



Brecon High School and Gwernyfed High School

Consultation Report - Responses

August 2016

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| 1 Quality | |
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| 1.1 General | |
| 1.1.1 | <p>Where is the cited evidence that the Proposal will make a difference to learning outcomes?</p> <p><i>The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. Through a larger critical mass of learners there will be greater opportunities to share good practice both within and across departments. Leadership structures will be more resilient to changes in staffing.</i></p> |
| 1.1.2 | <p>How does POWYS COUNTY COUNCIL expect the resultant amalgamated school will comply with guidance in 1.3 of the WG schools organisation code in providing at least the equivalent standard of education for the pupils of Gwernyfed High School from day one?</p> <p><i>The Proposal of providing educational provision across the current sites from September 2017 will ensure that there is minimal disruption to the experiences of the learners. The equivalent standard of education for the pupils of Gwernyfed High School can be delivered immediately upon establishing the new school. The time between September 2017 and movement to a new building will be used by the leadership team with the support of the Local Authority to ensure that policies and procedures are embedded including curriculum timetabling and staffing</i></p> |
| 1.2 Quality of Staff – Gwernyfed and good relationship with pupils | |
| 1.2.1 | <p>The shadow governing body of the New School would be expected to appoint high- quality teaching and staff who would be able to provide excellent learning experiences, teaching, care, support and guidance;'. How does this not suggest that Gwernyfed high school doesn't provide this and what evidence does the council have to support this statement?</p> <p><i>The statement contained within the Consultation Document does not infer that current staff are not quality. It asserts that any appointments would be of high quality staff. The Authority acknowledges the ongoing improvement at Gwernyfed High School in response to being judged as 'adequate' for performance and 'adequate' for prospects for improvement by Estyn, and congratulates the school for coming out of the Estyn monitoring category in February of this year.</i></p> |
| 1.2.2 | <p>The Proposal for the interim dual-site school solution expects a shadow governing body to “appoint high-quality teaching etc.” What evidence is there that the current teaching and support staff are not high-quality?</p> |

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| <p>1.2.3 Provide evidence that the current teaching and support staff at both Brecon and Gwernyfed High Schools are not “high-quality” or “able to provide excellent learning experiences, teaching, care, support and guidance.”</p> | |
| <p>1.3 Choice of Subject KS3, KS4 and Post 16</p> | |
| <p>1.3.1 Explain what is meant by “to maximise the curriculum benefits at Key Stage 3...” What benchmark is being compared here?</p> | <p><i>The consultation document states, ‘The Council believes that a school with a minimum of 600 pupils in KS3 and KS4 would have average year groups of 120 pupils, which would help maximise the curriculum benefits and lead to improved outcomes.’ As a pupil population grows so does a school’s capacity to: deliver a wider range of viable subject options at key stage 4; increase the number of teaching staff; and thereby improve the range of subject specialism.</i></p> |
| <p>1.3.2 Explain what is, and whether there is, a sound evidence basis for the Council’s “belief” that a rural high school needs to be at least 600 pupils strong at KS3 and KS4.</p> | <p><i>The figure of 600 pupils was agreed by officers of the Authority, in discussions with PriceWaterhouseCoopers (PwC), following their Study into the Viability of Secondary Schools. The Authority currently funds KS3 and KS4 classes that deliver core curriculum subjects on a teacher-pupil ratio of 1- 23, apart from subjects which have a health and safety aspect where it is expected that no class has more than 20 pupils. E.g. science – (these classes make up approximately 20% of the curriculum).</i></p> <p><i>In future, it is expected that the maximum teacher-pupil ratio will not exceed 1 – 30/31 for core curriculum subjects.</i></p> <p><i>The Authority’s School Reorganisation Policy 2015 states the following in relation to size of schools:</i></p> <p><i>‘For secondary phase provision, the Council aspires to have schools with at least 600 pupils in Years 7 to 11. This would allow average year group sizes of a minimum of 120 children.</i></p> |

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| | <p><i>The Authority’s optimum model for post-16 education is for centres to be able to provide 25 subjects, with a minimum class size of 12 or above. This will enable the Authority and schools to meet the requirements of the Learning and Skills (Wales) Measure 2009 whilst minimising the need for inter-school travel.</i></p> <p><i>However, 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 will be given to the specific circumstances of each school under consideration.’</i></p> |
| <p>1.3.3 Please explain how “an average of 120 students per KS3 & KS4 would help maximise curriculum benefits and lead to improved outcomes”.</p> | <p><i>As a pupil population grows so does a school’s capacity to: deliver a wider range of viable subject options at key stage 4; increase the number of teaching staff; and thereby improve the range of subject specialism. In this context, ‘outcomes’ refers to the choice available to pupils at key stage 4 with wider choice regarded as a positive outcome.</i></p> |
| <p>1.4 Size of School</p> | |
| <p>1.4.1 You state that the new school is the council’s aspiration for a size of school. Where is the data and statistical analysis which shows that this will educationally benefit children?</p> | <p><i>The county council commissioned a study by Price Waterhouse Cooper to report on the potential financial viability of each of the secondary and of the overall provision of secondary education across the county. The report concluded that ‘all the schools appear to be reaching a point where their options are extremely limited and there is a tangible risk that schools will become finance, rather than curriculum led’, and that ‘in light of the forecasted, deteriorating financial position of the whole county provision, even a concerted, joint effort of cost management may not be enough to avoid the requirement to examine structural changes to the education provision across the county’.</i></p> <p><i>As a pupil population grows so does a school’s capacity to: deliver a wider range of viable subject options at key stage 4; increase the number of teaching staff; and thereby improve the range of subject specialism.</i></p> |

