p>
1.7.2	If you move pupils to a school in special measures their work level will drop	It is true that Builth Wells High School is currently in Special Measures, following an inspection which took place in October 2015. However, the

		<p>authority is confident that the school is making good progress.</p> <p>Both Builth Wells High School and Brecon High School were placed in Standards Group 2 by the Welsh Government in the National Categorisation in 2017, therefore the authority does not accept that pupils work level would drop should they access the provision in Builth Wells.</p>
1.7.3	<p>Surely it is illegal to close a stream not in special measures to make children to somewhere that is in special measures</p>	<p>The School Organisation Code requires that all school reorganisation proposals consider the likely impact on the quality of:</p> <ul style="list-style-type: none"> <li>- Outcomes (standards and wellbeing);</li> <li>- Provision (learning experiences, teaching, care support and guidance, and learning environment); and</li> <li>- Leadership and management.</li> </ul> <p>The proposal's impact on these aspects is considered in the consultation document in respect of this proposal. In addition, the Code requires authorities to consult with Estyn on any school reorganisation proposals, and to include Estyn's response in the consultation report. Estyn's response is provided on page 13 of this report.</p> <p>In their response, Estyn conclude that:</p> <p>'the proposer appears to have suitably demonstrated that, given the small numbers of pupils in the Welsh medium stream, that overall the proposal is likely to at least maintain the current standards of education in the area.'</p>
1.7.4	<p>Estyn has recently stated that sacrificing local provision for critical mass and breadth of choice is not necessarily conducive to raising standards – surely this applies as much to Welsh-medium provision as it does to English-medium pre and post-16 provision</p>	<p>The authority notes this comment. However, the number of pupils currently accessing the Welsh-medium stream at Brecon High School is very small, which makes the provision unviable.</p>
<b>1.8 Impact on pupils with additional needs</b>		

1.8.1	The proposal will affect children with learning difficulties and medical problems	It is true that, should the proposal be implemented, pupils from the current catchment area of the Welsh-medium stream at Brecon High School would need to transfer to alternative provision to continue to access Welsh-medium education. This would affect all pupils, including any pupils with learning difficulties and medical problems. Pupils in Powys with very complex additional and medical needs are transported to the authority's special schools. In many cases, this requires pupils to travel further than the proposed travel distance for Welsh-medium secondary pupils from the Brecon area, therefore the authority does not believe that this would compromise their well-being or safety.
1.8.2	How will the council support children with additional needs?	Should the proposal be implemented, pupils with additional needs who are affected by the proposal would be supported at the alternative provision they may transfer to through the existing processes.
1.8.3	Concern about pupils with additional needs who don't travel well	Children who have difficulty with travel are assessed on an individual basis. Powys, by its nature, has many children that travel relatively long distances. Measures are taken to support any children who may have difficulties.
1.8.4	Concern about the impact of additional travel on pupils with learning difficulties	Children with learning difficulties are no less able to travel to school than other children. Pupils in Powys with very complex additional and medical needs are transported to the authority's special schools. In many cases, this requires pupils to travel further than the proposed travel distance for Welsh-medium secondary pupils from the Brecon area.
1.8.5	Pupils with special needs will be unable to carry on in Welsh-medium education	Should the proposal be implemented, there is no reason to believe that pupils with learning difficulties would not be able to travel to the alternative provision. However, the authority acknowledges that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, taking the additional travel into consideration, and that some may decide to transfer to English-medium provision instead of transferring to Welsh-medium provision.
1.8.6	Concern about impact on dyslexic pupils who attend extra classes after school – they couldn't	Support for pupils with dyslexia or any other additional learning need is provided by the school during the school day. Many children in all schools are reliant on



	do that if they were reliant on school transport	transport to get home, so it would not be appropriate to limit access to only those who can make their own way home.
1.8.7	There is inadequate provision for pupils with additional learning needs – a school day is already tiring for pupils on the Autistic Spectrum, added travel either side on a noisy crowded bus will mean that the school day will become overwhelming and they will be unable to meet their potential in school or at home	The needs of individuals who may have sensory issues such as a low noise threshold would be assessed on an individual basis. There is an obligation for pupils to arrive at school in a state where they are ready to learn, and this would be monitored through partnership work between the transport providers, parents/carers and the schools.
1.8.8	Some pupils with additional needs might be happier in a smaller class, like in the Welsh stream at Brecon High School	The authority acknowledges that some pupils might prefer to have their lessons in smaller classes. However the current class sizes in the Welsh-medium stream at Brecon High School are very small, which makes the provision unviable. The authority believes that there are positive benefits to pupils from being part of a larger cohort of pupils.
1.8.9	Concern about wheelchair access on school transport for wheelchair users	Provision for learners with specific physical and additional needs such as wheelchair users would be provided by the authority to meet the learner's specific needs, which may include dedicated transport.
<b>1.9 Impact on pupil attendance</b>		
1.9.1	If forced to travel to Builth, more children would miss school due to absence	The authority does not agree with this comment. Should the proposal be implemented, transport would be provided for pupils transferring to Builth Wells High School / the New Mid Powys Secondary School. This transport would be arranged to ensure that pupils arrived at school on time. It is acknowledged that the additional travel required may require changes to pupils' daily routines, for example this may require pupils to get up earlier in order to be at the allocated pick up points in time.
1.9.2	Having to go to Builth school would have a negative impact on attendance as pupils would be unable to get to school after attending appointments	It is acknowledged that the additional travel may have a limited impact on pupil attendance as a result of attending appointments during the school day. It is always to good practice to have appointments at the end of the school day or during the school holidays when possible, in order to minimise the impact

	It would be more difficult for pupils to attend appointments and they would have to miss more school when they have them	on pupil attendance, however it is acknowledged that this is not always possible.
1.9.2	Pupil attendance has been a huge issue in all schools that have been put into special measures, making children travel long distances will not help with this	Whilst improving attendance was one of the Estyn recommendations in relation to Brecon High School, none of the recommendations at Builth Wells High School related to attendance.
<b>1.10 Impact on English-medium pupils</b>		
1.10.1	<p>Having a Welsh-medium stream in the school has had a beneficial effect on pupils learning Welsh as a second language</p> <p>The Welsh stream in Brecon High School is good because pupils in the Welsh stream can teach Welsh to English-medium pupils</p> <p>Pupils from the Nepalese community hear incidental Welsh and have an opportunity to integrate with children who speak Welsh as a first language – that opportunity will be taken from them</p> <p>If the Welsh stream closes, English stream pupils won't have the opportunity to learn and practice their Welsh</p>	All secondary schools in Wales are encouraged to develop a Welsh language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2 <sup>nd</sup> language to pupils, and would be expected to maintain a Welsh ethos and provide opportunities for pupils to use incidental Welsh.
<b>1.11 Links with the community</b>		
1.11.1	Pupils will be less integrated into the Brecon community by not attending school here	Builth Wells High School already serves a large catchment area, and has links with towns and villages across the catchment area. Should the proposal be implemented, Builth Wells High School / the New Mid Powys Secondary

	Being educated in their local school is important in the development of children	School would endeavour to establish links within the Brecon community, initially by strengthening links with Ysgol y Bannau.
<b>1.12 Other</b>		
1.12.1	The improvement will be for the benefit of a minority of Welsh-medium pupils, not the majority  Closing the Welsh-medium stream at Brecon High School in order to provide 'more robust linguistic progression' would prevent any linguistic progression at all for many pupils	The number of Welsh-medium pupils at Brecon High School is currently small, which means that the provision is unviable. In addition, the authority's view is that the stream is not currently providing an appropriate educational experience for pupils due to the small class sizes.
1.12.2	The council is paying no attention to work-life balance for pupils	The authority is paying attention to work-life balance for pupils, and has identified on page 17 of the consultation document the potential risk that 'additional travel has an adverse impact on pupil well-being and attainment'. However, the number of Welsh-medium pupils at Brecon High School is currently small, which means that the provision is unviable. In addition, the authority's view is that the stream is not currently providing an appropriate educational experience for pupils due to the small class sizes.
1.12.3	It's unfair that Welsh-medium pupils are being treated in this way	The authority's view is that the current provision available to Welsh-medium pupils at Brecon High School does not provide equal opportunity and is therefore unfair to Welsh-medium pupils. Whilst the council accepts that Welsh-medium pupil numbers at Brecon High School have decreased as a result of the recent consultations on closure of the Welsh-medium stream, the level of Welsh-medium provision available before the commencement of the consultations did not provide equality of opportunity for Welsh-medium pupils. This has been exacerbated since the number of Welsh-medium pupils at the school has decreased.
1.12.4	All proposals should place the interests of learners above all other	All school reorganisation proposals that are taken forward are done so in the best interests of learners. The proposal's impact on pupils is considered on pages 22-24 of the consultation document in respect of this provision. Despite the impact outlined, as stated in the consultation document 'the authority's

		view is that the small number of Welsh-medium pupils and limited Welsh-medium curriculum provision at Brecon High School is not acceptable.’
1.12.5	Do not feel children’s education will be best served by creating a “critical mass”, if indeed this critical mass would actually be achieved	The authority’s view is that the very small number of pupils currently attending the Welsh-medium stream at Brecon High School is not providing an appropriate educational experience for pupils.
1.12.6	There are Welsh-medium pupils in classes of 2 and 3 at Brecon High School, but it is more important for them to have their education locally than to have to travel to Builth	The current number of pupils attending the Welsh-medium stream at Brecon High School are very small, which means that the current provision is unviable. In addition, the authority’s view is that the very small class sizes in the Welsh-medium stream are not providing an appropriate educational experience for pupils.
<b>2. IMPACT ON PARENTS / FAMILIES</b>		
<b>2.1 Financial impact</b>		
2.1.1	<p>Transferring to Builth would have a financial impact on parents due to the extra fuel that would be needed to travel to the school for meetings, concerts etc</p> <p>Concern about additional cost to families of children travelling to Builth</p> <p>Families cannot afford for children to go to Builth and to carry on accessing the full provision of extra-curricular activities as they are now</p> <p>If pupils missed the bus to Builth, parents would have to pay to transport them there</p>	<p>The authority acknowledges that transferring to Builth Wells High School / the New Mid Powys Secondary School would have a financial impact on parents due to the additional travel that would be required to attend activities at the school and to collect pupils from after-school activities.</p> <p>However a significant proportion of pupils that previously attended the Welsh-medium stream at Brecon High School have already decided to transfer their children to Builth Wells High School. As a result, the number of pupils currently attending the Welsh-medium stream in Brecon High School is very small, and the authority’s view is that this is not providing an appropriate educational experience for learners.</p>
2.1.2	<p>Less well-off families will suffer</p> <p>The proposal will affect families who don’t run two</p>	Should the proposal be implemented, the authority would provide free home to school transport to all qualifying pupils, therefore there would be no impact in terms of pupils’ ability to access alternative Welsh-medium provision.

	cars	<p>However it is recognised that there would be an impact on parents in terms of attending school activities and events, and that this would be more difficult for less well-off families and families who do not have two cars. In the Equalities Impact Assessment carried out in relation to this proposal, the authority acknowledged that ‘some people on low incomes will be affected. Whilst free home to school transport would be provided to alternative provision, it is likely that the greater distance to travel to the school for other activities would have a greater impact on people on low incomes.’</p> <p>The impact assessments will be updated to reflect the issues raised during the consultation period, and the updated impact assessments will be considered by Cabinet when determining how to proceed.</p>
<b>2.2 Ability to attend school activities</b>		
2.2.1	<p>The additional distance would mean that it would be impossible for parents to attend parents evening</p> <p>There is nothing in the consultation document to address the issue of parents being able to attend parents evenings etc – the authority doesn’t seem concerned about the adverse impact this would have on the families involved</p> <p>Additional travel to Builth has caused difficulty for parents to access school events</p> <p>Parents who have children in Builth High School were unable to attend Ysgol y Bannau’s Christmas concert as there was a parents evening at Builth High School the same evening</p>	<p>The authority acknowledges that closure of the Welsh-medium stream at Brecon High School would mean that parents would have to travel further to attend parents evenings and other school activities.</p> <p>However the number of pupils currently attending the Welsh-medium stream in Brecon High School is very small, and the authority’s view is that this is not providing an appropriate educational experience for learners.</p> <p>The authority notes that there was a clash of dates between Builth Wells High School and Ysgol y Bannau, however should the proposal be implemented, Ysgol y Bannau would become a feeder school for Builth Wells High School / the New Mid Powys Secondary School, and the authority would expect the two schools to work together in order to avoid similar clashes in the future.</p>
<b>2.3 Inconvenience to parents / families</b>		

2.3.1	<p>Concern about the impact on family life</p> <p>Additional travel would put pressure on family life</p> <p>Concern about managing the negative impact having to move our children to a school in another town would have on family life and happiness</p> <p>Concern about the impact on the logistics of family life</p> <p>Concern about families with younger children having to juggle collection from after school clubs</p> <p>Concern about the impact on parents of having children in schools 20 miles apart</p> <p>Parents don't have time to travel so far every day to collect children as they work</p>	<p>The authority notes the concerns in relation to the impact implementation of the proposal would have on family life due to the additional travel for Welsh-medium pupils. Should the proposal be implemented, the authority acknowledges that pupils and their parents would need to make difficult decisions with regard to pupils' future education.</p> <p>However the number of pupils currently attending the Welsh-medium stream in Brecon High School is very small, which makes the provision unviable, and the authority's view is that this is not providing an appropriate educational experience for learners.</p>
2.3.2	<p>If a child was ill, it would require an hour trip for a parent to collect them from Builth</p>	<p>The provision in Builth Wells already serves both the Builth Wells and Llandrindod Wells catchment areas. Builth Wells High School is well equipped to meet the needs of learners who travel to school and to deal with any problems that may arise during the course of the school day. There is no reason to believe that would not continue to be the case following the proposed establishment of the New Mid Powys Secondary School.</p> <p>Obviously it would take longer for parents to get to the pupils if they were attending a school located further away. However, the authority would expect the number of incidents when parents would need to be contacted to be extremely low. Where there is a medical emergency that the school was unable to deal with, it would have procedures in place to call for medical assistance.</p>


2.3.3	Reference to pupils taking part in Builth's recent school production – parents had to drive to Builth to collect them every night	The authority notes this comment.
<b>2.4 Parents feel let down</b>		
2.4.1	<p>Unfair that parents have put their faith in the Welsh-medium education system and could now have it pulled away from their children in the middle of their education</p> <p>Parents who made an early commitment to Welsh-medium education through Ysgol Feithrin, Bobl Bach y Bannau and Ysgol y Bannau feel betrayed by the council</p> <p>Parents would not have put their children in Ysgol y Bannau if they had known that there would be no secondary provision in Brecon</p>	<p>The authority is committed to providing access to Welsh-medium primary and secondary education to all pupils that request it. The authority's view is that the small number of pupils currently accessing Welsh-medium provision at Brecon High School and the limited number of subjects currently provided means that this is not appropriate provision for Welsh-medium pupils.</p> <p>Should the proposal be implemented, the authority would continue to provide access to Welsh-medium secondary provision through the provision of home to school transport to the nearest alternative provider, however it is acknowledged that there would be implications to this. Should the proposal be implemented, the authority accepts that pupils and their parents would need to make difficult decisions with regard to pupils' future education, and that in some cases, this could result in pupils leaving Welsh-medium education and transferring to English-medium provision locally.</p>
2.4.2	<p>Parents have been in tears because their children are at a critical stage in their education and they don't know what to do</p> <p>The proposal is causing huge upset to parents and the families affected</p> <p>The Welsh stream in Brecon has been under threat for a long time which has caused great distress to parents</p>	<p>The authority acknowledges that any school reorganisation proposal causes uncertainty for those affected, and that the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School has had an impact on current pupils and their parents.</p> <p>The authority also acknowledges that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education.</p> <p>The authority is keen to conclude this process as quickly as possible in order to bring this period of uncertainty to an end.</p>
2.4.3	Parents have felt that they had to move their children to different schools due to the disruption	The authority acknowledges that many parents have already chosen to move their children to other schools due to the ongoing uncertainty in relation to the

		Welsh-medium stream at Brecon High School.
2.4.4	Parents want to see provision continuing in their community through to 18 years old	The authority recognises that in an ideal world there would be equality of provision in every dual stream school. However, the authority needs to ensure that Welsh-medium learners in Brecon have equality of provision, even if this means they have to travel to access it. Parents are free to choose whether they would prefer their child to attend local provision or Welsh-medium provision, however it is the authority's duty to ensure that the provision available is the best it can be.
<b>2.5 Families are moving from the area</b>		
2.5.1	<p>Many families chose Brecon as their base because there is a Welsh-medium primary school and they could then transfer to the Welsh stream in the local high school – these families are already moving out of the area</p> <p>Families will have to move out of the area and county to access Welsh-medium education</p> <p>Welsh-medium education would not be an option for any new families living in the community</p>	The authority has an obligation to provide Welsh-medium primary and secondary education to all pupils who request it. For pupils who live in some parts of Powys, this is achieved through the provision of free home to school transport to their nearest provider. The authority would transport pupils to their nearest Welsh-medium provider wherever they live, however parents can of course decide to move house so that they live closer to Welsh-medium secondary provision if they desire.
2.5.2	Concern about parents who can't travel to Builth Wells or Ystalyfera	Should the proposal be implemented, free home to school transport would be provided to pupils to their nearest alternative provider of Welsh-medium secondary provision, therefore there would be no need for parents to transport their children to school on a daily basis. However, it is acknowledged that additional travel would be required of parents in order to attend parents evening and other school based activities.
<b>3. ISSUES RELATING TO TRAVEL / TRANSPORT</b>		
<b>3.1 Issues relating to provision of transport to other Welsh-medium providers</b>		



3.1.1	<p>PCC has deliberately misled families by providing transport to Builth Wells</p> <p>There is already a bus going to Builth, that is as a result of the last consultation</p> <p>Pupil numbers in the Welsh stream at Brecon have decreased since the provision of free transport to Builth</p>	<p>The authority has not deliberately misled families.</p> <p>The provision of transport to Builth Wells was provided to families following a successful transport appeal on the grounds that the breadth of the provision offered in Brecon was significantly below the breadth of the provision offered at Builth.</p> <p>The applications for transport were initially refused at Stage 1 and 2, however the applications were taken to appeal and the appeal panel took the decision to award transport, due to the enhanced level of Welsh-medium provision provided at Builth Wells High School.</p> <p>The council recognises that the provision of funded transport to Builth has had a negative impact on the pupil numbers in the Welsh Stream at Brecon.</p>
3.1.2	<p>Has the council ever published anything official to say that buses have been put on for pupils to go to Builth?</p>	<p>Yes, following the successful admissions appeal the authority has changed the information provided through the 'Information for Parents' booklet in respect to the admissions arrangements for the 2016-17 and 2017-18 school years to include Brecon in the areas from which transport would be provided to Builth High School for Welsh-medium provision.</p>
3.1.3	<p>Does everyone who wants to go to Builth High School have to apply for transport?</p>	<p>Yes, all pupils who wish to travel on local authority transport have to apply for transport through the agreed admissions and transport processes.</p>
3.1.4	<p>The council started paying to transport children to schools out of county which has impacted on Welsh-medium pupil numbers at Brecon High School</p> <p>PCC have encouraged parents to move their children out of county by providing transport</p> <p>By providing transport to out of county schools the council has undercut the Welsh-medium provision at Brecon High School</p>	<p>The provision of transport to Ysgol Gyfun Ystalyfera was provided to families following a successful transport appeal on the grounds that the breadth of the provision offered in Brecon was significantly below the breadth of the provision offered in Ystalyfera.</p> <p>The applications for transport were initially refused at Stage 1 and 2, however the applications were taken to appeal and the appeal panel took the decision to award transport, due to the enhanced level of Welsh-medium provision provided at Ystalyfera.</p> <p>The council recognises that the provision of funded transport to Ystalyfera has</p>

	Powys County Council should stop paying for transport to out of county schools	had a negative impact on the pupil numbers in the Welsh Stream at Brecon.
3.1.5	Is the council still funding transport for new pupils to Ysgol Ystalyfera?	Yes, the council is still funding transport for new pupils to Ysgol Gyfun Ystalyfera.
3.1.6	The council has encouraged parents to move their children to other schools by providing transport, which has impacted on pupil numbers at Brecon High School  Had the council not transport pupils to other distant schools the number of pupils in Brecon Welsh stream would not be as they are	The authority has not encouraged parents to move their children to other schools. However, the authority recognises that the provision of transport following the successful transport appeals has had an impact on the number of pupils accessing the Welsh-medium stream at Brecon High School.
3.1.7	If Brecon High School became a 2B school from September 2017 you would no longer need to provide transport elsewhere	If Brecon High School became a category 2B school from September 2017, the authority would not provide transport for new pupils, however it would continue to meet the transport costs for pupils currently being transported to alternative provision.
<b>3.2 Transport appeal process</b>		
3.2.1	Query re transport appeal process – the Cabinet member took it upon themselves to grant free transport to Builth	The authority followed the agreed transport application process. The applications were turned down by officers at stages 1 and 2 of the process. The appeal was then heard by the Portfolio Holder for Schools, who was provided advice and support by the legal service.
3.2.2	Can you supply minutes where the decision to allow transport was made? Can these be included in the consultation report so that we can fully understand the decision process that has taken place?	No formal minutes are taken of transport appeals, however those appealing are informed in writing of the decision.  A redacted copy of the decision letter issued in respect of the decision to uphold the appeal in relation to transport to Builth Wells is provided below:

		 Transport Appeal Letter redacted.pdf
3.2.3	Why was the decision made to pay for transport to Builth High School?	<p>Transport to Builth Wells was provided to families following a successful transport appeal on the grounds that the breadth of the Welsh-medium provision offered in Brecon was significantly below the breadth of the provision offered at Builth Wells.</p> <p>The applications for transport were initially refused at stages 1 and 2 of the process, however the applications were taken to appeal and the appeal panel took the decision to award transport, due to the enhanced level of Welsh-medium provision provided at Builth Wells High School compared with the provision at Brecon High School.</p>
3.2.4	The council has admitted that the decision to give transport to Builth High School was made by an employee of the council so was therefore not independent	<p>Transport to Builth Wells was provided to families following a successful transport appeal on the grounds that the breadth of the Welsh-medium provision offered in Brecon was significantly below the breadth of the provision offered at Builth Wells.</p> <p>The applications for transport were initially refused at stages 1 and 2 of the process, however the applications were taken to appeal and the appeal panel took the decision to award transport, due to the enhanced level of Welsh-medium provision provided at Builth Wells High School compared with the provision at Brecon High School.</p> <p>The decision was not made by an employee but by the portfolio holder, who was supported and advised by a senior officer from the legal service.</p>
<b>3.3 Travel distance / time to alternative provision</b>		
3.3.1	The distance to the alternative provision is too large to ever be acceptable as a solution	The authority's transport policy states that travel time should not normally be more than one hour to / from school. It is the authority's view that travel time to the nearest alternative Welsh-medium provision would be within this travel

	<p>The commute from Llangors to Builth is unacceptable</p> <p>Concern about 51 mile round trip to Builth Wells</p> <p>The current 12 miles from Trecastle to Brecon is more than enough to travel each day</p> <p>Children would have to travel over 2 hours a day to their nearest provision</p> <p>The fact that children will be travelling 50 minutes to 1 hour each way means that most children would have to find alternative schools</p> <p>The proposed travel time from Talybont is totally unrealistic</p> <p>Unfair to expect any children to travel more than an hour on the bus every day</p>	<p>time for the vast majority of pupils.</p> <p>The authority notes the comments in respect of the likely distance / travel time from locations such as Llangors, Trecastle and Talybont to Builth Wells. As stated in the proposal on page 3 of the consultation document, 'pupils wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream of Brecon High School would be able to attend Builth Wells High School or their closest secondary Welsh-medium provision'. The proposal also states that 'pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School that live closer to alternative Welsh-medium secondary provision outside Powys would have the opportunity to transfer to these schools.' It is likely that pupils living in some of the areas referred to would live closer to alternative Welsh-medium secondary provision outside Powys.</p>
3.3.2	<p>Whilst travel distances and time will be a key consideration in areas such as Powys, pupils in Powys already travel long distances to access Welsh-medium education. In the north, pupils from Newtown travel 16+ a day each way to receive secondary education in Llanfair Caereinion, and pupils travel from Sennybridge/Llangors to Ysgol Gyfun Ystalyfera, which is also a significant journey.</p>	<p>The authority notes this comment.</p>
<b>3.4 Cost of additional transport</b>		
3.4.1	<p>Tax payers money should be spent on education rather than transport</p>	<p>The provision of home to school transport is an essential element of the budget requirement to ensure access to the appropriate curriculum for</p>

	<p>The council is throwing money away on transport</p> <p>A significant proportion of the council's budget is spent on school transport costs, this would be better spent on supporting education provision</p>	<p>learners wishing to study through the language of their choice, particularly so in a rural area such as Powys.</p> <p>Over the last 2-3 years the authority has retendered all of its home to school transport provision, and has realised significant efficiencies through this work.</p>
3.4.2	<p>A commitment to one Welsh stream in Mid / South Powys will mean a long term commitment to transport costs. These are currently at least £100,000 per year.</p>	<p>The comment is noted, it is the authority's expectation that the transport costs would increase from the current figure as the numbers accessing the Welsh-medium provision in Builth Wells increase. However, the authority is committed to providing greater equality in terms of the provision available to Welsh-medium pupils compared with the provision available to English-medium pupils. The authority's view is that the current number of Welsh-medium pupils in mid and south Powys is not large enough to maintain secondary provision in two locations and to provide appropriate curriculum choice for pupils.</p>
3.4.3	<p>Transport costs will only increase in the future</p>	<p>The authority notes this comment.</p>
3.4.4	<p>Unhappy that the council is wasting so much money on transporting Welsh-medium children away from their area when they could be spending much less money by providing the right provision in Brecon High School</p>	<p>Transport to alternative providers of Welsh-medium secondary provision was provided to families following a successful transport appeals on the grounds that the breadth of the provision at the alternative providers was significantly greater than that offered at Brecon High School.</p> <p>If Brecon High School provided a wider curriculum through both Welsh and English, the authority would fund this in accordance with the fair funding formula, and if that level increased sufficiently, the requirement to transport pupils to other schools would be removed.</p>
3.4.5	<p>You are currently spending £110976 to transport children out of the Brecon catchment whilst the cost of improving Brecon to 2B status is £47000, which would negate the need to transport children</p> <p>It costs the authority £110k to transport Welsh-</p>	<p>During the recent consultation period on the proposal to close the Welsh-medium stream at Brecon High School, a county councillor requested details of the additional funding that would be required for the Welsh-medium provision at Brecon High School to meet the definition of a Category 2B school. The figure provided was £47000, which is the additional funding that would be provided to the school through the authority's funding formula to</p>

	<p>medium pupils to Ystalyfera and to Builth High School, this is more than it would cost to bring Brecon High School up to 2B status</p>	<p>support the provision of Welsh-medium subjects for 80% of curriculum time in years 7 to 11.</p> <p>However, whilst the funding provided to dual stream schools through the authority's funding formula is based on the % of curriculum time where Welsh-medium options are available to pupils, the Welsh Government's definition of a category 2B school is as follows: 'At least 80% of <b>subjects</b> (excluding Welsh and English) are taught through the medium of Welsh but are also taught through the medium of English.'</p> <p>In relation to the funding provided through the formula to support dual stream provision in key stage 4, the authority considers that Welsh-medium curriculum time is available when a minimum of 1 Welsh-medium options subject is available in each options block. For example, a dual stream school offering 1 Welsh-medium subject and 5 English-medium subjects in each options block, as well as all core subjects through the medium of Welsh, would receive the maximum funding available from the authority to support its dual stream provision, and would be providing 80% of curriculum time through the medium of Welsh. However, this school would not necessarily meet the Welsh government definition for a category 2B school, as the school would not be providing 80% of <b>subjects</b> through the medium of Welsh and English.</p> <p>Therefore, whilst the figure of £47000 provided during the consultation is the maximum additional funding that would be provided to support dual stream provision at Brecon High School based on the authority's funding formula, this would not be sufficient to enable the school to provide Welsh-medium provision which would meet the definition for a category 2B school.</p>
3.4.6	<p>How much is the council spending on transporting Welsh-medium children from the Brecon area to Ystalyfera and Builth?</p>	<p>The current transport costs are £111,000, however this includes transport for some primary aged pupils to the Welsh-medium stream at Builth Wells CP School who live in the Builth catchment area but on the route used by the transport from Brecon.</p>
3.4.7	<p>Has the council costed transport to Builth from Ysgol y Bannau in their transport budget?</p>	<p>The authority is not proposing to change the transport arrangements in relation to Ysgol y Bannau. The current cost of transport provision for</p>

		secondary aged pupils from the Brecon catchment area to Builth and Ystalyfera is £111,000.
3.4.8	What would be the cost of providing transport for children from the Talybont area to their nearest Welsh-medium provision in Pontypool?	<p>As stated in the proposal outlined on page 3 of the consultation document, 'Pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School that live closer to alternative Welsh-medium secondary provision outside Powys would have the opportunity to transfer to these schools.'</p> <p>If dedicated transport was provided, this could cost up to £200 per day (£38,000 per annum). However, should the proposal be implemented, the authority would look to work with Torfaen and Monmouthshire councils in order to ensure that transport was provided as efficiently as possible.</p>
3.4.9	What is the cost of transporting pupils to Ystalyfera? Is it £450 a day?	<p>Pupils from the Brecon catchment area are transported to Ysgol Gyfun Ystalyfera on public service T6. The cost of this service is a cost to the authority whether there are any pupils transported on it or not, however for accounting purposes, the schools service contributes £22,230 per annum in respect of the 38 pupils currently transported on this route.</p> <p>In addition, there is a bus transporting pupils from the Ystradgynlais area to both Ysgol Gyfun Ystalyfera and Ysgol Maesydderwen. The annual cost of this bus is £34,181, with 34% of the children using the bus attending Ysgol Gyfun Ystalyfera (£11,626).</p>
3.4.10	<p>The council should stop paying for out of county transport and should use the money to employ better qualified teachers</p> <p>You should invest money into teachers rather than school transport</p>	Under the Learner Wales Travel Measure, the authority is required to transport children to their closest suitable school delivering through the language of choice. Following the transport appeal, it was agreed that the current level of Welsh-medium provision at Brecon was below that being delivered at the alternative schools.
<b>3.5 Concern about pupil safety</b>		
3.5.1	Concern about additional travel for pupils to Builth	The authority is content that the roads that would be used to transport pupils

	<p>on hazardous roads</p> <p>Concern about the safety of the road to Builth – particularly in bad weather</p> <p>Travelling to Builth in the winter is dangerous, pupils could be forced to miss days of school due to bad weather</p>	<p>between the Brecon and Builth Wells catchments are safe, as long as the road users are using the roads responsibly. Transport is already provided from Brecon to Builth Wells and vice versa, and the authority is not aware of any major incident that has occurred in recent years involving that transport.</p> <p>In times of bad weather, the authority and contractors will have alternative routes available to travel from Builth Wells back to Brecon in times of bad weather.</p>
3.5.2	<p>Concern that Welsh speaking pupils are being transported to Ystalyfera on public service buses with no seat belts and sometimes have to stand as there are no seats available</p> <p>Want assurance that there will be a designated bus for pupils from Sennybridge to Ystalyfera with seat belts provided</p> <p>If you make Sennybridge a feeder school for Ystalyfera you will have to provide a designated bus at cost for the children, as parents are not happy with children going on a public bus that has no seat belts or the guarantee that children will even get a seat</p>	<p>The current regulations state that dedicated home to school transport must be fitted with seatbelts and that all passengers must be seated and wear the seatbelt. However, this regulation, together with the requirement to be seated, does not apply to learners who travel to school on a public service bus.</p> <p>The authority is currently undertaking a review of its Home to School Transport Policy, and will be undertaking consultation on the proposed revisions to the policy. The review will consider if the authority should continue to use public service buses to transport pupils.</p>
3.5.3	<p>Concern about pupils from Sennybridge travelling to Ystalyfera on a public service bus which travels at fast speeds</p> <p>The council hasn't considered the safety of transporting pupils to Ystalyfera</p>	<p>All transport provision is expected to adhere to the relevant speed limits that apply to the roads the transport travels on, whether this is dedicated home to school transport or a public service bus. The authority is confident that all routes are safe if drivers adhere to the speed limits and road conditions.</p>
3.5.4	<p>The road above Crai Reservoir to Ystalyfera is especially hazardous – is Powys willing to expose pupils to these unnecessary risks and face the</p>	<p>The road between Sennybridge and Abercrave (over Crai) is an A road and is therefore very suitable for home to school transport. The authority is confident that all routes are safe if drivers adhere to the speed limits and road conditions</p>



	consequences should an accident occur?	at the time.
3.5.5	Concern that the council is happy to risk children travelling on public transport which could see any paedophile able to sit next to them	<p>The drivers of all public service transport vehicles have had full DBS checks and the provision of school transport through public service buses is common across Wales and the United Kingdom.</p> <p>The authority has a duty under the 1985 Transport Act to ensure efficient use of public monies by integrating learners on to public service buses where possible. The authority is not aware of any incidents where children have been groomed while travelling on public service buses.</p>
3.5.6	It's unfair and unsafe to bus children around Powys for their education	The provision of home to school transport is an essential element in order to ensure access to the appropriate curriculum for learners wishing to study through the language of their choice, particularly so in a rural area such as Powys. The authority acknowledges that the additional travel required should the proposal be implemented would have an impact on pupils and their families, however the authority does not agree that the additional travel would be unsafe. The authority is confident that all routes are safe if drivers adhere to the speed limits and road conditions
3.5.7	Concern about problems that could arise when travelling by bus e.g. possibility of bullying, risk of an accident causing possible death or injury	A significant proportion of secondary pupils in Powys travel to school by bus, and the authority would expect pupils, parents and schools to adhere to its behaviour code. If there were persistent issues on the provided transport, the authority would consider taking appropriate action against the perpetrators and fitting CCTV onto the transport if this was considered appropriate. The authority has a very low number of accidents occurring on home to school transport.
<b>3.6 Environmental impact of additional travel</b>		
3.6.1	<p>Additional travel would lead to pollution and damage to the environment</p> <p>Concern about the carbon footprint we would be forcing on our Welsh-medium pupils – when they</p>	The authority acknowledges that additional travel would have an environmental impact. However, following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. Should the

	leave school they could each have clocked up over 54,000 miles	proposal be implemented, the additional transport that would be required would be minimal.
<b>3.7 The council's Transport Policy</b>		
3.7.1	The proposal is not in-line with the authority's School Transport Policy which indicates that pupils should not have to travel more than 45 minutes	The authority consulted on a revised Home to School Transport Policy in 2011-12, which included a proposal that the normal travel time to and from school should not normally be more than 60 minutes. The authority is planning to undertake further consultation in the Summer Term 2017 on the same basis in respect of travel time.
3.7.2	What amendments are you making to your transport policy in your next policy?	The authority consulted on a revised Home to School Transport Policy in 2011-12, which included a proposal that the normal travel time to and from school should not normally be more than 60 minutes. The authority is planning to undertake further consultation in the Summer Term 2017 on the same basis in respect of travel time.
3.7.3	What has been the transport policy for children who live in the Sennybridge area to go to Brecon Welsh stream in the last 5 years? Parents from the Welsh stream have said that the council told them they would only be entitled to transport to the Welsh stream in Brecon if there were seats available on the bus. If they became unavailable they would be asked to find their own way to high school or they would be offered transport to Ystalyfera – subsequently children have been going to Ystalyfera to avoid having to find their own way to school or change schools, although they would have preferred to go to the Welsh stream in Brecon	Sennybridge is part of the catchment area of Brecon High School and learners can access transport to Brecon High School for both English-medium and Welsh-medium provision.
3.7.4	Ysgol y Bannau catchment area reaches out to Gwernyfed and Crickhowell High School, children from these areas should have the entitlement for	Should the proposal be implemented, and should parents of pupils currently attending the Welsh-medium stream at Brecon High School who live closer to Gwernyfed High School or Crickhowell High School choose for their children

	free transport to Brecon High School even if the Welsh-medium provision is removed because they are already in Brecon High School	to remain in Brecon High School to access English-medium provision instead of transferring to alternative Welsh-medium providers, the authority would consider the transport arrangements for these pupils on a case by case basis, taking account of the available seats on the transport going to Brecon and the vacant seat arrangements.
3.7.5	Would the council provide transport for children from the Builth area to their nearest category 1 Welsh-medium primary school (Ysgol y Bannau)? The precedent has already been set with providing transport to Ystalyfera and Builth. What would be the cost of this?	The current home to school transport policy does not differentiate between a Welsh-medium primary school and a primary school delivering the full curriculum through the medium of Welsh in a dual stream school such as Builth Wells CP School.
<b>3.8 Issues relating to travel to a designated Welsh-medium secondary school</b>		
3.8.1	Would be fair enough to expect an 11 year old to travel 52 miles a day (Talybont to Builth) on a bus for a Welsh-medium school and a tangible improvement on the subject provision available to them, but unfair to expect them to travel to another stream and no improvement in the subject provision available	The current Welsh-medium subject provision in Builth Wells is greater than the provision available at Brecon High School, therefore whilst it is true that the proposal would see most of the pupils in the current catchment area of the Welsh-medium stream at Brecon High School attending another stream based provision in order to continue to access Welsh-medium provision, the proposal would lead to a 'tangible improvement on the subject provision available' to pupils, and there would be an 'improvement in the subject provision available'.
3.8.2	Some parents have decided that if travel is absolutely necessary, they would be better going to a fully Welsh-medium secondary school out of county funded by the council  If parents did want their children to continue their education in Welsh and if the only way they could do so was for their children to travel away from their local school, it would make more sense for them to send them to the Welsh medium school in Ystalyfera than to a Welsh stream in Builth	The authority notes this comment. Should the proposal be implemented, the authority would provide free home to school transport in accordance with the council's School Transport Policy and the Learner Travel (Wales) Measure 2008. Pupils are eligible for free home to school transport if they live more than 3 miles from their nearest school offering provision in the language of their choice. For some pupils, the nearest Welsh-medium provision could be located outside Powys.

