



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 31st August 2017 during the period 21st November 2016 to the 9th January 2017.

On the 14th 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 16th March 2017, and the Objection Period ended on the 13th 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
1. Criticism of the process		5
1.1	Reference to the decision made by Cabinet on the 14 th 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
2. Issues relating to impact on the Brecon Area		48
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

3. Issues relating to travel and transport		65
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
4. Issues relating to pupil numbers		79
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
5. Issues relating to Welsh Language and Welsh Education Policy		93
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
6. Issues relating to Brecon High School		106
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
7. Financial issues		119
7.1	Issues relating to the cost of providing category 2B provision at Brecon High School	119

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

5. Issues raised in Objections

1. CRITICISM OF THE PROCESS		
1.1 Reference to the decision made by Cabinet on the 14th 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 14th 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"> - 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 <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 16th 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 7th 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	The Cabinet who made the decision will not be the Cabinet that implements the decision.	It is true that the final decision on this proposal will be made by a new Cabinet.

	<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 14th March, when they determined how to proceed in relation to this proposal.</p>
1.1.6	<p>Cabinet decision on the 14th March lacked any scrutiny by members of Cabinet.</p> <p>The decision made on the 14th March was based on misleading facts and figures</p> <p>The decision on the 14th 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 14th 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 14th 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 14th 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 Builth</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 th 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 th 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 st June 2017, primary Welsh-medium pupil numbers are as follows: <table border="1" data-bbox="846 1249 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>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</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	Ysgol y Bannau	16	28	17	15	23	10	18	Sennybridge	9	6	11	5	5	2	5
	R	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6																			
Ysgol y Bannau	16	28	17	15	23	10	18																			
Sennybridge	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>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> <tr> <td>Trefonnen</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>Rhayader</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"> - 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 	Builth CP	24	11	16	14	21	19	14	Trefonnen	8	20	9	8	11	11	6	Rhayader	8	9	11	7	13	4	5
Builth CP	24	11	16	14	21	19	14																			
Trefonnen	8	20	9	8	11	11	6																			
Rhayader	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>Consultation Document – page 31: <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>Consultation Report – page 41: <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 subjects (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>
--	---------------------------------------	---

		<p><i>category 2B school, as the school would not be providing 80% of subjects 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>Cabinet meeting 14th March 2017: 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"> • <i>'Summarising each of the issues raised by consultees;</i> • <i>Responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons, and</i> • <i>Setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal'</i> <p>There is no requirement for authorities to provide a weighting to the issues raised.</p>
1.2 Consultation Process		
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 th 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 29th 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 23rd 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 27th September 2016. At this meeting, Cabinet determined the following:</i></p> <ul style="list-style-type: none"> - <i>To publish a statutory notice for the closure of Builth Wells and Llandrindod High Schools on the 31st 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 1st September 2018</i> - <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> <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 14th 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"> - <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> <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"> - <i>'The impact on pupils' journeys to school and on school transport costs.'</i> <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 2008¹. 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

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

		<i>provision outside Powys.'</i>
1.2.7	<p>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>	<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>	<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>
1.2.9	<p>There is a clear demand for retaining Welsh-medium secondary education in Brecon as shown by</p>	<p>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.</p>

	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 27th September 2016 stated the following in relation to the recommendation to re-consult on the closure of the Welsh-medium stream:</p> <p><i>‘The preferred choice is to re-consult on element C of the Proposal. The reasons for this are as follows:</i></p> <ul style="list-style-type: none"> • <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> • <i>The Welsh Government’s Welsh-medium Education Strategy states ‘Welsh-medium education from the early years, with robust linguistic progression through every</i>

		<p><i>phase of education, offers the best conditions for developing future bilingual citizens.'</i></p> <ul style="list-style-type: none"> • <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> • <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> • <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> • <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> <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>
--	--	--

		<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.
1.3 Issues relating to the documentation issued during the process		
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><i>‘Details of affected schools</i></p> <ul style="list-style-type: none"> <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> <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>
<p>1.3.10</p>	<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>
<p>1.4 Consultation Meetings</p>		
<p>1.4.1</p>	<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 1st 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 14th 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>	
<p>1.5 Issues relating to the Consultation Report</p>		
<p>1.5.1</p>	<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"> - 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
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 must publish a consultation report:</i></p> <ul style="list-style-type: none"> • <i>Summarising each of the issues raised by consultees;</i> • <i>Responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and</i> • <i>Setting out Estyn’s view...of the overall merits of the proposal.’</i> <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 1st March 2017 as part of the papers for the full County Council meeting on the 3rd 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 8th March 2017, to be considered by Cabinet at its meeting on the 14th 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 10th March. The version published here was the updated version which was to be considered by Cabinet on the 14th 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 10th 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 1st March 2017 as part of the papers for the full County Council meeting on the 3rd 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 8th March 2017, to be considered by Cabinet at its meeting on the 14th 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"> - Numbers leaving Welsh-medium education - Low numbers coming into Ysgol y Bannau's new year intake - That 2/3 of children will not continue in Welsh-medium education - The numbers leaving Ysgol y Bannau throughout the 	<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