| 1.5 Special Measures/Estyn | | |
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| 1.5.1 | If the four schools become two neither will be subject to special measures for the next two years. Is this motivation for Powys County Council to proceed with this Proposal and a convenient, short term solution to what appears to be a historic and deep rooted problem? There appears an obvious loophole in the process which you have exploited to your advantage. | <i>The Proposal is not about the current situation of removing a school from special measures due to a reorganisation process. The intention of the Proposal is to establish a sustainable secondary school infrastructure for the future that can deliver high-quality education. Should the Proposal be implemented, Welsh Government and Estyn will expect the school to be continually monitored.</i> |
| 1.5.2 | What systems will you implement which, for these two years, education standards will be monitored and reviewed adequately and any shortfalls and inadequacies addressed promptly? | <i>All schools in Powys are monitored through the Regional School Improvement Strategy through a team of Challenge Advisers deployed through the regional consortium for South West and Mid Wales, namely ERW. This consists of a core visit during the Autumn Term annually at which a school is categorised for standards and also the capacity to improve and placed on a matrix. This matrix determines the support required by a school. The support required is then brokered through the designated Challenge Adviser to ensure appropriate improvements are made.</i> |
| 1.5.3 | What form will your support take during the transitional period - when staff will be working across two sites - to convince us that the Proposals will benefit our children's education? | <i>Officers from the Authority through the Regional School Improvement strategy will with the leadership team of the school provide a bespoke menu of support to ensure there is a smooth transition. The deployment of staff will be the responsibility of the leadership team</i> |
| 1.5.4 | Where are the latest Estyn inspection figures? pg. 29 quotes an annual review in 2014. What was the Estyn feedback on Curriculum and Quality in 2014? | <i>Estyn did not carry out a full inspection of Brecon High School In 2014. It carried out a monitoring visit following the core inspection of 2012. During the monitoring visit Estyn evaluated progress against the recommendations of the core inspection and therefore did not make judgement relating specifically to the quality indicators of the Common Inspection Framework. In 2014 of the 8 recommendations 6 were judged to be partly addressed and two fully addressed.</i> |

| 1.6 Educational Attainment – Gwernyfed | | |
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| 1.6.1 | Gwernyfed High School has been producing excellent results and the students are passionate about staying there. They are also keen to ensure that their siblings have the opportunity to go there too. Doesn't that say something about the quality of the school? | <i>There are a range of factors that are taken into account when considering the performance of a school. This needs to reflect not only performance within the Local Authority but also against similar schools across Wales. From the comment made it is evident that students are pleased with their outcomes and this is reflected in their siblings also wanting to attend the school</i> |
| 1.6.2 | Why change something that works for something that is a large question mark?! | <i>The Proposal will ensure that the educational infrastructure is sustainable for the future through a critical mass of learners ensuring appropriate curriculum choice. With reducing pupil numbers across the secondary sector and reduction in grant funding for post 16 education it is increasingly difficult to ensure choice and related quality when compared to schools of a similar context across Wales</i> |
| 1.6.3 | Can you explain how the current school of Gwernyfed does not meet the requirements of the learning and skills measures in a single location? Why can't a broad range in curriculum be provided at the current Gwernyfed site? | <p><i>The requirement of the Learning and Skills (Wales) Measure is that every post-16 earner should have access to 30 level 3 courses, 5 of which must be vocational subjects across the 3 domains.</i></p> <p><i>Every 14 – 16 learner should have access to 23 subjects.</i></p> <p><i>The Authority receives a grant from Welsh Government for post-16 provision which is allocated on a formula basis, which has been agreed by all Powys secondary headteachers. The formula is, based on pupil numbers, along with uplifts for sparsity, deprivation and Welsh-medium. . Given that Gwernyfed High School had 89 pupils in the sixth form in 2015/16, the school received funding for 11.5 subjects.</i></p> |
| 1.6.4 | How can the learning environment be improved when Gwernyfed High School is located in a safe rural environment and the new school would be built in a busy town, where pupils are already known to leave the current school site in school time and stroll around the town centre? | <i>Safeguarding is a key principle in the design of any new school. The learning environment in the new school would be Condition A, rather than the current Condition C of Gwernyfed High School.</i> |

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| 1.7 Size of Year Groups | |
| 1.7.1 | <p>What evidence does the council have that year groups of 120 pupils will lead to improved outcomes? What does the council mean by improved outcomes?</p> <p>See 1.3.1 and 1.3.2</p> |
| 1.8 Standards at Gwernyfed – Relevant to Consultation Process | |
| 1.8.1 | <p>If one of the general issues (pg. 8) is that Gwernyfed High School was under Estyn monitoring but is NO longer, then surely this must have no impact as a general issue? If it is not under monitoring then it is not a concern. As this is now historical, surely it does not need to be discussed and is prejudicing the consultation process?</p> <p><i>As stated in the Consultation Document, Gwernyfed High School was removed from Estyn monitoring in 2016. However, the school will continue to be monitored and this is part of the Regional School Improvement Strategy. All schools in Powys are monitored by a team of Challenge Advisers deployed through the regional consortium for South West and Mid Wales, namely ERW. This consists of a core visit during the Autumn Term annually at which a school is categorised for standards and also the capacity to improve and placed on a matrix. This matrix determines the support required by a school. The support required is then brokered through the designated Challenge Adviser to ensure appropriate improvements are made.</i></p> <p><i>The Consultation Report that will be considered by Cabinet will reflect the fact that Gwernyfed High School has been removed from the requirement of Estyn monitoring due to progress having been made in addressing the recommendations of the core inspection of Autumn 2013.</i></p> |
| 1.8.2 | <p>How can we trust an education department who have recently been in Estyn special measures to provide Gwernyfed High School pupils with an equal standard of education and school life or better, to what they already have?</p> <p><i>The education department of Powys County Council has not at any time been in the Estyn category of special measures. Estyn inspections of Local Authority Education Services for Children and Young People (LAESCYP) are wide ranging and not limited to the Education Department. LAESCYP in Powys was placed in the category of requiring “Significant Improvement” in October 2012 following an Estyn Monitoring visit. Subsequently due to the progress and improvements made it was removed from the category in June 2014.</i></p> |