3.8.3	The fact that so many parents have chosen to transport their children out of county for Welsh-medium secondary education proves that they will travel if the provision is secure	The authority notes this comment.
3.8.4	Ysgol y Bannau's wide catchment area proves that parents are willing to send their children on a long journey in order to attend Welsh-medium primary education – confident that south Powys parents would be similarly committed if a Welsh-medium secondary school was available, wherever it was located	The authority notes this comment.
<b>3.9 Other</b>		
3.9.1	The vast majority of parents don't want their children to travel, this has been made abundantly clear during this consultation and previous consultations	The authority notes this concern in relation to the additional travel that would be required for pupils should the proposal be implemented, and has acknowledged that implementation of the proposal would lead to additional travel for Welsh-medium pupils. However, the current number of Welsh-medium pupils at Brecon High School is very small, which means that the provision is unviable. In addition, the authority's view is that the current provision is not providing an appropriate educational experience for pupils. A significant proportion of pupils have already transferred from the Welsh-medium stream at Brecon High School to alternative provision, which has required additional travel. This suggests that these parents are willing for their children to travel in order to access an increased level of Welsh-medium provision.
3.9.2	Concern about increased transport on roads	Following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. Should the proposal be implemented, the additional transport that would be required would be minimal.
3.9.3	The idea of bussing children out is old fashioned	The provision of home to school transport is an essential element in order to

		ensure access to the appropriate curriculum for learners wishing to study through the language of their choice, particularly so in a rural area such as Powys. The authority acknowledges that the additional travel required should the proposal be implemented would have an impact on pupils and their families, however the authority does not agree that the additional travel would be unsafe. The authority is confident that all routes are safe if drivers adhere to the speed limits and road conditions.
3.9.4	Moving children out of county means that services such as transport will be tendered out and companies will be coming in to transport children from out of county thus reducing employment	Over the last 2-3 years, the authority has tendered all its public service and home to school transport routes, with the contracts being awarded on a price and quality basis. The majority of contracts have been awarded to companies that are based in Powys.
<b>4 WELSH-MEDIUM PUPIL NUMBERS AT BRECON HIGH SCHOOL</b>		
<b>4.1 Impact of provision of transport to alternative schools</b>		
4.1.1	<p>The current number of Welsh-medium pupils at Brecon has been falsified due to the provision of free transport to Builth High School</p> <p>The fact that PCC has provided transport is the reason for the falling numbers in the Welsh stream</p> <p>The council's agreement to pay transport costs to Builth was another nail in the coffin of the Welsh stream and smacks of predetermination</p> <p>Paying to transport children to a Welsh-medium provision other than at Brecon before the outcome of your proposal is agreed is an example of manipulating the situation in your favour. This could be considered 'predetermination'</p>	<p>The information provided in the consultation document is factual information based on the number of pupils that were attending the Welsh-medium stream at Brecon High School at the time of writing.</p> <p>18 months or so ago, a number of parents of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education. As an admissions authority, the council cannot refuse places to children if there is a place available at the school to which they apply. When parents applied for places at Builth Wells High School, there were places available, therefore the authority was unable to reject the applications, however transport was initially refused at Stage 1 and 2 of the transport application process.</p> <p>Following this, the applications were taken to appeal, and the appeal panel took the decision to award transport based on the breadth of Welsh-medium provision offered at Builth Wells High School being greater than the provision offered at Brecon High School.</p>

	Families who have not fully understood the consultation process took the implementation of free transport to Builth Wells as Powys having made its decision to close the Welsh stream in Brecon	The council acknowledges that the decision of the appeal panel to award transport has impacted on the number of pupils attending the Welsh-medium stream at Brecon High School, however this is not predetermination – transport was not automatically awarded to these parents, it was referred to the Appeals Panel in accordance with the agreed process.
4.1.2	If you took the pupils who currently travel to Builth and Ystalyfera for Welsh-medium education and increase the provision at Brecon High School, the stream would be viable	<p>The authority first proposed closure of the Welsh-medium stream at Brecon High School during the summer of 2015, which was before pupils had started to transfer to Builth Wells High School to access Welsh-medium secondary provision.</p> <p>The authority's view is that the number of pupils currently accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.</p>
4.1.3	The number of Welsh-medium pupils leaving Sennybridge and Ysgol y Bannau have remained constant since 2010/11, if those pupils had been supported and encouraged to continue their education at Brecon High School, the school would not have found itself in a position where pupil numbers have declined	Information about the Welsh-medium provision available at Brecon High School, as well as alternative providers, is included in the authority's Admissions Booklet which is published annually. However, parents are entitled to apply for a place at whichever school they choose, and as an admissions authority, the council cannot refuse places to children if there is a place available at the school to which they apply.
<b>4.2 Impact of previous consultations</b>		
4.2.1	<p>If 19 pupils can survive 3 consultations, how many children would be in the stream if it was not under consultation to close?</p> <p>The numbers in the Welsh stream now do not show the real demand for the Welsh stream in Brecon and are only low because of the 3<sup>rd</sup></p>	<p>18 months or so ago, a number of parents of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education. As an admissions authority, the council cannot refuse places to children if there is a place available at the school to which they apply.</p> <p>When parents applied for places at Builth Wells High School, there were</p>

<p>consultation that is happening</p> <p>The current Welsh-medium pupil numbers at Brecon High School are entirely due to the proposals</p> <p>Pupil numbers have remained stagnant wholly due to the council repeatedly proposing to close the Welsh-medium provision at Brecon High School</p> <p>Numbers in the Welsh stream have always been high – there were classes of 25-30 in the past, 20 years ago there were classes of around 24, however pupil numbers dropped very quickly due to the uncertainty about the Welsh stream</p> <p>The Welsh stream was viable until everyone panicked and there was a domino effect once it was suggested the stream was under threat</p> <p>The consultation has had a massive impact on pupil numbers in the Welsh stream</p> <p>The uncertainty has had a negative impact on numbers in the Welsh-medium stream</p> <p>Without the previous consultations, numbers in the Welsh stream would be at least similar to those in earlier years</p> <p>The present low numbers are from this being the 3<sup>rd</sup> consultation to close the stream</p> <p>The numbers that have transferred to the Welsh</p>	<p>places available, therefore the authority was unable to reject the applications, however transport was refused at Stage 1 and 2 of the transport application process. Following this, the applications were taken to appeal, and the appeal panel took the decision to award transport.</p> <p>Whilst the authority acknowledges that the previous consultations have impacted on Welsh-medium pupil numbers at Brecon High School, the authority does not agree that the stream would be viable had pupils not transferred to alternative providers. The authority's view is that the number of pupils accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.</p>
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	<p>stream have been very low over the last two years, this is due to the uncertainty caused by these consultations</p> <p>If you hadn't made it so obvious that you were going to close the Welsh stream here, parents wouldn't have moved their children from the Welsh stream</p> <p>When Powys started the consultations, the numbers in the Welsh stream started to decrease</p> <p>Dwindling numbers at Brecon Welsh stream are hardly surprising given the atmosphere of uncertainty you continue to create with years of underinvestment and scaremongering</p>	
4.2.2	<p>Parents chose to send their children to Ystalyfera when they would have preferred to send them to Brecon because of the uncertainty in relation to the provision at Brecon</p>	<p>The authority is aware of parents from the Brecon and Sennybridge area that chose for their children to attend Ysgol Gyfun Ystalyfera long before the authority carried out consultation on closure of the Welsh-medium stream.</p>
4.2.3	<p>Parents have chosen English-medium provision over the Welsh-medium stream at Brecon because of the uncertainty</p> <p>There has been a decrease in the number of Brecon families choosing Welsh at secondary level as parents don't want to risk their children's welfare</p>	<p>The authority has acknowledged in the consultation document that implementation of the proposal could lead to an increase of in the proportion of pupils transferring from Welsh-medium to English-medium provision on transfer to secondary education.</p>
4.2.4	<p>That a significant number of parents moved their children from the Welsh stream at Brecon High School in 2015 is not an indication that they were unhappy with the provision and were suddenly</p>	<p>The authority notes this comment. However, the fact remains that 18 months or so ago, following the initial Cabinet decision to consult on closure of the Welsh-medium stream at Brecon High School, the parents of a number of pupils that were attending the Welsh-medium stream at Brecon High School</p>



	prepared to travel, but that they thought they had no choice	decided to move their children to another school to access Welsh-medium education.
4.2.5	Groups have been working to encourage parents to enter Welsh-medium education in Brecon, but are fighting against the perception that the Welsh stream may not be there in the future	The authority notes the difficulties caused by the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School.
4.2.6	Brecon High School showed commitment and employed Welsh speaking staff, but as a result of the consultation, pupils in the Welsh stream jumped ship and the school had to shelve the commitment to take on Welsh medium staff	The authority notes this comment.
4.2.7	Brecon High School was 'stabbed in the back' by the consultation process. When pupils left the school it compounded the problem because there were financial implications	<p>It is not true that Brecon High School was 'stabbed in the back' by the consultation process.</p> <p>18 months or so ago, following the initial Cabinet decision to consult on closure of the Welsh-medium stream at Brecon High School, and before any final decision had been made, the parents of a number of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education.</p>
4.2.8	The low pupil numbers in the Welsh stream are because of your previous announcement that the Welsh stream in Brecon was going to close. By stating in advance that the stream will close you scared parents and forced their hand. This reduced the numbers in Brecon and boosted the numbers in Builth which conveniently gave the council the figures they needed to justify their proposal.	<p>It is not true that the authority 'stated in advance' that the Welsh stream in Brecon was going to close.</p> <p>18 months or so ago, following the initial Cabinet decision to consult on closure of the Welsh-medium stream at Brecon High School, and before any final decision had been made, the parents of a number of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education.</p>
4.2.9	The current pupil numbers are not representative of the want and need for a Welsh stream in	The information provided in the consultation document is factual information regarding the number of pupils that were attending the Welsh-medium stream

	Brecon	at Brecon High School at the time of writing. The authority acknowledges that there has been a reduction in Welsh-medium pupil numbers at the school over recent years. This has been due to parental choice, although it is acknowledged that the recent consultations in relation to the Welsh-medium stream have impacted on the number of pupils attending the Welsh-medium stream at Brecon High School.
4.2.10	If parents could see an improvement in the prospects and future of the Welsh stream at Brecon then the tide would turn and they would want to send their children there	The authority's priority is to provide equality of opportunity to Welsh-medium pupils. The small class sizes and limited Welsh-medium provision available at Brecon High School does not provide this. The authority's view is that the number of pupils currently accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.
<b>4.3 Reference to category 2B categorisation</b>		
4.3.1	<p>The reduction in numbers is directly related to the constant undermining and lack of support for the development of the Welsh stream at Brecon High School in attaining 2B status as promised by the council</p> <p>Had the council kept to the commitment to make Brecon's Welsh stream up to 2B and the Cabinet's decision to invest money in the Welsh stream in Brecon High, the stream would have the cohort numbers required to run a good, growing Welsh-mediums provision</p> <p>If finance had been provided to bring Brecon up to 2B status, pupils would have stayed here</p>	<p>In the Cabinet minutes of a meeting held on the 22<sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p> <p>Early discussions took place with Brecon High School about providing additional support, however due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil this.</p> <p>The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools. Some schools have succeeded in strengthening and increasing the Welsh-medium provision</p>

	<p>Raising the status of Brecon to a 2B stream would create a stream with large numbers of pupils that would give parents the confidence to invest in Welsh-medium education in the Brecon area</p> <p>For years parents have been wanting to send their children to Brecon but have been waiting for it to offer 2B provision</p> <p>The council promised to make Brecon Welsh stream 2B which would have meant all of Sennybridge stream would have come to Brecon, making Brecon's stream as good if not better than Builth's</p>	available, however this has not been the case at Brecon High School.
4.3.2	<p>If the council made Brecon High School 2B status, all the children that left before the start of the consultation would come back, plus more as the stream would then attract pupils that have gone to Ystalyfera and those that have gone to English-medium provision</p> <p>If Brecon is made 2B status pupils will come back from Builth</p>	The authority's view is that the current number of Welsh-medium secondary pupils in mid and south Powys is not sufficient to support two Welsh-medium streams and to provide equality of opportunity to Welsh-medium pupils. There is no evidence that pupils that have transferred to alternative providers would return to Brecon High School should the level of Welsh-medium provision at the school increase.
4.3.3	<p>Pupil numbers at Ysgol y Bannau and Sennybridge are of a good size and should be able to give Brecon a 2B school</p>	The authority's view is that the number of pupils currently accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.
<b>4.4 Criticism of the council's treatment of Welsh-medium provision at Brecon High School</b>		
4.4.1	The council has turned its back on Brecon High	It is not true that the council has turned its back on Brecon High School's

	<p>School's Welsh-medium provision, hence the low numbers</p> <p>What has the council done to increase the number of Welsh-medium learners coming into Brecon High School?</p> <p>Astonishing that the council has not given any assistance to Brecon High School to maintain the numbers in the Welsh stream</p> <p>It's clear that Powys have not been supportive of the Welsh stream at Brecon High School for some time – this has led to a decline in the number of teachers and subjects that can be offered through the medium of Welsh</p> <p>It's disappointing to note how the Welsh stream in Brecon has been run down over the years</p> <p>Welsh-medium provision at the school has not been fully supported and has been undercut repeatedly</p> <p>Brecon High School has been held back financially and that has been used against the school</p> <p>Historic lack of investment in Welsh medium secondary education in Brecon High School has meant that there has been very limited uptake of Welsh language learning.</p>	<p>Welsh-medium provision. The same level of support, including both financial support and other officer support, has been provided to support dual stream provision at all Powys' dual stream secondary schools over recent years. Some schools, such as Builth Wells High School, have succeeded in strengthening and increasing the Welsh-medium provision available during this time, however this has not been the case at Brecon High School.</p>
4.4.2	<p>The council has been uninterested in why Welsh-medium pupil numbers have been low in Brecon</p>	<p>The authority is committed to increasing the number of pupils accessing Welsh-medium education in Powys, in order to contribute to the</p>

	The figures Brecon High School are being judged on as a reason for lack of viability have been created by the lack of clarity and direction by the council	implementation of the Welsh Government's Welsh-medium education strategy, and is very concerned about why there has not been an increase in Welsh-medium pupil numbers in the Brecon area, which is contrast with other areas of Powys.
4.4.3	The reduction in pupil numbers at Brecon High school Welsh stream is not due to reduced pupil numbers learning through Welsh in South Powys, it is due to bad management of these pupils by the council	The authority does not agree with this comment. The reduction in pupil numbers at Brecon High School is due to the fact that a number of parents of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education, however it is acknowledged that the recent consultations in relation to the Welsh-medium stream contributed to the decrease in pupil numbers. The authority does not 'manage' pupils, parents are entitled to apply for a place in any school they choose.
4.4.4	The local authority has not provided an environment for the Welsh language to grow – the authority's indecision has provided a situation where people are losing faith	The authority acknowledges that the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School has impacted on pupil numbers at the stream since 2015/16. However, details of pupil numbers at the Welsh-medium stream since 2010/11 are provided on page 11 of the consultation document, and this information shows that pupil numbers decreased between 2010/11 and 2014/15, before the council began any consultation in relation to the future of the stream.
4.4.5	In the consultation meeting the authority admitted responsibility for the reduced numbers in the Welsh stream	Whilst the authority acknowledges that the previous consultations have impacted on Welsh-medium pupil numbers at Brecon High School, the authority does not agree that the stream would be viable had pupils not transferred to alternative providers. The authority's view is that the number of pupils currently accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.
4.4.6	Parents need to be reassured, they haven't been reassured which has led to them making difficult	The authority accepts that the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School has impacted on the

	decisions which have affected the number of pupils at Brecon High School	number of Welsh-medium pupils at the school. However, the fact is that the current number of pupils accessing the stream is small, and the Welsh-medium curriculum provided to them is limited. The authority's view is that the current number of Welsh-medium secondary pupils in mid and south Powys is not enough to sustain two separate provisions and provide an enhanced Welsh-medium curriculum.
<b>4.5 Prospective pupil numbers</b>		
4.5.1	Can you look at the potential number of pupils going out of county or wanting to come to Welsh-medium provision at Brecon High School if it was available?	Pupils travelling out of county are attending a designated Welsh-medium secondary school, which offers more Welsh-medium opportunities to pupils than could be offered in a dual stream provision. As stated in Powys' draft WESP for 2017-20: 'The authority fully agrees with the view of Welsh Government that pupils are more likely to become fully bilingual after attending Welsh-medium schools, particularly when they come from non-Welsh speaking homes'.
4.5.2	When will you know what the intake from Ysgol y Bannau to Brecon High School will be in the 2017-18 academic year?	Applications for secondary places were to be submitted by the 18 <sup>th</sup> November 2016, and places will be allocated by the authority by the 1 <sup>st</sup> March. The authority has received 10 applications for places in the Welsh-medium stream at Brecon High School from September 2017.
4.5.3	The projected numbers going into the Welsh-medium stream in 2017/18 should influence any decision about the future of the Welsh language in this school	The authority has received 10 applications for places in the Welsh-medium stream at Brecon High School. This will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal. Whilst 10 pupils would be an increase on the current number of pupils in year 7 at Brecon High School's Welsh-medium stream, this would still be a small class, and would not enable the school to offer a significantly increased Welsh-medium curriculum to these pupils.
4.5.4	Apart from year 5, the numbers in Ysgol y Bannau are really good, and until these consultations the majority of pupils were going to Brecon	The number of pupils attending Ysgol y Bannau are included on page 12 of the consultation document. Even if all the pupils currently attending Ysgol y Bannau transferred to the Welsh-medium stream at Brecon High School, class sizes would remain relatively small in some year groups, and it is unlikely that the school would be able to offer significantly greater Welsh-medium provision

		to pupils.
4.5.5	A Welsh stream at Brecon High School could be an option for families in Ebbw Vale and Merthyr	Welsh-medium pupils in Ebbw Vale and Merthyr have access to designated Welsh-medium secondary schools, therefore it is unlikely that a significant number of pupils would choose to attend a dual stream provision in Brecon. It is also unlikely that they would be eligible for home to school transport.
4.5.6	Pupil numbers in the nursery class at Sennybridge Welsh stream and the number in the nursery class at Ysgol y Bannau are enough to have two classes in the Welsh stream at Brecon High School	<p>The current number of Welsh-medium pupils in Ysgol y Bannau and Sennybridge C.P. School are provided on page 12 of the consultation document. Apart from one year group (year 1), the total number of pupils per year group is less than 30, therefore even if all pupils transferred to Brecon's Welsh-medium stream, it is unlikely that there would be enough pupils to have more than one class in most years, and that the school would be able to provide a comprehensive range of Welsh-medium options to Key Stage 4 pupils.</p> <p>The majority of Welsh-medium pupils from Sennybridge C.P. School currently transfer to Ysgol Gyfun Ystalyfera, a designated Welsh-medium secondary school, where they have access to a full Welsh-medium curriculum. A stream based provision at Brecon would not be able to provide the same immersion opportunities as a Welsh-medium secondary school, therefore it is very unlikely that all of Sennybridge's Welsh-medium pupils would transfer to Brecon High School. As stated in Powys' draft WESP for 2017-20: 'The authority fully agrees with the view of Welsh Government that pupils are more likely to become fully bilingual after attending Welsh-medium schools, particularly when they come from non-Welsh speaking homes'.</p>
4.5.7	The numbers in the Welsh-medium classes lower down at Sennybridge CP School are buoyant	It is true that the numbers in the Welsh-medium classes lower down at Sennybridge C.P. School are greater than the numbers in the junior classes.
4.5.8	From the current year 6 pupils at Ysgol y Bannau, 10 will be going to Brecon Welsh stream in September and once the decision is made to maintain the provision in Brecon there will be more	The authority notes that a number of current year 6 pupils at Ysgol y Bannau have stated their preference to transfer to the Welsh-medium stream at Brecon High School in September 2017. However, 10 pupils is still a small class, and would not enable the school to provide a comprehensive Welsh-medium curriculum to these pupils, particularly as they move into Key Stage 4.

4.5.9	10 pupils have signed up to join the Welsh stream from the current year 6 at Ysgol y Bannau. Has any other school or stream had 3 proposals for closure in 2 years and still had rising numbers?	The authority notes that a number of current year 6 pupils at Ysgol y Bannau have stated their preference to transfer to the Welsh-medium stream at Brecon High School in September 2017. The authority is not aware of any other school or stream that has had 3 proposals for closure in 2 years. Whilst the number of pupils that have applied for a place in year 7 in the Welsh-medium stream from September 2017 would be an increase compared with the previous year 7, this would not lead to any significant increase in overall pupil numbers in the Welsh-medium stream, and the total number of pupils in years 7-11 would remain lower than they were in 2014/15.
<b>4.6 Other</b>		
4.6.1	<p>If there is more you could have done to support Welsh-medium education why has this not happened before?</p> <p>It has mentioned that support will be given to Ysgol y Bannau to help numbers transfer to Builth Wells High School, why isn't this support in place to help pupils go to Brecon High School?</p>	<p>The authority established a Welsh-medium learning partnership, 'Clwstwr y Ffynnon' a few years ago, which included all Welsh-medium providers in mid and south Powys. Improving transfer rates into Welsh-medium secondary provision was one of the objectives of that partnership. Events were held in a number of schools to promote progression from Welsh-medium primary education into Welsh-medium secondary education.</p> <p>Should the proposal be implemented, the authority has acknowledged in the consultation document that there would be a new risk to transfer rates from Welsh-medium primary provision to Welsh-medium secondary provision in the area, and as mitigation for this risk, the authority has proposed working with the primary schools concerned to establish transition links, in order to contribute to the Welsh Government aim of retaining pupils within the Welsh-medium sector.</p>
4.6.2	The fact that the school buildings at Brecon High School have not been addressed is part of the problem – can understand why parents opt for other schools when they see the state of the buildings here	The authority notes this comment and would agree that the condition of the school buildings at Brecon High School is one of a number of reasons why Welsh-medium parents have opted for alternative provision.
4.6.3	The council needs to ask the right questions to	The authority's view is that there are a number of reasons why the number of



	find out why Welsh medium pupils numbers haven't grown in Brecon despite Brecon having the required population density, transport links and hub status within local and Welsh government to make Welsh-medium education viable and sustainable, and the council needs to act on this	Welsh-medium pupils in the Brecon area hasn't grown, however the authority's view is that the limited Welsh-medium provision available in the secondary sector is one of these reasons. As stated in the consultation document in respect of this proposal, one of the reasons for the proposal is the 'need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education.'																																
4.6.4	What is the viable number of pupils needed for the Welsh stream to continue in Brecon High School? Please give me a breakdown of costings for this	<p>In order for the Welsh-medium provision at Brecon High School to be considered 'viable', the school would need to provide an appropriate range of Welsh-medium provision for Welsh-medium pupils. The authority's view is that dual stream schools should be aiming to provide Welsh-medium provision which meets the Welsh Government definition for a category 2B school.</p> <p>Currently, Ysgol Uwchradd Caereinion is the only dual stream secondary provider in Powys which meets the Welsh Government definition of a category 2B school. The breakdown of year 7 – 11 pupils in this school in September 2016 was as follows:</p> <table border="1" data-bbox="1016 839 2002 1152"> <thead> <tr> <th>Year</th> <th>Welsh-medium</th> <th>English-medium</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>47</td> <td>36</td> <td>83</td> </tr> <tr> <td>8</td> <td>40</td> <td>36</td> <td>76</td> </tr> <tr> <td>9</td> <td>58</td> <td>37</td> <td>95</td> </tr> <tr> <td>10</td> <td>49</td> <td>38</td> <td>87</td> </tr> <tr> <td>11</td> <td>43</td> <td>43</td> <td>86</td> </tr> <tr> <td><b>Total</b></td> <td>237</td> <td>190</td> <td>427</td> </tr> </tbody> </table> <p>During 2016-17, Caereinion High School is providing the following number of subjects through the medium of Welsh, English and bilingually to pupils in years 7 – 11:</p> <table border="1" data-bbox="1016 1326 2002 1394"> <thead> <tr> <th>Year</th> <th>Welsh-medium</th> <th>English-medium</th> <th>Bilingual</th> </tr> </thead> <tbody> </tbody> </table>	Year	Welsh-medium	English-medium	Total	7	47	36	83	8	40	36	76	9	58	37	95	10	49	38	87	11	43	43	86	<b>Total</b>	237	190	427	Year	Welsh-medium	English-medium	Bilingual
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		<p>As with all schools, it is ultimately the responsibility of the senior leadership team, in partnership with the governing body, to agree the school's priorities and to structure the school's curriculum and timetable accordingly. When considering the historic development of Welsh-medium education across all Powys schools, it is apparent that some schools have prioritised Welsh-medium education more than others and, where this has been the case, these Welsh streams have developed in terms of pupil numbers and in terms of the breadth of Welsh-medium provision.</p>																				
4.6.5	There are a lot of Welsh speaking children in Brecon High School that have had Welsh at home and went to an English primary school	The authority notes this comment and acknowledges that some Welsh speaking parents choose for their children to be educated through the medium of English.																				
4.6.6	If the right provision was provided in Brecon, the stream would have the viable number required to run a good, robust Welsh-medium provision	The authority notes this comment, however the fact remains that the current Welsh-medium provision in Brecon High School is very limited and does not provide an appropriate level of provision for Welsh-medium learners.																				
4.6.7	<p>Has the council ever asked parents who pulled their children out of Ysgol y Bannau or Brecon Welsh stream to ask why they made that decision?</p> <p>The council should act on why families moved out of Ysgol y Bannau and Brecon Welsh stream rather than what they think the answer is</p>	<p>All parents have had the opportunity to let the council know their views as part of the recent consultation on the proposal to close the Welsh-medium stream at Brecon High School.</p> <p>Individual parents have presented their case to the authority as part of the transport appeals process, and the main reasons provided was the lack of breadth and continuity of curriculum at Brecon High School.</p>																				
<b>5. WELSH MEDIUM PROVISION AT BRECON HIGH SCHOOL</b>																						

5.1 Category 2B categorisation		
5.1.1	<p>The council's failure to work with Brecon High school to put in place a high quality learning environment for the proposed 2B Welsh stream is the cause of the problem</p> <p>PCC was supposed to support Brecon High School to get to category 2B status, but the council did not support the school</p> <p>Have never understood why Brecon High School was never supported by the authority to become a category 2B school</p>	<p>In the Cabinet minutes of a meeting held on the 22<sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p> <p>Early discussions took place with Brecon High School about providing additional support, however due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil this.</p> <p>The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools. Some schools have succeeded in strengthening and increasing the Welsh-medium provision available, however this has not been the case at Brecon High School.</p>
5.1.2	<p>The council's Cabinet committed to bringing Brecon Welsh stream up to 2b status – at some point the council reneged on this, but I cannot find details of when the council voted to not implement this commitment – could you inform me of the details of this decision?</p>	<p>It is true that in November 2011, the council's Cabinet resolved the following:</p> <ol style="list-style-type: none"> <li>1. 'To deliver 11-16 Welsh-medium education from <u>five</u> dual stream schools as follows: <ul style="list-style-type: none"> <li>• Brecon High School</li> <li>• Builth Wells High School</li> <li>• Caereinion High School</li> <li>• Llanfyllin High School</li> <li>• Ysgol Bro Ddyfi</li> </ul> </li> <li>2. To provide additional investment and support to these schools to enhance and maintain the curriculum at the appropriate level'</li> </ol> <p>Early discussions took place with Brecon High School about providing</p>

		<p>additional support, however due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil this.</p> <p>The decision to move to an alternative model in relation to Welsh-medium secondary provision was made by Cabinet on the 27<sup>th</sup> January 2015. At this meeting, Cabinet approved the commencement of a Secondary School Reorganisation programme, which intended to transform the secondary and post-16 sector across the county. One of the aims of this Programme was:</p> <ul style="list-style-type: none"> <li>- 'Reconfiguration of Welsh-medium education with the aim of establishing at least one Welsh-medium secondary school in the county, and the consolidation of other Welsh-medium streams into larger units.'</li> </ul>
5.1.3	Who was responsible for not supporting Brecon to come up to 2B standard? This should be subject to scrutiny	Following the Cabinet decision of the 22 <sup>nd</sup> November 2011 that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school, early discussions took place with Brecon High School and other dual stream schools about providing additional support. However due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil this.
5.1.4	<p>Had the authority given the school the appropriate finances to bring the stream up to 2B status, the school would not have had to reduce the Welsh-medium curriculum at Key Stage 3</p> <p>In November 2011, PCC mooted the idea of the school becoming 2B status, but there was no financial help – how can you expect the school to come up to 2B status without financial support?</p> <p>Ridiculous that the council expected the school to get up to 2B status without having the money to do so – unless the school has the money to bring</p>	<p>In the Cabinet minutes of a meeting held on the 22<sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p> <p>Early discussions took place with Brecon High School about providing additional support, however due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil this.</p> <p>The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on</p>

	in staff to deliver Welsh-medium education it cannot bring the school up to 2B status	the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools. Some schools have succeeded in strengthening and increasing the Welsh-medium provision available, however this has not been the case at Brecon High School.
5.1.5	PCC should as a matter of priority provide the financial resource to Brecon High School in order to bring it up to category 2B status	<p>On the 27<sup>th</sup> January 2015, Cabinet approved the commencement of a Secondary School Reorganisation programme, which intended to transform the secondary and post-16 sector across the county. One of the aims of this Programme was:</p> <ul style="list-style-type: none"> <li>- 'Reconfiguration of Welsh-medium education with the aim of establishing at least one Welsh-medium secondary school in the county, and the consolidation of other Welsh-medium streams into larger units.'</li> </ul> <p>This replaced the previous decision made by Cabinet on the 22<sup>nd</sup> November 2011 that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p>
<b>5.2 Funding for Welsh-medium provision at Brecon High School</b>		
5.2.1	<p>Brecon High School has been held back financially and that has been used against the school</p> <p>In November 2011, PCC mooted the idea of the school becoming 2B status, but there was no financial help – how can you expect the school to come up to 2B status without financial support?</p> <p>Ridiculous that the council expected the school to get up to 2B status without having the money to do so – unless the school has the money to bring in staff to deliver Welsh-medium education it cannot bring the school up to 2B status</p>	<p>The same level of support is provided to all dual stream secondary schools in relation to Welsh-medium provision. The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on the number of subjects delivered through both languages.</p> <p>Whilst some schools have succeeded in strengthening and increasing the Welsh-medium provision available within the financial support provided, this has not been the case at Brecon High School.</p>

	Had the authority given the school the appropriate finances to bring the stream up to 2B status, the school would not have had to reduce the Welsh-medium curriculum at Key Stage 3	
5.2.2	A Welsh speaking maths teacher left Brecon High and it was not possible to replace him. Now the school doesn't have the funding to employ any new Welsh speaking staff	The authority notes this comment.
5.2.3	Brecon High School still has the staff to provide a fuller curriculum to Welsh-medium pupils if funding were to be provided, however the Welsh-medium curriculum in Key Stage 3 had to be reduced due to the small numbers entering the stream	The authority notes this comment.
5.2.4	If the current cost of transport which is £100,000 was invested into Brecon High School, there would be more pupils in the Welsh stream in Brecon	Under the current funding arrangements, the school would have to increase its Welsh-medium curriculum in the September prior to receiving any additional funding. In respect of the dual stream uplift, the maximum uplift that the school would receive would be around an additional £55,000 per annum. In addition, it would receive the pupil led funding related to any additional children.
<b>5.3 Quality of Welsh-medium provision at Brecon High School</b>		
5.3.1	<p>The Welsh-medium teachers at Brecon are of a very high standard</p> <p>Brecon High School has first subject Welsh-medium teachers across a large number of subjects</p> <p>The Welsh-medium staff at Brecon High School are some of the best teachers in the school</p>	The authority notes this comment. The quality of the Welsh-medium teachers at Brecon High School are not the reason for this proposal.