	Sept. 2013	Sept. 2014	Sept. 2015	Sept. 2016
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:

Ysgol y Bannau	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
Sennybridge CP School Welsh Stream	3 pupils to Ysgol Gyfun Ystalyfera 1 pupil to Ysgol Maesydderwen 1 unknown
Sennybridge CP School English Stream	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
R	10	28	16	17	27	17
Yr1	21	10	28	16	17	28
Yr2	27	20	10	27	16	18
Yr3	19	24	21	10	26	15
Yr4	18	18	22	21	9	24
Yr5	23	17	18	20	19	10
Yr6	20	22	18	15	20	19
Total	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"> - 1 English-medium school - 2 Welsh-medium schools - 4 bilingual schools <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 1179 1832 1370"> <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> </tbody> </table>	Year	Welsh-medium	English-medium	Total	7	47	36	83	8	40	36	76	9	58	37	95
Year	Welsh-medium	English-medium	Total															
7	47	36	83															
8	40	36	76															
9	58	37	95															

		<table border="1"> <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>Total</td> <td>237</td> <td>190</td> <td>427</td> </tr> </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>	10	49	38	87	11	43	43	86	Total	237	190	427	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
10	49	38	87																																			
11	43	43	86																																			
Total	237	190	427																																			
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																																			
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>																																		
<p>1.5.22</p>	<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="846 804 1951 1121"> <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																																
	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																																

		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 subjects 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 22nd 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 must publish a consultation report:</i></p> <ul style="list-style-type: none"> • <i>Summarising each of the issues raised by consultees;</i> • <i>Responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and</i> • <i>Setting out Estyn's view...of the overall merits of the proposal.'</i> <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 14th 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.
1.6 Predetermination		
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 6th and June 1st 2016. These were updated to include issues that were raised during the consultation process and were considered, alongside the Consultation Report, by cabinet on 27th 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><i>c) 'From the 1st 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></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>	
--	--	--

2. ISSUES RELATING TO IMPACT ON THE BRECON AREA

2.1 Impact on Ysgol y Bannau

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 th 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 14th 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>2. 2 Impact on availability of/access to Welsh-medium education in the Brecon area</p>		
<p>2.2.1 Access to secondary Welsh-medium provision in Brecon</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>
--	---	---

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>
2.2.2 Access to primary Welsh-medium provision in Brecon		
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
2.3 Impact on Brecon / the community		
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.
2.4 Concern about the impact on the Welsh language in the area		
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.

2.5 Impact on pupils in Brecon		
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	<p>Concern about impact on the well-being of pupils who would be forced to leave Brecon for their secondary education</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 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.</p>
2.5.5	<p>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>	<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 31st 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 nd language if they change to English-medium provision – if they cannot do Welsh 1 st language they should do some kind of higher level Welsh, 2 nd 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>
3. ISSUES RELATING TO TRAVEL AND TRANSPORT		
3.1 Impact of additional travel on pupils education, health and wellbeing		
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 23rd 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>
---	--

	<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 23rd 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 be 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

	<p>many different rural locations where all the Ysgol y Bannau children live</p>	<p>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.</p>
<p>3.1.11</p>	<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.
3.2 Access to extra-curricular activities will be restricted		
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 14th 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>

	<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.</p>	
3.2.6	<p>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>	<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 14th 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"> • <i>'Summarising each of the issues raised by consultees;</i> • <i>Responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons, and</i> • <i>Setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal'</i> <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>
3.3 Transport appeal 2015		
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 27th 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.

4. ISSUES RELATING TO PUPIL NUMBERS

4.1 Impact of previous consultations on Welsh-medium pupil numbers at Brecon High School

4.1.1

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.

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:

	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

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.

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.