| 1.9 The Consultation Document | | |
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| 1.9.1 | Reasons for the Proposal, bullet point 1: ' <i>an opportunity to improve the learning outcomes.</i> ' Please cite the educational research that backs up this assertion. | <i>Evidence that a move to new or refurbished buildings is provided by Estyn through a thematic report published in 2007. It states that "In nearly all schools with new or refurbished buildings that we surveyed, pupils' attainment and achievement have improved".</i> |
| 1.9.2 | Pg. 18 Advantages of the Proposal: ' <i>Opportunities to enable all learners to achieve high standards of achievement and attainment.</i> ' Please cite the evidence base for this. | <i>As stated above. In addition the Estyn report states "Most schools offer pupils more choices than in their previous buildings because they have more space and better facilities. It also states "improvements in the quality of buildings have a very beneficial effect on the quality of teaching and morale of staff which has a positive impact on school performance"</i> |
| 1.9.3 | Pg. 18 ' <i>Opportunities to provide excellent teaching and learning provision reflecting national, regional and local priorities.</i> ' Please cite the evidence base for this. Where is the evidence that the Proposal will improve teaching? Please cite research. | <i>In 16 secondary schools sampled, there was a range of improvement of between 5 and 10 percentage points in the core sublet indicator(5 A*-C) at key stage 4 with the average improvement being 3.9 percentage points</i> |
| 1.9.4 | How does the closure of Gwernyfed High School provide my son with the highest quality of education possible? It can't! It will disrupt his education massively, just as Powys County Councils shambolic primary school policies have already done | |
| 1.9.5 | The Proposal by Powys County Council does not provide any evidence that closing Gwernyfed High School will improve the standards of its young people. Where and when we will see such evidence? | |
| 1.9.6 | Where is your research-based evidence that demonstrates the 'new school' will achieve | |

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| | <p>educational standards equivalent to Gwernyfed High School in five years?</p> | |
| <p>1.9.7</p> | <p>The Welsh Government’s School Organisation Code requires that “Relevant bodies should place the interests of learners above all others.” Explain how the current Proposals achieve this for all learners in each of the Brecon and Gwernyfed catchments.</p> | <p><i>The Proposal as outlined in the Consultation Report is based on a number of factors. Through a larger critical mass of learners there will be greater opportunities to share good practice both within and across departments. As a pupil population increases so does the school’s capacity to deliver a wider range of subjects at Key stage 4. There would be less reliance on the use of non-specialist teachers at key stage 3 and greater opportunities for the sharing of good practice both within and across departments.</i></p> |
| <p>1.9.8</p> | <p>Could you please provide evidence of having searched for literature / research which charts the impact upon pupils’ educational outcomes of being subject to more than one experience of school closure?</p> | <p><i>The Authority is not aware of any research published on this issue. However the pastoral programmes at the new school would mitigate any risk to well-being and achievement</i></p> |
| <p>1.9.9</p> | <p>Can Powys County Council guarantee that the quality of education under the new system would be at least as good as the current high standards at Gwernyfed? Where is the empirical evidence that the quality of education under the new system would be at least as good as the current high standards at Gwernyfed?</p> | <p><i>It is the role of the Local Authority through its school improvement service delivered through the regional School Improvement service, namely ERW to continually monitor the performance of all schools in Powys and to provide challenge and broker support as and when necessary. It is the role of the Local Authority to ensure that all Powys learners have an entitlement to a good quality of provision. Through the merger of the two schools good practice in both schools can be shared amongst all departments to ensure improvement</i></p> |
| <p>1.9.10</p> | <p>How can Powys County Council guarantee that the quality of education under the new system would be at least as good as the current high standards at Gwernyfed? Merging a failing school with Gwernyfed will lower standards not improve them!</p> | |

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| <p>1.9.11 With the proposed closure of the schools and introduction of the 'one school, two sites' idea scheduled for August 2017, just before I begin one of the most important years of my life, how can you guarantee that it will not affect my exam results or cause added pressure to me during this period of time?</p> | <p><i>The Authority recognises that any school reorganisation proposal creates a period of uncertainty for pupils. However, all pupils will be supported in the transition to a new school. One of the reasons for the interim Proposal of one school over two sites is to ensure that learners commencing any new courses would be supported in this through a familiar learning environment.</i></p> |
| <p>1.9.12 How has the Council taken into account the effect on educational performance at both schools due to the threat of the Proposals since 2009? Again, if it hasn't how can they be held up as a rationale for closure?</p> | <p><i>With reference to the informal consultation on a variety of options for reorganisation secondary schools, which took place in 2011, not 2009, Cabinet listened to the views of local people and proposed a number of alternative models which maintained the current infrastructure of schools.</i></p> |
| <p>1.9.13 If the consultation does not follow the anticipated timescales, you MUST give all appropriate support and resources to BRECON HIGH SCHOOL to ensure the current cohort of children are not neglected for the sake of you long term vision. What assurances can you provide that will instil us with some confidence?</p> | <p><i>All schools in Powys are monitored through the Regional School Improvement Strategy through a team of Challenge Advisers deployed through the regional consortium for South West and Mid Wales, namely ERW. This consists of a core visit during the Autumn Term annually at which a school is categorised for standards and also the capacity to improve and placed on a matrix. This matrix determines the support required by a school. The support required is then brokered through the designated Challenge Adviser to ensure appropriate improvements are made.</i></p> |
| <p>1.9.14 If your Proposals don't proceed according to plan, what assurances can you give us parents that our children's health and safety will not be compromised as a result of your insufficient governance in this area?</p> | <p><i>In any school, it is the responsibility of the school leadership team and staff to ensure that children are safeguarded and protected from harm. The schools Health and Safety policy will underpin this. Advice is available from the Local Authority</i></p> |
| <p>1.9.15 Explain how "to significantly improve the learning outcomes..." is defined.</p> | <p><i>A range of performance indicators are used to define performance. Currently the schools are not meeting the modelled expectations for schools with the same context relating to free school meal benchmarking quartiles. This is one definition.</i></p> |