	The teachers in Brecon's Welsh stream are really good at what they do and are very good at teaching	
5.3.2	<p>Pupils are receiving Welsh-medium education of a very high standard at Brecon High School</p> <p>Children have had a fantastic education in the Welsh stream at Brecon High School</p>	The authority's view is that the current small number of pupils currently accessing the Welsh-medium stream at Brecon High School and the limited Welsh-medium provision available to pupils at the school is not providing an appropriate educational experience for pupils.
5.3.3	<p>Pupils from Brecon High School can move to schools like Ystalyfera and Builth without any language help – this shows that their standard of Welsh is really good</p> <p>Linguistic abilities at Brecon High School are regarded as superior to those of pupils at Builth Wells</p> <p>You seem to think that pupils in Brecon struggle linguistically, if so can you provide the evidence of this?</p> <p>Welsh speaking learners in Brecon Welsh stream have excellent linguistic abilities</p> <p>Welsh speaking learners in Brecon's Welsh stream are considered to be superior to students in Builth as they have been to the Welsh medium primary school located next door</p>	At Key Stage 4, the school performed in the lower 50% of similar schools based on free school meals eligibility in 2015, and in the bottom 25% of similar schools in 2016 at A*-C at GCSE in Welsh First Language.
5.3.4	The majority of the high fliers who have got A*s and As are from the Welsh stream	The authority notes this comment. However, the number of pupils in the Welsh-medium stream at Brecon High School is currently very small, and as stated in the consultation document, 'Official Welsh Government sets relating

	<p>Most of Brecon's Welsh stream are in the top sets for most subjects</p> <p>Welsh stream performance and grades are exceptionally high year on year</p> <p>Pupils in Brecon's Welsh stream are achieving above average results year on year</p>	<p>to the school's performance relates to all pupils at the school, rather than pupils in the Welsh-medium stream alone. The number of Welsh-medium pupils at each school, particularly Brecon High School, is small, therefore it would not be valid to compare the performance of Welsh-medium pupils in these schools.'</p>
5.3.5	<p>Estyn calls the Welsh-medium stream a strength of Brecon High School</p>	<p>It is true that the Estyn report on the core inspection of Brecon High School carried in May 2012 states: The provision for Welsh language is a strength of the school...However, the school has not yet made enough progress on promoting the use of the Welsh language in school life.' However, as stated in the consultation document in respect of this proposal, the number of pupils accessing the Welsh-medium stream at Brecon High School has decreased significantly since then, which has impacted on the level of Welsh-medium provision available at the school. Estyn's response to the current proposal to close the Welsh-medium stream is provided on page 13 of this report.</p>
5.3.6	<p>Estyn's report on education at Brecon in December 2016 states 'Many write in Welsh with a good degree of accuracy and use different tenses appropriately. Many have good pronunciation and speak Welsh confidently'</p>	<p>It is true that this statement appears in Estyn's monitoring report following their monitoring visit in November 2016. This statement appears within Recommendation 1, which relates to Welsh Second Language.</p>
5.3.7	<p>There are a number of other subjects that could be offered through the medium of Welsh if there was sufficient demand from students</p>	<p>The authority notes this comment, and notes that additional Welsh-medium subjects could be offered if there were sufficient demand. However, the fact remains that the number of pupils currently accessing the Welsh-medium stream at Brecon High School is small, which makes it very difficult for the school to offer a comprehensive Welsh-medium curriculum for these pupils.</p>
5.3.8	<p>Past pupils who attended the Welsh stream at Brecon are now employed as Welsh speakers – they would not have done that had they not attended the Welsh stream at the school</p>	<p>The authority notes that Welsh-medium provision at the school has had a positive impact on the Welsh language skills of past pupils of the Welsh-medium stream, which has meant that they have been able to continue to use their Welsh language skills in the workplace. However, the number of pupils</p>



		accessing the Welsh-medium stream has decreased significantly in recent years; it is acknowledged that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to this. The current small number of pupils makes the provision unviable, and also means that the school is unable to offer a comprehensive Welsh-medium curriculum to pupils. There is no reason to believe that these pupils would not have had the same opportunities to develop their Welsh language skills had they attended alternative schools which provide Welsh-medium secondary education.
5.3.9	Although the level of Welsh-medium provision at Brecon High School has not been consistent, it appears that the quality of education in the Welsh stream has been stronger than the quality of education in the school in general.	The authority notes this comment.
5.3.10	Closing the Welsh stream would destroy the sense of community Brecon Welsh stream provides  The Welsh stream in Brecon High School is like a family	The authority notes this comment. However, the number of pupils attending the Welsh-medium stream at Brecon High School is very small, and the authority's view is that this makes the provision unviable. In addition, the authority's view is that the small class sizes within the Welsh-medium stream is not providing an appropriate educational experience for pupils.
5.3.11	It is not a failing of the school that A levels are not offered through the medium of Welsh – through agreement of the south Powys post 16 consortium this provision has been centred on Builth Wells High School so it is never the case that Brecon would be offering these courses. The South Powys Consortium helps to maintain access to some A levels through the medium of Welsh	The authority notes this comment. The south Powys consortium for post-16 education is a collaborative model that has been developed jointly by the authority and schools. For a number of years, since before the establishment of the South Powys Consortium, Builth Wells High School has provided a number of Welsh-medium post-16 courses, however Brecon High School has not provided any Welsh-medium post-16 courses. Whilst it is true that Welsh-medium pupils could choose to study Welsh-medium subjects at other schools, no pupils have chosen this option.
5.3.12	Acknowledge the challenge to Brecon High School of maintaining the current provision within	The authority notes this comment and acknowledges the challenge faced by Brecon High School to maintain the current provision given the small number

	the budget constraints	of pupils accessing the school's Welsh-medium stream.
5.3.13	<p>Not all parents are looking for 8, 9 or 10 GCSEs in Welsh – Brecon High School gives the opportunity for pupils to be confidently bilingual when they leave school so that they can apply for jobs where Welsh language skills are necessary</p>	<p>The authority notes this comment. However, the authority's priority is to provide equality of opportunity for Welsh-medium pupils and to ensure that they are able to access a comprehensive Welsh-medium curriculum. The current provision at Brecon High School does not provide this opportunity.</p> <p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a category 4 school, which is described as a 'Predominantly English Medium Secondary School'.</p> <p>The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: 'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'</p> <p>Within this definition, the school could continue to offer some subjects through the medium of Welsh, which could include Welsh first language, to enable pupils to continue to develop their Welsh language skills, however this would be a decision for the school. There are examples of 'Predominantly English Medium Secondary Schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p>
5.3.14	<p>Year 11 at Brecon High School currently have very few subjects through the medium of Welsh – this puts a question on whether it's worth putting your child in Welsh-medium education if they eventually have to move for English-medium for most subjects</p> <p>When pupils were in year 7 they had lots of lessons in Welsh, now they only have 2</p>	<p>The authority notes this comment. The authority's priority is to provide equality of opportunity for Welsh-medium pupils and to ensure that they are able to access a comprehensive Welsh-medium curriculum. The current provision at Brecon High School does not provide this opportunity.</p>

5.3.15	Apart from the size of the Welsh stream at Brecon High School, what is the problem?	<p>As stated in the consultation document in respect of this proposal, the reasons for the proposal are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul>
5.3.16	If Builth Wells High School can have a Welsh stream with more subjects, why can't Brecon?	<p>In the Cabinet minutes of a meeting held on the 22<sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p> <p>Discussions took place with all schools about their Welsh-medium provision at the time and how they would develop this in order to move towards achieving the target of a Category 2B school. Whilst the Cabinet minutes refer to 'additional investment', it was not possible to fulfil this due to the challenging financial situation facing the council.</p> <p>The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools. Some schools, such as Builth Wells High School, have succeeded in strengthening and increasing the Welsh-medium provision available, however this has not been the case at Brecon High School.</p>
5.3.17	Dispute the need for two classes in each cohort – there has been just one class in Brecon and it has provided an excellent education	<p>As stated in the consultation document in respect of this proposal, the reasons for the proposal are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> </ul>

		<ul style="list-style-type: none"> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The small number of pupils currently attending the Welsh-medium stream at Brecon High School means that the school is only able to offer a limited range of Welsh-medium subjects to pupils, and this is exacerbated at Key Stage 4 when pupils choose their options subjects.</p>
<b>5.4 Brecon High School's Welsh ethos and commitment to Welsh-medium education</b>		
5.4.1	<p>Brecon High School has a fantastic Welsh ethos</p> <p>The Welsh ethos is high across the whole school</p> <p>Pupils at Brecon High School have constant opportunities to use Welsh</p> <p>Pupils have fantastic opportunities to see, hear and use Welsh at Brecon High School</p> <p>The ethos of Brecon High School will change if there is no Welsh stream in the school</p> <p>If the Welsh stream goes from the school, the Welshness will go as well</p> <p>If the Welsh stream closed, you wouldn't hear Welsh in the corridor in the high school</p>	<p>The authority is pleased to note the positive comments relating to Brecon High School's Welsh language ethos and the opportunities for pupils to use Welsh within the school. However, the fact remains that the number of pupils currently attending the Welsh-medium stream at the school is very small. The number of Welsh-medium pupils in the alternative providers which pupils would be expected to transfer to is significantly greater, therefore the authority's view is that this would lead to increased opportunities for pupils to use their Welsh.</p> <p>All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2<sup>nd</sup> Language to pupils, and would be expected to maintain a Welsh ethos.</p>
5.4.2	<p>The headteacher and teachers at Brecon High School are 100% in support of the Welsh stream</p> <p>Brecon High School has a new headteacher who needs time to prove to the council that he can</p>	<p>The authority is pleased to note the positive comments in relation to the support of the headteacher and staff of Brecon High School to the Welsh-medium stream. However, the fact remains that the number of pupils currently attending the Welsh-medium stream at the school is very small, which makes the provision unviable.</p>

	make a very successful Welsh stream in Brecon	
5.4.3	The previous 2 consultations showed how supportive Brecon High School is towards Welsh-medium education	The responses received during previous consultations were taken into consideration at the appropriate points within those processes. However the number of pupils accessing the Welsh-medium stream at Brecon High School is very small, which makes the provision unviable.
5.4.4	About 20 years ago, priority was given to Welsh speakers when appointing staff – however this policy changed when there was a change of headteacher – as there have been no teachers to deliver subjects through the medium of Welsh, Welsh-medium provision has decreased	The authority notes this comment and would agree that the diminishing level of Welsh-medium provision available at Brecon High School over a number of years is due to the fact that the school has not prioritised the appointment of staff who are able to deliver subjects through the medium of Welsh over a number of years.
<b>5.5 Contribution of Welsh-medium pupils to Brecon High School</b>		
5.5.1	<p>Welsh-medium pupils contribute to the development of the Welsh language in the school – how could they contribute without a Welsh stream in the school?</p> <p>The Welsh language environment at Brecon High School is strengthened by the 1<sup>st</sup> language students</p> <p>Concern about the implications for 2<sup>nd</sup> language Welsh pupils – they improve their language skills by speaking to 1<sup>st</sup> language students</p> <p>If there were no Welsh stream, there would be less Welsh events in the school – it would have an impact on the cultural side of the school</p> <p>The culture and ethos of Brecon High School has been strengthened by having Welsh-medium</p>	<p>The authority is pleased to note the positive comments in relation to the positive contribution made by Welsh-medium pupils to the Welsh language ethos of Brecon High School.</p> <p>All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2<sup>nd</sup> Language to all pupils and would be expected to provide opportunities for pupils to use Welsh outside the classroom.</p>

	<p>learners at the school</p> <p>Welsh-medium pupils have a positive impact on Brecon High School</p>	
5.5.2	<p>Welsh-medium pupils are completely immersed in the life of the school and are involved in the sports and musical life of the school</p> <p>Ysgol y Bannau pupils have been a large part of the back bone of activities at Brecon High School eg Orchestra, Drama, Sports</p> <p>Lots of Welsh stream pupils have already left which has impact on sports teams and other activities</p>	<p>The authority acknowledges the involvement of Welsh-medium pupils in a range of sports and cultural activities at Brecon High School. However the authority's priority is to provide equality of opportunity for Welsh-medium pupils and to ensure that they are able to access a comprehensive Welsh-medium curriculum. The current Welsh-medium provision at Brecon High School does not offer this.</p>
5.5.3	<p>You can't say that removal of the Welsh stream will not have an impact on the school</p>	<p>The authority fully acknowledges that the removal of the Welsh-medium stream would have an impact on Brecon High School. However due to the small number of pupils currently accessing the Welsh-medium stream at Brecon High School, the authority's view is that the impact would not be significant.</p>
5.5.4	<p>Transporting Welsh stream pupils from Brecon High School will have a negative impact on the school's success</p>	<p>Due to the current small number of Welsh-medium pupils at Brecon High School, the authority does not anticipate that implementation of the proposal would have a negative impact on Brecon High School.</p>
<p><b>5.6 Provision that could be offered at Brecon High School should the Welsh-medium stream close</b></p>		
5.6.1	<p>If the Welsh stream closes, Brecon needs to set up more facilities for 2<sup>nd</sup> language Welsh i.e. singing groups, more fun sessions to encourage Welsh as a second language</p> <p>What opportunities would you expect Brecon High</p>	<p>All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2<sup>nd</sup> Language to all pupils and would be expected to provide opportunities for pupils to use Welsh outside the classroom. The actual opportunities offered would depend on the school.</p>

	<p>School to provide to second language students to use Welsh if 1<sup>st</sup> language Welsh speakers were removed from the school?</p>	
5.6.2	<p>Could any provision be offered for Welsh-medium pupils if Brecon was a category 4 school?</p> <p>Would Welsh language pupils still be able to do Welsh first language at Brecon High School if it was a category 4 school?</p> <p>What will happen to children who are currently assessed in Welsh 1<sup>st</sup> language in Brecon at the end of Key Stage 3? Will they be able to continue to be assessed in Welsh 1<sup>st</sup> language or will they have to do Welsh 2<sup>nd</sup> language?</p> <p>If the Welsh stream closed, it is a joke that children would not be able to read, write or talk in Welsh except in Welsh 2<sup>nd</sup> language</p> <p>As a minimum, would like a commitment that Welsh 1<sup>st</sup> language GCSE and A level could be available in Brecon if the Welsh stream closed</p> <p>Would be a waste of time for Welsh-medium pupils to be expected to do Welsh 2<sup>nd</sup> language if they transferred to English-medium provision at Brecon High School. Understand that they would not be able to do first language as they would be disadvantaged by doing this without the support of the Welsh stream, but they should be able to do some kind of higher level Welsh e.g. 2<sup>nd</sup> language A level. The council must take responsibility for this and not leave it for the</p>	<p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a category 4 school, which is described as a 'Predominantly English Medium Secondary School'.</p> <p>The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: 'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'</p> <p>Whether or not to provide the opportunity for pupils who study Welsh First Language or any other subjects through the medium of Welsh would be a decision for the school. There are examples of 'Predominantly English Medium Secondary Schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p> <p>Brecon High School does not currently provide A level Welsh First Language, although pupils can access this subject at Builth Wells High School via the South Powys Collaboration, therefore it is very unlikely that this subject would be offered at Brecon should the Welsh-medium stream close.</p> <p>The authority's priority is to provide equality of opportunity for Welsh-medium pupils and to ensure that they are able to access a comprehensive Welsh-medium curriculum. The current provision at Brecon High School does not provide this opportunity.</p>

	<p>school to sort out</p> <p>Many parents have stated that they would accept a reduced number of subjects through the medium of Welsh at Brecon High School if necessary, even if just Welsh first language as a very last resort, if this allowed their children to remain locally</p>	
5.6.3	<p>If the Welsh stream closes next year, will pupils already in the school be able to do subjects in Welsh until they finish school?</p>	<p>As stated in the consultation document, the authority's proposal is as follows:</p> <p>'From the 1<sup>st</sup> September 2017, there would be no Welsh-medium provision in Brecon High School for pupils in years 7, 8, 9 and 10. However, Welsh-medium provision would continue to be provided in Brecon High School for those pupils who would be entering year 11 in September 2017. This provision would continue until July 2018.'</p> <p>The definition of a category 4 school 'Predominantly English Medium Secondary School' allows for the provision of one or two Welsh-medium subjects, which could include Welsh first language, however this would be a decision for the school to make.</p>
5.6.4	<p>A focus group has been created to look at creating a category 2B Welsh stream at Brecon High School regardless of the outcome of the ongoing consultation</p>	<p>The authority notes this comment. The authority would welcome the strengthening of the Welsh-medium provision in Brecon High School, however should the authority decide to proceed with implementation of the current proposal, the authority would not be able to provide any funding to support this development.</p> <p>The authority's priority is to provide equality of opportunity for Welsh-medium pupils and to ensure that they are able to access a comprehensive Welsh-medium curriculum. The current provision at Brecon High School does not provide this opportunity, and the authority's view is that the most effective way to improve the provision available to Welsh-medium pupils in the short term is to consolidate the current providers.</p>



<b>5.7 Criticism of the current Welsh-medium provision at Brecon High School</b>		
5.7.1	<p>The current Welsh-medium provision does not provide an opportunity for all pupils to access a full Welsh-medium curriculum throughout their educational careers.</p> <p>The current provision at Brecon High School is not acceptable from a language point of view</p>	The authority notes this comment.
5.7.2	The unsatisfactory Welsh-medium provision at Brecon High School has had an impact on the number of pupils accessing Welsh-medium education as some parents have not chosen Welsh-medium education whilst others have chosen Welsh-medium primary education but moved their children to private education on transfer to secondary.	The authority notes this comment.
5.7.3	With regard to the Welsh Government's Welsh language categories, Brecon High School is currently classified as a category 3 school – this level of provision is unsatisfactory compared with the provision at a category 1 or category 2A school.	The authority notes this comment.
5.7.4	The level of Welsh-medium provision at Brecon High School has not improved over many years, in fact it has deteriorated significantly.	The authority notes this comment.
5.7.5	Historically, Brecon High School has struggled to recruit Welsh-medium teachers to teach in the stream at Brecon	The authority notes this comment.

5.7.6	English is the main language used in the school, for example in assemblies, sports, performances, during break times	The authority notes this comment.
5.7.7	Some parents are under the impression that the current arrangement at Brecon High School provides sufficient Welsh-medium provision and will enable pupils to become fully bilingual, however this is not the case.	The authority notes this comment.
5.7.8	There is a lack of understanding among parents in relation to the level of provision at Brecon High School – they are shocked to realise the true picture.	The authority notes this comment.
5.7.9	The school has not been honest in terms of the information shared with parents about the level of Welsh-medium provision available.	The authority notes this comment.
<b>5.8 Other</b>		
5.8.1	There would be a big impact on Brecon High School if there was no Welsh stream in the school	The authority notes this comment.
5.8.2	It's good that pupils can learn in two languages in Brecon High School	The authority notes this comment and agrees that in an ideal world, all schools would provide opportunities for pupils to learn in Welsh. However, due to the small number of pupils currently accessing Welsh-medium provision at Brecon High School, the school is unable to provide equality of opportunity for Welsh-medium pupils compared with the opportunities available to English-medium pupils.
<b>6 GENERAL ISSUES RELATING TO BRECON HIGH SCHOOL</b>		
<b>6.1 Quality of education at Brecon High School</b>		

6.1.1	Do not agree that the education provided in Brecon High School is of a poor standard – the standard of education is excellent	Whilst the school was removed from Special Measures in November 2016, Brecon High School had been in Special Measures since February 2014.
6.1.2	Standards in Brecon High School are now one of the best in the county	<p>In terms of the level 2 inclusive indicator, Brecon High School performed above the line of modelled expectations in 2016, which placed the school among the higher performing schools in Powys for this indicator.</p> <p>However, school performance is compared with similar schools across Wales based on free school meals eligibility, not with other schools in Powys. Whilst the level 2 inclusive indicator placed the school in the higher 50% of similar schools, for level 2, level 1 and Capped 8, the school performed in the bottom 25% of similar schools, and in the lower 50% of similar schools for Core Subject Indicator.</p>
6.1.3	<p>Brecon High School is now out of special measures</p> <p>The timing of the consultation is unfortunate as Brecon has now been taken out of Special Measures</p> <p>Brecon High School has come out of Special Measures by working hard to be the best school and to offer our children the best education and experience</p> <p>Children and teachers at Brecon High School have worked hard to come out of special measures</p>	It is true that Brecon High School has now been removed from Special Measures. Cabinet members will be made aware of this when they are determining how to proceed in relation to this proposal.
6.1.4	Standards in Welsh 2 <sup>nd</sup> language at Brecon High School have improved due to the contribution of the Welsh-medium stream	Standards in Welsh 2 <sup>nd</sup> language have improved at Brecon High School. However, there is no evidence that this is due to the Welsh-medium stream.

6.1.5	Brecon High School is showing clear evidence of improvement	The authority acknowledges in the consultation document in respect of this proposal that 'There has been a good improvement trajectory of performance in recent years' at Brecon High School. Since the consultation document was published, Brecon High School has been removed from Special Measures. Cabinet members will be made aware of this when they are determining how to proceed in relation to this proposal.
6.1.6	With regard to National School Categorisation System Brecon is now on a par with Ystalyfera and above Builth having achieved 2B	Ysgol Gyfun Ystalyfera is placed in the Green support category. Builth High School is placed in the Amber support category. However, both Brecon and Builth are placed in Standards Group 2 by Welsh Government.
6.1.7	The results from Ystalyfera and Builth compared to Brecon show that fuller immersion in Welsh does not mean better results. Estyn have said that this consultation and previous consultations have not proved that there will be educational improvements	Estyn's response to the current consultation is provided on page 13 of this report. In their response, Estyn conclude that: 'the proposer appears to have suitably demonstrated that, given the small numbers of pupils in the Welsh-medium stream, that overall the proposal is likely to at least maintain the current standards of education in the area.'
<b>6.2 Issues relating to the planned new building</b>		
6.2.1	<p>Unfair that local Welsh-medium children will not have an opportunity to be part of the brand new schools</p> <p>What message will it send to Ysgol y Bannau pupils if there is a brand new secondary school building across the road but if you speak Welsh you have to go to school 20 miles away</p> <p>You will have a Welsh-medium primary school directly opposite the new building but you are saying that those pupils will not be coming to Brecon High School's new school</p> <p>Welsh-medium pupils will be missing out on the</p>	<p>Whilst a new building for Brecon High School would be a fresh start for secondary education in Brecon, there would be no significant increase in Welsh-medium pupil numbers in the short term, therefore it would be difficult for the new school to offer any more Welsh-medium subjects than are currently offered.</p> <p>The quality of accommodation at Builth Wells High School was rated B by the Welsh Government's 21<sup>st</sup> Century Schools Survey, therefore the authority has no concerns about the quality of accommodation at Builth Wells.</p> <p>Whilst the condition of Ysgol Gyfun Ystalyfera was rated D, capital work is currently being undertaken to improve the quality of accommodation at the school. The school's condition grading will improve as a result of this work.</p> <p>Should this proposal be implemented, there would be no Welsh-medium</p>

<p>opportunity to attend a new school with new facilities</p> <p>Disgusted that the council are trying to shut down the Welsh-medium stream despite spending £50 million on a new school</p> <p>If there is no Welsh stream in the new school, it would be like saying 'You can't come here' to the Welsh-medium pupils</p> <p>It's unfair that you are spending millions on a new school but you are not letting Welsh-medium pupils come into it</p> <p>To provide a new school at the exclusion of a Welsh stream would be denying equality</p> <p>Should the proposal go ahead, it would result in a 21<sup>st</sup> Century School that accepts students from most backgrounds, including Nepalese and Eastern Europe, providing them with all the amenities and advantages that Powys would hope for, but telling our local Welsh-speaking stakeholders that they are excluded</p> <p>All the diverse communities who work and study effectively together will be welcome in the new building except those who wish to be educated in Welsh</p> <p>Welsh-medium pupils will not be able to reap the rewards of the new super school – one standard of learning environment for English speakers, a lesser one for Welsh speakers – this is possibly</p>	<p>stream in Brecon High School, and therefore there would be no Welsh-medium stream at the new school building. However Welsh-medium pupils would still be able to apply for a place in Brecon High School, should that be their preference, and places would be allocated in accordance with the authority's Admissions Policy.</p>
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	<p>racist</p> <p>It would be an error to spend millions of pounds on a new building for Brecon High School and to disenfranchise Welsh speakers</p> <p>In these more optimistic times for Brecon High School it would be more forward thinking of Powys to include our Welsh speaking students and all the academic, sporting and artistic talent they can bring in a flagship, future proof school</p>	
6.2.2	<p>A new “super school” will attract new teachers, good teachers who will want to work in this new, first class environment, children will perform better and will have the best possible learning environment, however only children learning through English will be able to benefit from this</p>	<p>The authority has no concerns about the quality of accommodation that would be available at the alternative providers to which pupils may transfer should the proposal be implemented. As stated in the consultation document, the condition of Builth Wells High School was graded B by the Welsh Government’s 21<sup>st</sup> Century Schools Survey, and whilst the condition of Ysgol Gyfun Ystalyfera was graded D, capital work is currently being undertaken to improve the quality of accommodation at this school.</p> <p>Concerns have been raised in relation to the ability of the two current dual stream providers in mid and south Powys to attract and appoint Welsh-medium teachers, the authority would hope that centralising the provision would improve the opportunities to recruit high quality Welsh-medium teachers.</p>
6.2.3	<p>If the Welsh stream is removed, planning for the new building would be undertaken based on this knowledge, which would make it very difficult to re-establish a Welsh stream in the future in a school potentially only planned for English-medium pupils</p>	<p>The authority notes this comment.</p>
6.2.4	<p>Building a new school is an opportunity for Powys to get behind the aim to ensure 1 million Welsh</p>	<p>Whilst a new building for Brecon High School would be a fresh start for secondary education in Brecon, there would be no significant increase in</p>

	<p>speakers</p> <p>The new building in Brecon would be a golden opportunity to create a transformational change to Welsh-medium secondary education in Brecon</p> <p>If there was a Welsh stream in the new build, the Welsh stream would appeal to more parents</p> <p>If there was a Welsh stream in the new school, do you think the numbers would increase?</p> <p>Welsh-medium provision could be strengthened in the new school if the council was prepared to offer more leadership and to insist that the provision developed</p>	<p>Welsh-medium pupil numbers in the short term, therefore it would be difficult for the new school to offer any more Welsh-medium subjects than are currently offered.</p>
6.2.5	<p>Parents of pupils in Sennybridge CP School will be moving their children to Brecon High School when the new school building is opened</p>	<p>The authority notes this comment. Should the proposal be implemented, pupils of Sennybridge CP School could choose between accessing Welsh-medium provision at Ysgol Gyfun Ystalyfera or English-medium provision at Brecon High School. Capital work is currently being undertaken to improve the quality of accommodation at Ysgol Gyfun Ystalyfera. The authority is satisfied that the quality of accommodation at Ystalyfera will be comparable to the quality of accommodation at Brecon High School once the new school building is opened.</p>
6.2.6	<p>When you submitted the business case for funding for the new school to Welsh Government, were they aware of your proposal to remove Welsh-medium provision?</p>	<p>The Outline Business Case that was submitted to Welsh Government in September 2016 was for capital investment in a new 11-18 English-medium school. The OBC was submitted on a without prejudice basis to any decisions taken by Cabinet. The OBC was approved in October 2016.</p>
6.2.7	<p>The case for a new school at Brecon was always pitched as a bilingual school</p>	<p>Whilst a new building for Brecon High School would be a fresh start for secondary education in Brecon, there would be no significant increase in Welsh-medium pupil numbers, therefore it would be difficult for the school to offer any more Welsh-medium subjects than are currently offered.</p>

6.2.8	Ridiculous to invest millions of Welsh money in a new school but not include provision for the Welsh language stream – was this included in the original business case?	The Strategic Outline Case that was submitted to Welsh Government in March 2015 was for an 11-16 English-medium school.
6.2.9	<p>Welsh Government has agreed that Brecon High School will be developed up to and including a sixth form – this is an ideal opportunity to include plans for the Welsh-medium stream within that</p> <p>When the new school is built, there could be 150 in the 6<sup>th</sup> form – this would have an impact on the curriculum offer at post 16, and the school could then offer more Welsh-medium classes</p>	<p>Welsh Government has approved the Outline Business Case for an 11-18 English-medium school for 750 pupils. The authority will be submitting a Full Business Case to the Welsh Government for funding, which will reflect the outcome of this consultation. It includes 150 sixth form places, however as it currently stands, the proposal is for an English-medium school, and Welsh-medium sixth form subjects would continue to be delivered from Builth Wells. Whilst a new building for Brecon High School would be a fresh start for secondary education in Brecon, there would be no significant increase in Welsh-medium pupil numbers in the short term, therefore it would be difficult for the new school to offer any more Welsh-medium subjects than are currently offered. This would also be the case in relation to sixth form provision.</p>
6.2.10	Transporting Welsh speaking children out of Brecon will significantly increase the carbon footprint of the new building	The authority acknowledges that additional travel would have an environmental impact. However, following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. Should the proposal be implemented, the additional transport that would be required would be minimal.
6.2.11	Want assurance that Ysgol y Bannau pupils can be accommodated under English-medium in the new building and not assumed that parents will send their children to Builth / Ystalyfera	Ysgol y Bannau pupils will be able to apply for a place in Brecon High School, should that be their preference, and places would be allocated in accordance with the authority's Admissions Policy.
6.2.12	A new school building is all Brecon needs to be a successful, excellent school	The authority notes this comment.



6..2.13	A Welsh stream would enhance the new build	The authority notes this comment. However, the authority's priority is to ensure equality of provision for Welsh-medium learners compared with English-medium learners. The current small number of Welsh-medium pupils at Brecon High School means that the Welsh-medium provision offered is limited and does not provide equality for Welsh-medium learners compared with English-medium learners. Whilst a new building for Brecon High School would be a fresh start for secondary education in Brecon, there would be no significant increase in Welsh-medium pupil numbers, therefore it would be difficult for the school to offer any more Welsh-medium subjects than are currently offered.
<b>6.3 Staff at Brecon High School</b>		
6.3.1	The proposal is causing uncertainty for staff  Teachers have moved because of the consultation	The authority acknowledges that any school reorganisation proposal leads to a period of uncertainty for members of staff affected by the proposal, and that this has been exacerbated by the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School. The authority is keen to conclude this process as swiftly as possible in order to end this period of uncertainty for all those affected by the proposal.
6.3.2	The school has been under pressure for many years, yet the same staff are still here – this shows their commitment  The school's staff are committed	The authority is pleased to note the commitment of the staff of Brecon High School.
6.3.3	What will happen to the teachers who only teach subjects in Welsh?	The authority acknowledges that any school reorganisation proposal leads to a period of uncertainty for members of staff affected by the proposal, and that the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School has caused ongoing uncertainty for members of staff at the school that teacher through the medium of Welsh. It is possible that closure of the Welsh-medium stream at Brecon High School would have an impact on the number of teaching staff required by the school. Should the proposal be implemented, the authority would support the school with the management of change procedures, if required.

<b>6.4 Other</b>		
6.4.1	There are a lot of people in Brecon who would not want their children educated anywhere other than Brecon High School	The authority notes this comment. Should there be no Welsh-medium stream at Brecon High School, parents would be able to apply for a place for their children at an alternative school which provides education through the medium of Welsh or they could apply for a place for their child in Brecon High School, where they would be educated through the medium of English. Places would be allocated in line with the authority's Admissions Policy.
6.4.2	Brecon High School is a Powys County Council school too and should be treated as equal to other schools	The authority is fully aware that Brecon High School is a Powys County Council school, and disagrees that the school has not been treated as equal to other schools.
<b>7 ISSUES RELATING TO BUILTH WELLS HIGH SCHOOL</b>		
<b>7.1 Quality of education at Builth Wells High School</b>		
7.1.1	<p>Builth Wells High School's last Estyn report put the school into Special Measures</p> <p>Builth Wells High School has failed its inspection due to the actual education provided at the school</p> <p>Estyn have labelled Builth as a failing school with inadequate prospects for improvement</p> <p>Builth is in Special Measures with unsatisfactory chance of improvement</p>	<p>It is true that Builth Wells High School is currently in Special Measures, following an inspection which took place in October 2015. This is stated on page 36 of the consultation document in respect of this proposal. However, the authority is confident that the school is making good progress.</p> <p>Builth Wells High School was placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017. The capacity to improve at the school has improved, as evidenced in the National Categorisation of Schools.</p>
7.1.2	<p>It's unfair for Brecon children to be forced to a school that is failing its children by the education it provides</p> <p>Unfair that local Welsh-medium children will be</p>	<p>It is true that Builth Wells High School is currently in Special Measures, following an inspection which took place in October 2015. This is stated on page 36 of the consultation document in respect of this proposal. However, the authority is confident that the school is making good progress.</p>

	<p>sent to a school that is in Special Measures</p> <p>It is unreasonable to suggest that transferring children out of a school that is not in special measures could be better educationally</p> <p>Unfair to move children from a school that is improving and to move them to a school that is failing and not improving</p> <p>Unfair to propose that Welsh-medium provision transfers to a school that has just gone into special measures</p>	<p>Both Builth Wells High School and Brecon High School were placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017.</p> <p>As stated in the proposal outlined on page 3 of the consultation document, should the proposal be implemented 'Pupils living in other parts of the catchment area currently served by the Welsh-medium stream at Brecon High School that live closer to alternative Welsh-medium secondary provision outside Powys would have the opportunity to transfer to these schools.' A proportion of pupils living in the current catchment area of the Welsh-medium stream would live closer to Ysgol Gyfun Ystalyfera, which is not in special measures.</p>
7.1.3	<p>Closing Builth to wipe the fact that the school is in special measures will mean that points like those highlighted in the Estyn report will take longer to be sorted and corrected</p> <p>Builth High School is still in Special Measures and it looks like the only way out is for the school to be closed and re-opened as a new school, rather than actually improving and putting better procedures in place as has happened at Brecon High School</p>	<p>The proposal to establish a new dual-sited school that will operate from the current sites of Builth Wells and Llandrindod High Schools is intended to deliver a sustainable model of secondary education in the area, which would be able to provide high quality education. It is true that the proposed new school would replace two schools that are currently in special measures. The fact that the schools are in special measures is a key reason for the proposal.</p> <p>In respect of Builth Wells High School, the school is currently in Special Measures, following an inspection which took place in October 2015. However, the authority is confident that the school is making good progress.</p> <p>Builth Wells High School was placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017. The capacity to improve at the school has improved, as evidenced in the National Categorisation of Schools.</p>
7.1.4	<p>Alarming that the council wants to make changes and put further pressure on Builth Wells High School with increased numbers when they are in special measures – getting their house in order should be their priority before putting extra work,</p>	<p>It is true that Builth Wells High School is currently in Special Measures, following an inspection which took place in October 2015. This is stated on page 36 of the consultation document in respect of this proposal. However, the authority is confident that the school is making good progress.</p>

	pressure and changes on them	<p>Builth Wells High School was placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017. The capacity to improve at the school has improved, as evidenced in the National Categorisation of Schools.</p> <p>The proposal's impact on Builth Wells High School / the New Mid Powys Secondary School is considered on page 27-28 of the consultation document. In respect of the impact on leadership and management at the school, the authority concluded that 'It is possible that implementation of the proposal may place some additional pressure in terms of leadership and management in the short term, as the school may need to make arrangements to accommodate additional pupils. However, the proposal is not expected to have a negative impact in the longer term.'</p> <p>A number of pupils that previously attended the Welsh-medium stream at Brecon High School have already transferred to the Welsh-medium stream at Builth Wells High School, therefore the authority has already had to make arrangements to accommodate these additional pupils. The number of pupils currently attending the Welsh-medium stream at Brecon High School is small, therefore the additional impact should these pupils transfer to Builth would be minimal.</p>
7.1.5	Why would parents want their children to go to a school that is failing and is 20 miles away?	<p>As stated in the consultation document in respect of this proposal, the reasons for the proposal are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>There are more Welsh-medium pupils at Builth Wells High School compared with Brecon High School, therefore pupils would be part of a larger cohort of pupils. In addition, greater curriculum choice is offered to Welsh-medium pupils throughout all key stages of education.</p>

		<p>Whilst it is true that Builth Wells High School is currently in Special Measures, following an inspection which took place in October 2015, the authority does not agree that the school is 'failing' – the authority is confident that the school is making good progress. Builth Wells High School was placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017, and the capacity to improve at the school has improved, as evidenced in the National Categorisation of Schools.</p> <p>The authority acknowledges that implementation of the proposal would lead to additional travel for the affected pupils.</p>								
7.1.6	Some pupils have gone to Ystalyfera because Builth Wells High School is in Special Measures	The authority notes this comment.								
<b>7.2 Comparisons between Builth Wells High School and Brecon High School</b>										
7.2.1	Builth Wells High School is in a far worse situation than Brecon and has had an Estyn report that is worse than any of Brecon's	<p>It is true that Builth Wells High School is currently in Special Measures, following an inspection which took place in October 2015. This is stated on page 36 of the consultation document in respect of this proposal. However, the authority is confident that the school is making good progress.</p> <p>Builth Wells High School was placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017. The capacity to improve at the school has improved, as evidenced in the National Categorisation of Schools.</p>								
7.2.2	As stated in the Consultation Document, Capacity to Improve for Brecon is C and the school is rated as Amber, whereas Capacity to Improve for Builth is D and the school is rated Red	<p>The capacity to improve at both Brecon and Builth Wells High Schools have improved in the 2017 National Categorisation of Schools. The 2017 categorisations for both schools are provided in the following table:</p> <table border="1"> <thead> <tr> <th>School</th> <th>Standards Group</th> <th>Improvement Capacity</th> <th>Support Category</th> </tr> </thead> <tbody> <tr> <td>Brecon High School</td> <td>2</td> <td>B</td> <td>Yellow</td> </tr> </tbody> </table>	School	Standards Group	Improvement Capacity	Support Category	Brecon High School	2	B	Yellow
School	Standards Group	Improvement Capacity	Support Category							
Brecon High School	2	B	Yellow							

		Builth Wells High School	2	C	Amber
7.2.3	Classroom control is poorer in Builth than in Brecon – this was highlighted strongly in the Estyn report re Builth, and was also highlighted to the children of the Brecon Welsh stream when they went there to do a taster day	It is true that Estyn identified that ‘Pupils in a few classes display poor behaviour’ in the core inspection of Builth Wells High School carried out in 2015. However, in Estyn’s monitoring visit in June 2016, they judged that ‘Most pupils behave well in lessons.’			
7.2.4	The work at Builth High School isn’t as challenging as it is in Brecon, this was highlighted by children from the Welsh stream who visited Builth and in the Estyn report that put Builth into special measures recently	The authority notes this comment. However the number of pupils accessing the Welsh-medium stream at Brecon High School, which make the provision unviable.			
7.2.5	Educational achievement is lower in Builth than it is in Brecon  Brecon students achieve better than Builth students	Both schools were placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017.			
7.2.6	Builth is in Special Measures but Brecon is improving	It is true that Builth Wells High School is in Special Measures following an inspection which took place in October 2015, whilst Brecon High School was removed from Special Measures following a monitoring visit in November 2016. However, Builth Wells High School is also securing improvements. The school was placed in Standards Group 2 by Welsh Government in the National Categorisation in 2017, and capacity to improve at the school has also improved, as evidenced in the National Categorisation of Schools.			
<b>7.3 Welsh-medium pupil numbers at Builth Wells High School</b>					
7.3.1	There are not currently viable numbers of Welsh-medium learners at Builth	The current number of Welsh-medium pupils at Builth Wells High School is significantly larger than the number of Welsh-medium pupils at Brecon High School.			