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>number of Sennybridge pupils that had intended to come to Brecon High School before the consultation was announced.</p>
<p>4.1.2</p>	<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 3rd 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.
4.2 Prospective Welsh-medium pupils numbers at Brecon High School		
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"> - 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 <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	<p>Certainty of provision in Brecon would result in an increase in the number of pupils choosing Welsh-medium education</p>	<p>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.</p>
<p>4.3 Concern about pupils transferring from Welsh-medium provision to English-medium provision</p>		
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">Ysgol y Bannau</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">Sennybridge CP School Welsh Stream</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">Sennybridge CP School English Stream</td> <td data-bbox="1301 501 1850 571">6 pupils to Brecon High School</td> </tr> </table>	Ysgol y Bannau	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	Sennybridge CP School Welsh Stream	3 pupils to Ysgol Gyfun Ystalyfera 1 pupil to Ysgol Maesydderwen 1 unknown	Sennybridge CP School English Stream	6 pupils to Brecon High School																																																									
Ysgol y Bannau	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																																																																
Sennybridge CP School Welsh Stream	3 pupils to Ysgol Gyfun Ystalyfera 1 pupil to Ysgol Maesydderwen 1 unknown																																																																
Sennybridge CP School English Stream	6 pupils to Brecon High School																																																																
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></th> <th>Jan 2012</th> <th>Jan 2013</th> <th>Jan 2014</th> <th>Jan 2015</th> <th>Jan 2016</th> <th>Jan 2017</th> </tr> </thead> <tbody> <tr> <td>R</td> <td>10</td> <td>28</td> <td>16</td> <td>17</td> <td>27</td> <td>17</td> </tr> <tr> <td>Yr1</td> <td>21</td> <td>10</td> <td>28</td> <td>16</td> <td>17</td> <td>28</td> </tr> <tr> <td>Yr2</td> <td>27</td> <td>20</td> <td>10</td> <td>27</td> <td>16</td> <td>18</td> </tr> <tr> <td>Yr3</td> <td>19</td> <td>24</td> <td>21</td> <td>10</td> <td>26</td> <td>15</td> </tr> <tr> <td>Yr4</td> <td>18</td> <td>18</td> <td>22</td> <td>21</td> <td>9</td> <td>24</td> </tr> <tr> <td>Yr5</td> <td>23</td> <td>17</td> <td>18</td> <td>20</td> <td>19</td> <td>10</td> </tr> <tr> <td>Yr6</td> <td>20</td> <td>22</td> <td>18</td> <td>15</td> <td>20</td> <td>19</td> </tr> <tr> <td>Total</td> <td>138</td> <td>139</td> <td>133</td> <td>126</td> <td>134</td> <td>131</td> </tr> </tbody> </table>		Jan 2012	Jan 2013	Jan 2014	Jan 2015	Jan 2016	Jan 2017	R	10	28	16	17	27	17	Yr1	21	10	28	16	17	28	Yr2	27	20	10	27	16	18	Yr3	19	24	21	10	26	15	Yr4	18	18	22	21	9	24	Yr5	23	17	18	20	19	10	Yr6	20	22	18	15	20	19	Total	138	139	133	126	134	131
	Jan 2012	Jan 2013	Jan 2014	Jan 2015	Jan 2016	Jan 2017																																																											
R	10	28	16	17	27	17																																																											
Yr1	21	10	28	16	17	28																																																											
Yr2	27	20	10	27	16	18																																																											
Yr3	19	24	21	10	26	15																																																											
Yr4	18	18	22	21	9	24																																																											
Yr5	23	17	18	20	19	10																																																											
Yr6	20	22	18	15	20	19																																																											
Total	138	139	133	126	134	131																																																											

		<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.
4.4 Welsh-medium primary pupil numbers		
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>
4.5 General issues relating to Welsh-medium pupil numbers		

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>Brecon High School</th> <th>2014/15</th> <th>2015/16</th> <th>2016/17</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>Total</td> <td>57</td> <td>30</td> <td>19</td> </tr> </tbody> </table> <table border="1" data-bbox="846 703 2040 1027"> <thead> <tr> <th>Builth Wells High School</th> <th>2014/15</th> <th>2015/16</th> <th>2016/17</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>Total</td> <td>107</td> <td>129</td> <td>138</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>	Brecon High School	2014/15	2015/16	2016/17	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	Total	57	30	19	Builth Wells High School	2014/15	2015/16	2016/17	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	Total	107	129	138
Brecon High School	2014/15	2015/16	2016/17																																																							
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																																																							
Total	57	30	19																																																							
Builth Wells High School	2014/15	2015/16	2016/17																																																							
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																																																							
Total	107	129	138																																																							

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
	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																											

		School							
		Ysgol Trefonnen	8	20	9	8	11	11	6
		Rhayader CiW School	8	9	11	7	13	4	5
		Total	65	74	64	49	73	46	48

4.5.5 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.