| REF | ISSUE | RESPONSE |
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| 2. Post 16 Education | | |
| 2.1 Post 16 model | | |
| 2.1.1 | Please answer for me what evidence you have that holding academic and vocational at one site is of benefit to either of those categories? | <p><i>The authorities view is that if learners can access both academic and vocational courses all on one site then this widens the curriculum choices and reduces travel requirements for learners who would like to study a mix of both academic and vocational courses.</i></p> <p><i>The Proposal aims to provide a high-quality tertiary model of post-16 education, with a number of benefits. Tertiary Colleges provide the solution to the dilemma facing many young people today as they ponder their future - Tertiary colleges are a single establishment meeting educational and skills needs for all young people, their communities, and local employers.</i></p> <p><i>Tertiary colleges were originally defined as educational establishments which combined the functions of a further education college and a sixth form college, offering further education through a full range of courses, both vocational and academic, primarily to the 16-19 age group. In a pure tertiary model, schools within a given area do not operate sixth forms, but instead young people progress to a single local institution that provides both their 16-19 education and adult learning for the wider community.</i></p> <p><i>Tertiary Colleges offer, within one institution, readily accessible pathways of progression from foundation level to level 3 qualifications and beyond, across a wide range of subjects and skills sectors. They promote personalised programmes for young people and adults alike, enabling individuals to combine academic and vocational studies. The breadth of offer and the opportunity for individuals to fulfil their potential by moving from lower to higher levels of programmes are key characteristics of Tertiary Colleges.</i></p> <p><i>In addition to their considerable portfolio of 16-19 provision, Tertiary Colleges are important providers of adult education and training. They play a major role</i></p> |

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| | <p><i>in developing employer responsive provision, working closely with local enterprise, business and industry, to meet their demands and local, regional and sometimes national skills needs; they successfully deliver Apprenticeships and traineeships and have been key in supporting individuals and businesses</i></p> <p><i>Evidence from the Promise and Performance Report 2007, a Report of the Independent Review of the Mission and Purpose of Further Education in Wales in the context of the Learning Country: Vision in to Action, concluded that ‘pupils who have a wider choice of schools at their place of residence perform no better than those with a more limited choice’ and ‘on balance, choice and competition does not seem to be generally effective in raising standards in the school context’. The report expressed concern over the either/or mentality of academic or vocational pathways suggesting that “To embed more personalised learning we need to offer each learner a choice of a wide range of subjects, pathways and modes of learning to suit as many interests, capabilities, learning styles and career opportunities as possible. Choice should apply equally to all learners, whether they are academically or practically orientated. It should include a range of learning styles and contexts from the didactic to experiential, from classroom based to work-based – but all learners must have a wider range of vocational learning opportunities.”</i></p> <p><i>NPTC Group of Colleges is not a private college. It is a Further Education (FE) College and is classified by the National Office for Statistics as NPISH (Not for Profit Institution Serving Households). All FE Colleges in Wales are classified in this way and they are largely treated in the same way as any charity, but they are regulated by Welsh Government, not the Charities Commission.</i></p> |
| <p>2.1.2 Explain what “sustainable infrastructure” and “... the sustainability of post-16 education” mean.</p> | <p><i>The Proposal is intended to create a post-16 model that is financial and educationally viable in the face of the financial and legislative pressures that Powys currently faces:</i></p> <ul style="list-style-type: none"> • <i>There are small sixth forms at both schools with a narrow choice of subjects, which are both below the Council’s aspiration for size of sixth form. The Council wants sixth forms to be able to provide at least 25 AS/A level</i> |

subjects from one location, which means that the Council aspires to having sixth forms that have over a 150 pupils;

- *Learners currently have to travel between school/college sites during the school day to have a wider choice of subjects – this is an additional cost to the Council;*
- *The Welsh Government gives Powys County Council an annual grant for post-16 provision. This grant has been reducing every year since 2013, and is forecast to reduce even further. This means that the number of subjects that the schools can offer has also reduced, and may reduce further;*
- *Even within Powys, there is a limited Post-16 choice of subjects, meaning that some pupils travel to sixth forms or colleges in other counties or in England to study – this means that there is even less money coming in to Powys to spend on post-16 subjects.*

| No. of funded year | 2013/14 | 2014/15 | 2015/16 |
|------------------------------|----------------|----------------|----------------|
| 12 classes | | | |
| Brecon High School | 14 | 12 | 12 |
| Gwernyfed High School | 12 | 10.5 | 10.5 |

2.1.3 Explain why Powys County Council is content to rely on a crude Appraisal Methodology that ignores insight and evidence, is highly subjective, vulnerable to misdirection and that betrays institutional fatigue by the decision makers.

The Option Appraisal Methodology is aligned with the HM Treasury Five Case Model approach.