	Are you happy with the number of pupils in the cohort at Builth Wells High School now?																																														
7.3.2	Welsh-medium pupil numbers in the Builth catchment are decreasing year on year, numbers in the Brecon catchment are increasing	<p>The number of Welsh-medium primary pupils in the current catchment area of Brecon High School is provided on page 12 of the consultation document. This information does not show that pupil numbers are consistently increasing year on year.</p> <p>The number of Welsh-medium primary pupils in the current catchment area of Builth Wells High School are as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Builth Wells CP School</th> <th>Llandrindod C. in W. School Trefonnen</th> <th>Rhayader C. in W. School</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td><b>R</b></td> <td>22</td> <td>8</td> <td>8</td> <td>38</td> </tr> <tr> <td><b>1</b></td> <td>11</td> <td>20</td> <td>9</td> <td>40</td> </tr> <tr> <td><b>2</b></td> <td>16</td> <td>8</td> <td>11</td> <td>35</td> </tr> <tr> <td><b>3</b></td> <td>14</td> <td>8</td> <td>7</td> <td>29</td> </tr> <tr> <td><b>4</b></td> <td>21</td> <td>12</td> <td>13</td> <td>46</td> </tr> <tr> <td><b>5</b></td> <td>19</td> <td>11</td> <td>4</td> <td>34</td> </tr> <tr> <td><b>6</b></td> <td>14</td> <td>6</td> <td>5</td> <td>25</td> </tr> <tr> <td><b>Total</b></td> <td><b>117</b></td> <td><b>73</b></td> <td><b>57</b></td> <td><b>247</b></td> </tr> </tbody> </table> <p>This shows that the number of Welsh-medium pupils in the current catchment of the Welsh-medium stream at Builth Wells High School is larger than the number of Welsh-medium pupils in the current catchment of the Welsh-medium stream at Brecon High School in all year groups.</p>		Builth Wells CP School	Llandrindod C. in W. School Trefonnen	Rhayader C. in W. School	Total	<b>R</b>	22	8	8	38	<b>1</b>	11	20	9	40	<b>2</b>	16	8	11	35	<b>3</b>	14	8	7	29	<b>4</b>	21	12	13	46	<b>5</b>	19	11	4	34	<b>6</b>	14	6	5	25	<b>Total</b>	<b>117</b>	<b>73</b>	<b>57</b>	<b>247</b>
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7.3.3	<p>If the extra hypothetical Welsh-medium children don't go to Builth, Builth won't be able to offer the predicted improvements</p> <p>It's clear that Builth High School will not achieve the critical mass of Welsh-medium pupils needed</p>	<p>The authority has identified in the consultation document in respect of this proposal that there are a number of risks linked to implementation of the proposal. These include the risk that 'pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school' and that 'pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon'.</p>																																													

	<p>to provide a “greatly improved” learning environment to pupils</p> <p>Less than 50% of this year’s year 6 at Ysgol y Bannau have chosen Builth High School for September 2017 – this is less than expected and a blow to establishing a critical mass of pupils in Builth</p> <p>Not all Welsh-medium learners have moved to Builth, therefore you haven’t created the critical mass you hoped to create</p> <p>Current indications from parents / pupils at Ysgol y Bannau suggest that a ‘critical mass’ would not be achieved – parents would send their children to the English stream at Brecon instead of sending them to Builth</p> <p>The stream at Builth will remain the size it was before the threat of closure of the stream in Brecon</p> <p>Closing the provision in Brecon to increase the numbers in Builth will not work in the long term</p> <p>The number of Welsh-medium pupils going to Builth will be low initially and even lower in the future</p> <p>Centralising in Builth will only increase the numbers in Builth slightly, and numbers will decline drastically in the future</p>	<p>These risks acknowledge the uncertainty in relation to the number of pupils that could be attending provision in Builth Wells in the future, and that it is likely that not all Welsh-medium learners will transfer to Builth Wells.</p> <p>However, more Welsh-medium secondary provision is currently provided in Builth Wells compared with the provision at Brecon High School, therefore the authority is satisfied that even if less pupils than expected from the Brecon area transfer to Builth Wells High School / the New Mid Powys Secondary School, more Welsh-medium provision will continue to be available to them compared with the provision at Brecon High School.</p>
7.3.4	Parents already know which high school their	On page 16 of the consultation document in respect of this proposal, the



	<p>children will attend when they decide which primary school they wish their children to attend, therefore parents of current pupils at Ysgol y Bannau will not wish their children to attend Builth Wells High School</p>	<p>authority identified the risk that ‘Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school’. The document also states that ‘In the short term, the authority would expect there to be some reduction in the proportion of pupils from the Brecon area continuing to access Welsh-medium provision in the secondary sector’.</p> <p>However, the current Welsh-medium provision in Brecon High School is very limited and the authority’s view is that this does not provide equality of opportunity for Welsh-medium pupils.</p> <p>As stated in the consultation document ‘Retaining pupils within the Welsh-medium sector is one of the Welsh Government’s priorities, and the authority will work with the primary schools concerned to establish transition links with the alternative providers with the aim of reversing any reduction in transfer rates into KS3 in the longer term.’</p>
7.3.5	<p>Builth High School will get even more undesirable for Brecon parents as people see and hear that other families are constantly backwards and forwards between Builth and Brecon</p>	<p>The authority notes this comment and accepts that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils’ future education. However, the current number of pupils accessing the Welsh-medium stream at Brecon High School is very small which makes it unviable.</p>
7.3.6	<p>The council wants to close the stream in Brecon now because if they left it a few more years Brecon would have more pupils than Builth</p>	<p>This is untrue. The reasons why the authority is proposing to close the Welsh-medium stream at Brecon High School are stated in the consultation document in respect of the proposal, and are as follows:</p> <ul style="list-style-type: none"> <li>- ‘Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education’</li> </ul>
<p><b>7.4 Welsh-medium provision at Builth Wells High School</b></p>		

7.4.1	How many subjects are currently taught through the medium of Welsh in Builth?	<p>During the current academic year, the following number of subjects are taught through the medium of Welsh in years 7-11 at Builth Wells High School:</p> <table border="1" data-bbox="1016 296 1868 541"> <thead> <tr> <th>Year</th> <th>Number of Welsh-medium subjects</th> <th>Number of bilingual subjects</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>12</td> <td>0</td> </tr> <tr> <td>8</td> <td>12</td> <td>0</td> </tr> <tr> <td>9</td> <td>12</td> <td>0</td> </tr> <tr> <td>10</td> <td>9</td> <td>5</td> </tr> <tr> <td>11</td> <td>9</td> <td>4</td> </tr> </tbody> </table>	Year	Number of Welsh-medium subjects	Number of bilingual subjects	7	12	0	8	12	0	9	12	0	10	9	5	11	9	4
Year	Number of Welsh-medium subjects	Number of bilingual subjects																		
7	12	0																		
8	12	0																		
9	12	0																		
10	9	5																		
11	9	4																		
7.4.2	It's unfair that Builth High School was able to go ahead with increasing Welsh-medium provision	<p>In the Cabinet minutes of a meeting held on the 22<sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p> <p>Discussions took place with all schools about their Welsh-medium provision at the time and how they would develop this in order to move towards achieving the target of a Category 2B school. Whilst the Cabinet minutes refer to 'additional investment', it was not possible to fulfil this due to the challenging financial situation facing the council.</p> <p>The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools. Some schools, such as Builth Wells High School, have succeeded in strengthening and increasing the Welsh-medium provision available, however this has not been the case at Brecon High School.</p>																		
7.4.3	In the first consultation the council said they would use Ysgol y Bannau children to improve the standard of Welsh in Builth – this is not a reason	The council did not say they would 'use Ysgol y Bannau children to improve the standard of Welsh in Builth' in the first consultation on closure of the Welsh-medium stream at Brecon High School. In the consultation document																		

	to make Ysgol y Bannau children travel. If Builth's standard of Welsh is not good enough then improve the teaching not transport the better performing children to Builth to improve their standard	issued at that time, the council identified as an advantage of the proposal that 'an increased number of Welsh-medium pupils would enable Builth Wells High School to further develop its Welsh ethos'.
7.4.4	Builth shows more bilingualism in the way the school is run than Brecon ever did	The authority notes this comment.
7.4.5	Although there is more Welsh-medium provision in Builth than in Brecon, it is not as consistent as Brecon in all departments	The authority notes this comment.
7.4.6	The council has been unable to ensure the development of the Welsh-medium stream in Brecon High School, so there is no assurance that the council cannot ensure this in Builth Wells High School either	The authority notes this point. However, in recent years Builth Wells High School has actively developed its Welsh-medium provision, through the recruitment of additional Welsh-medium teachers. The authority is satisfied that the current SMT and governing body at Builth Wells High School are committed to the further development of Welsh-medium provision.
7.4.7	Proposal to extend the Welsh medium curriculum at Builth Wells may not materialise given you are unlikely to increase your critical mass sufficiently	<p>The authority notes this concern. On page 16 of the consultation document, the council identified a risk that 'Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'. In the risk management measures in relation to this risk, the authority states the following: 'Retaining pupils within the Welsh-medium sector is one of the Welsh Government's priorities, and the authority will work with the primary schools concerned to establish transition links with the alternative providers with the aim of reversing any reduction in transfer rates into KS3 in the longer term.'</p> <p>More Welsh-medium secondary provision is currently provided in Builth Wells compared with the provision at Brecon High School, therefore the authority is satisfied that even if less pupils than expected from the Brecon area transfer to Builth Wells High School / the New Mid Powys Secondary School, more Welsh-medium provision will continue to be available to them compared with the provision at Brecon High School.</p>

7.4.8	There are more Welsh medium pupils in Builth so Welsh-medium pupils would hear more Welsh	The authority agrees that the fact that there are more Welsh-medium pupils in Built Wells High School than there are at Brecon High School would mean that pupils would have more opportunities to use Welsh.
<b>7.5 Other</b>		
7.5.1	Builth have said that they can't do any more than they do now to accommodate pupils in terms of access to after school activities, and that Ysgol y Bannau pupils aren't the only pupils that travel to school so they can't give them any extra help	The authority notes this concern. The authority has acknowledged that implementation of the proposal would impact on the ability of pupils to access after school activities should they transfer to the provision at Builth Wells. Builth Wells High School, and particularly the Welsh-medium stream, already serves a large catchment area, and many pupils are reliant on home to school transport. The authority's view is that pupils from the Brecon area transferring to Builth Wells High School / the New Mid Powys Secondary School would not be disadvantaged compared to other pupils that already attend the school.
7.5.2	Moving provision to Builth is a short term solution not a long term solution	The authority disagrees with this comment. As stated on page 21 of the consultation document, 'the authority's view is that closure of the Welsh-medium stream at Brecon High School is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.'
7.5.3	Will Builth Wells High School be given additional financial support, advice or direction from the council to address solutions? Are the school aware of their additional responsibilities to help deliver solutions you don't have an answer for? Are you putting the schools in a situation for which there may be no acceptable solution without you committing additional resources? Concern that Builth High School, already in special measures, will be under more pressure	The proposal's impact on Builth Wells High School is considered on pages 27-28 of the consultation. In addition, Builth Wells High School were consultees as part of the consultation, and could have contacted the authority to raise any concerns they had in relation to implementation of the proposal.

7.5.4	If parents wanted their children to go to Builth Wells High School they would have sent them to primary schools in Builth Wells to start with	Pupils in the Brecon area would not be eligible for home to school transport to attend primary provision in the Builth Wells catchment, therefore it is unlikely that parents would have sent their children to primary schools in the area.
<b>8 ISSUES RELATING TO YSGOL GYFUN YSTALYFERA</b>		
8.1	<p>Families in Sennybridge are realising that travelling to Ystalyfera, out of the area, is not a positive thing for their children</p> <p>Children and families from Sennybridge are starting to choose Brecon Welsh stream over Ystalyfera</p> <p>Pupils who have chosen Ystalyfera in the past are now looking to Brecon since realising that travelling is not a positive option</p> <p>Unfair that pupils in Sennybridge will only be able to choose a single language secondary school</p>	<p>In recent years, the majority of Welsh-medium pupils from Sennybridge C.P. School have transferred to Ysgol Gyfun Ystalyfera for secondary provision. As stated in the consultation document in respect of this proposal 'This is a pattern that has developed over time...where parents have chosen for their children to attend Ysgol Gyfun Ystalyfera for their secondary provision, partly due to the greater level of Welsh-medium provision available.'</p> <p>Ysgol Gyfun Ystalyfera is a Welsh-medium secondary school, and can offer a full Welsh-medium curriculum to pupils. As stated in the council's draft Welsh in Education Strategic Plan (WESP) for 2017-20, 'The authority fully agrees with the view of Welsh Government that pupils are more likely to become fully bilingual after attending Welsh-medium schools, particularly when they come from non-Welsh speaking homes'.</p>
8.2	Why are you so adamant that Sennybridge Welsh stream should feed Ystalyfera when the distance to Ystalyfera is 18 miles, 10 miles further than to Brecon High School? What are your motives?	<p>In recent years, the majority of Welsh-medium pupils from Sennybridge C.P. School have transferred to Ysgol Gyfun Ystalyfera for secondary provision. This has been the choice of parents, partly due to the greater level of Welsh-medium provision available.</p> <p>Ysgol Gyfun Ystalyfera is a Welsh-medium secondary school, therefore the Welsh-medium provision available to pupils is significantly greater than that offered in Brecon High School, or any other dual stream school. The authority's view is that the additional travel distance of 10 miles referred to is not an unreasonable additional distance in order to access full Welsh-medium provision, and this is supported by the parents who have chosen for their children to transfer to Ystalyfera in recent years.</p> <p>The authority's only motive is to ensure that pupils from the Sennybridge area</p>

		continue to be able to access Welsh-medium secondary provision of the highest quality, and should this proposal be implemented, the authority would take steps to formalise the arrangement with Neath Port Talbot County Borough Council to ensure that the Sennybridge is included in the official catchment area of Ysgol Gyfun Ystalyfera.
8.3	<p>It's impossible for Powys children attending school in Ystalyfera to maintain social friendships with children from Swansea and Neath who attend that school</p> <p>Concern that pupils from Powys would be lost in a large urban school like Ystalyfera</p>	<p>The authority acknowledges that the current catchment area of Ysgol Gyfun Ystalyfera is large, however the authority is aware that Neath Port Talbot County Borough Council intends to establish a second Welsh-medium secondary stie in the south of the county, which will result in the catchment area for the Ystalyfera site being reduced.</p> <p>Historically, Brecon High School was a school of over 800 pupils, and therefore Ysgol Gyfun Ystalyfera is not significantly larger than the numbers that have been educated at Brecon in the past, and it is expected that the number of pupils on the Ystalyfera site will reduce following the establishment of a second site in the south of the county. The school is located in the village of Ystalyfera which is smaller than Brecon, therefore it is not true that it is an urban school.</p>
8.4	Concern that pupils from Sennybridge would have to transfer to Ystalyfera on their own if they were the only pupil in the year group	All secondary schools have transition plans for pupils transferring into the school. The authority recognises that should the proposal be implemented, pupils from Sennybridge could be transferring to a different school to English-medium pupils, however this is already happening due to parental choice.
8.5	In previous consultation documents it has been stated that the capacity for Ystalyfera is 1285 pupils, however projections are that pupil numbers will exceed this figure to 1355 by January 2019 – what if Neath Port Talbot is no longer willing or able to accept children from out of county?	<p>As stated in footnote 14 on page 35 of the consultation document in respect of this proposal, Ysgol Gyfun Ystalyfera will close on the 31<sup>st</sup> August 2017, as will Ysgol Gymraeg Y Wern and a new 3-19 school will open in their place. The projected pupil numbers for January 2018 onwards include the projected pupil numbers for Ysgol Gymraeg y Wern and Ysgol Gyfun Ystalyfera.</p> <p>Neath Port Talbot County Borough Council are currently progressing a proposal to open a second Ystalyfera site in the south of the area. This will provide additional capacity for Welsh-medium secondary provision in the county, and the number of Powys pupils likely to access Ystalyfera, including</p>

		Sennybridge pupils, have been taken into account in planning this work.
8.6	There is going to be a change at Ysgol Ystalyfera – there is going to be a new campus in Neath Port Talbot. How well known is this? Are parents in the area aware of this?	Footnote 14 on page 35 of the consultation document in respect of this proposal refers to the development of a second campus for Ysgol Gyfun Ystalyfera in the south of Neath Port Talbot County Borough. Pupils living in Powys will continue to access the current site, therefore it is not anticipated that the development of a second campus would have a significant impact on Powys pupils.
8.7	70 Welsh-medium students from Powys are attending Ysgol Gyfun Ystalyfera – Neath Port Talbot is getting money that Powys should be getting	Welsh-medium pupils from the Ystradgynlais area wishing to continue to access Welsh-medium provision on transfer to secondary education have for many years transferred to Ysgol Gyfun Ystalyfera at the start of year 7. When the authority undertook its transformation review in the area at the start of the current decade, it was decided to continue with this arrangement rather than duplicate the provision in Ysgol Maesydderwen. Ysgol Gyfun Ystalyfera is a Welsh-medium secondary school, therefore the breadth of Welsh-medium provision and opportunities to use Welsh within the school are significantly greater than those that would be offered in any dual stream provision.
8.8	Pupils who have been to Ystalyfera but moved to Brecon say that they have more opportunities to use Welsh in Brecon High School than they did in Ystalyfera	Ysgol Gyfun Ystalyfera is a Welsh-medium secondary school which provides a full Welsh-medium curriculum to pupils. In addition, Welsh is the main language used in the school, and extra-curricular activities are provided in Welsh. The authority does not agree that more opportunities are provided for pupils to use Welsh in Brecon High School than at Ystalyfera.
8.9	Over a number of years, some parents have chosen to transport their children to Ystalyfera for secondary education as this school, as a Welsh-medium secondary school, could offer certainty to the parents and pupils with regard to the provision that would be available throughout Key Stage 3 and 4.	The authority acknowledges that as a Welsh-medium secondary school, Ysgol Gyfun Ystalyfera can offer certainty to parents and pupils with regard to the Welsh-medium provision available throughout all key stages.
8.10	Pupils would have more Welsh speaking friends in a Welsh school like Ystalyfera	The authority agrees that given the significantly greater number of Welsh-medium pupils at Ystalyfera, pupils would have more Welsh speaking friends

		at this school.
8.11	Many Welsh-medium pupils at Sennybridge School have already decided that they will be going to Ystalyfera, and have visited the school	The authority notes this comment.
<b>9. IMPACT ON YSGOL Y BANNAU</b>		
<b>9.1 Pupil numbers at Ysgol y Bannau</b>		
9.1.1	<p>Ysgol y Bannau would decline dramatically in the long term if the Welsh stream in Brecon High School closed</p> <p>The uncertainty about the future of Welsh-medium provision in Brecon High School is affecting pupil numbers in Ysgol y Bannau</p> <p>Children are already being removed from Ysgol y Bannau due to the ongoing uncertainty</p> <p>It has taken decades to build Ysgol y Bannau into the successful designated Welsh-medium primary school it is at present, with a steady 140+ on roll for years – this number will rise given the security of Welsh-medium education in Brecon, however there will undoubtedly be a fall in numbers should Welsh-medium provision be removed from Brecon High School</p> <p>Powys County Council does not seem concerned that the number of pupils in Ysgol y Bannau will decline</p> <p>The reduction in pupil numbers at Ysgol y Bannau</p>	<p>The authority acknowledges that the proposal could have a negative impact on Ysgol y Bannau in the short term, and this is identified in the consultation document. However, whilst Welsh-medium pupil numbers in other parts of Powys have grown over recent years, this hasn't been the case at Ysgol y Bannau.</p> <p>There has been dissatisfaction with the Welsh-medium secondary provision available in Brecon for many years, since long before the authority mentioned the possibility that the Welsh-medium stream could close, which has resulted in a number of parents choosing for their children to attend alternative provision, instead of transferring to the Welsh-medium stream at Brecon High School. The authority's view is that this uncertainty in relation to secondary progression has contributed to the lack of growth of Ysgol y Bannau.</p> <p>The authority's view is that closure of the Welsh-medium stream at Brecon High School would provide greater clarity in terms of the Welsh-medium provision available in the secondary sector. This would enable the authority to work with other organisations such as Mudiad Meithrin and Menter Brycheiniog a Maesyfed to promote the benefits of bilingualism and Welsh-medium education, with the aim that any reduction in pupil numbers could be reversed in the longer term, with the potential that they could increase.</p>



	<p>is a threat to the creation of a critical mass of pupils for Key Stages 3 and 4</p> <p>The council needs to accept that it will be responsible for the decline in numbers in Ysgol y Bannau</p> <p>If the Welsh stream goes from the high school, parents will think that there's no point sending their children to Welsh-medium education and the numbers will go down</p> <p>Only the Welsh speaking families will be left in Ysgol y Bannau – at the moment 2/3 of pupils have no Welsh at home</p> <p>Numbers in the 3 year old setting at Ysgol y Bannau have decreased over the last two years</p>	
9.1.2	<p>The consultation document refers to providing support to Ysgol y Bannau to maintain pupil numbers, if not grow, to help with the numbers transferring to Builth Wells, why can't the same support be provided to Ysgol y Bannau to support a Welsh-medium stream in Brecon High School?</p>	<p>Over the years, the authority has worked with organisations such as Menter Brycheiniog and Twf to promote Welsh-medium education in the Brecon area. However, the limited secondary provision available has caused difficulties with this work. The authority's view is that closure of the Welsh-medium stream at Brecon High School would provide greater clarity in terms of the Welsh-medium provision available in the secondary sector. This would enable the authority to work with other organisations such as Mudiad Meithrin and Menter Brycheiniog a Maesyfed to promote the benefits of bilingualism and Welsh-medium education, with the aim that any reduction in pupil numbers could be reversed in the longer term, with the potential that they could increase.</p>
9.1.3	<p>Have had to increase the opening hours of the Cylch Meithrin in Brecon due to an increase in the number of children</p>	<p>The authority is pleased to note that the number of children attending the Cylch Meithrin provision in Brecon is increasing. Should the proposal be implemented, the authority would work with organisations such as Mudiad Meithrin and Menter Brycheiniog a Maesyfed to promote the benefits of bilingualism and Welsh-medium education, in order to promote progression</p>

		into Welsh-medium education, and would hope that the greater clarity in terms of the Welsh-medium provision available in the secondary sector for pupils from the Brecon area would support this.
<b>9.2 Threat of closure of Ysgol y Bannau</b>		
9.2.1	<p>The proposal could result in closure of Ysgol y Bannau</p> <p>The proposal would have a huge impact on the viability of Ysgol y Bannau</p> <p>The proposal would lead to closure of a lovely, happy and safe Welsh-medium primary school</p> <p>Removing the Welsh-medium stream will almost certainly guarantee the closure of Ysgol y Bannau</p> <p>Concern about the future of Ysgol y Bannau if the proposal goes through</p> <p>You say that you have no plans to close Ysgol y Bannau, however the proposal is already having a detrimental impact and if parents vote with their feet, the school is likely to close in the future</p>	<p>The authority is not planning to close Ysgol y Bannau. The authority is committed to Ysgol y Bannau as a provider of Welsh-medium education in Brecon, and would hope that the improved clarity with regard to secondary progression would lead to an increase in pupil numbers at the school in the long term.</p> <p>The authority's draft WESP for 2017-20 states the authority's aim to increase the number of Welsh-medium pupils in Powys, and Ysgol y Bannau will be a key partner for the authority in this work.</p>
9.2.2	<p>The reduction in pupil numbers could mean that the school will become too small to maintain its present site and will return to being a unit in an English-medium primary school in Brecon town</p> <p>Concern that Ysgol y Bannau will have to move in the future</p>	<p>The authority currently has no plans to relocate Ysgol y Bannau.</p> <p>The authority acknowledges that the model of a designated Welsh-medium school is preferable to a dual stream school in terms of ensuring that pupils can develop their bilingual skills, therefore the authority would not propose the school returning to being a unit in an English-medium primary school.</p>
<b>9.3 Issues relating to parental preference</b>		

9.3.1	<p>The parents of most pupils at Ysgol y Bannau want their children to transfer to Brecon High School not Builth Wells High School</p> <p>The majority of parents of year 6 pupils in Ysgol y Bannau wish their children to transfer to Brecon High School in September 2017, and will continue to send their children here if the Welsh stream closes</p>	<p>The authority notes this comment. However, even if all pupils attending Ysgol y Bannau transferred to the Welsh-medium stream at Brecon High School, the number of pupils in each year group would remain small.</p> <p>The authority accepts that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education.</p>
9.3.2	<p>Many parents of pupils at Ysgol y Bannau are non-Welsh speakers who take a 'leap of faith' when they choose Welsh-medium education – they will not take that 'leap of faith' if there is no secondary provision available locally</p>	<p>In contrast to other designated Welsh-medium primary schools in Powys, pupil numbers at Ysgol y Bannau have not grown significantly in recent years. The authority's view is that the lack of secondary provision which provides equality of opportunity for Welsh-medium pupils and access to a comprehensive Welsh-medium curriculum is one of the reasons for this. The authority's hope is that the improved clarity in relation to the Welsh-medium opportunities available in the secondary phase would encourage more parents to take a 'leap of faith' and choose Welsh-medium education. This supports the Welsh Government's Welsh-medium education strategy, which states that: 'Welsh-medium education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing young people who are truly bilingual'.</p>
<b>9.4 Impact on staff</b>		
9.4.1	<p>There will be redundancies amongst the staff</p> <p>The reduction in pupil numbers could be to such an extent that the school will face teacher redundancies</p>	<p>The authority acknowledges that any school organisation proposal will lead to a period of uncertainty for staff, and that staff at Ysgol y Bannau may be concerned about the school's future. However the authority is committed to Ysgol y Bannau as a provider of Welsh-medium education in Brecon, and would hope that the improved clarity with regard to secondary progression would lead to an increase in pupil numbers at the school in the long term.</p>
<b>9.5 Other</b>		

9.5.1	Without the Welsh stream at Brecon High School, Ysgol y Bannau will operate in isolation	<p>Ysgol y Bannau currently operates in isolation to some extent, this was one of the reasons why Clwstwr y Ffynnon was established, to strengthen links between Ysgol y Bannau and other Welsh-medium providers in south Powys.</p> <p>Should the proposal be implemented, Ysgol y Bannau would become a feeder school for Builth Wells High School, which would result in strengthened links with that school and other schools which feed the school's Welsh-medium stream.</p>
9.5.2	Ysgol y Bannau has an after school club called Y Gorlan which employs Welsh speaking 6 <sup>th</sup> form pupils from Brecon High School. If these pupils weren't attending Brecon High School they would not be back in time to do this, therefore Y Gorlan would struggle to find people to work these strange hours	The authority notes this comment.
9.5.3	When Ysgol y Bannau was built there was a lot of talk about the fact that Welsh-medium primary pupils could choose Welsh-medium provision at Brecon High School, however there appears to have been a change of viewpoint	<p>The authority agrees that in an ideal world, pupils would be able to access comprehensive Welsh-medium primary and secondary provision locally. However the current provision at Brecon High School does not offer comprehensive provision for pupils. In addition, the current arrangement of providing access to Welsh-medium secondary provision in Brecon has not led to any significant increase in Welsh-medium pupil numbers in the area over recent years.</p> <p>The authority's view is that in order to increase the provision available in order to provide a greater level of equality for Welsh-medium pupils, the current two providers need to be consolidated.</p>
9.5.4	Ysgol y Bannau is being discriminated against	The authority's view is that the current provision at Brecon High School is not providing equality of opportunity for Welsh-medium pupils in the catchment, and that this is unfair to pupils. The aim of the proposal is provide greater equality of provision for Welsh-medium pupils, however it is acknowledged that there will be some negative implications associated with this.

9.5.5	<p>There is no point having Welsh-medium primary provision in Brecon if there is no follow on provision</p> <p>The proximity of Ysgol y Bannau to Brecon High School makes it obvious that there should be continuity in Welsh-medium education from primary to secondary</p> <p>It's good for Ysgol y Bannau that there is a Welsh stream next door, if it moves this won't be the case</p>	<p>The authority does not agree with this statement. Ysgol Dafydd Llwyd located in Newtown has grown significantly in recent years despite there being no Welsh-medium secondary provision located in the town.</p> <p>Due to the growth in numbers at Ysgol Dafydd Llwyd, the council has recently invested in a new building for the school, which allows for further growth. The new school is located next door to Newtown High School, an English-medium secondary school.</p>
9.5.6	Ysgol y Bannau is at the top of a hill, this can put lower income families without cars off choosing Welsh-medium education	The authority notes this comment, and accepts that the location of Ysgol y Bannau could be a barrier to accessing Welsh-medium education for some families.
<b>10. ISSUES RELATING TO EQUALITY / DISCRIMINATION</b>		
<b>10.1 Discrimination against poorer families</b>		
10.1.1	<p>Welsh-medium education will only be accessible to wealthier families</p> <p>The council is discriminating against those less fortunate to favour those that are well off</p> <p>Low income families will be unable to carry on in Welsh-medium education</p> <p>Families from low income families will have to choose between Welsh and quality of life</p>	<p>In the draft equality impact assessment produced in respect of this proposal, the authority identified that should the proposal be implemented, 'Some people on low incomes will be affected. Whilst free home to school transport would be provided to alternative provision, it is likely that the greater distance to travel to the school for other activities would have a greater impact on people on low incomes'.</p> <p>The draft impact assessment will be updated to reflect issues raised during the consultation period, and will be taken into consideration by Cabinet when determining how to proceed in relation to this proposal.</p>
10.1.2	Pupils from disadvantaged families will be prevented from accessing Welsh-medium	The authority notes these concerns. However, the authority's view is that the current limited Welsh-medium provision provided at Brecon High School is

	<p>education – parents will be unable to support their children if they are not in a position to travel to attend events, activities, parents evenings or to take children to school after hospital / dentist appointments</p> <p>The proposal does not create equal opportunity as parents from disadvantaged families will not be able to travel the distances to support their children in extra-curricular activities</p>	<p>disadvantaging Welsh-medium pupils and is not providing equal opportunity for these pupils.</p> <p>The draft equality impact assessment produced in respect of this proposal identified that the proposal would have an impact on people/families on low incomes. The impact assessment will be updated to reflect issues raised during the consultation period, and will be taken into consideration by Cabinet when determining how to proceed in relation to this proposal.</p>
10.1.3	<p>The majority of pupils travelling to Builth for Welsh-medium secondary education are from more advantaged families with those unable to consider this as an option remaining in Brecon with less provision</p>	<p>The authority notes this comment and acknowledges that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, which would include consideration of the impact of additional travel.</p>
10.1.4	<p>The proposal discriminates against pupils with working parents</p>	<p>The authority does not agree that the proposal discriminates against pupils with working parents. The authority has acknowledged that implementation of the proposal would lead to an increase in travel for pupils, and that this would also impact on parents, and that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education, which would include consideration of the impact of additional travel.</p>
<b>10.2 Discrimination against Welsh-medium pupils</b>		
10.2.1	<p>Welsh-medium children will be disadvantaged compared to English-medium pupils who are easily able to access all extra-curricular activities at no or low cost to their families</p> <p>Moving Welsh speaking children out of their community is not providing equality, it is marginalising them and pushing them away from</p>	<p>The authority's view is that Welsh-medium pupils are currently disadvantaged to the limited Welsh-medium curriculum available to them at Brecon High School. The aim of the proposal is to provide greater equality to Welsh-medium pupils in terms of the Welsh-medium curriculum available to them, however it is acknowledged that there are disadvantages and risks associated with this.</p>

	<p>their local community</p> <p>Children wanting to learn through the medium of Welsh are not being treated equally – pupils are being asked to transfer to a sub-standard school which is under-achieving in order to continue with education through the medium of Welsh – English-medium pupils are not being asked to do this</p> <p>If Welsh is a student’s first language, Powys is proposing to force them to travel elsewhere – is this equal opportunity for all or discrimination?</p>	
10.2.2	<p>The council intends to exclude children from attending the school they assisted in improving simply because of the language they speak</p>	<p>The authority is not excluding children from attending Brecon High School. Should the proposal be implemented, pupils currently attending the Welsh-medium stream at Brecon High School could either transfer to alternative providers of Welsh-medium education or they could transfer to the English-medium stream at Brecon High School.</p>
10.2.3	<p>Question of fairness and discrimination to Welsh-medium pupils if they are to be expected to transfer to study Welsh second language – they will not have the opportunity to learn and develop their first language / mother tongue</p> <p>If there is no Welsh first language taught at Brecon High, there will be a breach of equal opportunities – first language Welsh speakers will not even be able to study Welsh language and literature apart from as a second language</p>	<p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a ‘Predominantly English Medium secondary school’</p> <p>The Welsh Government document ‘Defining Schools according to Welsh medium provision’ (2007) provides the following definition for the curriculum provision of this type of school: ‘Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.’</p> <p>Whether or not to provide the opportunity for pupils who study Welsh First Language would be a decision for the school. There are examples of ‘Predominantly English Medium secondary schools’ in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p>

<b>10.3 Discrimination against the Welsh language</b>		
10.3.1	<p>The proposal is discrimination against the Welsh language</p> <p>The proposal treats the Welsh language less favourably than English</p> <p>Comparison with the Welsh Not</p> <p>The implication in the proposal is that the Welsh language and those who wish to speak it are of less important than their monoglot counterparts</p>	<p>The authority does not agree with these statements. The authority's view is that the current Welsh-medium provision at Brecon High School is discriminating against Welsh-medium pupils in the Brecon area. The aim of the proposal is to provide greater equality to Welsh-medium pupils compared with English-medium pupils.</p>
10.3.2	<p>The whole process has given the impression that the falling numbers have been planned and shows a strong sense of discrimination towards the Welsh language</p>	<p>This is not the case. The current consultation has been carried out in line with the requirements of the School Organisation Code. No final decision has yet been made in relation to the future of the Welsh-medium stream at Brecon High School, and all issues raised will be taken into consideration by Cabinet when determining how to proceed. However, it is acknowledged that a number of parents decided to move their children to alternative Welsh-medium provision following the initial Cabinet decision to consult on closure of the Welsh-medium stream, and that this has impacted on the numbers currently attending the stream.</p>
<b>10.4 Issues relating to racism</b>		
10.4.1	<p>It's unequal and possibly racist that English speaking pupils will be able to access the benefits of a new school building, but this won't be available to Welsh speakers</p>	<p>The authority does not agree with this statement. The authority's view is that the current provision is unequal and unfair to Welsh-medium pupils due to the limited Welsh-medium curriculum available at Brecon High School. The aim of the proposal is to provide greater equality to Welsh-medium pupils in terms of the Welsh-medium curriculum available to them, however it is acknowledged that there are disadvantages and risks associated with this.</p> <p>Whilst a new building for Brecon High School would be a fresh start for</p>



		<p>secondary education in Brecon, there would be no significant increase in Welsh-medium pupil numbers in the short term, therefore it would be difficult for the new school to offer any more Welsh-medium subjects than are currently offered.</p> <p>Should this proposal be implemented, there would be no Welsh-medium stream in Brecon High School, and therefore there would be no Welsh-medium stream at the new school building. However Welsh-medium pupils will still be able to apply for a place in Brecon High School, should that be their preference, and places would be allocated in accordance with the authority's Admissions Policy.</p>
10.4.2	The council is trying to carry out cultural cleansing in this part of Powys. How can the council justify this discrimination?	The authority does not agree with this statement. The authority's view is that the current provision is unequal and unfair to Welsh-medium pupils due to the limited Welsh-medium curriculum available at Brecon High School. The aim of the proposal is to provide greater equality to Welsh-medium pupils in terms of the Welsh-medium curriculum available to them, however it is acknowledged that there are disadvantages and risks associated with this.
<b>10.5 Other</b>		
10.5.1	Brecon High School successfully integrates the Nepalese community and students from Eastern Europe, but now the council wants to take the Welsh-medium voice out of the school	All secondary schools in Wales are encouraged to develop a Welsh language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2 <sup>nd</sup> language to pupils, and would be expected to maintain a Welsh ethos and provide opportunities for pupils to use incidental Welsh. This would ensure that pupils from the Nepalese community and Eastern Europe would continue to have exposure to the Welsh language.
10.5.2	<p>In terms of equality of provision / equal opportunity, this is not the best option</p> <p>The proposal goes against Powys County Council's own School Organisation Policy due to not creating equal opportunities for all students</p>	The authority's view is that the current provision is unequal and unfair to Welsh-medium pupils due to the limited Welsh-medium curriculum available at Brecon High School. The aim of the proposal is to provide greater equality to Welsh-medium pupils in terms of the Welsh-medium curriculum available to them, however it is acknowledged that there are disadvantages and risks associated with this.