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.

	Sept. 2013	Sept. 2014	Sept. 2015	Sept. 2016
Builth Wells CP School	100%	91%	93%	85%
Rhayader CiW School	100%	100%	100%	100%
Sennybridge CP School	N/A	78%	75%	67%
Ysgol Trefonnen	78%	55%	56%	17%
Ysgol y Bannau	85%	94%	93%	65%

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:

- 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

5. ISSUES RELATING TO WELSH LANGUAGE AND WELSH EDUCATION POLICY

5.1 Welsh Government Policy

<p>5.1.1</p>	<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 21st 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>
<p>5.1.2</p>	<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 21st 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 21st 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 21st 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.
5.2. Criticism of the council’s treatment of the Welsh language / Welsh-medium education		
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"> - 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 <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>
5.3 Reference to the council's WESP		
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 th March.
5.3.3	If as stated in ref 14.1.7 the vote on 27 th 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 th 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 th 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 20th 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 20th 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>
5.4 Criticism of RhAG		

5.4.1	<p>The whole episode stems from RhAG giving the authority direction on the future of Welsh medium education in the county</p>	<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>	<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.</p>
5.4.3	<p>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>	<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	<p>RhAG fighting to get a Welsh medium secondary school, but this shouldn't be at the cost of stopping children have access to Welsh-</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</p>

	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>
6. ISSUES RELATING TO BRECON HIGH SCHOOL		
6.1 Impact on the viability and financial situation of Brecon High School		

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>
6.2 Issues relating to Welsh-medium provision at Brecon High School		

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 22nd 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>
6.3 Impact on English-medium pupils		

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 2nd 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 2nd 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.
6.4 Criticism of the council’s treatment of Brecon High School		
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"> - 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 <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.	<p>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.</p> <p>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.</p>
6.5. Issues relating to the new school build for Brecon High School		
6.5.1	<p>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</p> <p>Decision could not be reversed as the planning for the new building would be undertaken based on the decision</p> <p>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</p>	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 21st 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>
7. FINANCIAL ISSUES		
7.1 Issues relating to the cost of providing category 2B provision at Brecon High School		
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 14th 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 14th 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>Consultation Document – page 31:</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>Consultation Report – page 41:</p> <p><i>'During the recent consultation period on the proposal to close the Welsh-medium stream at</i></p>
---	--

	<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 subjects (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 subjects 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>Cabinet meeting 14th March 2017: 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>
--	---	---

		<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" data-bbox="846 671 1832 983"> <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>Total</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="846 1121 1832 1390"> <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	Total	237	190	427	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
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																																																			
Total	237	190	427																																																			
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																																																			

7.2 Cost of transport		
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 1st 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>	
--	--	--

	<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"> - 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 <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?	
8. ISSUES RELATING TO BUILTH WELLS HIGH SCHOOL / THE NEW MID POWYS SECONDARY SCHOOL		
8.1 Uncertainty about future of Builth Wells High School		
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 (27th 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 28th 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 27th 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.
8.2 Provision at Builth Wells High School		
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 st 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 31st August 2018, Builth Wells High School will close and the site will reopen as part of the New Mid Powys Secondary School from the 1st 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>
9. ISSUES RELATING TO THE QUALITY OF PROVISION		
9.1 Standards at Builth Wells High School		

<p>9.1.1</p>	<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>
--------------	--	---

	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"> - Outcomes (standards and wellbeing); - Provision (learning experiences, teaching, care support and guidance, and learning environment); and - Leadership and management. <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" data-bbox="846 467 1906 879"> <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" data-bbox="846 916 1906 1327"> <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
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																															

10. REFERENCE TO ALTERNATIVE OPTIONS

<p>10.1</p>	<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>
<p>10.2</p>	<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>
<p>10.3</p>	<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	
11. ISSUES RELATING TO EQUALITY / DISCRIMINATION		
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.

		<p>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.</p>
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>	
12. GENERAL CRITICISM OF THE COUNCIL		
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	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. However, the main reasons for the proposal aren't financial. The reasons for proposing to close the Welsh-medium stream, as outlined in the consultation document, are: <ul style="list-style-type: none"> - 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
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.
--	--	---