2.1.4 All thirteen FE tertiary colleges in Wales are based in much larger urban settings. Explain why Powys County Council believes that this is the best solution for Brecon and Gwernyfed catchments.

The size of the Brecon High School and Gwernyfed High School post-16 student population means that establishing both an effective Sixth Form Centre and a school sixth form to provide this choice is not viable. This prioritisation of one kind of choice will be to the detriment of a choice of courses, pathways and options for a great number of students.

| 2.2 Statistics | | |
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| 2.2.1 | I questioned you on the detail of what Powys believes a viable sixth form to be. You and your officials have made reference to a roll of 150 learners although no one has been able to confirm what this figure is based on or where it is advised. ... I can only reach the conclusion that there is no basis for this figure. | <p><i>The Authority's optimum model for post-16 education is for centres to be able to provide 25 subjects, with a minimum class size of 12 and above.</i></p> <p><i>Each learner, over a two year period, studies an average of 3.5 subjects (4 AS in Year 12, 3 A Levels in Year 13).</i></p> <p><i>On an average class size of 12, the size of a sixth form (Years 12 & 13) would be 180</i></p> <p><i>On an average class size of 15, the size of a sixth form (Years 12 & 13) would be 220.</i></p> <p><u>$180 \times 3.5 = 630/50 = 12.6$</u></p> <p><u>$220 \times 3.5 = 770/50 = 15.4$</u></p> <p><i>However, in order to reflect Powys' extreme rurality and sparsity, officers agreed that the threshold should be 150 pupils.</i></p> |
| 2.2.2 | The Final Business Case explains that a minimum sixth form size, of 180 pupils, is based on providing 25 subjects with a minimum class size of 12. Explain the arithmetic behind this | See 2.2.1. |
| 2.2.3 | Explain clearly what the A level attendance and results are currently per subject for the Brecon site of the NPTC Group of Colleges. | <i>Results will not be available until mid-August.</i> |
| 2.2.4 | Explain how Powys County Council has identified the demand, from parents, teachers and pupils, for a tertiary model of education rather than an in-school sixth form. | <i>The Authority has not previously identified demand, but will do so through this consultation process.</i> |
| 2.2.5 | On what basis has the council decided that a sixth form of 150 pupils contributes to the wellbeing and education of the pupils in that sixth form? | <i>The wellbeing and educational attainment of all pupils is the responsibility of the school, whatever its size. Some pupils prefer to be in smaller sixth forms, others prefer larger settings.</i> |

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| 2.2.6 | Please explain how NPTC arrives at a figure of 'up to 201' students attending the new college. | <i>NPTC Group of Colleges bases this on existing numbers attending 6th forms in Brecon HIGH SCHOOL and Gwernyfed HIGH SCHOOL plus a number who currently travel out of county to obtain a wider subject choice.</i> |
| 2.3 Travel – Current Position | | |
| 2.3.1 | Page 6 states 'limited post 16 education meaning that some pupils need to travel outside of Powys...' What evidence does Powys County Council have to suggest that this would improve if there was no secondary education on the Gwernyfed High School site? | <i>It is the intention of the Proposal that a post-16 centre is established in Brecon High School, with brand new facilities, and a wider range of option choices, thereby allowing learners to have real choice as opposed to being restricted to the current Post-16 Partnership timetable. The Authority expects that this will be attractive to learners in the future, reducing the numbers of learners who are currently travelling out of county.</i> |
| 2.3.2 | How will this be diminished by the current Proposal to only have 11-16 to education within Brecon/Gwernyfed? | <i>See 2.3.1</i> |
| 2.3.3 | The Governing Body also asks: <i>why has pupil retention not been included as a risk of increased travel time?</i> This, they feel will be of particular significance to students accessing A- and AS-level provision. | <i>Comment noted – this will be included as a new risk.</i> |
| 2.4 Fall in Funding for Sixth Form Education | | |
| 2.4.1 | The documents states that the council has received a cut in its annual grant for post-16 education (pg. 8). What steps has the council taken to seek additional funding from alternative sources as opposed to just creating a cut in spending? What solutions have been researched to find additional funding? | <i>The Authority has worked with Powys Secondary Headteachers to develop a model of funding that ensures equity for all schools – this funding model is different to the way Welsh Government distributes its post-16 funding. The Authority also uses a proportion of the Educational Investment Grant to fund specific courses and transport for learners. Discussions take place with the Welsh Government Post-16 Planning Team on a bi-annual basis, and they are fully aware of the issues faced by Powys.</i> |