10.5.3	The council is breaking its own equal opportunities policy	The authority's view is that the current provision is unequal and unfair to Welsh-medium pupils due to the limited Welsh-medium curriculum available at Brecon High School. The aim of the proposal is to provide greater equality to Welsh-medium pupils in terms of the Welsh-medium curriculum available to them, however it is acknowledged that there are disadvantages and risks associated with this.
<b>11. WELSH-MEDIUM PUPIL NUMBERS AND ACCESS TO WELSH-MEDIUM PROVISION</b>		
<b>11.1 Current Welsh-medium pupils will transfer to English-medium provision</b>		
11.1.1	<p>If the Welsh stream is closed pupils will be forced out of Welsh-medium education</p> <p>If there was no Welsh stream in Brecon, pupils would have to move to English-medium provision as the additional travel time is unrealistic</p> <p>Brecon High School will continue to be a popular option for the majority of Ysgol y Bannau parents, whether it retains a Welsh stream or not</p>	<p>It is not true that pupils would be 'forced' out of Welsh-medium education should the proposal be implemented. However, the authority acknowledges that should the proposal be implemented, pupils and their parents would need to make difficult decisions with regard to pupils' future education.</p> <p>Should the Welsh-medium stream at Brecon High School close, pupils currently attending the Welsh-medium stream at Brecon High School and other Welsh-medium primary providers in the catchment area could choose to transfer to their nearest alternative provider of Welsh-medium secondary education, which in some cases would be out of county, or they could choose to access English-medium provision locally.</p>
11.1.2	<p>If you close the stream you will lose Welsh-medium pupils to English-medium education</p> <p>Many parents have already opted for English-medium provision due to the proposal</p> <p>Many pupils have already gone to other English-medium schools instead of going to Builth</p> <p>Parents of pupils at Ysgol y Bannau don't want their children to travel to Builth so they are</p>	<p>On page 16 of the consultation document, the council has identified the following as a risk of the proposal:</p> <p>'Pupils choose to access English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'.</p> <p>The authority's view is that the Welsh-medium provision currently available at Brecon High School does not provide appropriate linguistic continuity for Welsh-medium pupils, and the aim of the proposal is to provide greater equality in terms of the provision available to Welsh-medium pupils. However</p>

	<p>sending them to Gwernyfed or Crickhowell</p> <p>Pupils currently in the Welsh-medium stream at Brecon High School won't transfer to Builth – they will be lost to Welsh-medium education</p> <p>If the Welsh stream closed, a lot of the Welsh-medium pupils currently at Brecon High School would stay in the school anyway</p> <p>The majority of year 6 pupils at Ysgol y Bannau have committed to transfer to Brecon High School in September 2017, these children will be lost to Welsh-medium education if you close the Welsh-medium stream</p>	<p>as stated in the consultation document, 'in the short term, the authority would expect there to be some reduction in the proportion of pupils from the Brecon area continuing to access Welsh-medium provision in the secondary sector.'</p> <p>Retaining pupils within the Welsh-medium sector is one of the Welsh Government's priorities, and the authority is required to monitor pupil progression within Welsh-medium education annually, and report this information to Welsh Government. As stated in the consultation document, 'should the proposal be implemented, the authority would work with the primary schools concerned to establish transition links with the alternative providers, with the aim of reversing any reduction in transfer rates into KS3 in the longer term'.</p>
<p><b>11.2 Parents won't choose Welsh-medium primary education in the first place</b></p>		
11.2.1	<p>Future parents will not make the initial commitment to send their children to Ysgol y Bannau if the local secondary provision is removed, therefore pupil numbers will suffer and Welsh will be lost to south Powys</p> <p>Parents won't send their children to a Welsh-medium primary if it means a lengthy bus trip when they reach secondary school age</p> <p>The number of children and families choosing Welsh-medium in the Brecon area will fall drastically</p> <p>The proposal will mean that parents won't enter Welsh-medium education or will leave it</p>	<p>On page 17 of the consultation document, the council has identified the following as a risk of the proposal:</p> <p>'Pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon'.</p> <p>The document goes on to state that 'The authority acknowledges that there may be a reduction in pupil numbers at Ysgol y Bannau in the short term. However, the authority is committed to increasing the number of pupils accessing Welsh-medium education, and would work with Ysgol y Bannau, Menter Brycheiniog and other organisations to promote the benefits of Welsh-medium primary education in the Brecon area. The authority would hope that the greater clarity in relation to secondary arrangements for pupils from the Brecon area and the increased level of provision available would lead to an increase in pupil numbers in future.'</p>

	Parents have already been lost to Welsh-medium primary education due to the uncertainty	
11.2.2	The council is putting barriers in the way of parents who would otherwise consider Welsh-medium education	The authority is committed to providing access to Welsh-medium education to all parents that request it, and to provide access to an appropriate Welsh-medium curriculum for Welsh-medium pupils. The number of pupils currently accessing the Welsh-medium provision at Brecon High School is very small, and the provision available is limited.
11.2.3	New families living in the area would not see Welsh-medium education as an option	The authority is committed to providing access to Welsh-medium education to all parents that request it. Should the proposal be implemented, Welsh-medium education would continue to be an option to all parents, through access to primary provision at Ysgol y Bannau and the Welsh-medium stream at Sennybridge C.P. School and the provision of home to school transport to the nearest provider of Welsh-medium secondary provision.
<b>11.3 Suggestions to increase Welsh-medium pupil numbers</b>		
11.3.1	<p>The Welsh-medium stream at Brecon is an advert for Welsh-medium education in the Brecon area – to help Welsh-medium numbers grow you must keep the Welsh stream in Brecon</p> <p>Keeping the Welsh stream in Brecon will grow Welsh in this part of Wales</p> <p>Welsh-medium pupil numbers vary from year to year, but future for the Welsh language in Brecon will only increase the numbers</p> <p>Powys needs to nurture Welsh, this can only be done if you work on smaller cohorts and get them to grow in the areas they are</p>	<p>There is no evidence that this is the case. As stated in the consultation document in respect of this proposal, there has been no increase in pupil numbers in Ysgol y Bannau in recent years, despite there being access to Welsh-medium secondary provision in Brecon High School. This is in contrast to other areas of Powys, where there has been an increase in the number of pupils attending Welsh-medium primary schools.</p> <p>The current provision in Brecon and across Powys has not led to any significant overall growth in Welsh-medium pupil numbers in recent years. As stated in the authority's draft WESP for 2017-20, 'The council recognises that significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers'.</p>
11.3.2	There has to be a positive drive to promote	The authority acknowledges the need to promote the Welsh-medium

	Welsh-medium education, led and supported by the authority	opportunities available in Powys. The authority's draft WESP for 2017-20 includes a commitment to 'work with key stakeholders, such as the Mentrau Iaith, to implement a Communications / Marketing Strategy in conjunction with the establishment of any new Welsh-medium provision, in line with the authority's Welsh-language Promotion Strategy'.
11.3.3	Powys needs to look in more detail, research properly and invest initially in order to grow Welsh-medium education so that in the future it will grow and sustain itself	The authority's vision and strategic direction for Welsh-medium education is set out in the draft Welsh in Education Strategic Plan (WESP) for 2017-20.  The authority's view is that change is needed to the current method of delivering Welsh-medium education in Powys. The current method of delivery is not leading to growth in the number of pupils educated through the medium of Welsh. As stated in the authority's draft WESP for 2017-20, 'The council recognises that significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers'.
11.3.4	If Welsh-medium education was compulsory in primary schools, there would be an increase in numbers	The authority currently has no plans to make Welsh-medium education compulsory in primary schools.
11.3.5	Does the council advertise Welsh-medium options to all primary schools?	Information about Welsh-medium provision is provided in the council's Admissions Booklet.
<b>11.4 Access to Welsh-medium education</b>		
11.4.1	As many people as possible should have access to Welsh-medium education in Wales  Every child should have access to Welsh-medium education  Would hope that the council would do everything it can to safeguard, promote and ensure that	The authority agrees that as many people as possible should have access to Welsh-medium education, and is committed to providing access to Welsh-medium education to all that request it.

	<p>people have the opportunity to access Welsh language provision</p> <p>The Welsh stream must be kept in Brecon to ensure that everyone has access to Welsh-medium education</p>	
11.4.2	<p>The proposal would remove all accessible secondary Welsh-medium education for low income families in the Brecon catchment area</p> <p>Asking all pupils who wish to be educated in Welsh to travel many miles to school is a retrograde step</p>	<p>The authority notes this concern, and acknowledges that implementation of the proposal would lead to additional travel for Welsh-medium pupils in the Brecon catchment. However, the authority's view is that the current Welsh-medium provision at Brecon High School is not providing equality of opportunity for Welsh-medium pupils.</p>
11.4.3	<p>How central will Welsh-medium provision be?</p> <p>Where will be the most southern dedicated Welsh-medium stream secondary school?</p>	<p>Should the proposal be implemented, the most southern Welsh-medium provision in Powys would be located in Builth Wells. However, Welsh-medium secondary provision is also available at a number of out-of-county locations on the periphery of south Powys, including Ysgol Gyfun Ystalyfera, Ysgol Gyfun Gwynllyw and Ysgol Gyfun Rhydywaun.</p>
11.4.4	<p>There should be a Welsh stream in every school because that is the way the Welsh language will be promoted</p> <p>All schools in Wales should have a Welsh stream or the opportunity to have a Welsh stream</p> <p>Pupils should have the opportunity to continue their secondary education locally in Welsh</p> <p>It's good that Welsh-medium education is available locally</p>	<p>The authority notes this comment and agrees that in an ideal world, all schools would provide opportunities for pupils to learn in Welsh, and all pupils would have the opportunity to continue to access Welsh-medium secondary education in their local secondary school. However, due to the small number of pupils currently accessing Welsh-medium provision at Brecon High School, the school is unable to provide equality of opportunity for Welsh-medium pupils compared with the opportunities available to English-medium pupils.</p>
11.4.5	<p>Brecon is the right place for Welsh-medium</p>	<p>The authority acknowledges that the population of the Brecon catchment is</p>

	<p>education</p> <p>Brecon is the second largest population centre in Powys, so it is odd that you plan to reduce Welsh-medium provision here and bus students away from Brecon</p> <p>Brecon has the required population density, transport links and hub status within local and Welsh government to make Welsh-medium education viable and sustainable</p>	<p>larger than the population of the Builth Wells catchment, however there are currently more Welsh-medium pupils in Builth Wells High School compared with Brecon High School.</p>
11.4.6	<p>Closing the Welsh stream at Brecon High School would mean removing all Welsh-medium secondary education from the Brecon Beacons National Park which would undermine their policies on promoting the Welsh language within the park</p>	<p>It is true that should the proposal be implemented, there would be no Welsh-medium secondary education within the Brecon Beacons National Park. However, primary education would continue to be provided at Ysgol y Bannau, and the council would continue to provide access to Welsh-medium provision through the provision of home to school transport to alternative providers.</p>
<b>11.5 Issues relating to parental choice</b>		
11.5.1	<p>Currently there is a lack of choice for Welsh-medium pupils – if pupils don't get on with other children in their class or their teachers and want to change schools, their only option is English-medium</p> <p>In Brecon there are 3 English-medium primary schools and only one Welsh-medium primary school, so Welsh-medium parents do not have a choice</p>	<p>The authority notes these comments, however the authority currently has no plans to introduce another Welsh-medium stream in the primary sector in Brecon.</p>
11.5.2	<p>The council needs to create choice within WM education, not reduce choice, which closing Brecon High Welsh stream will do</p>	<p>The authority's priority is to provide equality for Welsh-medium pupils compared with English-medium pupils. The current Welsh-medium provision at Brecon High School is very limited and does not provide equality of</p>

	<p>Closing the Welsh stream in Brecon would restrict choice</p> <p>Pupils and families should be able to choose between going to Brecon High School and Builth Wells High School</p>	<p>opportunity for Welsh-medium pupils. Should the proposal be implemented, pupils and their parents would still be able to choose between transferring to alternative Welsh-medium provision or accessing English-medium provision locally.</p>
11.5.3	<p>Ysgol y Bannau is too big a leap for some families as it is a 100% Welsh school, so a stream within another primary school would be a choice for some families</p>	<p>The authority currently has no plans to introduce another Welsh-medium stream in the primary sector in Brecon.</p>
<b>11.6 Other</b>		
11.6.1	<p>If families really want their children to have a full Welsh-medium education they would have sent them to Ystalyfera – look at the numbers going to Ystalyfera to see the number of pupils that will continue with Welsh-medium education after the Brecon stream closes</p>	<p>Whilst it is true that a number of parents from the current catchment of the Welsh-medium stream at Brecon High School have chosen for their children to attend Ysgol Gyfun Ystalyfera, a number have also chosen for their children to attend Builth Wells High School.</p>
11.6.2	<p>Your acceptance of losing a percentage of pupils to English-medium in the short term is likely to be a permanent consequence of closing the Welsh-medium stream in Brecon. How does this comply with the Welsh Government's strategic aims for the Welsh language, including those outlined within the Donaldson report?</p> <p>2 years ago the council had 57 pupils in Brecon and 107 in Builth. If you close the Welsh stream, you will have gone from a total of 164 pupils to 124 pupils</p>	<p>The authority has acknowledged on page 16 of the consultation document that 'in the short term, the authority would expect there to be some reduction in the proportion of pupils from the Brecon area continuing to access Welsh-medium provision in the secondary sector'.</p> <p>However, the current Welsh-medium provision in Brecon High School is very limited – based on the school's current provision, it is categorised as a Category 3 school, which is described as a 'Predominantly English-medium secondary school with significant use of Welsh'.</p> <p>Retaining pupils within the Welsh-medium sector is one of the Welsh Government's priorities. Pupil retention is monitored annually and the figures are reported to Welsh Government. Should the proposal be implemented, the</p>



		authority's view is that the provision available to Welsh-medium pupils in the secondary sector would be more comprehensive. Should the proposal be implemented, the authority would work with the primary schools concerned to establish transition links with the alternative providers, with the aim of reversing any reduction in transfer rates into KS3 in the longer term.
<b>12. GENERAL ISSUES RELATING TO WELSH-MEDIUM EDUCATION</b>		
<b>12.1 Issues relating to the establishment of a Welsh-medium Secondary School in South Powys</b>		
<b>12.1.1 In favour of establishing a Welsh-medium Secondary School</b>		
12.1.1.1	<p>The council has been unable to ensure the development of the Welsh stream in Brecon and cannot ensure this in Builth Wells High School either – the only way to ensure provision that is consistent is by establishing a Welsh-medium secondary school</p> <p>It is appalling that there is no Welsh-medium secondary school in the whole of south Powys – Powys is failing its children, who do not have the same opportunities as children in other areas of Wales</p>	<p>The authority notes this comment. The authority acknowledges on page 16 of the consultation that one disadvantage associated with the proposal is that 'Powys based provision would still be in a dual stream school, rather than a designated Welsh-medium school.'</p> <p>The consultation document also states on page 21 that 'the authority's view is that closure of the Welsh-medium stream at Brecon High school is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.'</p>
12.1.1.2	RhAG branches in mid and south Powys consider establishing a designated Welsh-medium secondary school in the area as a basic aim, to ensure that pupils can access a full range of pre-16 and post-16 subjects through the medium of Welsh	The authority notes this comment. As stated on page 21 of the consultation document, 'the authority's view is that closure of the Welsh-medium stream at Brecon High school is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.'
12.1.1.3	Reference to a survey carried out by RhAG in 2011 which found that:	The authority notes this comment.

	<ul style="list-style-type: none"> <li>- 81% of respondents were in favour of establishing a Welsh-medium secondary school (category 1 or 2A) in south Powys</li> </ul> <p>and a survey carried out by RhAG in 2016, during the consultation period, which found that:</p> <ul style="list-style-type: none"> <li>- 76% of respondents were in favour of establishing a Welsh-medium secondary school (category 1 or 2A) in south Powys, and</li> <li>- 76% were of the view that the current arrangement does not offer equality of opportunity for pupils in South Powys.</li> </ul>	
12.1.1.4	Currently the only way for Powys pupils to receive their secondary education fully through the medium of Welsh is by travelling out of county to access this type of provision.	The authority notes this comment.
12.1.1.5	Due to the lack of access to a designated Welsh-medium secondary school in Powys, Powys County Council is currently disadvantaging a significant proportion of learners, this is in contrast to other authorities across Wales.	The authority notes this comment.
12.1.1.6	If a Welsh-medium secondary school was established in the area, it would grow and thrive once it had become established, in line with the experience in other areas across Wales	The authority notes this comment.
12.1.1.7	Establishing a Welsh-medium secondary school would enable parents to see a clear path in terms of transition within Welsh-medium education.	The authority notes this comment.

12.1.1.8	Powys is in the minority as a county without a Welsh-medium secondary school	The authority notes this comment.
12.1.1.9	Powys County Council should adopt the principle that designated Welsh-medium secondary schools (category 1 or 2A) are the preferred model for providing Welsh-medium secondary education in Powys as the basis for any further proposals developed following this consultation.	The authority notes this comment.
12.1.1.10	Establishing Welsh-medium secondary schools across the county should be a key element of the council's strategic planning in order to further develop Welsh-medium education in Powys.	The authority notes this comment.
12.1.1.11	Prefer the model of a Welsh-medium school to a dual stream school – in a dual stream school not everyone understands Welsh so you have to speak English	The authority notes this comment.
<b>12.1.2 Against establishing a Welsh-medium Secondary School</b>		
12.1.2.1	<p>The council shouldn't close the Welsh stream at Brecon to work towards getting a Welsh-medium high school, as this will decrease the number of families choosing Welsh-medium education and will lead to less Welsh-medium children not more</p> <p>Lots of children will lose out on Welsh-medium education if the council closes the Welsh-medium stream at Brecon High School in its bid to establish the first category 2A school in the county</p>	<p>The authority has a duty to provide access to Welsh-medium education to those pupils that choose it. The authority's view is that the current provision in mid and south Powys does not provide equality for Welsh-medium pupils due to the limited Welsh-medium curriculum available, and the authority's view is that the only way to improve this is to centralise provision in the area in order to provide access to an increase Welsh-medium curriculum.</p> <p>The authority has acknowledged in the consultation document that there are a number of risks associated with the proposal, which include a potential impact on Welsh-medium pupil numbers in the short term. The authority is not currently proposing to establish a Welsh-medium secondary school in the mid/south Powys area, however, as stated on page 21 of the consultation</p>

		document, ‘the authority’s view is that closure of the Welsh-medium stream at Brecon High school is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.’
12.1.2.2	Putting Welsh-medium pupils in a designated Welsh-medium secondary school “ghetto’s” the language	The authority does not agree that Welsh-medium secondary school’s “ghetto” the language.
12.1.2.3	Not all parents want their children educated entirely through the medium of Welsh and your ultimate aim to provide a Welsh medium school or extended curriculum is not everyone’s preference	The authority has a duty to provide access to Welsh-medium education to those pupils that choose it. The authority’s view is that the current provision in mid and south Powys does not provide equality for Welsh-medium pupils due to the limited Welsh-medium curriculum available, and the authority’s view is that the only way to improve this is to centralise provision in the area in order to provide access to an increase Welsh-medium curriculum.
<b>12.1.3 Criticism of dual stream model</b>		
12.1.3.1	Based on previous experience, we are concerned that the dual stream model will not success, despite the best efforts of the school	The authority notes this comment.
12.1.3.2	The dual stream model in Powys is disadvantaging Welsh-medium pupils compared with pupils in other areas of Wales  The uncertainty that exists within the dual stream system is unfair to Welsh-medium pupils	The authority notes this comment.
12.1.3.3	The success of the dual stream model is dependent on individuals – changes in a school’s headteacher and governing body can have a serious impact on the leadership and Welsh	The authority notes this comment.

	language ethos of a dual stream school	
12.1.3.4	The council has been unable to ensure the development of the Welsh stream in Brecon and cannot ensure this in Builth Wells High School either	The authority notes this comment.
<b>12.1.4 Other</b>		
12.1.4.1	Powys should have a Welsh-medium secondary school but Powys does not have the numbers to do this, and trying to force children to a central point will not work	The authority's view is that the current Welsh-medium secondary provision in mid and south Powys does not provide equality for Welsh-medium pupils due to the limited Welsh-medium curriculum available, and that the best way to improve the provision available is to centralise the provision.
12.1.4.2	A report by the council identified that the largest percentage of respondents who would prefer a designated Welsh-medium school were those in the Brecon catchment area, so why is the council deciding to centralise and make a start for a Welsh-medium school in Builth?	The report referred to was the result of a survey carried out by the authority to assess the demand for designated Welsh-medium secondary provision across Powys. The question asked to parents was whether they would prefer for their children to attend a designated Welsh-medium secondary school or a Welsh-medium stream in a dual stream school. The report identified that the largest percentage of respondents who would prefer a designated Welsh-medium school were those in the Brecon catchment. However that isn't the same as saying that the greatest demand for Welsh-medium secondary provision is in the Brecon catchment. This proposal is not about establishing a designated Welsh-medium school.
<b>12.2 Reference to the benefits of bilingualism and Welsh-medium education</b>		
12.2.1	<p>Bilingual pupils will be able to contribute to and benefit from a bilingual society</p> <p>Bilingual children will have a distinct advantage in the job market</p> <p>Being bilingual will improve pupils thinking and creativity</p>	The authority is fully aware of the benefits of bilingualism and Welsh-medium education and is committed to providing access to Welsh-medium education to all pupils that request it. Due to the rural nature of Powys and the number of pupils currently educated through the medium of Welsh, it is inevitable that in some cases, access to Welsh-medium provision will be via the provision of home to school transport to the nearest provider.

	<p>Being bilingual will make it easier for pupils to learn other languages</p> <p>Being bilingual will give pupils a stronger sense of identity and will help them stand out from the crowd</p> <p>Being bilingual will help pupils to value and appreciate other cultures</p> <p>Reference to benefits to pupils of being able to learn, speak and use more than one language</p> <p>Reference to benefits of being bilingual – research by Neuroscientists at University College London:  <a href="http://www.fil.ion.ucl.ac.uk/spm/doc/papers/am_vb_mreview.pdf">http://www.fil.ion.ucl.ac.uk/spm/doc/papers/am_vb_mreview.pdf</a></p> <p>It's a great advantage for children to learn and be educated in the native language of Wales</p>	
<b>12.3 Reference to other local authorities</b>		
12.3.1	<p>Places like Monmouthshire are actively surveying and researching their present families with 2 year olds to see what demand for WM education will be in the future, why are you not doing this?</p>	<p>The authority carried out a survey to measure demand for Welsh-medium education in 2010, and the results have helped to inform the primary and secondary modernisation programmes. The authority has been prepared to carry out a further survey since 2014 in line with Welsh Government guidelines, however there have been difficulties with accessing the information required to conduct this survey.</p> <p>Even if any such survey did identify significant additional demand for Welsh-medium education in the Brecon catchment area, it would be many years until this additional demand fed through to the secondary sector, therefore any</p>

		<p>future increase in Welsh-medium pupil numbers would not improve the breadth of Welsh-medium provision available to pupils currently accessing Welsh-medium provision in the Brecon catchment area.</p>
12.3.2	<p>The support and provision in Gwent for Welsh-medium children is far greater than has been shown in Powys</p>	<p>The authority's vision and aspiration for Welsh-medium education is set out in the council's draft Welsh in Education Strategic Plan for 2017-20. As stated in the document, 'The authority aspires to develop an infrastructure that enables all pupils to access full provision in either Welsh or English throughout their educational careers.'</p> <p>Due to the rural nature of Powys, the authority is faced with making difficult decisions in order to work towards achieving this aspiration.</p> <p>In local government terms, Gwent was abolished in 1996, and has been succeeded by Blaenau Gwent County Borough, Caerphilly County Borough, Monmouthshire, the City of Newport and Torfaen County Borough. These areas are very different to Powys in terms of area and population density in particular, therefore the challenges facing these authorities are very different to those facing Powys County Council.</p>
<b>12.4 Criticism of RhAG</b>		
12.4.1	<p>RhAG are focussing on the wrong thing by concentrating on establishing a Welsh-medium secondary school – if you follow their recommendations you will lose any future in Welsh-medium education</p> <p>RhAG are fighting to get Powys to have a Welsh-medium only secondary school, but that must not be at the cost of stopping some children having access to Welsh-medium education</p>	<p>Due to the open and public nature of the consultation exercise carried out in respect of the proposal to close the Welsh-medium stream in Brecon High School, RhAG were entitled to respond to the consultation. However, no greater weighting is given to the response received from RhAG than any other response received.</p> <p>Whilst the current proposal under consideration does not propose the establishment of a Welsh-medium secondary school, the authority agrees that more Welsh-medium opportunities are provided to pupils in a Welsh-medium secondary schools compared to those offered in a dual stream secondary school. As stated in Powys' draft WESP for 2017-20: 'The authority fully agrees with the view of Welsh Government that pupils are more likely to become fully bilingual after attending Welsh-medium schools, particularly</p>

		when they come from non-Welsh speaking homes’.
12.4.2	The questionnaires sent by RhAG are misleading and don't give an opportunity to put what we want	<p>A report on the survey carried out by RhAG during the consultation period was received as a response to the consultation, however this is only one response. No greater weighting is given to the response received from RhAG than any other response.</p> <p>Any parents who did not agree with the content of the questionnaire distributed by RhAG were entitled not to complete it, and in addition, they were entitled to submit their own response to the consultation on closure of the Welsh-medium stream at Brecon High School, to inform the council of their views.</p>
<b>12.5 Other</b>		
12.5.1	There was an experiment in Builth where English-medium children were immersed in Welsh so that they could move to Welsh-medium education at secondary level. Why has this not been tried with English-medium pupils in Sennybridge, or advertised in the Brecon area?	<p>It is true that a late immersion or ‘trochi’ programme was provided at Builth Wells High School a number of years ago. The possibility of establishing this type of programme was discussed with the previous headteacher of Brecon High School in 2011-12, however it was agreed that it was not an appropriate time for the school to introduce such a programme as it would be difficult to offer an appropriate level of immersion for pupils.</p> <p>Late immersion or ‘trochi’ programmes were historically funded by the Welsh Language Board, and this funding was later incorporated into the Welsh in Education Grant. However, this grant was discontinued in 2015, and is now incorporated into the Education Improvement Grant. At the current time, the authority does not have any funding available to support ‘trochi’ programmes, however identifying opportunities to introduce this type of provision is an objective of the council’s draft WESP for 2017-20.</p>
12.5.2	It’s important that the council centralises Welsh-medium provision – it is difficult for schools in this area to get Welsh-medium teachers and by centralising, they can focus on getting better teachers and can offer a wider variety of subjects	The authority notes this comment and acknowledges the difficulties experienced by schools in the area to appoint Welsh-medium teachers.



	in Welsh	
12.5.3	Concern that raising the age of admission will have a negative impact on language competency as pupils won't be immersed in the Welsh language until they are 5	The authority notes this comment. The raising of the age of admission in Powys schools is a separate process, and consultation on this took place during the spring term 2016. The authority has recognised the need to ensure that Welsh-medium pre-school provision is provided across the authority.
<b>13. ISSUES RELATING TO THE WELSH LANGUAGE</b>		
<b>13.1 Detrimental impact on the Welsh language</b>		
13.1.1	<p>Closure of the Welsh-medium stream will have a detrimental impact on the Welsh language</p> <p>PCC needs to accept that it will be responsible for the decline in the Welsh language in the Brecon area</p> <p>The council should be looking to promote Welsh not kill it at its roots</p> <p>The proposal will kill the language in South Powys</p> <p>The Welsh language is Wales' most precious asset, to lose it would be shameful</p> <p>Closing the Welsh stream will have an affect on the Welsh language in Brecknockshire</p> <p>The proposal will make the Brecon area an English only area</p> <p>Brecon would once again become an anglicised part of Wales as it was in the past</p>	<p>The authority does not agree with these comments. The current method of delivering Welsh-medium education in the area has not led to any significant increase in the number of Welsh-medium pupils, therefore the authority's view is that change is needed to the method of delivery in order to encourage confidence and the system and a growth in Welsh-medium pupil numbers.</p> <p>Further to this, there was a decrease of 1.7% in the number of Welsh speakers in Brecon between the 2001 census and the 2011 census, which suggests that the proportion of Welsh speakers in the area was declining before the authority commenced any proposals to close the Welsh-medium stream.</p> <p>Should the proposal be implemented, pupils in the Brecon area would continue to have access to Welsh-medium education, at Ysgol y Bannau and Sennybridge CP School in the primary sector, and at alternative providers such as Builth Wells High School and Ysgol Gyfun Ystalyfera in the secondary sector. The improved choice and linguistic experience for Welsh-medium pupils at these alternative providers would enable them to be even more confident Welsh speakers.</p> <p>These pupils would continue to live in the Brecon area even if they were receiving their education elsewhere, and they would still be able to contribute to the development of the Welsh language in the Brecon area.</p>

	<p>The proposal will not secure the future of the Welsh language in Brecon – it will deny it completely</p> <p>Concern that the proposal will take the Welsh language out of the Brecon community, and there will be no bilingual teenagers in the community between Ystradgynlais and Builth Wells</p> <p>The proposal would be detrimental to Welsh language and culture</p> <p>Closure of the Welsh stream will have a detrimental impact on the use of the Welsh language in the Brecon area</p> <p>There will be less people speaking Welsh in Brecon if the Welsh stream closes</p> <p>The area is very anglicised, there is no future for the Welsh language here if the Welsh stream closes</p> <p>It's important for the town of Brecon to keep the Welsh language local</p> <p>First language Welsh students are the future of the Welsh language locally, they need to be an integrated part of the community</p>	
<p><b>13.2 Impact on Welsh language organisations / activities</b></p>		
<p>13.2.1</p>	<p>There is considerable local interest in the growth of the Welsh language, which is borne out by the fact that there are almost a dozen classes</p>	<p>The authority notes the concerns in relation to the future of Welsh for Adults provision and other Welsh language activities in the Brecon area. However, the authority's priority is to provide equality of provision for Welsh-medium</p>

	<p>teaching Welsh to adults in the Brecon area</p> <p>Concern about the impact on Welsh for Adults provision</p> <p>Since the consultations have started, the numbers attending Cymraeg i'r Teulu lessons have fallen, this will worsen if the Welsh stream closes</p> <p>Brecon is the centre for the Welsh language with evening classes held in the college, moving the stream will cause this to cease</p>	<p>pupils, and the authority's view is that the current provision in Brecon High School does not offer this.</p>
13.2.2	<p>Concern about the impact on Twf and Mudiad Meithrin</p>	<p>The Twf project came to an end in 2016, and has been replaced by the 'Cymraeg i Blant' project which is run by Mudiad Meithrin.</p> <p>Mudiad Meithrin is a key partner of the council's in terms of the delivery of Welsh-medium early years provision in Powys. Regular meetings take place between Mudiad Meithrin staff and council officers, and a Mudiad Meithrin representative attends meetings of the council's Welsh-medium Education Forum.</p> <p>Should the proposal be implemented, more equitable Welsh-medium provision would be provided to secondary learners in the Brecon area. The authority would work with Mudiad Meithrin and other organisations such as Menter Brycheiniog a Maesyfed to promote the opportunities available in the Brecon area.</p>
13.2.3	<p>A number of local eisteddfodau are heavily supported by children and parents from local Welsh-medium schools. There would be a considerable loss to the cultural and community life of the area if there were fewer Welsh speaking children able to take part</p>	<p>Should the proposal be implemented, pupils in the Brecon area would continue to have access to Welsh-medium education, at Ysgol y Bannau and Sennybridge CP School in the primary sector, and at alternative providers such as Builth Wells High School / the New Mid Powys Secondary School and Ysgol Gyfun Ystalyfera in the secondary sector. The improved choice and linguistic experience for Welsh-medium pupils at these alternative providers would enable them to be even more confident Welsh speakers.</p>

	<p>Welsh language organisations in Brecon need Brecon to have its Welsh children learning and living in Brecon</p> <p>Communities in the Brecon area are working hard to promote Welsh in different ways, however this will be more difficult without Welsh-medium secondary provision in Brecon</p> <p>The proposal will affect opportunities for young people in the area to use Welsh</p>	<p>These pupils would continue to live in the Brecon area even if they were receiving their education elsewhere, and they would still be able to contribute to the development of the Welsh language in the Brecon area.</p> <p>The alternative schools to which pupils might choose to transfer should the proposal be implemented serve large catchment areas, and there is no reason to believe that these alternative schools would not continue to encourage pupils to support Welsh language activities in their home communities.</p>
13.2.4	There are more Welsh language organisations in the community in Brecon than there are in Builth	The authority notes this statement. However, there are currently more Welsh-medium pupils in the Builth Wells catchment than the Brecon catchment.
13.2.5	Welsh-medium pupils contribute to the development of the Welsh language in the school and in Brecon as a community, how could they contribute without a Welsh stream in the high school?	<p>All schools in Wales are expected to ensure a bilingual ethos, regardless of whether or not they offer Welsh-medium education. Should there be no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh as a Second Language, and would be expected to provide opportunities for pupils to use Welsh outside the classroom.</p> <p>Should the Welsh-medium stream close, pupils continuing to access Welsh-medium secondary provision would still live in the Brecon area and would continue to be able to contribute to Welsh language activities in the local area.</p>
<b>13.3 General criticism of the council's treatment of the Welsh language</b>		

13.3.1	<p>Shocked that the council does not appreciate the treasure that is our native tongue</p> <p>The council is not showing a positive commitment to the Welsh language</p> <p>The council should be doing all it can to promote the national culture throughout the country, not specialising it in a few areas – cannot see the Basque or Catalan authorities closing down Basque or Catalan medium schools/streams</p>	<p>The authority is committed to supporting the Welsh language, to providing access to Welsh-medium education to all that request it, and to providing equality of opportunity for Welsh-medium pupils. The authority's view is that the current provision in Brecon High School is not providing equality of opportunity for Welsh-medium pupils, and is not encouraging growth in the number of pupils accessing Welsh-medium education in the Brecon area. The figures provided on page 12 of the consultation document show that Welsh-medium pupil numbers in the area, and in particular at Ysgol y Bannau, have remained fairly stagnant over the last few years. This is contrast with other designated Welsh-medium primary schools in Powys.</p> <p>Whilst the authority has identified in the consultation document that implementation of the proposal could impact on number of pupils attending Ysgol y Bannau in the short term, the authority's hope is that pupils numbers would recover and increase in the longer term due to the greater clarity in relation to secondary progression.</p>
13.3.2	<p>Concern that the council is about to close the Welsh youth club which is the only place pupils can go to speak Welsh</p>	<p>The authority is currently reviewing the provision of Youth Services in Powys, however at the present time, no decision has been made to close any clubs.</p>
<b>13.4 Impact on the ability of employers in the local area to employ Welsh speakers</b>		
13.4.1	<p>The proposal will impact on the number of Welsh speaking employees in the private and public sector in the Brecon area which will have financial implications for employers including PCC eg translation costs and compliance with the new Welsh language laws – surely it is more cost effective to invest in Welsh medium education locally to ensure home grown Welsh speakers are supported</p> <p>Welsh Language Measure 2011 and introduction of the Welsh Language Standards requires</p>	<p>The current small number of pupils attending the Welsh-medium stream at Brecon High School makes the provision unviable, and the authority's view is that the small class sizes and limited Welsh-medium provision is not providing an appropriate educational experience for Welsh-medium pupils. Should the proposal be implemented, Welsh-medium secondary provision would continue to be available to pupils in the Brecon area through the provision of free home to school transport to alternative provision. The alternative providers provide an increased level of Welsh-medium provision, and the authority's view is that the increased provision would have a positive impact on pupils' bilingual skills, and would better equip them to use their Welsh language skills in the workplace in the future.</p>

	<p>Brecon Beacons National Park to provide services through the medium of Welsh as well as English. A lack of local Welsh-medium provision will be detrimental to the National Park's residents in the long term and could impact negatively on the authority's ability to provide a bilingual service as future generations are not being allowed to develop Welsh language skills ready to take their places in the job market</p> <p>Concern that organisations such as the BBNP would not be able to recruit Welsh speakers</p> <p>There are currently not enough Welsh speakers to fill jobs where Welsh speakers are needed – the proposal will not help with this</p>	
<b>13.5 Other</b>		
13.5.1	<p>The National Park has a duty under Welsh Language Standard 145 to promote the use of the language and to set a target for increasing the number of Welsh speakers in our area – the national park authority anticipates that closure of the Welsh-medium stream at Brecon High School will have a substantial negative impact on the number of Welsh speakers in this area</p>	<p>The current method of delivering Welsh-medium education in the area has not led to any significant increase in the number of Welsh-medium pupils, therefore the authority's view is that change is needed to the method of delivery in order to encourage confidence and the system and a growth in Welsh-medium pupil numbers.</p> <p>Further to this, there was a decrease of 1.7% in the number of Welsh speakers in Brecon between the 2001 census and the 2011 census, which suggests that the proportion of Welsh speakers in the area was declining before the authority commenced any proposals to close the Welsh-medium stream.</p> <p>Should the proposal be implemented, pupils in the Brecon area would continue to have access to Welsh-medium education, at Ysgol y Bannau and Sennybridge CP School in the primary sector, and at alternative providers such as Builth Wells High School / the New Mid Powys Secondary School and</p>

		<p>Ysgol Gyfun Ystalyfera in the secondary sector. The improved choice and linguistic experience for Welsh-medium pupils at these alternative providers would enable them to be even more confident Welsh speakers.</p> <p>These pupils would continue to live in the Brecon area even if they were receiving their education elsewhere, and they would still be able to contribute to the development of the Welsh language in the Brecon area.</p>
<b>14. POLICIES / STRATEGIES RELATING TO THE WELSH LANGUAGE</b>		
<b>14.1 Powys County Council's Welsh in Education Strategic Plan (WESP)</b>		
14.1.1	The proposal is contrary to the Powys Draft WESP for 2017-20	<p>The proposal is not contrary to the Powys draft WESP for 2017-20. The authority's aim as stated in the draft WESP is 'To provide equality of provision for Welsh-medium learners in Powys'. The current small number of Welsh-medium pupils and limited Welsh-medium subject provision at Brecon High School means that this provision does not provide equality of provision for Welsh-medium learners.</p> <p>Further to this, the council's third Strategic Objective for 2017-20 as stated in the draft WESP is 'To provide equitable and sustainable linguistic progression for Welsh-medium pupils from Key Stage 2 into Key Stages 3, 4 and 5'. The current provision at Brecon High School does not meet this objective.</p>
14.1.2	The WESP wants 14.5% of pupils to be assessed through the medium of Welsh at secondary level	<p>It is true that the authority's draft WESP for 2017-20 includes a target for 14.5% of year 9 pupils to be assessed in Welsh first language.</p> <p>However, in the draft WESP, the authority also recognises that 'significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers'.</p> <p>In respect of secondary provision, the draft WESP acknowledges on page 15 that 'it is possible that the authority's plans to provide equitable provision for</p>

		Welsh-medium learners in the secondary sector will lead to a reduction in the proportion of pupils continuing to access Welsh-medium provision on transfer to secondary school in the short term.'
14.1.3	<p>The vision in the draft WESP is 'To provide equality of opportunity for Welsh-medium pupils' – providing a new-build High School for Brecon at the exclusion of a Welsh-medium stream would be denying equality of opportunity. If education is taught through English to those pupils living in the Brecon area, equality of opportunity means that an equivalent Welsh language offer should be available at the same school for those wishing to learn through the medium of Welsh</p> <p>The proposal to provide transport to Welsh-medium provision in Builth or Ystalyfera is not providing an equivalent or equal education to those who choose to learn through the English language in Brecon</p>	The current Welsh-medium provision offered at Brecon High school does not provide equality of opportunity for Welsh-medium pupils, the aim of the proposal is to address this by providing access to a more comprehensive Welsh-medium curriculum to Welsh-medium learners.
14.1.4	Reference to the Draft Strategic Objectives 'To increase the opportunities for pupils to access Welsh medium early years provision' and 'to provide equitable and sustainable linguistic progression for Welsh-medium pupils from key Stage 2 into Key Stages 3, 4 and 5' – closure of the Welsh-medium stream at Brecon High School would lead to falling numbers at Ysgol y Bannau, this will undermine the objective of increasing opportunities for pupils to access Welsh-medium early years provision	<p>As identified in the consultation document in respect of this proposal, it is possible that the proposal will lead to a reduction in pupil numbers at Ysgol y Bannau in the short term. However, the authority is committed to Ysgol y Bannau as a provider of Welsh-medium education in Brecon.</p> <p>The authority is currently carrying out a tendering exercise in relation to early years education in Brecon, which includes the provision of Welsh-medium provision in Brecon.</p>
14.1.5	Draft Strategic Objective 'To establish, and	The authority agrees that an increase in the number of Welsh-medium primary



	identify opportunities to establish, new designated Welsh-medium provision in the primary sector' – this should lead to more primary schools in the Brecon area and beyond and should increase the number of bilingual pupils, leading to higher numbers who could potentially enter the Welsh-medium stream at Brecon High School	providers in the Brecon area and beyond should increase the number of pupils, leading to higher numbers who could potentially enter the Welsh-medium stream at Brecon High School. However, there is a lengthy process which must be followed in order to establish any new provision, therefore it is likely to be a number of years until any new provision is established, and even longer until any new provision fed into the secondary sector. The authority's priority is to provide the best possible opportunities for Welsh-medium pupils in the system now.
14.1.6	Why are you consulting on re-writing the WESP at the same time as you are consulting on closure of the Welsh-medium stream in Brecon	The timescale for re-writing and consulting on the revised WESP for 2017-20 is set by the Welsh Government and is included in the Welsh in Education Strategic Plans (Wales) Regulations 2013.
14.1.7	<p>Powys County Council never carried out the commitment in the current WESP to make Brecon High's Welsh-medium stream up to 2B status</p> <p>The current WESP for 2014-17 states that the authority's policy is to create a category 2B Welsh stream at Brecon High School, yet in the consultation document it states that due to the challenging financial situation faced by the authority this has not been achievable</p>	<p>In the Cabinet minutes of a meeting held on the 22<sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school. This decision is reflected in the WESP for 2014-17.</p> <p>Early discussions took place with Brecon High School about providing additional support, however due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil the commitment to provide additional investment to the school.</p> <p>The decision to move to an alternative model in relation to Welsh-medium secondary provision was made by Cabinet on the 27<sup>th</sup> January 2015. At this meeting, Cabinet approved the commencement of a Secondary School Reorganisation programme, which intended to transform the secondary and post-16 sector across the county. One of the aims of this Programme was:</p> <ul style="list-style-type: none"> <li>- 'Reconfiguration of Welsh-medium education with the aim of establishing at least one Welsh-medium secondary school in the county, and the consolidation of other Welsh-medium streams into larger units.'</li> </ul>

14.1.8	When you re-write the WESP, make sure Welsh-medium secondary education is available for all and not just the privileged	The authority is committed to providing access to Welsh-medium primary and secondary education to all pupils regardless of their socio-economic background. However, in some cases, access to such provision will be via the provision of free home to school transport.
<b>14.2 A Million Welsh Speakers by 2050</b>		
14.2.1	<p>A target has been set that there will be 1 million Welsh speakers by 2050 – this proposal goes against this</p> <p>There has been a reduction in the number of Welsh-medium pupils progressing to secondary due to the consultation – this goes against the Welsh Government’s target of 1 million Welsh speakers</p> <p>How will you achieve the assembly’s target of 1 million Welsh speakers if the Welsh stream is closed?</p> <p>How will you meet the Welsh Government target for 25% of the Welsh population to be Welsh speakers by 2050?</p>	<p>The council’s draft WESP for 2017-20 takes account of the Welsh Government strategy to create a million Welsh speakers by the year 2050.</p> <p>The current method of delivering Welsh-medium education in Powys has not led to an increase in the number of pupils educated through the medium of Welsh. In the draft WESP for 2017-20, the authority recognises that ‘a fundamental change is required in Powys to ensure all learners can access high quality, robust provision from the early years onwards’ and that ‘significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers’.</p> <p>The draft WESP also acknowledges that the authority’s plans to provide access to more equitable provision for Welsh-medium pupils may a negative impact on Welsh-medium pupil numbers in Powys in the short term, however the authority’s aim is that this would be reversed in the longer term.</p>
<b>14.3 Welsh-medium Education Strategy</b>		
14.3.1	The council’s plans go against the Welsh-medium Education Strategy	Strategic aim 3 of the Welsh-medium Education Strategy, on page 15 of the Strategy is ‘To ensure that learners develop their Welsh-language skills to their full potential and encourage sound linguistic progression from one phase of education and training to the next’. Further to this, the Strategy states that ‘Welsh-medium education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing young people who are truly bilingual’.

		The current Welsh-medium provision at Brecon High School does not provide sound linguistic progression for pupils in the Brecon area. The authority's view is that implementation of the proposal would contribute to implementation of the Welsh-medium Education Strategy by providing access to more robust linguistic progression to Welsh-medium pupils in the Brecon area.
14.3.2	The Welsh Government publication 'Welsh-medium Education Strategy: next steps' commits Welsh Government to 'publish best practice guidance on how local authorities should measure demand for Welsh-medium education' – you should wait for this guidance before going ahead with these proposals to ensure that you are considering the correct way to measure demand	The authority carried out a survey to identify demand for Welsh-medium education in line with Welsh Government requirements in 2010, however due to the rural nature of Powys and the dispersed nature of the population, it is difficult to draw any firm conclusions from this work. The authority is looking to identify alternative ways to measure and create demand for Welsh-medium education to inform work in relation to Welsh-medium provision in the primary phase. However, any additional demand identified would take many years to feed through to the secondary phase. The authority's priority is to provide equality of opportunity for pupils currently being educated through the medium of Welsh. The current provision does not provide this.
14.3.3	The Welsh-medium Education Strategy includes a commitment to 'enable an increase in the number of people of all ages and backgrounds who are fluent in Welsh and able to use the language with their families, in their <b>communities</b> '	<p>In the draft Welsh Language Impact Assessment carried out in relation to this proposal, the authority acknowledges that 'implementation of the proposal would mean that Welsh-medium secondary provision would not be available in the town of Brecon'. However, Welsh-medium provision would be available through the provision of home to school transport to alternative provision.</p> <p>However, as stated in the draft Welsh Language Impact Assessment, 'Whilst Welsh-medium pupils would be leaving Brecon to access Welsh-medium secondary provision, they would continue to live in the town and surrounding areas, and will continue to be able to participate in Welsh language activities in the local community. The Authority's view is that the increased level of Welsh-medium provision available to them will enable all Welsh-medium pupils to become more confident Welsh speakers, who will be able to play a greater role in terms of the Welsh language in the community.'</p> <p>The authority's view is that implementation of the proposal would continue to enable people of all ages to use Welsh in their communities.</p>

14.3.4	The proposal is in-line with the Welsh Government's strategic aims as outlined in the Welsh-medium Education Strategy. The strategy states that 'Welsh-medium education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing future bilingual citizens.' (p.7)	The authority notes this comment and agrees that the proposal is in-line with the aims of the Welsh-medium Education Strategy.
<b>14.4 The Welsh Language (Wales) Measure 2011</b>		
14.4.1	<p>PCC has a responsibility under the Welsh Language Measure to provide services through the language of choice and to provide Welsh medium schooling if that is what parents want</p> <p>The Welsh language has official status in Wales and should be treated no less favourably than English – people in Wales should be able to live their lives through the medium of Welsh if they choose to</p>	The authority is committed to providing access to Welsh-medium education to all parents who choose it. In some cases, this may be through the provision of free home to school transport to the nearest provider.
<b>14.5 The Welsh Language Standards</b>		
14.5.1	The guiding principle of the Welsh language standards are that the Welsh language should be treated no less favourably than English – this proposal is flying in the face of the Welsh language standards	The authority's view is that the current Welsh-medium provision available in Brecon High School is treating Welsh-medium pupils less favourably than English-medium pupils. The aim of the authority's proposal is to address this, and to ensure that Welsh-medium pupils in the Brecon area can access a broader Welsh-medium curriculum throughout all key stages.
14.5.2	Welsh language standard 145 – PCC has a duty to maintain or increase the number of Welsh speakers in its area – fail to see how the removal of Welsh-medium education at Brecon High School will increase the number of Welsh	<p>The council's draft WESP for 2017-20 acknowledges that the current method of delivering Welsh-medium education in Powys has not led to an increase in the number of pupils educated through the medium of Welsh.</p> <p>In the draft WESP for 2017-20, the authority recognises that 'a fundamental</p>

	speakers in the area	<p>change is required in Powys to ensure all learners can access high quality, robust provision from the early years onwards' and that 'significant changes are needed to the way Welsh-medium education is delivered within the county in order to encourage confidence in the system and an increase in the number and percentage of pupils accessing Welsh-medium education throughout their educational careers'.</p> <p>The draft WESP also acknowledges that the authority's plans to provide access to more equitable provision for Welsh-medium pupils may have a negative impact on Welsh-medium pupil numbers in Powys in the short term, however the authority's aim is that this would be reversed in the longer term.</p>
14.5.3	<p>It is early days for the Welsh Language Standards and parents and councillors do not yet realise the impact on future job prospects in Wales</p> <p>Anyone wishing to receive a public service in Welsh must be able to do so, which means that you will need to be able to speak Welsh to work in the public sector – removal of the Welsh stream would lead to less Welsh speakers and local people will be unable to take up local jobs because they do not speak Welsh</p>	<p>The authority is fully aware of the implications of the Welsh Language Standards in terms of the need to ensure that pupils have the appropriate Welsh language skills to enable them to provide services in Welsh in the future.</p> <p>The authority's view is that the current Welsh-medium provision at Brecon High School does not provide the correct environment to ensure that pupils can continue to develop their bilingual skills throughout their time at secondary school, and to ensure that they are confidently bilingual when they leave school.</p>
<b>14.6 General comments relating to Welsh Government Language Strategy</b>		
14.6.1	<p>The proposal goes against Welsh Government priorities</p> <p>The proposal would result in the exact opposite of what the Welsh Government seeks to achieve</p> <p>The proposal is a backwards step which goes against the Welsh Government policy of trying to promote Welsh</p>	<p>The authority does not agree that this proposal goes against Welsh Government priorities. The aim of the proposal to provide a greater level of equality for Welsh-medium pupils in terms of the provision available to them, which will provide improved opportunities for them to continue to improve their Welsh language skills throughout their educational careers. This aligns with Strategic Aim 3 of the Welsh-medium Education Strategy, 'To ensure that learners develop their Welsh-language skills to their full potential and encourage sound linguistic progression from one phase of education and training to the next'. Further to this, the Strategy states that 'Welsh-medium</p>

	<p>Can the council see how this proposal will have a detrimental impact on WG aims and policy objectives?</p> <p>Is Powys education authority deliberately trying to undermine WG policy?</p> <p>The council should be looking at how to promote the Welsh language in line with the Welsh Government's strategies, not how to kill the language</p> <p>Laws and strategies by Welsh Government show the desire by the Welsh Government to increase the level of Welsh spoken across Wales – removing the Welsh medium from Brecon would go against this</p> <p>Powys will be losing Welsh-medium pupils at a time when Welsh Government is trying to increase Welsh-medium provision</p> <p>Loss of Welsh-medium pupils is likely to affect the council's ability to meet Welsh Government targets for the uptake of the Welsh language in the short and longer term</p>	<p>education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing young people who are truly bilingual'.</p> <p>The authority is fully committed to the Welsh Government strategy to increase the number of Welsh speakers in Wales. In contrast with other designated primary schools in Powys, there has been no significant increase in the number of pupils in Ysgol y Bannau since 2010. The authority's aim is that the greater clarity in relation with secondary progression and the increased level of Welsh-medium provision available will create more confidence in Welsh-medium education and will lead to an increase in pupil numbers, therefore contributing to an increase in Welsh speakers.</p>
<p>14.6.2</p>	<p>PCC should aim for higher numbers of Welsh-medium learners instead of concentrating on more robust linguistic progression in order to contribute to the Welsh Government's targets on the number of Welsh speakers</p> <p>"A living language: a language for living – Welsh</p>	<p>As stated in the consultation document, 'Welsh-medium pupil numbers in the area have remained fairly stagnant over the last few years.' Access to secondary provision in Brecon has not led to an increase in the number of Welsh-medium pupils in the area, therefore the authority's view is that a new strategy is needed in order to create more confidence in Welsh-medium education.</p>

	<p>language strategy 2012 to 2017” emphasises the importance of Welsh-medium education strategy as an essential component in producing the Welsh speakers of the future – removing the Welsh stream from Brecon High School goes against this and will reduce the number of children learning through the medium of Welsh in the secondary sector</p> <p>Reference to extract from ‘The Position of the Welsh Language 2012-15’, the Welsh language commissioner’s 5 year report published 02/11/19 which highlights how education is the key to increasing the number of Welsh speakers</p>	
14.6.3	<p>The proposal seems to directly contradict the Welsh Government Strategy for the Welsh language: ‘to increase the provision of Welsh-medium activities for children and young people’, ‘to strengthen the position of the Welsh language in the community’, ‘to strengthen the infrastructure of the language’ – none of these are achieved by closing down Welsh-medium secondary education in Brecon</p>	<p>As stated in the consultation document, ‘Welsh-medium pupil numbers in the area have remained fairly stagnant over the last few years.’ Access to secondary provision in Brecon has not led to an increase in the number of Welsh-medium pupils in the area, therefore the authority’s view is that a new strategy is needed in order to create more confidence in Welsh-medium education.</p> <p>The number of pupils currently accessing the Welsh-medium stream at Brecon High School is very small, and the authority’s view is that the small class sizes and limited Welsh-medium provision offered is not providing an appropriate educational experience for Welsh-medium pupils. In addition, the provision is not encouraging confidence in the Welsh-medium provision available locally. The authority’s view is that centralising the provision at one location in mid and south Powys, and formalising the link with Ysgol Gyfun Ystalyfera in relation to pupils from the Sennybridge area will strengthen the infrastructure in terms of the provision of Welsh-medium secondary education in the area, and as stated in the consultation document, ‘would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.’</p>

14.6.4	None of the six aims in the Welsh Government's 'strategy for the promotion and facilitation of the use of the Welsh language in everyday life' will be met	<p>The six aims of the Welsh Government strategy 'a living language: a language for living – Welsh language strategy 2012 to 2017' are as follows:</p> <ul style="list-style-type: none"> <li>- To encourage and support the use of the Welsh language within families</li> <li>- To increase the provision of Welsh-medium activities for children and young people</li> <li>- To strengthen the position of the Welsh language in the community</li> <li>- To increase opportunities for people to use Welsh in the workplace</li> <li>- To improve Welsh language services to citizens</li> <li>- To strengthen the infrastructure for the language, including digital technology</li> </ul> <p>As stated in the consultation document, 'Welsh-medium pupil numbers in the area have remained fairly stagnant over the last few years.' Access to secondary provision in Brecon has not led to an increase in the number of Welsh-medium pupils in the area, therefore the authority's view is that a new strategy is needed in order to create more confidence in Welsh-medium education. Whilst the current provision provides some access to Welsh-medium secondary education locally in Brecon, the limited provision that is available is not providing the opportunity for the Welsh language and Welsh-medium education to grow in the area.</p> <p>With particular reference to the aims listed above, implementation of the proposal would 'improve Welsh language services to citizens' through the provision of an improved Welsh-medium curriculum to pupils, and would 'strengthen the infrastructure for the language'.</p>
14.6.5	The Well-being of Future Generations Act 2011 sets clear well-being goals in relation to the Welsh language	The Well-being goals of the Well-being of Future Generations Act 2011 have been considered in the Integrated Impact Assessment carried out in relation to this proposal. The assessment will be updated to take account of the issues raised during the consultation period, and will be considered by the Cabinet when determining how to proceed in relation to this proposal.



<b>15. ISSUES RELATING TO THE COMMUNITY / THE RURAL NATURE OF THE AREA</b>		
15.1	<p>Closure of the Welsh-medium stream would have a negative impact on the community as a whole</p> <p>Concern about the impact on Brecon Swimming Club as Welsh-medium pupils attending a different school would not be able to train in all sessions</p> <p>Closure of the stream would affect the economy of the whole community</p> <p>Closure would affect a variety of aspects of Welsh culture, tourism and attraction to foreign visitors</p>	<p>Consideration was given to the proposal's impact on the community of Brecon in the community impact assessment in respect of this proposal. The community impact assessment will be updated to reflect comments received during the consultation period, and the updated assessment will be taken into consideration by Cabinet when determining how to proceed in relation to this proposal.</p> <p>Whilst the authority notes the concerns in relation to the impact of the proposal on the community, the aim of the proposal is to improve the Welsh-medium opportunities available to pupils. Ultimately, economic and social factors are non-educational issues.</p>
15.2	<p>The proposal will not and cannot work in this area because of how rural the area is</p> <p>The proposal is based on what has worked in urban areas and will not work in our rural area</p> <p>In urban areas you can close schools and the travel distance for pupils isn't excessive as the communities are relatively close – this isn't the case in rural areas</p> <p>This is a rural community and the council needs to be more creative in delivering services</p>	<p>The authority is fully aware of the rural nature of Powys and the challenges associated with delivering high quality services in such a rural area. This is acknowledged in the authority's School Organisation Policy (2015), which states that 'In a rural county as diverse as Powys there is no one size fits all approach to school organisation.'</p> <p>The authority's view is that the current Welsh-medium provision at Brecon High School is not providing appropriate Welsh-medium opportunities for pupils. In addition, the current model of delivery has not led to an increase in Welsh-medium pupil numbers in Brecon, in contrast with other areas of Powys.</p> <p>The authority's view is that centralising the provision in Builth Wells is the most appropriate solution at the current time, however it is acknowledged that, as with every proposal, there are some disadvantages associated with this.</p>
15.3	<p>Because we are in a rural area, the term 'community' is being applied to include Brecon and Builth Wells, two separate communities 20</p>	<p>The authority has not used the term 'community' to include both Brecon and Builth Wells. The draft community impact assessment published during the consultation period referred to the proposal's impact on the community of</p>

	miles apart – this is not an acceptable interpretation	Brecon.
<b>16. FINANCIAL ISSUES</b>		
<b>16.1 Queries about the estimated savings</b>		
16.1.1	<p>Closing the Welsh-medium stream won't save any money as the saving mentioned in the consultation document has already been lost on transporting children to Builth</p> <p>If Brecon Welsh stream closes no real money will be saved and money would carry on being wasted on transport and less children would be able to continue in Welsh-medium education</p> <p>The main aim of this proposal is to save money, however there is no evidence to show that it will save money</p>	<p>The reasons for proposing to close the Welsh-medium stream as outlined in the consultation document are;</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The total saving to the authority should the proposal be implemented is estimated to be £58,475, as detailed in the consultation document.</p>
16.1.2	The consultation document states that the saving if the proposal was implemented would be £58,475 – this is inaccurate	As stated in the consultation document, the total saving to the authority should the proposal be implemented is estimated to be £58,475. The authority is satisfied that this is accurate.
16.1.3	Have not seen information anywhere about how much this change will save – the project is to save money, however I do not understand whether it will actually save money – I estimate 4 coaches at £250 per day making 2 journeys each would cost £1000 per day, this would be £195,000 per year – this could pay for 6 teachers in Brecon	<p>The reasons for proposing to close the Welsh-medium stream as outlined in the consultation document are;</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The total saving to the authority should the proposal be implemented is estimated to be £58,475, as detailed in the consultation document.</p>

16.1.4	The savings of the proposal plan are far outweighed by the benefits of retaining provision at Brecon	<p>As stated in the consultation document, the reasons for proposing to close the Welsh-medium stream are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The authority's view is that the current small number of pupils and limited subject provision in the Welsh-medium stream at Brecon High School is not providing an appropriate educational experience for pupils.</p>
<b>16.2 Funding provided for transport</b>		
16.2.1	Providing subjects in Brecon would cut transport costs	<p>As stated in the consultation document, the reasons for proposing to close the Welsh-medium stream are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The authority's view is that the number of pupils currently accessing Welsh-medium secondary provision in mid and south Powys is not large enough to sustain two Welsh-medium streams and to provide appropriate curriculum choice to Welsh-medium pupils, therefore the authority does not agree that continuing to provide two Welsh-medium streams in mid and south Powys is viable.</p>
16.2.2	<p>How can you justify spending £50k more to transport Welsh-medium pupils than it would have cost to bring Brecon High School up to 2B status?</p> <p>It is a scandalous waste of public resources that the council is spending more on transport than it would cost to upgrade Brecon High School to 2B status</p>	<p>During the recent consultation period on the proposal to close the Welsh-medium stream at Brecon High School, a county councillor requested details of the additional funding that would be required for the Welsh-medium provision at Brecon High School to meet the definition of a Category 2B school. The figure provided was £47000, which is the additional funding that would be provided to the school through the authority's funding formula to support the provision of Welsh-medium subjects for 80% of curriculum time in years 7 to 11.</p>

	<p>It would cost £40,000 to uplift Brecon Welsh stream to 2B status – if the council did this there would be no reason for children to want or need to go to Ystalyfera or Builth so the council would not have to pay for transport</p>	<p>However, whilst the funding provided to dual stream schools through the authority's funding formula is based on the % of curriculum time where Welsh-medium options are available to pupils, the Welsh Government's definition of a category 2B school is as follows: 'At least 80% of <b>subjects</b> (excluding Welsh and English) are taught through the medium of Welsh but are also taught through the medium of English.'</p> <p>In relation to the funding provided through the formula to support dual stream provision in key stage 4, the authority considers that Welsh-medium curriculum time is available when a minimum of 1 Welsh-medium options subject is available in each options block. For example, a dual stream school offering 1 Welsh-medium subject and 5 English-medium subjects in each options block, as well as all core subjects through the medium of Welsh, would receive the maximum funding available from the authority to support its dual stream provision, and would be providing 80% of curriculum time through the medium of Welsh. However, this school would not necessarily meet the Welsh government definition for a category 2B school, as the school would not be providing 80% of <b>subjects</b> through the medium of Welsh and English.</p> <p>Therefore, whilst the figure of £47000 provided during the consultation is the maximum additional funding that would be provided to support dual stream provision at Brecon High School based on the authority's funding formula, this would not be sufficient to enable the school to provide Welsh-medium provision which would meet the definition for a category 2B school.</p>
16.2.3	<p>It does not seem the best value for money to transport pupils to Builth and Ystalyfera</p>	<p>The authority's view is that the current small number of pupils and limited subject provision in the Welsh-medium stream at Brecon High school is not providing an appropriate educational experience for pupils. The authority is committed to providing greater equality for Welsh-medium pupils in the area, and the authority's view is that centralising provision in mid and south Powys in Builth Wells will provide access to increased Welsh-medium provision, and would provide better value for money to the council as it would reduce the duplication of provision in both Builth Wells and Brecon.</p>

16.3 Fair Funding Formula																													
16.3.1	PCC's Fair Funding Formula does not take into account the size of the school compared to the stream, therefore Brecon has always been unfairly the poorer stream of the two	The fair funding formula is based on various elements which include premises allowances. Additional funding to support the teaching element of provision is provided by the language uplift.																											
16.3.2	The money provided to dual stream secondary schools is only for the Welsh stream, but if you want to be able to create an ethos across the school with all letters etc bilingual, it will incur extra costs	The money provided through the funding formula is based on the school delivering through both languages. No uplift is provided to single language schools.																											
16.4 General issues relating to the council's budget																													
16.4.1	What is the total budget for education in Powys and how much goes on administration?	<p>The pie chart below shows the total Education budget in Powys in 2016-17. The chart shows the split of the total £99m.</p> <p>SSSR totalling £2.1m is the total cost of administration.</p> <table border="1"> <caption>Education Budget Split in Powys (2016-17)</caption> <thead> <tr> <th>Category</th> <th>Amount (£m)</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Schools Delegated Budgets</td> <td>£65.4m</td> <td>66%</td> </tr> <tr> <td>Home to School Transport</td> <td>£9.5m</td> <td>10%</td> </tr> <tr> <td>ALN</td> <td>£8.7m</td> <td>9%</td> </tr> <tr> <td>Operational</td> <td>£4.6m</td> <td>5%</td> </tr> <tr> <td>Capital Charges</td> <td>£6.3m</td> <td>6%</td> </tr> <tr> <td>Other</td> <td>£1.2m</td> <td>1%</td> </tr> <tr> <td>SSSR</td> <td>£2.1m</td> <td>2%</td> </tr> <tr> <td>School Meals</td> <td>£1.2m</td> <td>1%</td> </tr> </tbody> </table>	Category	Amount (£m)	Percentage	Schools Delegated Budgets	£65.4m	66%	Home to School Transport	£9.5m	10%	ALN	£8.7m	9%	Operational	£4.6m	5%	Capital Charges	£6.3m	6%	Other	£1.2m	1%	SSSR	£2.1m	2%	School Meals	£1.2m	1%
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16.4.2	Why do you budget forward transport costs but not education costs?	All of the authority's costs are considered as part of the overarching financial strategy for the authority, and are considered on an annual basis when the budget is approved by the council. Individual schools are provided with 3 year funding estimates to inform a 3 year budget planning cycle.
16.4.3	It may be that Powys needs more money from central government to enable pupils to operate on a level playing field with the rest of Wales	The authority notes this comment, however reducing funding to local government is the situation we are faced with. Because of this reduction in funding to local government, the authority's school transformation programme is essential to ensure that the authority can continue to provide high quality Welsh-medium and English-medium education within a reducing funding envelope.
16.4.4	The authority is spending £110976 transporting children away from Brecon simply because Brecon does not have a category 2B Welsh stream – can you explain how this is not serious financial mismanagement by the council?	The provision of home to school transport to both Builth Wells High School and Ysgol Gyfun Ystalyfera was awarded following a transport appeal which was managed by the legal services section of Powys County Council. Once the appeal panel had concluded that the level of Welsh-medium provision in Brecon High School was significantly lower than the provision in Builth Wells High School and Ysgol Gyfun Ystalyfera, the authority had no choice but to provide transport. The authority is content that the procedures followed were correct. The authority does not accept that this is financial mismanagement.
<b>16.5 Other</b>		
16.5.1	If Brecon was 2B status, the £3000 per child that the Welsh assembly pays to Ystalyfera for Powys children to go there would be paid to our schools rather than out of county schools – this would amount to £120,000 extra from the Welsh assembly going to Brecon High School rather than Ystalyfera	If the pupils were attending Powys schools rather than Ysgol Gyfun Ystalyfera, it is true that the authority would receive additional funding from Welsh Government through the settlement procedure. The additional funding allocated to Brecon High School would be calculated through the schools funding formula, and Brecon High School would have to support the additional pupils within the funding provided.
16.5.2	Plea for the council to withdraw this negative proposal and start investing the money wasted in	As stated in the consultation document in respect of this proposal, the reasons why the authority is proposing to close the Welsh-medium stream at Brecon

	administering the consultation to bolster our excellent schools, support teachers and give children the right to learn Welsh in Brecon	High School are as follows: <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul>
16.5.3	£100,000 more per year has been put into Builth High School for Welsh-medium provision	Builth High School is funded in accordance with the fair funding formula, with the language uplift being based on the number of subjects delivered in both Welsh and English. The allowance provided to Builth Wells High School during 2016-17 was £100,619, whilst the allowance provided to Brecon High School during 2016-17 was £58,475.
16.5.4	The proposal is financially driven not educationally driven  The proposal appears to be a short term financial saving for the council dressed as an attempt to 'improve the standard of Welsh language education'	As stated in the consultation document in respect of this proposal, the reasons why the authority is proposing to close the Welsh-medium stream at Brecon High School are as follows: <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul>
<b>17. ALTERNATIVE OPTIONS</b>		
<b>17.1 Improve the Welsh-medium provision in Brecon</b>		
17.1.1	The council should extend and improve Welsh-medium provision at Brecon High School  PCC should invest in Brecon High School's Welsh-medium stream and make it a 2B status just as everything is coming together for Brecon High School  Brecon High School should be funded properly to provide local Welsh-medium provision so that pupils are not transported elsewhere because	Financial support for the provision of education on a dual stream basis has been provided to Brecon High School for a number of years, in accordance with the authority's Fair Funding Formula. Despite this support being in place for many years, there has been no increase in the level of provision available at Brecon High School.

	<p>they speak Welsh</p> <p>Welsh-medium provision to continue in Brecon High School, and needs to be funded so that it is viable so that the school can provide a full curriculum, recruit staff and support their professional development</p> <p>Make Brecon Welsh stream a success and you wouldn't be forced to transport children across vast areas to access WM education</p> <p>Providing more subjects in Brecon would cut travel costs, would ensure the security, safety and welfare of pupils and would prevent anxiety and stress to pupils and their families</p> <p>The council should be supporting and encouraging Brecon High School to thrive and become a well-established and successful secondary school with Welsh-medium provision</p>	
17.1.2	<p>Brecon High School should receive more funding as a dual language school from the Welsh commissioner</p> <p>The council should put a case for special additional funding to the Welsh Government in order to secure a future for a Welsh language stream in Brecon</p>	<p>The authority is not aware of any additional funding available from the Welsh Language Commissioner or the Welsh Government to support the provision of a Welsh-medium stream in Brecon.</p>
17.1.3	<p>The Welsh stream in Brecon should be maintained and fully funded as Builth is in order to comply with government recommendations</p>	<p>Financial support for the provision of education on a dual stream basis has been provided to Brecon High School for a number of years, in accordance with the authority's Fair Funding Formula. The same level of support has been provided to other dual stream high schools, including Builth Wells High</p>



		School. Whilst other schools have used this funding to increase the level of Welsh-medium provision within the school, there has been no significant increase in Welsh-medium provision at Brecon High School.
17.1.4	<p>The council should advise and encourage senior management in Brecon High School to promote and showcase the school as a bilingual school in the community</p> <p>Brecon High School should raise its profile as a bilingual school through bilingual letters, concerts, articles etc</p>	The promotion of any school is the responsibility of the school's governing body and senior management team.
17.1.5	The council should be looking at long term solutions for Welsh medium in the Brecon area, not just how it can improve in the Builth area in the short term	The council is looking at a long term solution for Welsh-medium secondary provision for the whole mid and south Powys area, which will provide a comprehensive Welsh-medium curriculum for current pupils and future pupils. As stated on page 21 of the consultation document: 'the authority's view is that closure of the Welsh-medium stream at Brecon High School is the most suitable way forward in order to ensure that more robust linguistic continuity can be provided to Welsh-medium learners. This would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.'
17.1.6	Why are you not considering raising the status of Brecon High School to 2B as an option?	<p>In the Cabinet minutes of a meeting held on the 22<sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p> <p>Early discussions took place with Brecon High School about providing additional support, however due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil this.</p> <p>The Fair Funding Formula arrangements were reviewed for the 2013-14</p>

		<p>financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools. Some schools have succeeded in strengthening and increasing the Welsh-medium provision available, however this has not been the case at Brecon High School.</p> <p>On the 27<sup>th</sup> January 2015, Cabinet approved the commencement of a Secondary School Reorganisation programme, which intended to transform the secondary and post-16 sector across the county. One of the aims of this Programme was:</p> <ul style="list-style-type: none"> <li>- 'Reconfiguration of Welsh-medium education with the aim of establishing at least one Welsh-medium secondary school in the county, and the consolidation of other Welsh-medium streams into larger units.'</li> </ul> <p>This replaced the previous decision made by Cabinet on the 22<sup>nd</sup> November 2011 that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school.</p>
<b>17.2 Establish a category 2A Welsh-medium secondary school</b>		
17.2.1	This is a golden opportunity to make a significant improvement to the provision of Welsh-medium education in South/Mid Powys by establishing a Welsh-medium secondary school	The authority notes this comment.
17.2.2	The policy of dual stream secondary provision has not been successful in terms of developing Welsh-medium education	The authority notes this comment.
17.2.3	A majority of parents of Welsh-medium primary pupils have stated many times in a number of surveys that they wish to see the establishment of	The authority notes this comment.

	a Welsh-medium secondary school to serve the area	
17.2.4	The authority has previously stated that the cost is the reason for not establishing a category 2A school at the current time, however this shows a lack of vision and ignores the fact that a dual stream school is more expensive to maintain and wastes resources	The authority notes this comment.
17.2.5	Establishing a Welsh-medium secondary school would lead to a growth in Welsh-medium pupil numbers	The authority notes this comment.
17.2.6	If the council is serious about its aspiration to offer full Welsh-medium provision to the Welsh-medium pupils of Powys, continuing with the policy of a dual stream school in Builth Wells will not achieve this	The authority notes this comment.
17.2.7	Designated Welsh-medium secondary provision could be established via an all-through school, consisting of secondary provision in Builth Wells, and two designated Welsh-medium primaries – one in mid Powys and Ysgol y Bannau in Brecon.	The authority notes this comment.
17.2.8	Establishing a Welsh-medium school would provide equal opportunity to pupils in the south of the county compared with English-medium pupils and other pupils across Wales, and would offer equality for parents who want a fully Welsh-medium education for their children	The authority notes this comment.
17.2.9	Establishing a Welsh-medium school would safeguard Welsh-medium provision in the 6 <sup>th</sup> form	The authority notes this comment.