| 2.5 Existing Quality of Sixth Form – Gwernyfed | |
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| 2.5.1 | <p>Gwernyfed' s 6th form results are far superior to those from NPTC at present so the question has to be asked why change something that's working for a model that is clearly worse, so far POWYS COUNTY COUNCIL have failed to articulate why Gwernyfed' s 6th form is not good enough.</p> |
| 2.5.2 | <p>Gwernyfed offers a broad range of the core academic A- levels (in association with other schools) that many pupils who attend sixth form are likely to want to take (quality is always better than quantity). In the past there have been few negative issues with the A-levels offered at Gwernyfed so what advantage is being gained by shutting it and who would benefit from the proposed closure?</p> |
| 2.5.3 | <p>Explain why it wouldn't be advantageous to retain an in-school sixth form in Brecon and Gwernyfed High Schools, and a separate complementary vocational FE college.</p> |
| | <p><i>The issue with Gwernyfed's sixth form is its size and ability to provide real choice for learners, without the need to travel to other sites. . In 2009, the Welsh Government introduced the Learning and Skills (Wales) Measure, focusing on provision for 14– 19 year olds. The Measure requires schools to provide a basic minimum of choice for its learners. At post-16, the Measure places a duty on local authorities, schools and further education providers to provide a local curriculum for students aged 16 to 18 which contains a minimum of 30 courses of study at Qualifications and Credit Framework (QCF) and National Qualification Framework (NQF) level 3.</i></p> <p><i>The Consultation Document clearly notes the standards of A levels at Gwernyfed High School over the last three years.</i></p> <p><i>NPTC Group of Colleges delivers A levels to students progressing from 9 secondary schools. Therefore, their results should be compared with the all Powys figure, not against any one individual school. This is a particularly unreliable measure when one factors in the comparative levels of social deprivation of students from many of the Neath Port Talbot schools. Neath Port Talbot secondary schools have a typical free school meal entitlement of around 19-20% although several are around 40%. Gwernyfed HIGH SCHOOL is identified from the same data source as having less than 5% of students entitled to free school meals.</i></p> <p><i>The Proposal is intended to create a post-16 model that is financial and educationally viable in the face of the financial and legislative pressures that Powys currently faces:</i></p> <ul style="list-style-type: none"> <i>• There are small sixth forms at both schools with a narrow choice of subjects, which are both below the Council's aspiration for size of sixth form. The Council wants sixth forms to be able to provide at least 25 AS/A level subjects from one location, which means that the Council aspires to having sixth forms that have over a 150 pupils;</i> |

- *Learners currently have to travel between school/college sites during the school day to have a wider choice of subjects – this is an additional cost to the Council;*
- *The Welsh Government gives Powys County Council an annual grant for post-16 provision. This grant has been reducing every year since 2013, and is forecast to reduce even further. This means that the number of subjects that the schools can offer has also reduced, and may reduce further;*
- *Even within Powys, there is a limited Post-16 choice of subjects, meaning that some pupils travel to sixth forms or colleges in other counties or in England to study – this means that there is even less money coming in to Powys to spend on post-16 subjects.*

| No. of funded year | 2013/14 | 2014/15 | 2015/16 |
|------------------------------|----------------|----------------|----------------|
| 12 classes | | | |
| Brecon High School | 14 | 12 | 12 |
| Gwernyfed High School | 12 | 10.5 | 10.5 |

2.6 Existing Quality of Sixth Form Brecon

2.6.1 Powys County Council must go on record to demonstrate that it has not predetermined its own preference for NPTC Group of Colleges to take over post-16 education by deliberately allowing Brecon High School to continue to founder financially, contributing to the recent Special Measures.

The Authority did not allow Brecon High School to continue to founder financially. Brecon High School ended the 2015/16 financial year with a surplus of £107k. Current projections submitted by the Governing Body show projected deficits for the next few years. These figures do not take into account the action the school will take to reduce the projected deficit. The Authority works with all schools to offer the appropriate support and challenge to ensure they meet the requirements of the Scheme. Cabinet will review the position upon receipt of the Governing Body's proposed recovery plan.

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| 2.7 Why Tertiary College Model here alone? | |
| 2.7.1 | <p>Explain why, when this isn't the model elsewhere it is advantageous for pupils to blend academic and vocational strands of education in Brecon. Explain why only the pupils of Brecon and Gwernyfed, and nowhere else in Powys, will be provided with no other choice by the LEA but to attend a private tertiary FE college, with no prior record in Brecon, to complete their A level studies within the county.</p> |
| | <p><i>The reason why a tertiary model has been proposed here is because there is because NPTC Group of Colleges already deliver both vocational and academic subjects in Brecon – this provides an opportunity to develop a sustainable post-16 centre with the additional benefits of a tertiary model as outlined previously.</i></p> |
| 2.8 The Proposal | |
| 2.8.1 | <p>Success Factor 3: <i>'To provide post-16 provision that <u>improves access to</u>, and participation in, both academic and vocational courses and which meets the requirement of the Learning and Skills Measure, whilst minimising the need for additional travel during the school day.'</i> What does ACCESS to mean? How will this success factor be achieved with pupils moving out of country to Hereford for their A' Level provision? pg. 33. Why is Hartbury College not included in the list? How does increased travel times contribute to improved access? How a reduction in does proposed A Levels e.g. Chemistry improve access?</p> |
| | <p><i>Improved access means that learners will have access to at least 30 subjects from one location, rather than having to travel between sites, as currently happens. It is the intention of the Proposal that a post-16 centre is established in Brecon, with brand new facilities, and a wider range of option choices, thereby allowing learners to have real choice as opposed to being restricted to the current Post-16 Partnership timetable. The Authority expects that this will be attractive to learners in the future, reducing the numbers of learners who are currently travelling out of county.</i></p> <p><i>NPTC Group of Colleges proposes to increase the range of A levels on offer, not reduce it. Chemistry was missing from the original provisional list; this was as an oversight which was pointed out during consultation. Chemistry has been added to the provisional list as will other subjects where there is demand.</i></p> |
| 2.8.2 | <p>Please explain why within the pros for the Status Quo, the list is full of Learning Environment positives, yet one of the key suggestions why the New School option is being put forward is an improvement in learning.</p> |
| | <p><i>The advantages for the Status Quo on page 11 of the Consultation Document include a variety of advantages including the following:</i></p> <ul style="list-style-type: none"> • Provides access to separate Secondary Schools within two communities • No additional transport costs • More acceptable to local stakeholders |