17.2.10	A Welsh-medium school would attract well-qualified, enthusiastic, talented staff	The authority notes this comment.
17.2.11	A Welsh-medium school would provide effective linguistic immersion for pupils	The authority notes this comment.
17.2.12	A Welsh-medium school would be a central hub for the Welsh language and would be a focus for the language in south Powys	The authority notes this comment.
17.2.13	Establishing a Welsh-medium school would correspond with national policy in terms of strengthening, expanding and developing Welsh-medium education, and would enable Powys County Council to achieve national targets which have been set by the Welsh Government.	The authority notes this comment.
<b>17.3 Shared teachers</b>		
17.3.1	<p>Well qualified teachers should be appointed to work in Builth and Brecon schools – this would ensure a greater number of subjects in both schools, both schools would share the same teachers and would maintain Welsh traditions in the school</p> <p>Teachers travelling between Brecon and Builth would be the best solution to increase the numbers on both sites</p> <p>Why can't a Welsh speaking team of teachers travel between Builth and Brecon?</p> <p>Teachers teaching in both schools would increase</p>	<p>Whilst it is possible that the amalgamation of staff in order to maintain provision in both Brecon and Builth Wells would result in an extended curriculum offer for Brecon pupils, it would not address the very low pupil numbers on the Brecon site.</p>

	<p>Welsh language provision in both schools and would not incur additional transport costs</p> <p>Surprised that Powys have not appeared to consider a federated approach to this problem, by moving teachers between Brecon and Builth High Schools, this would enable a Welsh stream to thrive at both schools, and would also allow the Welsh stream pupils to benefit from the new proposed Penlan campus</p>	
17.3.2	<p>The council has staff based locally in Brecon at Ysgol y Bannau and Brecon High School who can offer Welsh-medium provision and expertise throughout Key Stage 3 and 4, other staff could be supplied from Builth Wells to teach the remaining subjects</p>	<p>Whilst it is possible that utilising staff based at Ysgol y Bannau and Builth Wells High School / the New Mid Powys Secondary School in order to maintain provision in both Brecon and Builth Wells would result in an extended curriculum offer for Brecon pupils, it would not address the very low pupil numbers on the Brecon site.</p>
17.3.3	<p>A county advisory teacher for Welsh should liaise with both schools, organise meetings with senior management re timetables etc</p>	<p>The authority's Challenge Advisor with responsibility for Welsh as a subject provides challenge and advice to all schools who deliver Welsh first or second language. It is the responsibility of individual schools to structure the timetable and curriculum of their school. This is not the responsibility of the local authority.</p>
<b>17.4 Increase primary pupil numbers</b>		
17.4.1	<p>Powys needs to look at ways to increase numbers in Welsh-medium in the primary sector to create numbers that can filter into Brecon Welsh stream</p> <p>The authority should increase the number of Welsh streams in primary schools which feed secondary schools with Welsh streams, but especially Brecon High School</p>	<p>There has been no significant growth in pupil numbers at Ysgol y Bannau in recent years, therefore there is no evidence that there is demand for any additional Welsh-medium streams in the Brecon area at the current time. A Welsh-medium workstream was established as part of the Gwernyfed Area Review that was carried out a few years ago, however this workstream concluded that there was no demand for Welsh-medium primary provision in that area at the time.</p>

	<p>Encourage the council to increase the number of Welsh streams in primary schools that feed secondary streams</p> <p>More bilingual education in other primary schools in the local area would mean that the future of the Welsh stream at Brecon would be constructed on a more solid foundation</p>	
<b>17.5 Use of modern technology</b>		
17.5.1	<p>Pupils could be grouped in a room for a lesson but taught via video conferencing / Skype as is the case in other parts of the world</p> <p>Modern technology eg Skype should be used for older pupils</p>	The authority, supported by Welsh Government, has provided every secondary school in Powys with video conferencing facilities, therefore there has been no reason why Brecon High School could not have worked with other providers to offer additional Welsh-medium opportunities for pupils.
<b>17.6 Bring current schools together</b>		
17.6.1	<p>Propose you bring Brecon Welsh stream, Ysgol y Bannau and Sennybridge together as one through school operating from their individual sites but working together to achieve a strong Welsh-medium provision</p> <p>Bringing Brecon Welsh stream, Ysgol y Bannau and Sennybridge schools together would increase cohort numbers and would provide a pool of Welsh-medium teachers to fall back on and would eliminate additional transport costs</p>	The authority acknowledges the benefits of a Welsh-medium school compared with dual stream provision, and that the suggested model would succeed in establishing a school of this type. Whilst this model would strengthen transition from Sennybridge to the provision at Brecon, there would be no significant increase in secondary pupil numbers compared with the numbers that were attending the Welsh-medium stream in Brecon High School in 2014/15, therefore the authority's view is that this provision would not be viable.
17.6.2	Powys needs to get existing providers of Welsh-medium education to work together	The authority established a Welsh-medium learning partnership, 'Clwstwr y Ffynnon' a few years ago, which included all Welsh-medium providers in mid and south Powys. The aim of this group was to strengthen links between

	Brecon Welsh stream, Ysgol y Bannau and Sennybridge School could start working together as one e.g. combined visits, trips, activities	existing providers of Welsh-medium education and encourage joint activities. During 2013/14 and 2014/15, a day of Welsh language activities was held for all Welsh-medium providers in the area, and further joint activities are currently arranged by Menter Brycheiniog a Maesyfed and the Urdd.
<b>17.7 Keep two Welsh-medium streams</b>		
17.7.1	Retaining two Welsh streams would mean that all children could access Welsh-medium education  Keeping provision in Brecon and Builth would provide choice for families in Sennybridge	The authority notes this comment. However the current number of Welsh-medium pupils in mid and south Powys is not sufficient to support two Welsh-medium streams and to provide a comprehensive Welsh-medium curriculum for pupils.
17.7.2	Giving free transport to Builth is the answer to growing Welsh-medium education in the Brecon area, as long as Brecon's Welsh-medium stream remains – this would provide choice for families choosing Welsh-medium education	Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a category 4 school, which is described as a 'Predominantly English Medium Secondary School'.  The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: 'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'  This category would allow the school to teach one or two subjects through the medium of Welsh, which could include Welsh first language, however this would be a decision for the school. There are examples of 'Predominantly English Medium secondary schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.
<b>17.8 Other</b>		
17.8.1	You need to spend an initial amount to fix the problem of Welsh-medium education in south	The authority is currently facing significant financial pressure, and is under pressure to ensure that services are delivered as cost effectively and

	Powys but it will be worth it in the future	efficiently as possible.  In September 2016, the council's Cabinet agreed to re-consult on the closure of the Welsh-medium stream at Brecon High School. The reason for this decision was 'to provide a more sustainable, educationally and linguistically viable model of Welsh-medium secondary education'.
17.8.2	The proposal would be more workable if the changes meant that there would still be provision but at worst the most children would have to travel is 20-30 minutes	The authority notes this comment and acknowledges that implementation of the proposal would lead to an increase in travel time for pupils
17.8.3	The council should monitor and ensure that there is 'robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education'	The authority does monitor the Welsh-medium provision available in each of the 6 dual stream secondary schools in Powys on an annual basis. Through this monitoring, the authority has identified that the current provision does not provide 'robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education'
17.8.4	There should be a hub in Brecon which could be a centre of excellence, and modern technology could be used to present lessons to students	The authority is currently planning a new building for Brecon High School which will provide first class facilities for the school, which will include the provision of modern technology which can be used to present lessons.
17.8.5	Not all parents are looking for 8, 9 or 10 GCSEs in Welsh – they want access to a few subjects and Welsh first language to ensure that pupils are confidently bilingual when they leave school so that they can apply for jobs where Welsh language skills are necessary	The authority notes this comment. However, the authority has a duty to ensure that full Welsh-medium provision is available for those pupils who choose it, to ensure that pupils have the best possible opportunities to continue to develop their Welsh language skills during their time in secondary school, so that they are confidently bilingual when they leave school. The current provision at Brecon High School does not provide this.
17.8.6	The answer is very simple – start properly funding and supporting Welsh-medium education to demonstrate to both parents and children that they are a valued and respected section of the community	Additional funding to support the provision of Welsh-medium education is provided to dual stream schools via the Fair Funding Formula. The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion.



		Additional support is provided to schools based on the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools. Some schools, such as Builth Wells High School, have succeeded in strengthening and increasing the Welsh-medium provision available, however this has not been the case at Brecon High School.
17.8.7	It would be easier to close the Welsh stream at Builth Wells High School because there isn't a Welsh-medium school there like there is in Brecon	The authority does not agree with this comment. Currently, the number of pupils accessing the Welsh-medium provision at Builth Wells High School is significantly greater than the number of pupils accessing the provision at Brecon High School, and the school provides an increased level of Welsh-medium provision to pupils compared with the provision currently offered at Brecon High School. In addition, there are more feeder primary schools in the current catchment of the Welsh-medium stream of Builth Wells High School.
17.8.8	Feel that not all options have been considered – the council has latched onto the first idea of closing the stream at Brecon High School without considering any alternatives	<p>As outlined on page 19 of the consultation document, a wide range of possible options for the future of Welsh-medium provision in mid and south Powys have been considered since 2015. In particular, a number of options were evaluated in the business case relating to the review of secondary provision in Mid and South Powys. This business case concluded that 'the most appropriate option at the current time is to centralise Welsh-medium secondary provision across the Mid and South Powys region.'</p> <p>The only 2 options included in the consultation document in respect of the current proposal are to retain the Welsh-medium stream at Brecon High School or to close the Welsh-medium stream at Brecon High School. As stated on page 19 of the document, 'The authority is currently going through the statutory process to close Builth Wells High School and Llandrindod Wells High School and establish a new secondary school across two sites. The proposal is that the new school will be a dual stream school, with the current dual stream provision being retained on the Builth Wells site. Therefore, the only options now available to the authority in relation to the Welsh-medium provision at Brecon High School is whether or not to retain this provision.'</p> <p>A number of other options have been suggested during the consultation</p>

		period, and these will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.
<b>18. ISSUES RELATING TO THE CONSULTATION PROCESS</b>		
<b>18.1 Pre-determination</b>		
18.1.1	<p>The council should have an independent investigation into why they pre-determined the outcome of this consultation by implementing free transport from Brecon to Builth before the consultation process had run its course</p> <p>Considering the decisions that have been made re transport, how has PCC not pre-determined the outcome of this proposal?</p> <p>How is paying for transport provision to other schools before the outcome of consultation is known not predetermination?</p>	<p>18 months or so ago, a number of parents of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education. As an admissions authority, the council cannot refuse places to children if there is a place available at the school to which they apply. When parents applied for places at Builth Wells High School, there were places available, therefore the authority was unable to reject the applications, however transport was initially refused at Stage 1 and 2 of the transport application process.</p> <p>Following this, the applications were taken to appeal, and the appeal panel took the decision to award transport based on the greater breadth of Welsh-medium provision offered at the alternative providers compared with the breadth of provision offered at Brecon High School.</p> <p>The council acknowledges that the decision of the appeal panel to award transport has impacted on the number of pupils attending the Welsh-medium stream at Brecon High School, however this is not predetermination – transport was not automatically awarded to these parents, it was referred to the Appeals Panel in accordance with the agreed process.</p>
18.1.2	The decision was made several years ago – 6/7 years ago the then headteacher of Brecon High School said to a governor “the Welsh is going to Builth and Ysgol y Bannau will be dead”	A final decision on the future of the Welsh-medium stream at Brecon High School has not been made. The authority has no knowledge to either support or deny the accusation that this statement was made by the then headteacher of Brecon High School.
18.1.3	Ysgol y Bannau has been made an official feeder school for Builth Wells Welsh stream, with Builth representatives coming in to champion their	Ysgol y Bannau has not been made an official feeder school for Builth Wells Welsh stream as no final decision has yet been made in relation to the future of the Welsh-medium stream at Brecon High School. However, a number of

	<p>school – why are Builth primary school children not encouraged to attend Brecon Welsh stream? This is predetermination</p>	<p>parents of pupils at Ysgol y Bannau have chosen for their children to attend Builth Wells High School, therefore it is not unreasonable that Ysgol y Bannau has developed links with Builth Wells High School in order to facilitate transition of these pupils to high school. More Welsh-medium provision is available in Builth Wells High School than Brecon High School. As the authority's aim is to provide more equality for Welsh-medium pupils, Builth pupils would not be encouraged to attend Brecon High School.</p>
18.1.4	<p>Lots of things have pre-determined the consultation therefore it has not been able to run fairly</p>	<p>The outcome of the consultation has not been pre-determined. All issues raised during the consultation period will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.</p>
<p><b>18.2 Issues relating to the timing of the consultation</b></p>		
18.2.1	<p>The council is not prepared to extend the unrealistic deadline for the end of the consultation, despite it being Christmas and many parents are focussed on that</p> <p>The timing of the consultation, over the Christmas period, is difficult, and there is insufficient time to respond</p> <p>Request for an extension to the closing date</p>	<p>The School Organisation Code requires councils to consult on proposals at least 42 days or 6 weeks, with at least 20 of these being school days. The council extended this period to seven weeks for this consultation, to take account of the Christmas period.</p> <p>The council recognises that this consultation has taken place during a particularly busy time, however the council needs to balance the need to provide sufficient time for stakeholders to respond to the consultation and the need to conclude the process so that Cabinet can make a decision on how to proceed in order to avoid an extended period of uncertainty.</p>
18.2.2	<p>The timing of the consultation will impact on the school's ability to design a curriculum for the next academic year – how can this be planned when it is not known whether there will be a Welsh stream</p> <p>The timing of the consultation does not help with year 6/7 transition</p> <p>The consultation should be cancelled until after</p>	<p>The authority notes that the timing of the consultation has caused some operational difficulties for the schools and pupils affected. All school reorganisation proposals lead to a period of uncertainty for those affected, and due to the fact that uncertainty in relation to the Welsh-medium stream at Brecon High School has continued for many years, the authority's view was that it was preferable to move forward with the consultation in order to seek a resolution to this issue.</p>

	the new building is built as there are too many variables at the moment for the council to make an informed decision	
18.2.3	The consultation is being conducted at a difficult time of year – it is difficult to get hold of members of the School Transformation Team as staff are unavailable – either not in the office, working from home or on leave	<p>Members of the School Transformation Team were working on all but 5 working days throughout the consultation period. On some of these working days, staff were out of the office or in meetings, however messages could be left and officers were contactable by e-mail.</p> <p>Responses to the consultation were to be submitted in writing or via e-mail, therefore responses could be submitted at any time, regardless of whether or not officers were in the office.</p>
<b>18.3 Issues relating to the consultation meetings</b>		
18.3.1	<p>The speakers responses in the consultation meeting were unsatisfactory</p> <p>None of the fears, concerns, anxieties and worries raised by the public in the public meeting were met with adequate reassuring or convincing responses</p> <p>Answers provided at the consultation meeting can only be described as lame and un thought out</p>	Officers endeavoured to answer all questions posed in the consultation meetings to the best of their abilities. Responses to all issues raised during the consultation period, including those raised in the consultation meetings, are provided in this report.
18.3.2	Why was there no councillor in the meeting with staff?	The authority's usual practice is that the portfolio holder and the leader attend the meeting with parents / the community and the portfolio holder attends the meeting with governors. However, the minutes of all three meetings, as well as the meetings held with pupils, will be included as an appendix with the report considered by Cabinet, and the issues raised in all meetings are included in this report, therefore the portfolio holder and all other Cabinet members will be aware of all issues raised during the consultation, including those raised in meetings and in other written responses, before making a decision on how to proceed.

18.3.3	Feeling that the public meeting was called by the council simply to convince the public to accept something that was a 'fait accompli' – there was not a lot of consultation taking place	The consultation meetings were arranged in order to give stakeholders the opportunity to let the council know their views on the proposal. Minutes were taken of all meetings, and the issues raised in all meetings have been included in this report. All issues raised during the consultation period will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.
18.3.4	The public spoke at the public meeting and their concerns were ignored  Not one member of the public at the public meeting supported the plans	The views expressed in the consultation meetings and in written responses to the consultation will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.
18.3.5	Members of Cabinet at the consultation meeting did not instil confidence that any decisions would be well informed and forward thinking	The authority notes this view. Cabinet members were in attendance at the consultation meeting in order to hear the views of stakeholders in relation to the proposal. All issues raised during the consultation period will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.
<b>18.4 Issues relating to the minutes of the consultation meetings</b>		
18.4.1	Why are the minutes, an important document that was promised at the consultation meeting, being deliberately withheld from us in the consultation period, but were freely available to all in previous consultations  The withholding of minutes undermines the validity of the whole consultation and brings into question whether the whole process is being taken seriously and conducted with the honesty and integrity that is a requirement of a legitimate consultation process	The purpose of the minutes is to inform Cabinet members of the issues raised in the meetings, and they will be published along with the Cabinet papers in due course. This is in line with the procedure followed in relation to the minutes of other consultation meetings held in relation to other proposals.  The minutes were released to the Headteacher and Chair of Governors of Brecon High School before the end of the consultation period, to give them the opportunity to comment / request any amendments to the content.

	<p>As the minutes have not been made available, many who were unable to make the consultation meeting were unable to know exactly what was said and were unable to comment on the information provided at the meeting</p> <p>The fact that the minutes have not been made available has meant that this consultation has not been run fairly and shows that the council are trying to hide information that came out in the consultation meeting</p> <p>People who were unable to attend the public meeting were relying on having the minutes of the meeting available to them to have the details and answers to questions that were raised</p>	
18.4.2	<p>At the consultation meeting, the council was asked why the meeting was not being filmed and the answer given was that there were minutes being written and these would be made available – why were the minutes never made available?</p>	<p>The minutes were released to the Headteacher and Chair of Governors of Brecon High School before the end of the consultation period, to give them the opportunity to comment / request any amendments to the content.</p>
<b>18.5 Issues relating to who the council has consulted with</b>		
18.5.1	<p>Why have you not asked parents of Welsh-medium pupils travelling out of Brecon catchment if they would consider attending a local 2B school?</p>	<p>Information about the consultation was sent to the schools pupils might transfer to should the proposal be implemented for distribution to parents, which would include parents who had transferred to alternative Welsh-medium provision, therefore these parents did have the opportunity to respond to the consultation.</p>
18.5.2	<p>Why have you not asked parents of pupils in the Welsh-medium stream at Brecon High School if they would consider travelling to Builth if there was no provision available at Brecon?</p>	<p>Parents of pupils at Brecon High School, Ysgol y Bannau and Sennybridge CP School have been informed of the consultation in line with the requirements of the School Organisation Code, and were informed of the public meeting held at Brecon High School on the 1<sup>st</sup> December, therefore the</p>

	<p>Why have you not asked parents of pupils in the local Welsh primary school if they would consider travelling to Builth Wells if there was no Welsh-medium provision in Brecon?</p> <p>Has there been any engagement with parents of pupils at Ysgol y Bannau?</p> <p>New parents at Sennybridge are concerned that there has been little dialogue with them and they have had little choice</p> <p>The council has not consulted directly with parents of Welsh-medium pupils at this current stage</p> <p>The council has not asked parents what they want</p>	<p>council is satisfied that parents have had an opportunity to contribute to the consultation.</p>
18.5.3	<p>Are the pupils being consulted and when?</p>	<p>A young people's version and a primary version of the consultation document were produced and distributed to affected pupils. In addition, officers met with pupils at Brecon High School, Ysgol y Bannau and Sennybridge CP School during the consultation period.</p>
18.5.4	<p>Request for the Welsh Language Commissioner to get involved in this consultation</p>	<p>The School Organisation Code does not require the authority to consult with the Welsh Language Commissioner, however the Commissioner could have responded to the consultation if she had wished to.</p>
18.5.5	<p>How much weight is given to groups like RhAG in the consultation as they are not acting for the majority of Ysgol y Bannau parents who are the only parents who will be affected if you close Brecon Welsh stream</p> <p>The council is listening to RhAG which is led by</p>	<p>The School Organisation Code states the stakeholders that must be consulted with during any school reorganisation process. Whilst RhAG is not one of the stakeholders that must be consulted, due to the open and public nature of the consultation, RhAG are entitled to respond. There is no weighting to any of the stakeholders, however the Code states that the views of Estyn and young people must be highlighted in any consultation report.</p>

	<p>parents who want their children to be taught in a designated Welsh-medium school</p> <p>The council isn't listening to the views of the majority of parents – RhAG is a vocal group but it doesn't necessarily represent all the Welsh speaking community</p>	
<b>18.6 Comparisons with previous consultations</b>		
18.6.1	This consultation is not being taken as seriously as previous consultations	This consultation is being taken as seriously as previous consultations, and is being carried out in line with the requirements of the School Organisation Code. All issues raised during the consultation will be taken into consideration by the Cabinet when determining how to proceed in relation to the proposal.
18.6.2	There is no option to complete an online questionnaire as previous and people are only to respond in written form	An online response form was available on the council's website throughout the consultation period.
18.6.3	Why wasn't the consultation meeting filmed as in previous consultations? Not everyone was able to attend the meeting and some elderly people were relying on the filming as in previous consultations	The previous consultation meetings in relation to the proposals for secondary education were filmed due to the number of people expected to attend. As the number of pupils likely to be affected by this proposal is significantly less, the authority's view was that there was no need to film the meetings. This is in line with the arrangements for other consultations that have taken place recently, including proposals for primary education in Welshpool and proposals in relation to Nantmel C. in W. School, Llanbister C.P. School and Llanfihangel Rhydithon C.P. School.
18.6.4	<p>Why weren't facilitators used for this consultation as for the previous consultation in relation to Gwernyfed / Brecon High School?</p> <p>Why hasn't this consultation been given the same status as previous consultations with an external company facilitating and recording all aspects?</p>	ORS were brought in as facilitators during the previous consultations relating to secondary provision due to the scale of those proposals. At the time, the council was carrying out a large scale proposal that included four high schools, plus a number of proposals relating to primary schools. ORS were brought in primarily to carry out the task of analysing the consultation responses in relation to the secondary proposals. This was not necessary this time as there is internal officer capacity to carry out this work.



		The previous consultation meetings in relation to the proposals for secondary education were filmed due to the number of people expected to attend. As the number of pupils likely to be affected by this proposal is significantly less, the authority's view was that there was no need to film the meetings. This is in line with the arrangements for other consultations that have taken place recently, including proposals for primary education in Welshpool and proposals in relation to Nantmel C. in W. School, Llanbister C.P. School and Llanfihangel Rhydithon C.P. School.
18.6.5	Compared to the previous two consultations on closure of the Welsh-medium stream the response form for this one seems lazy in the extreme and it may well be very difficult to collate people's responses in a meaningful way	The response form use for this consultation is in-line with the requirements of the School Organisation Code, and is in-line with the response forms used for other consultations carried out by the authority in recent months, for example, changing the language category of Ysgol Dolafon, closure of Nantmel C. in W. School, Llanbister C.P. School and Llanfihangel Rhydithon C.P. School, closure of Talgarth C.P. School and Bronllys C.P. School and the reorganisation of primary education in Welshpool.
<b>18.7 Queries relating to the process going forward</b>		
18.7.1	When is the report on the outcome of consultation likely to be considered by Cabinet?	The current expectation is that the consultation report will be considered by the Cabinet in March 2017.
18.7.2	Could there be a new Cabinet considering the final report?	Local government elections will take place in May 2017. Should the consultation report be considered by the current Cabinet in March 2017, and should the current Cabinet decide to proceed with the publication of statutory notices, it is possible that the Objection Report would be considered by a new Cabinet.
<b>18.8 This consultation is not being taken seriously</b>		
18.8.1	This is a presentation not a consultation – this is a publicity stunt	The same value is being placed on this consultation exercise as any other consultation carried out by the council.

	<p>People feel that the consultation is not being conducted with the seriousness we would expect</p> <p>What value is being placed on this consultation, given that this is the third time there has been consultation on this proposal?</p> <p>It seems that this process may well be just a hoop you are obliged to make us jump through and that you can't really be bothered to put in the effort – hope that this is not the case and that all responses will be properly considered</p>	<p>The consultation has been carried out in line with the requirements of the School Organisation Code. All issues raised during the consultation will be taken into consideration by the Cabinet when determining how to proceed in relation to the proposal.</p>
18.8.2	<p>The way the consultation has been run has led to a lot of confusion and uncertainty – lots of families have been confused thinking that the stream had already closed or moved their children as they thought the Welsh stream is definitely closing</p>	<p>The authority notes this comment. The consultation has been carried out in line with the requirements of the School Organisation Code. The authority has not stated that the Welsh stream would definitely be closing. However, 18 months or so ago, following the initial Cabinet decision to consult on closure of the Welsh-medium stream at Brecon High School, the parents of a number of pupils that were attending the Welsh-medium stream at Brecon High School decided to move their children to another school to access Welsh-medium education.</p>
18.8.3	<p>Having to respond to the consultation again is excessive, time-consuming and unnecessary, many are being worn down – is this another example of manipulating the situation to reduce the number of responses?</p>	<p>The authority acknowledges that having to respond to another consultation has been time-consuming for parents. However, the same value is being placed on this consultation exercise as any other consultation carried out by the council.</p>
<b>18.9 Other</b>		
18.9.1	<p>Request for the council to write to parents to advise that the responses submitted to previous consultations will not be taken into consideration this time</p>	<p>This request was made by a parent during the public meeting held on the 1<sup>st</sup> December 2016. A letter to this effect was issued to parents during the week commencing the 5<sup>th</sup> December 2016.</p>

18.9.2	Have you considered the Well-being of Future Generations Act?	The authority has carried out an Integrated Impact Assessment in respect of this proposal, which takes account of the Well-being of Future Generations Act. The Assessment will be updated to reflect the views expressed during the consultation period, and will be considered by Cabinet when determining how to proceed in respect of this proposal.
18.9.3	All those directly affected by this want to keep the Welsh stream, the council should spend more time listening rather than proposing	All issues raised during the consultation will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal. However, Cabinet will also need to consider the small number of pupils currently attending the Welsh-medium stream at Brecon High School and the need to provide equality for Welsh-medium pupils.
18.9.4	The proposal is being pushed through with little research or understanding	The authority does not agree with this comment. The authority has been considering the future of the Welsh-medium stream at Brecon High School for a number of years. As outlined on page 19 of the consultation document, a wide range of possible options for the future of Welsh-medium provision in mid and south Powys have been considered since 2015. In particular, a number of options were evaluated in the business case relating to the review of secondary provision in Mid and South Powys.
<b>19. ISSUES RELATING TO THE CONSULTATION DOCUMENTATION</b>		
<b>19.1 Information not included in the consultation document</b>		
19.1.1	<p>PCC don't mention Builth's Estyn report at all apart from a table right at the end</p> <p>The consultation document hardly mentioned that Brecon is and has improved and that Builth is in Special Measures – in previous consultations, Brecon being in special measures was mentioned nearly every other word</p>	<p>The Welsh Government's School Organisation Code (2013) states that the consultation document must include the following information about Quality and standards in education:</p> <ul style="list-style-type: none"> <li>• 'The likely impact of the proposals on the quality of the following: <ul style="list-style-type: none"> <li>a. outcomes</li> <li>b. provision</li> <li>c. leadership and management</li> </ul> </li> <li>• Information about the most recent Estyn reports for each school likely</li> </ul>

		<p>to be affected;</p> <ul style="list-style-type: none"> <li>The likely impact of the proposals on the ability of school or schools which are the subject of the proposals or any other school which is likely to be affected, to deliver the full curriculum at the foundation phase and each key stage of education'</li> </ul> <p>The information provided in the consultation document meets these requirements.</p>
19.1.2	<p>Figures from the present year 6 in Ysgol y Bannau should be used as an indicator – PCC has the school preference returns</p> <p>Why haven't the council included the 10 year 6 pupils from Ysgol y Bannau that have committed to attend Brecon Welsh stream in the consultation document?</p> <p>Applications for secondary admissions were submitted by the deadline of the 11<sup>th</sup> November and the consultation document was published on the 21<sup>st</sup> November so why weren't these figures included.</p> <p>The document is flawed without the inclusion of information about the number of pupils that will be transferring to Brecon Welsh stream in September 2017 and cannot be used in its current form</p> <p>There is no mention that only 6 or 7 of the 19 pupils in year 6 in Ysgol y Bannau will be going to Builth</p>	<p>The deadline for submitting school preference forms was the 18<sup>th</sup> November 2016. Whilst the consultation was not distributed until the 21<sup>st</sup> November, the document was finalised a few weeks before this to allow time for translation, copying and distributing to the affected schools.</p> <p>Information about the preference of the current year 6 pupils is now available. 18 forms have been received from pupils currently in year 6 at Ysgol y Bannau, and the preference stated are as follows:</p> <p>Brecon High School Welsh-medium stream – 10 pupils  Builth Wells High School Welsh-medium stream – 6 pupils  Ysgol Gyfun Ystalyfera – 1 pupil  Llandovery College – 1 pupil</p>

19.1.3	Why are the other feeder schools numbers for Builth not in this consultation document as we should be able to see how they compare to the numbers in Ysgol y Bannau and Sennybridge	This proposal relates to the closure of the Welsh-medium stream at Brecon High School due to the small number of pupils currently attending this provision. The number of pupils in the primary schools that feed the Welsh-medium stream in Builth Wells are not relevant to this consultation.
19.1.4	Unfair that you only publish the figures that support your case and omit the figures that don't support your case	The data included in the consultation document is factual data which reflects the position at the time of writing. The data included is in line with the requirements of the School Organisation Code.
19.1.5	The document doesn't include the number of pupils that have left Welsh-medium education	The data included in the consultation document is factual data which reflects the position at the time of writing. The data included is in line with the requirements of the School Organisation Code.
19.1.6	The document doesn't refer to the low numbers coming into Ysgol y Bannau's new year intake	Information about the current number of pupils in each year group at Ysgol y Bannau is provided on page 12 of the consultation document.
19.1.7	The document does not take into consideration that although there will be more Welsh medium opportunities for pupils and access to a wider range of subjects through the medium of Welsh, it will be less available / accessible to the majority of pupils in Welsh-medium education now	<p>On page 15 of the consultation document, the authority identified 'loss of Welsh-medium secondary provision in Brecon' and 'increased travel times for Welsh-medium learners from the Brecon catchment' among the disadvantages of the proposal. This reflects the fact that the provision will be less accessible to pupils.</p> <p>In addition, on page 16 of the consultation document, the authority identified a risk that 'pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'. This also reflects the fact that the provision will be less accessible to pupils.</p>
19.1.8	<p>Why was the £110976 current cost of transporting Welsh-medium pupils out of the Brecon catchment and the £47000 cost to make Brecon a 2B Welsh-medium stream not included in the consultation document?</p> <p>The consultation document does not state what it</p>	<p>As stated in the consultation document:</p> <p>'Following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. As this transport is already provided, implementation of the proposal would not incur any additional transport costs.'</p>

	<p>would cost to bring the school up to 2B status</p>	<p>During the recent consultation period on the proposal to close the Welsh-medium stream at Brecon High School, a county councillor requested details of the additional funding that would be required for the Welsh-medium provision at Brecon High School to meet the definition of a Category 2B school. The figure provided was £47000, which is the additional funding that would be provided to the school through the authority's funding formula to support the provision of Welsh-medium subjects for 80% of curriculum time in years 7 to 11.</p> <p>However, whilst the funding provided to dual stream schools through the authority's funding formula is based on the % of curriculum time where Welsh-medium options are available to pupils, the Welsh Government's definition of a category 2B school is as follows: 'At least 80% of <b>subjects</b> (excluding Welsh and English) are taught through the medium of Welsh but are also taught through the medium of English.'</p> <p>In relation to the funding provided through the formula to support dual stream provision in key stage 4, the authority considers that Welsh-medium curriculum time is available when a minimum of 1 Welsh-medium options subject is available in each options block. For example, a dual stream school offering 1 Welsh-medium subject and 5 English-medium subjects in each options block, as well as all core subjects through the medium of Welsh, would receive the maximum funding available from the authority to support its dual stream provision, and would be providing 80% of curriculum time through the medium of Welsh. However, this school would not necessarily meet the Welsh government definition for a category 2B school, as the school would not be providing 80% of <b>subjects</b> through the medium of Welsh and English.</p> <p>Therefore, whilst the figure of £47000 provided during the consultation is the maximum additional funding that would be provided to support dual stream provision at Brecon High School based on the authority's funding formula, this would not be sufficient to enable the school to provide Welsh-medium provision which would meet the definition for a category 2B school.</p>
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		The authority is unable to calculate the cost of bringing the school up to 2B status because the calculation is based on the number of subjects being delivered through the medium of English, and would vary from school to school and from year to year, particularly in terms of Key Stage 4 provision.
19.1.9	The proposal doesn't give appropriate consideration to the effect travelling to Welsh-medium provision will have on pupils from Brecon	<p>On page 15 of the consultation document, the authority identified 'increased travel times for Welsh-medium learners from the Brecon catchment' as a disadvantage of the proposal.</p> <p>Further to this, on page 17 of the consultation document, the authority identified a risk that 'additional travel has an adverse impact on pupil well-being and attainment'.</p> <p>In addition, consideration is given to the impact of additional travel on the pupils currently attending the Welsh-medium stream at Brecon High School on page 22 of the consultation document, and on pupils attending Welsh-medium primary provision in the catchment on page 23 of the consultation document.</p>
19.1.10	The document doesn't include information about bus journey times to Builth from the many locations Ysgol y Bannau children live	As Ysgol y Bannau serves the catchment areas of Brecon, Gwernyfed and Crickhowell, it is the authority's expectation that some of the pupils would choose to transfer to closer schools in other authorities rather than Builth Wells High School. However it is the authority's expectation that the travel times required would be within the 1 hour maximum travel time to and from school for the vast majority of pupils currently attending Ysgol y Bannau.
19.1.11	The consultation document does not explain the context of the situation	The consultation document provides factual information based on the situation at the time the consultation commenced. Information about the background to the current consultation is provided on pages 7-9 and page 19 of the consultation document.
19.1.12	Request for historical figures to see the impact the consultation has had on pupil numbers in the Welsh stream	Historical figures showing the number of Welsh-medium pupils in years 7-11 at Brecon High School since 2010/11 are provided on page 11 of the consultation document.
19.1.13	We need more data about transport costs over a	The figure of £111,000 provided at the consultation meetings relate to the

	longer period, say 5 years	current costs incurred in transporting children from the Brecon catchment to Builth and Ystalyfera. The vast majority of these costs commenced following the admission appeals in 2015, but a second bus has been provided due to the increased numbers travelling to Builth.
19.1.14	You should have stated at the beginning of the document that the fall in the number of Welsh-medium pupils has had an impact on the school	<p>Information about the background to the current consultation is provided on pages 7-9 and page 19 of the consultation document.</p> <p>On page 13 of the consultation document, the authority states that ‘It is acknowledged that it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School’.</p>
19.1.15	Section 9.5 – you have not submitted any data relating to quality of education as you state that as the numbers are small it would not be valid to compare performance, yet in other parts of the document you are using data that goes back to 2010	<p>As stated in section 9.5 on page 35 of the consultation document ‘The information provided in respect of the quality of education at the affected schools is in-line with the requirements of the School Organisation Code’.</p> <p>The authority also states that as ‘the number of Welsh-medium pupils at each school, particularly Brecon High School, is small...it would not be valid to compare the performance of Welsh-medium pupils in these schools.’ This statement is supported by Estyn, who state in their response to the consultation, which is provided on page 13 of this report, that: ‘The proposer has not provided any performance data on standards in the Welsh medium stream in any of the affected schools, but reasonably makes the statement that as numbers are small in Brecon High School, it would not be valid to compare the performance of Welsh-medium pupils in these schools.’</p>
19.1.16	The document is not in line with the school organisation code as the code states that information on quality of education is required – could you please include in the consultation report the section of the School Organisation Code that states that the quality of education data does not need to be included?	<p>The Welsh Government’s School Organisation Code (2013) states that the consultation document must include the following information about Quality and standards in education:</p> <ul style="list-style-type: none"> <li>• ‘The likely impact of the proposals on the quality of the following: <ul style="list-style-type: none"> <li>a. outcomes</li> </ul> </li> </ul>



		<ul style="list-style-type: none"> <li>b. provision</li> <li>c. leadership and management</li> </ul> <ul style="list-style-type: none"> <li>• Information about the most recent Estyn reports for each school likely to be affected;</li> <li>• The likely impact of the proposals on the ability of school or schools which are the subject of the proposals or any other school which is likely to be affected, to deliver the full curriculum at the foundation phase and each key stage of education'</li> </ul> <p>The information provided in the consultation document on pages 25-30 and page 35 meets these requirements.</p> <p>As stated in section 9.5 on page 35 of the consultation document 'The information provided in respect of the quality of education at the affected schools is in-line with the requirements of the School Organisation Code'. The authority also states that as 'the number of Welsh-medium pupils at each school, particularly Brecon High School, is small...it would not be valid to compare the performance of Welsh-medium pupils in these schools.' This statement is supported by Estyn, who state in their response to the consultation, which is provided on page 13 of this report, that: 'The proposer has not provided any performance data on standards in the Welsh medium stream in any of the affected schools, but reasonably makes the statement that as numbers are small in Brecon High School, it would not be valid to compare the performance of Welsh-medium pupils in these schools.'</p>
19.1.17	The consultation document does not mention the number of pupils expected to leave Welsh-medium education in Brecon – what in your opinion is the acceptable number of Ysgol y Bannau pupils leaving Welsh-medium education at key stage 3 if there is no provision available locally?	<p>The consultation document identified on page 16 a risk that should the proposal be implemented, 'Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school.'</p> <p>The authority's view is that the Welsh-medium provision currently available at Brecon High School does not provide appropriate linguistic continuity for Welsh-medium pupils, and the aim of the proposal is to provide greater</p>

		<p>equality in terms of the provision available to Welsh-medium pupils. Whilst it is acknowledged that this may lead to a decrease in the proportion of pupils continuing to access Welsh-medium provision in the secondary sector, the authority's view is that pupils would benefit from the increased Welsh-medium opportunities available at the alternative providers.</p> <p>As stated in the consultation document, 'Retaining pupils within the Welsh-medium sector is one of the Welsh Government's priorities'. The authority is required to monitor pupil progression within Welsh-medium education annually, this information is reported annually to Welsh Government in the WESP. The authority does not have a view on the 'acceptable number of Ysgol y Bannau pupils leaving Welsh-medium education at key stage 3', the authority aims for all pupils educated through the medium of Welsh in the primary sector to continue to be educated in Welsh in the secondary sector. However, the authority acknowledges that on some occasions, pupils or their parents may choose to transfer to alternative provision.</p>
19.1.18	The consultation document does not give a true reflection of the current situation and the benefits of having a Welsh stream in Brecon High School	<p>The information contained in the consultation document is in line with the requirements of the School Organisation Code. The authority's view is that it reflects the position at the time of writing, and the document includes factual data which reflects the position at the time of writing. The data included is in line with the requirements of the School Organisation Code.</p> <p>In addition, the document outlines the advantages and disadvantages of the proposal on pages 15 to 16.</p>
19.1.19	It is mentioned that numbers in Ysgol y Bannau have stayed the same for the last few years, but it is not mentioned that across the whole of Wales numbers in Welsh-medium education have declined	<p>In the draft Welsh in Education Strategic Plan (WESP) for 2017-20, the council acknowledges that 'over the period of the authority's previous Welsh in Education Strategic Plan (2014-17), the percentage of pupils assessed in Welsh first language at the end of the Foundation Phase decreased.'</p> <p>However, as stated in the consultation document in respect of the proposal to close the Welsh-medium stream at Brecon High School, 'Whilst Welsh-medium pupil numbers at Sennybridge C.P. School have increased slightly, this has not been the case at Ysgol y Bannau. This is contrast with the two other designated Welsh-medium primary schools in Powys, Ysgol Dafydd</p>

		Llwyd in Newtown and Ysgol Gymraeg Dyffryn y Glowyr in the Ystradgynlais area, where pupil numbers have increase over the same period.'
19.1.20	The document doesn't mention that the percentage of children opting to go to Builth from Ysgol y Bannau is decreasing every year even though there is free transport and more Welsh-medium subjects available	The document provides factual information about the number of pupils attending the Welsh-medium stream at Brecon High School at the time of writing. In addition, on page 13 of the consultation document, information is provided about the number of year 6 Welsh-medium pupils that were attending Ysgol y Bannau and Sennybridge CP School during 2015/16 that transferred to Welsh-medium and English-medium providers in September 2016.
19.1.21	The consultation document doesn't explain how pupils whose mother tongue is Welsh, and pupils who have been educated at Ysgol y Bannau, who choose to attend their local High School will be able to keep up and develop their mother tongue and study literature in their first language, as those whose first language is English do. Is it the proposal that these pupils attend second language Welsh lessons?	<p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a 'Predominantly English Medium secondary school'</p> <p>The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: 'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'</p> <p>Whether or not to provide the opportunity for pupils who study Welsh First Language would be a decision for the school. There are examples of 'Predominantly English Medium secondary schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p>
19.1.22	The consultation document does not explain why Powys tax payers money is being used to transport Powys children to be educated in Neath Port Talbot	The authority receives funding in respect of home to school transport based on the population of children of the relevant age living within the authority and not based on the location of the schools they attend. The authority recognises that some Powys council tax payers money is used to transport pupils to out of county provision.
19.1.23	The document states the savings by moving the Welsh stream to Builth, but does not state the	The authority accepts that if the proposal is implemented and the number of pupils travelling to Builth Wells increase significantly, this may result in an

	cost of bussing these children to Builth should numbers rise	increase in transport costs. This cannot be quantified until the increase in numbers occurs.
19.1.24	Would like to see a proper comparison of what the school transport for Welsh-medium pupils is costing	The authority notes this comment, however it is unclear what comparison is being requested.
19.1.25	There is no evidence that the proposal will create a more educationally viable model	The authority does not agree with this statement. The current number of Welsh-medium pupils at Brecon High School is very small, which makes this provision unviable. The number of Welsh-medium pupils at Builth Wells High School is larger, therefore this provision is more viable.
19.1.26	The document does not refer to the stream of children leaving Welsh-medium education because of the proposed closure of Brecon Welsh stream	The authority has identified on page 16 the potential risk should the proposal be implemented that 'Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'.
<b>19.2 Inaccurate information</b>		
19.2.1	The numbers in the consultation document have been falsified due to the council providing free transport to Builth	The consultation document provides factual information about the number of pupils that were attending the Welsh-medium stream at Brecon High School at the time.
19.2.2	The document is full of inaccuracies  The document has been released with errors and omissions  Do you agree that there is information included in the consultation document which is incorrect?	The authority does not agree with these statements. The consultation document provides factual information about the situation at the time of writing, and the information included is in line with the requirements of the School Organisation Code.
19.2.3	The consultation document says that Welsh-medium provision will continue to be provided to years 11 and 12 – will there be an amendment to the document?	The proposal on page 3 of the consultation document states the following:  'From the 1 <sup>st</sup> September 2017, there would be no Welsh-medium provision in Brecon High School for pupils in years 7, 8, 9 and 10. However, Welsh-

		medium provision would continue to be provided at Brecon High School for those pupils who would be entering year 11 in September 2017. This provision would continue until July 2018....From the 1 <sup>st</sup> September 2018, there would be no Welsh-medium provision at Brecon High School.'
<b>19.3 Language used in the consultation document</b>		
19.3.1	<p>The proposal is biased in its use of language</p> <p>The consultation document is shockingly biased and deliberately overplays the positive and underplays the negative impacts the proposal will have</p> <p>The consultation document is one sided and does not reflect the actual truth – this will lead to an uninformed decision being made</p>	The authority does not agree that the consultation document is biased in its use of language. The document has been produced in line with the requirements of the School Organisation Code and provides factual information about the situation at the time of writing and the authority's view on the impact implementation of the proposal would have.
19.3.2	<p>Benefits are stated as generally affirmed outcomes when in reality most are pure speculation; disadvantages are stated as possibilities when in reality most can be taken as guaranteed outcomes of the proposal</p> <p>Reference to the language used on page 15 – use of 'would' in the advantages and 'may have', 'possible' under disadvantages</p>	The authority disagrees with this. The advantages and disadvantages are presented in a fair and balanced way and are written from the authority's perspective.
19.3.3	Do you agree that the language used is misleading?	The authority does not agree that the language used in the consultation document is misleading.
19.3.4	The wording in the consultation document makes it sound as though it is a 'done deal' and that Welsh-medium pupils will be unable to access the new building in Brecon	It is true that on page 15 of the consultation document, the authority identified as a potential disadvantage of the proposal that 'Welsh-medium pupils will be unable to access the new building in Brecon'. However, this does not mean that it is a 'done deal'. All issues raised during the consultation period will be

		taken into consideration by Cabinet when determining whether or not to proceed with the proposal.
19.3.5	The document is written so that everything is positive for the Welsh-medium going to Builth	The document has been produced in line with the requirements of the School Organisation Code and provides factual information about the situation at the time of writing and the authority's view on the impact implementation of the proposal would have. The reason why the authority is proposing closure of the Welsh-medium stream at Brecon High School is due to the small number of pupils accessing the provision and the need to ensure appropriate curriculum choice for Welsh-medium pupils. The number of pupils currently accessing the Welsh-medium stream at Builth Wells High School is greater than the number of pupils in Brecon, and the school provides more Welsh-medium subjects. However, the authority does acknowledge that there are disadvantages and risks associated with the proposal, these are outlined on pages 15-18.
19.3.6	The risks associated with the proposal are completely underplayed	The risks outlined on pages 16-18 of the consultation document are those identified by the authority prior to the commencement of the consultation period. The authority does not agree that the risks are 'completely underplayed'.
19.3.7	The impact on pupils on page 22 is underplayed with the use of 'could' rather than 'will', which is yet another attempt to underplay the negative impact of this proposal on people	<p>The authority does not agree with this statement. 'Could' is used on page 22 of the consultation document in the following paragraph:</p> <p>'Should the proposal be implemented, it is possible that some pupils would transfer to English-medium provision at Brecon High School rather than transferring to an alternative school to continue to access Welsh-medium provision. Whilst this would mitigate the impact of additional travel and separation from friends, this <i>could</i> have a negative impact on pupils' Welsh language skills.'</p> <p>The impact of transferring to English-medium provision on pupils' Welsh language skills will depend on the pupils' individual circumstances, therefore the authority's view is that the use of 'could' is appropriate in this context.</p>
19.3.8	The document is biased towards Builth Wells	The document provides factual information and provides the most up to date

	being the only option for Welsh-medium education	<p>data that was available at the time of writing. Alternative options are discussed on pages 19-21, however as explained in the document:</p> <p>‘The authority is currently going through the statutory process to close Builth Wells High School and Llandrindod Wells High School and establish a new secondary school across two sites. The proposal is that the new school will be a dual stream school, with the current dual stream provision being retained on the Builth Wells site. Therefore, the only options now available to the authority in relation to the Welsh-medium provision at Brecon High School is whether or not to retain this provision.’</p>
19.3.9	If you are to propose removing Welsh-medium secondary education from Brecon this consultation needs to be run correctly and honestly without contracting information and biased used of language	The consultation has been carried out in line with the requirements of the School Organisation Code.
<b>19.4 Other issues with the consultation documentation</b>		
19.4.1	<p>The consultation document contains inflammatory statements stating that closure of the stream would benefit the English-medium stream, these statements are intended to divide people and students – this can be said about any Welsh-medium provider in Powys</p> <p>Why would it be beneficial for Brecon to focus solely on English-medium provision but not any other Powys school that teaches Welsh-medium secondary education?</p>	<p>The consultation document considers the impact of the proposal on Brecon High School. It is likely that any consultation document on the closure of either an English-medium or Welsh-medium stream at any Powys school would conclude that closure of one stream would have a positive impact on the other stream.</p> <p>In their response to the consultation, Estyn states that the authority ‘has reasonably identified the overall positive impact that the proposal could have on English-medium education in Brecon High School.’</p>
19.4.2	Disagree with the statement in the document that says that English-medium pupils in Brecon are being disadvantaged by the Welsh stream being in Brecon	The consultation document does not say that English-medium pupils in Brecon are being disadvantaged by the Welsh stream being in Brecon. In fact, the authority acknowledges on page 23 of the consultation document that ‘the proposal could have a negative impact on the Welsh language skills

		<p>of English-medium pupils attending Brecon High School’.</p> <p>On pages 25 and 26 of the consultation document, the authority identified that the proposal could have a positive impact on the English-medium provision at the school, however this is not the same as saying that English-medium pupils are being disadvantaged by there being a Welsh-medium stream being at the school.</p>
19.4.3	Paragraph 8.1 and paragraph 8.3 contradict each other	The authority notes this comment. As stated in paragraph 8.1, ‘transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. As this transport is already provided, implementation of the proposal would not incur any additional transport costs.’
19.4.4	Can’t compare this situation to Ysgol Dafydd Llwyd and Caereinion – the distance from Ysgol y Bannau to Builth is a further 10 miles, plus many children have an extra journey before that to reach the main bus (YDLI to Caereinion is 11.9 miles, YyB to Builth is 20.5 miles)	The authority’s view is that these two situations can be compared. Whilst it is true that the mileage between Ysgol y Bannau and Builth Wells High School is greater than the mileage between Ysgol Dafydd Llwyd and Caereinion High School, the road between Brecon and Builth Wells is much better, therefore it is likely that the difference in terms of travel time would not be as great.
19.4.5	Disagree with the statement that any reduction in pupil numbers will be reversed in the longer term through development of close links between Ysgol y Bannau and Builth Wells High School	The authority notes this comment.
19.4.6	<p>The statistics in the consultation document are the result of the council’s own failings</p> <p>The consultation document seeks to downplay the enormously adverse effect PCC’s proposal had on the Welsh stream and then attempts to use the consequent reduced numbers as a reason for closing it</p>	<p>The consultation document includes factual data which is the latest data that was available to the council at the time.</p> <p>On page 13 of the consultation document, the authority acknowledges that ‘it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.’</p>





19.4.7	Are you expecting children from the Sennybridge area to travel out of county to Ystalyfera rather than Builth?	As stated in the proposal on page 3 of the consultation document: 'Pupils living in the Sennybridge area would continue to be able to access Welsh-medium provision at Ysgol Gyfun Ystalyfera'.
19.4.8	The consultation document relies heavily on numbers	The consultation document has been written in line with the requirements of the School Organisation Code, which requires the authority to provide a large amount of data.
19.4.9	The consultation document seems to all be based on subjective facts and assumptions – if it were a business case being put forward in the private sector, it would be thrown out at the first hurdle as there are no hard facts or figures	The authority does not agree with this statement. The consultation document has been written in line with the requirements of the School Organisation Code and includes the latest data that was available to the council at the time.
19.4.10	<p>The proposal in its current form cannot be classed as a robust proposal that could be carried to conclusion</p> <p>The council has produced a biased and partial consultation document which does not recognise, and indeed casts aspersions upon, the quality of education through the medium of Welsh currently being provided by Brecon High School</p> <p>The document is not open and truthful about the reality of the Welsh language in the area and seeks to deny parental choice</p>	The authority does not agree with these statements. The consultation document has been written in-line with the requirements of the School Organisation Code. All issues raised during the consultation period will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.
19.4.11	The document is misleading as it implies that it is a failing of Brecon High School that the school does not offer A levels through the medium of Welsh, however that is determined by the South Powys Consortium – Welsh-medium pupils can choose to study subject offered at other schools	The authority notes this comment. The south Powys consortium for post-16 education is a collaborative model that has been developed jointly by the authority and schools. For a number of years, since before the establishment of the South Powys Consortium, Builth Wells High School has provided a number of Welsh-medium post-16 courses, however Brecon High School has not provided any Welsh-medium post-16 courses. Whilst it is true that Welsh-

		medium pupils could choose to study Welsh-medium subjects at other schools, no pupils have chosen this option.
19.4.12	Why is there suddenly a desire in Powys County Council for 'more robust progression'?	<p>There is not 'suddenly' a desire for 'more robust progression'. One of the Strategic Aims in the council's Welsh in Education Strategic Plan (WESP) for 2014-17 was 'to provide robust linguistic continuity of Welsh-medium provision across all key phases of education.'</p> <p>This reflects the Welsh Government's Welsh-medium Education Strategy, which states on page 15 that 'Welsh-medium education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing young people who are truly bilingual.'</p>
19.4.13	In order to be fair, every time you mention the low numbers in Brecon Welsh stream in any of your documents, you must state that this is mostly due to this being the third consultation to close the Welsh stream. In the impact statement it is not mentioned once that this is the reason for the small numbers	The authority acknowledges on page 13 of the consultation document that 'it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.'
19.4.14	The authority states in the report that the children of Ysgol y Bannau will strengthen the Welsh stream at Builth Wells, but these children should be strengthening the Welsh stream at Brecon High School	The authority notes this comment, however the number of Welsh-medium pupils in Brecon High School is currently small which makes the provision unviable, and the authority's view is that the small class sizes and limited Welsh-medium provision do not provide an appropriate educational experience for pupils. In addition, the authority's view is that the current number of Welsh-medium secondary pupils in south Powys is not sufficient to support two streams
19.4.15	The consultation document states that there is 'medium' likelihood of a 'high' impact on pupil numbers at Ysgol y Bannau – this smacks of short term planning, given the money spent on building Ysgol y Bannau only a few years ago	As stated in this comment, the authority has acknowledged the risk in relation to pupil numbers at Ysgol y Bannau should the proposal be implemented on page 17 of the consultation document. The authority has also included risk management measures, which include working with other organisations to promote the benefits of Welsh-medium education. Whilst the authority acknowledges this risk, the authority is committed to Ysgol y Bannau as a

		provider of Welsh-medium education in Brecon, and would hope that the improved clarity with regard to secondary progression would lead to an increase in pupil numbers at the school in the long term.
19.4.16	The document states that the authority 'would expect pupil numbers to recover and increase' (p.29) however no evidence is given for this claim	The authority notes this comment. The use of 'would expect' in this statement reflects the fact that there is no guarantee that this would happen, therefore the authority's view is that this wording is appropriate.
19.4.17	Consultation document claims that Ysgol y Bannau will be supported and that the impact on pupil numbers may only be short term, however this cannot be known – there is real potential for numbers to continue to fall in Ysgol y Bannau	The authority has identified the risk that 'pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon' on page 17 of the consultation document. It is true that the impact on pupil numbers at Ysgol y Bannau cannot be known, however whilst there is potential for numbers to continue to fall, there is also potential for numbers to increase, due to the increased clarity in relation to secondary progression.
19.4.18	The proposal offers no clarity, no parity and no choice for Brecon Welsh learners	The current Welsh-medium provision at Brecon High School is very limited, and does not offer clarity, parity or subject choice for Welsh-medium learners. The authority's view is that implementation of the proposal would improve the equality of provision available to Welsh-medium learners, however it is acknowledged that there are a number of disadvantages and risks associated with the proposal, which are outlined in the consultation document.
19.4.19	The reasons for re-consultation were 'to provide a more sustainable, educationally and linguistically viable model of Welsh-medium secondary education' however the proposal does not meet these 3 reasons	The authority's view is that the proposal does meet these 3 reasons.
19.4.20	The consultation document does not reflect the true picture in Brecon	The consultation document provides factual information on the current situation at Brecon High School and other schools at the time of writing.
19.4.21	The arguments in the proposal are weak	The authority does not agree with this comment. The authority's view is that the current Welsh-medium provision at Brecon High School does not provide equality of opportunity for Welsh-medium pupils.

19.4.22	The council sometimes refers to Builth Wells as being in south Powys and sometimes refers to it as Mid Powys – this misleads the reader by implying that Builth Wells and Brecon are both in South Powys. However, Brecon and Builth aren't in the same area. Builth Wells is holding the Urdd Eisteddfod the year that it is the turn of North Wales, this acknowledges that Builth Wells is north and not south – if Brecon held the Eisteddfod it would be the year of the south	<p>The authority notes this point. Builth Wells is part of Brecknockshire, therefore the authority considers that it is part of south Powys. However, the authority has also been reviewing secondary provision in the Builth Wells and Llandrindod Wells area, therefore it is likely that this is the cause of the confusion.</p> <p>It is true that the Urdd Eisteddfod is being held on the Royal Welsh Showground in 2018. The title of this is 'The 2018 Brecon and Radnorshire Urdd National Eisteddfod', which suggests that the Urdd considers Brecon and Builth Wells to be within one area.</p>
19.4.23	So much of the proposal is based on convenient, inaccurate short term judgements and very little vision and optimism	The authority does not agree with this comment.
<b>20. GENERAL CRITICISM OF THE COUNCIL</b>		
<b>20.1 Criticism of the council's treatment of Brecon High School</b>		
20.1.1	<p>In the last consultation the council repeatedly talked of Brecon High School as a failing school</p> <p>The council has repeatedly stated over the last 2 years that Brecon is a 'failing' school – why does the council never state that Builth is a 'failing' school?</p> <p>Now that Brecon is no longer in special measures, request for the council to no longer label Brecon as a failing school</p>	<p>The authority has not described Brecon High School as a 'failing' school. The press release issued by the authority when Brecon High School went into Special Measures is provided below:</p> <div data-bbox="1084 979 1142 1043" data-label="Image"> </div> <p>PR 5977 - Brecon High School.docx</p> <p>The press release does not refer to Brecon High School as a 'failing' school.</p> <p>Whilst the above press release is what was issued by the authority to the media, the authority has no control over the headlines used by the media when reporting on council issues. If the term 'failing' was used for Brecon High School in the media, this would have been the editorial decision of that particular media outlet, not the council.</p>

20.1.2	<p>Why did the portfolio holder show support immediately for Builth Wells High School when it went into Special Measures but did not do this for Brecon and Llandrindod – why is Builth Wells High School favoured so much?</p>	<p>When a school goes into Special Measures, a press release is issued jointly by the authority and the school involved.</p> <p>The press releases issued by the authority when Brecon High School and Builth Wells High School went into Special Measures are provided below:</p> <div style="text-align: center;">   </div> <p>PR 5977 - Brecon High School.docx    PR 7676 - Builth Wells High School.d</p> <p>The authority does not agree that the press release issued in respect of Builth Wells High School shows a greater level of support of this school compared with that shown towards Brecon High School.</p>
20.1.3	<p>The proposal is an insult and shows no compassion or gratitude towards the headteacher and staff of Brecon High School who have made great improvements in order to bring the school out of special measures</p> <p>Why has the council not publicly praised Brecon High School for the work it has done and the improvements it has made to come out of special measures?</p> <p>Still waiting the council's official 'well done' to Brecon High School to be published in the Brecon and Radnor</p>	<p>In the consultation document, the council acknowledges that 'there has been a good improvement trajectory of performance in recent years' at Brecon High School. In addition, officers congratulated the school on the school's improvement at the end of the meeting for parents and the community held at Brecon High School as part of the recent consultation on closure of the Welsh-medium stream.</p> <p>The current proposal is not a reflection on the headteacher and staff of Brecon High School. As stated in the consultation document, the reasons for the proposal are as follows:</p> <ul style="list-style-type: none"> <li>- Low pupil numbers in the Welsh-medium stream at Brecon High School</li> <li>- Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education</li> </ul> <p>The authority does not issue a press release when a school is removed from special measures, however schools are able to issue something themselves. However, the Schools Service Management Team will consider whether press</p>

		releases should be issued as a matter of course when schools are removed from the category of special measures.
20.1.4	Feel let down by the council's lack of vision and ambition regarding the provision of Welsh-medium education at Brecon High School	The authority's vision for Welsh-medium education is set out in its Welsh in Education Strategic Plan. The authority has recently carried out consultation on a revised Plan for 2017-20. The draft Plan sets out the authority's aim 'To provide equality of provision for Welsh-medium learners in Powys'. The current provision at Brecon High School does not provide equality of provision for Welsh-medium learners in Powys.
<b>20.2 Issues relating to indecision by the council</b>		
20.2.1	<p>Hope that this process will result in a final resolution to this issue</p> <p>A decision needs to be made ASAP and the programme needs to be moved forward to start to concentrate and focus on providing good Welsh-medium education for our children now</p> <p>Please do not prolong this situation any longer than necessary for fear of losing even more pupils from Welsh-medium education</p>	The authority notes these comments and agrees that a decision needs to be made in order to end the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School and in order to move forward in relation to the development of Welsh-medium secondary provision in mid and south Powys.
20.2.2	<p>The council has behaved in a shamefully chaotic way with these consultations</p> <p>Exasperated by the council's inability to make a decision on the future of Welsh-medium in south Powys</p> <p>The council's indecision has weakened Welsh-medium altogether and if this continues there will be no children left to make the decision for</p>	The authority acknowledges the impact of the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School, and is keen to move forward with this process quickly in order to bring an end to this period of uncertainty.

	Anger at lack of decision making by the council	
20.2.3	The council is losing any thread of respect it has left among the community by repeatedly proposing to close the only Welsh stream available to many	The authority has identified a number of disadvantages and risks associated with the proposal, as well as the potential impact on pupils, in the consultation document in respect of this proposal. This includes the additional travel that would be required. These issues, and all other issues raised in the consultation period, will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.
<b>20.3 Issues relating to the council's financial situation</b>		
20.3.1	<p>The next time the council tries to cut something like bin collections, we won't believe that you have no money as you seem happy to waste it on transporting children out of their local area</p> <p>The people of Powys who are constantly being told the council has to make cuts will be appalled that the council could even consider wasting such large sums of money</p>	The authority notes this comment.
20.3.2	It seems that the council accepts Westminster's 'austerity' as a matter of course and are willing, without any complaint, to cut anything in public services	The authority notes this comment.
<b>20.4 Other</b>		
20.4.1	The council has failed to effectively communicate a positive vision for Welsh-medium secondary education provision in Brecon over more than a decade, and this failure is now being used to justify removal of Welsh-medium provision completely in Brecon	Since 2014, the authority's vision for Welsh-medium education has been set out in its Welsh in Education Strategic Plan (WESP). Prior to this, it was set out in the Welsh-medium Education Plan. The authority has continued with the current model of delivery of Welsh-medium secondary provision via two Welsh-medium streams, one in Brecon and one in Builth Wells, however this has not led to any growth in Welsh-medium pupil numbers in the Brecon area in particular. Whilst the authority committed in 2011 that all dual stream

		secondary schools would work towards becoming category 2B schools, the challenging financial situation faced by the council meant that no additional financial support could be provided, beyond the additional support provided to dual stream schools via the fair funding formula. The authority now believes that a new approach is needed in order to improve the opportunities available to Welsh-medium pupils area, encourage confidence in the system and lead to an increase in the number of Welsh-medium pupils in the future.
20.4.2	The council is not taking the views of parents on board – you keep putting us through this process and you don't seem to listen at all	The authority is taking the views of parents on board. However, the number of pupils accessing the Welsh-medium stream at Brecon High School is small, and has reduced since the last consultation. This is making the provision increasingly unviable, and the authority's view is that the very small class sizes in the Welsh-medium stream at Brecon High School is not providing an appropriate educational experience for pupils.
20.4.3	Concerned about the Cabinet's blasé, lethargic and tiresomely bureaucratic attitude	The authority notes this comment.
20.4.4	How are Cabinet members qualified to make decisions on education? How many have a background in education?	Cabinet members, and their specific portfolios, are determined by the Leader of the council. All members of the council selected through the democratic process.
20.4.5	Convinced that the council is acting unethically, if not unlawfully	The authority disputes this comment.
<b>21. REFERENCE TO OTHER PROPOSALS</b>		
<b>21.1 Proposals for Builth Wells High School and Llandrindod High School</b>		
21.1.1	Concern that there is uncertainty about the future of Builth Wells High School  How is greater clarity going to be given in relation to the proposal for secondary schools in mid Powys?	As stated on page 3 of the consultation document, 'on the 18 <sup>th</sup> October 2016, Powys County Council published a Statutory Notice proposing the establishment of a new dual-sited dual-stream school that will operate from the current sites of Builth Wells and Llandrindod High Schools from the 1 <sup>st</sup> September 2018.' The Objection Report outlining the issues raised in the objections received was considered by Cabinet on the 28 <sup>th</sup> February 2017,



		when Cabinet approved the proposal.
21.1.2	The council is trying to close Builth school to wipe out the fact that it is in special measures	The proposal to establish a new dual-sited school that will operate from the current sites of Builth Wells and Llandrindod High Schools is intended to deliver a sustainable model of secondary education in the area, which would be able to provide high quality education. The proposed new school would replace two schools that are currently in special measures. The fact that the schools are in special measures is a key reason for the proposal.
21.1.3	<p>Concern about the proposal to close Builth High School and merge with Llandrindod due to the additional distance to Llandrindod</p> <p>Request for reassurance that there will be no uncertainty about Welsh-medium provision being in Builth given the proposal around Llandrindod and Builth High Schools</p> <p>It is not clear where Welsh-medium provision will be located if the mid Powys proposal is approved, although you state that the preference is for Welsh-medium provision to be in the Builth area</p> <p>Will pupils have to move to Llandrindod?</p> <p>Unclear how it can be proposed that Welsh-medium will be provided from Builth when there are also plans to close and co-located Llandrindod and Builth</p>	<p>The proposal is to establish a new dual-sites schools that will operate from the current sites of Builth Wells and Llandrindod High Schools. The authority is proposing that Welsh-medium education remains on the Builth site of the proposed new school, however ultimately, the decision on how to structure the school will be made by the school's governing body and management team. Should the governing body wish to structure the teaching in a different way, which could have an impact on where Welsh-medium provision is provided, the authority would expect the governing body to consider the impact on the well-being of pupils and staff. In addition, there would need to be further discussions with the authority about the transport implications.</p> <p>The consultation document in relation to the proposal for Builth and Llandrindod states that the proposal to establish a new school on the two current sites is the first stage of potential wider plans for secondary education in the area. The second stage, which aims to establish the new school on a single site in the locality of Builth, requires further work to understand the overall capital cost and feasibility, and would be subject to another consultation if Cabinet decided to proceed to the second stage.</p>
21.1.5	Parents are moving their children to Hereford because of the lack of clarity in relation to what is happening to secondary education in Llandrindod	The authority is aware that there are increasing numbers of post-16 pupils who are choosing sixth form provision at Hereford Sixth Form College and other out of county providers. This has been occurring over a number of years and is due in part to the availability of subjects at those providers compared to the current availability within the Powys post-16 partnership. However, it is

		recognised that any school reorganisation process creates a period of uncertainty for pupils and that some pupils are choosing out of county providers for this reason as well.
21.1.6	The Equality Impact Assessment for Builth and Llandrindod assumes that the Brecon Welsh stream is closing – any objections will be based on the assumption that Brecon Welsh stream will be closed – this is predetermination	<p>In accordance with the requirements of the School Organisation Code, the authority published draft impact assessments (equality, community and Welsh language) as part of the formal consultation process that took place between the 6<sup>th</sup> April and 1<sup>st</sup> June 2016. These impact assessments were updated to take account of feedback received during the consultation, and were included in papers for the consideration of Cabinet on the 27<sup>th</sup> September 2016. Cabinet were also considering the outcome of consultation on an associated proposal for Brecon High School and Gwernyfed High School at the same time. Therefore, the Equality Impact Assessment (draft and final) reflected the proposals for all four schools.</p> <p>New draft impact assessments were published as part of the current consultation on closure of the Welsh-medium stream at Brecon High School, which considered the ongoing proposal in relation to Builth and Llandrindod High Schools. These will be updated to take account of feedback received during the consultation, and will be considered by Cabinet when determining how to proceed.</p>
21.1.7	Concern that the proposal for Builth and Llandrindod does not offer long term assurance in terms of Welsh-medium education	The authority's intention is to provide equality of provision. Builth Wells High School currently provides a more equitable distribution of subjects between English-medium and Welsh-medium streams. The authority believes that building a critical mass in one school will enable the development of a vibrant and viable Welsh stream. The improved choice and Welsh-medium experience will enable pupils to become even more confident Welsh speakers. The authority believes that learners will be more attracted to Welsh-medium provision in future if there are clear progression routes, and continuity of provision throughout their educational life. The authority's view is that centralising provision would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.

21.1.8	Should the proposal be implemented, the provision and staffing would depend on decisions made by the school's managers.	The authority acknowledges that the decision on how to structure the school would be made by the school's governing body and management team.
21.1.9	Many staff would have to work on two sites – Welsh-medium staff won't always be on the Builth site, so won't be there to answer questions or contribute to a Welsh ethos and activities.	The decision on how to structure the school would be made by the school's governing body and management team. As the sole provider of Welsh-medium secondary provision in mid and south Powys the authority would expect the new school to ensure that the provision was structured in order to enhance the Welsh-medium provision available.
<b>21.2 Reference to previous proposals</b>		
21.2.1	What were the critical elements which meant that the proposal to close the Welsh-medium stream in Brecon High School wasn't abandoned like the other proposals?	On the 27 <sup>th</sup> September 2016, Cabinet considered the consultation report in relation to the proposals related to Brecon and Gwernyfed High Schools. On the basis of the issues raised during the consultation period, Cabinet approved a recommendation to reconsult on element c of the original proposal, i.e. closure of the Welsh-medium stream at Brecon High School. The reasons are outlined on pages 4 and 5 of the cabinet report considered on the 27 <sup>th</sup> September 2016. The reason for the recommendation was 'To provide a more sustainable educationally and linguistically viable model of Welsh-medium secondary education'.
21.2.2	Of the 4 public consultation meetings held in 2016, Brecon was the only one where Welsh was used	This comment is noted.
21.2.3	Responses to many comments/criticisms in previous consultation reports are 'the authority notes this point' – is this because you have no answers or because the answers undermine your arguments?	The authority acknowledges that there are disadvantages and risks associated with every proposal. Whilst the authority endeavours to mitigate these, there are some issues which cannot be totally eradicated. In these cases, the only response available to the authority is to 'note' the point made. These issues, along with all other issues raised during the consultation, will be taken into consideration by Cabinet when determining how to proceed.
21.2.4	In previous consultation report you 'accept and acknowledge' comments/criticisms on four	The authority has not carried out any further risk assessments or mitigating action plans in relation to issues raised in previous consultation reports related

	<p>occasions – have you carried out any risk assessments to measure the impact of these and can you provide details of these together with any subsequent mitigating action plans</p> <p>On many occasions you ‘accept and acknowledge’ comments/criticisms and put the onus on the school to work with pupils and parents to ‘find a solution’. What risk assessments/action plans have been identified for implementation?</p>	<p>to the closure of the Welsh-medium stream at Brecon High School as no decision has yet been made to proceed with the closure of the stream.</p>
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**POWYS COUNTY COUNCIL  
SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013**

Notice is hereby given in accordance with section 42 of the School Standards and Organisation (Wales) Act 2013 (“the 2013 Act”) and the School Organisation Code (“the Code”) that Powys County Council of County Hall, Llandrindod Wells, Powys, LD1 5LG (hereinafter referred to as “the Council”), having consulted such persons as required, proposes to alter the medium of instruction of pupils at Brecon High School, Penlan, Brecon, Powys, LD3 9SR by discontinuing the Welsh-medium stream from the 31<sup>st</sup> August 2017 and changing the category of the school from dual stream to English-medium.

**From 1<sup>st</sup> September 2017:**

- i) There would be no Welsh-medium provision in Brecon High School for pupils in years 7, 8, 9 and 10. Welsh-medium provision would continue to be provided at Brecon High School for those pupils who would be entering year 11 in September 2017. This provision would continue until July 2018.
- ii) Pupils in years 7, 8, 9 and 10 wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream at Brecon High School would be able to attend their closest alternative secondary Welsh-medium provision – either Builth Wells High School or their closest out-of-county provider.

**From 1<sup>st</sup> September 2018:**

- i) There would be no Welsh-medium provision in Brecon High School.
- ii) All pupils wishing to access Welsh-medium secondary provision who live in the catchment area currently served by the Welsh-medium stream at Brecon High School would be able to attend their closest alternative secondary Welsh-medium provision – either the Builth Wells site of the New Mid Powys Secondary School or their closest out-of-county provider.

Parents may express a preference for another school and the Council will comply with any such expressed preference subject to the School Standards and Framework Act 1998, Section 86(3).

The Council undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees, the Council’s response and the views of Estyn is available on the Council’s website:

<http://www.powys.gov.uk/en/corporate/find-out-about-consultations-in-powys/brecon-high-school-welsh-medium-stream/>.

**Transport**

It is the intention of the Council that transport shall be provided free of charge for pupils who live more than 3 miles from their allocated / nearest school providing education in the language of their choice in accordance with the current policy which can be found at:

<http://www.powys.gov.uk/en/schools-students/apply-for-school-transport/>.

**How to Object to this Notice**

Within a period of 28 days after the publication of this proposal, that is to say by Thursday 13<sup>th</sup> April 2017, any person may object to the proposal.

Objections should be sent to Mr Jeremy Patterson, Chief Executive and Director of Education, Powys County Council, Powys County Hall, Llandrindod Wells, Powys, LD1 5LG, or by e-mail to [school.modernisation@powys.gov.uk](mailto:school.modernisation@powys.gov.uk).

Powys County Council will publish a summary of any such objections made within the objection period (and not withdrawn in writing), together with the Council’s observations thereon, within the period set out in the Code.

**Mr Jeremy Patterson,**  
**Chief Executive and Director of Education**  
**For Powys County Council**      Dated this day **16<sup>th</sup> March, 2017**

**Explanatory Note:**

This explanatory note does not form part of the Notice but is offered by way of explanation.

The Council's intention is to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2017. In the future, any pupils from the area currently served by the Welsh-medium stream at Brecon High School will be able to access enhanced alternative Welsh-medium provision at Builth Wells High School / the Builth Wells site of the New Mid Powys Secondary School or their closest out-of-county provider. Transport arrangements would be made for pupils who qualify under the Council's school transport policy.