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| | | <ul style="list-style-type: none"> • <i>No instability due to reorganisation</i> • <i>Schools can build on their current plans towards improving standards</i> • <i>No negative impact on local communities due to removal of secondary provision</i> • <i>Schools able to build on current good practices within both schools</i> • <i>Opportunities to enable all learners to achieve high standards of achievement and attainment;</i> • <i>Opportunities to provide excellent teaching and learning provision reflecting national, regional and local priorities;</i> • <i>Opportunities to develop an inclusive education model, meeting the needs of vulnerable learners.</i> • <i>Opportunities to collaborate between both schools</i> • <i>Some Welsh-medium provision available locally</i> |
| 2.8.3 | Can you please give me further information on what is Strategic Fit? | <i>Strategic Fit means 'Does the option fit with local / national strategies?'</i> |
| 2.8.4 | Will NPTC Group of Colleges of Colleges deliver courses that are relevant to the area concerned? | <i>Yes. NPTC Group of Colleges of Colleges plans its curriculum offer to meet national, regional and local needs. The curriculum offer on each of its campuses is different and reflects the needs of the learners, communities and employers within the catchment area it serves.</i> |
| 2.8.5 | What A level subjects will be available and realistically taught in this college? Are there skilled teachers for Maths? | <i>NPTC Group of Colleges has identified an initial offer for September 2017 which includes 25 A level subjects from the following list: Biology, Business Studies, Chemistry, Computer Science, 3D Design, Economics, English Lang, English Lit, Fine Art, French, Geography, Graphics, History, Law, Maths, Maths (Further), Music, PE, Photography, Physics, Psychology, Religious Studies, Sociology, Spanish, Theatre Studies and Welsh (2nd Lang). This is a provisional offer and can be fine-tuned to meet demand for subjects not currently on this list. NPTC Group of Colleges deliver 46 A levels on the Neath campus, any of these subjects could form part of the offer in Brecon if required.</i> |

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| | | <i>NPTC Group of Colleges has skilled teachers for Maths. Teachers are all appropriately qualified and registered with the Education Workforce Council (formerly the General Teaching Council Wales) in the same way that school teachers are.</i> |
| 2.8.6 | How can you guarantee that pupils will receive the full range and quality of courses at A-level in <i>NPTC Group of Colleges of Colleges</i> rather than in a high school 6th form? | <i>The current school 6th forms are too small to deliver a full range of subjects. NPTC Group of Colleges has demonstrated its ability to deliver a full range of high quality A level courses on it's Neath campus and is confident of replicating this in Brecon with the larger student numbers forecast in the schools reorganisation programme.</i> |
| 2.8.7 | Explain how the <i>NPTC Group of Colleges of Colleges</i> will increase provision from 13 A levels offered in September 2016 to 25 by 2017. | <i>NPTC Group of Colleges delivers 46 A level subjects in Neath and has access to teachers with a proven track record of delivering these subjects. The room requirements for 25 subjects have been modelled through the College's timetabling software to ensure that this increase can be accommodated. Any additional costs for specialist equipment will be incorporated into the budget of the 6th form academy in the same way as vocational areas are able to update their equipment. These costs are likely to be significantly less than within the vocational areas. NPTC Group of Colleges is confident that an increase from 13 to 25 A levels by September 2017 can be achieved without too much difficulty.</i> |
| 2.8.8 | Demonstrate the likelihood that the <i>NPTC Group of Colleges of Colleges</i> will offer any A levels at all in future. | <i>NPTC Group of Colleges has a track record of delivering A levels in Neath Port Talbot for the past 35 years. Its senior management and Board of Governors have made a commitment to deliver A levels in Brecon through the College's strategic planning process. The College is planning a considerable investment in time and money and its intention to deliver A levels as part of its long term operations should be clear to all.</i> |
| 2.8.9 | Can the Council and <i>NPTC Group of Colleges of Colleges</i> guarantee that they will increase A level provision in 2015 from the current 14 subjects to 25 in 2017? | <i>NPTC Group of Colleges can guarantee to offer increase it's A level offer from 14 to 25 subjects in 2017.</i> |
| 2.8.10 | The College offered 14 AS choices in the last academic year. How many of these choices ran for the full A Level? | <i>All students starting on an AS choice were given the opportunity to continue at A2, i.e. to complete the full A level.</i> |

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| 2.8.11 | Why is there no offer of Chemistry? | <i>The omission of Chemistry from the original list of A level subjects was an oversight. The subject list is provisional and if alternative subjects are required these can be added. Chemistry will form part of the A level offer for 2017.</i> |
| 2.8.12 | When will the list of A' Levels that are definitely to be provided be available to current Year 10 students? | <i>Early in the Autumn term, once the Cabinet has indicated its decision on future provision of 6th form in Brecon and Gwernyfed. This is in line with current information provided by schools.</i> |
| 2.8.13 | What assurance can POWYS COUNTY COUNCIL give that the full range of A-level subjects will be offered at the new campus and continue to be delivered from the site in future? | <i>NPTC Group of Colleges will be responsible for providing post-16 education at the New School in Brecon, and will ensure that its provision meets the requirements of learners.</i> |
| 2.8.14 | Can the Council and <i>NPTC Group of Colleges of Colleges</i> guarantee that they will increase A-level provision from 14 subjects to 25 by 2017, especially in light of the evidence that suggests they will not achieve the predicted number of pupils? And <i>what is the nature of the "commitment" from NPTC?</i> | <i>NPTC Group of Colleges has guaranteed it will offer 25 A level subjects in 2017 and hasn't seen any independent evidence to suggest that pupil predictions will be incorrect. Obviously, if there is zero demand for a subject, it will not run. However, NPTC Group of Colleges of Colleges expects to run with some small groups initially and is able to do so because these are compensated by large group sizes on the Neath campus.</i> |
| 2.9 Location/Travel to Neath/England | | |
| 2.9.1 | If there are insufficient pupils to make courses in Brecon viable, can you confirm that pupils will not be forced to travel to Neath to study, leaving their communities and friendship groups, which they would not have to do if provision was still available in local schools? | <i>NPTC Group of Colleges does not intend to deliver A levels for Brecon and Gwernyfed based students on the Neath Campus. These students will study their full programme on the Brecon campus.</i> |
| 2.9.2 | It is proposed that NPTC Group of Colleges of Colleges would provide at least 25 AS/A subjects -what happens if one of those subjects | <i>NPTC Group of Colleges does not expect Brecon and Gwernyfed based students to travel to Neath to study. Some small group sizes are likely and their</i> |

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| <p>has a very low uptake and NPTC decide it isn't financially viable, would that subject still be offered or would the students be expected to travel to Neath?</p> | <p><i>lack of financial viability will be subsidised by large group sizes in Neath, not by transporting students to Neath.</i></p> |
| <p>2.10 Transport/Travel Issues</p> | |
| <p>2.10.1 On the point of Post 16 education - we are led to understand that costs for bussing children to Brecon have been included in the original scope but what about additional costs if this group do end up at Hereford or Neath?</p> | <p><i>It is the local Authorities policy not to fund out of county college/6th form so there would be no extra costs incurred should learners chose to access Neath or Hereford provision.</i></p> |
| <p>2.10.2 If the sixth form closes to go to <i>NPTC Group of Colleges of Colleges</i> in Brecon and if they require 39B Bus, what will happen to the general public who uses the 8:00 and the 16:00 bus to go to work, as there well may be less seating? (Due to current NPTC Group of Colleges students as well as possible sixth form)</p> | <p><i>The local Authority will review all transport links and implement the most appropriate links to accommodate an increase of learners travelling to Brecon which will not affect the general public's ability to use public transport.</i></p> |
| <p>2.11 NPTC Group of Colleges of Colleges</p> | |
| <p>2.11.1 What is the minimum number of students a sixth form college in private hands will operate and for how long?</p> | <p><i>NPTC Group of Colleges is not a private college. It is a Further Education (FE) College and is classified by the National Office for Statistics as NPISH (Not for Profit Institution Serving Households). All FE Colleges in Wales are classified in this way and they are largely treated in the same way as any charity, but they are regulated by Welsh Government, not the Charities Commission.</i></p> <p><i>NPTC Group of Colleges 6th form academy students are funded from the same post 16 Education budget that the schools receive via Powys County Council. Its curriculum delivery plans have to be agreed with the Welsh Government and its quality is inspected by HMI (Estyn) using the same criteria as 6th forms in schools.</i></p> |

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| <p>2.11.2 What additional support is there outside the curriculum?</p> | <p><i>All students have a personal tutor allocated to look after their academic and pastoral needs. Students have access to specialist advice and guidance staff and can access support with issues ranging from personal problems, health related problems, financial guidance and counselling. Academic support staff provide one to one and group support with literacy, numeracy and potential obstacles to learning such as dyslexia. The college employs learning coaches and specialists qualified to access dyslexia and other potential barriers to effective learning.</i></p> |
| <p>2.11.3 Are the intentions of <i>NPTC Group of Colleges of Colleges</i> purely educational or financial? (Also how are the Powys area of NPTC Group of Colleges of colleges being treated? As I have also learned, the Newtown Campus is run like a ghost ship and that the Llandrindod Wells campus only now covers two subject areas as FE subjects, which I find very worrying).</p> | <p><i>NPTC Group of Colleges primary purpose is to provide a high quality education to post 16 learners. It is a not for profit organisation, so the financial imperative is to operate within budgets and any surpluses produced are utilised to maintain facilities and equipment at a satisfactory level.</i></p> <p><i>Powys campuses are fully integrated into NPTC Group of Colleges and senior managers operate across all campuses. Academic schools or faculties operate across all campuses with single budgets, policies and procedures. There is a designated campus management team responsible for the day to day running of Newtown, Llandrindod and Brecon and a similar team based in Neath and Afan.</i></p> <p><i>The campuses are well run and the curriculum offer has increased in Powys since the formation of the Group. This includes expansion of the subjects in Newtown to include plumbing and level 3 engineering, amongst others, seldom found in a 'Ghost Ship'.</i></p> <p><i>The Llandrindod Wells campus has always run a very limited curriculum when compared to Newtown and Brecon. Due to its size and location, Coleg Powys (several years prior to merger) decided to focus investment into vocational facilities and equipment on its main campuses in Newtown and Brecon.</i></p> |
| <p>2.11.4 What is the provision for free periods or IT with <i>NPTC Group of Colleges</i>?</p> | <p><i>During free periods students can access learning resources including a large number of computers and other learning materials in order to pursue independent study. They are also able to access cafeteria and coffee shop areas for relaxation and social interaction.</i></p> |

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| 2.12 Why Has Powys County Council Chosen NPTC Group of Colleges? | |
| 2.12.1 | <p>Why NPTC Group of Colleges when Merthyr college is much nearer and appears to be of equal quality.</p> <p><i>The reason why POWYS COUNTY COUNCIL is working with NPTC Group of Colleges is because they are the main deliverer of post-16 FE provision in Powys, with campuses in Brecon and Newtown, following the merger with Coleg Powys in 2013.</i></p> |
| 2.12.2 | <p>If Powys County Council are so concerned about the quality of education for our children, what is the rationale for handing over the control of post 16 provision to NPTC?</p> <p><i>The Proposal aims to provide a high-quality tertiary model of post-16 education, with a number of benefits. Tertiary Colleges provide the solution to the dilemma facing many young people today as they ponder their future - Tertiary colleges are a single establishment meeting educational and skills needs for all young people, their communities, and local employers.</i></p> <p><i>Tertiary colleges were originally defined as educational establishments which combined the functions of a further education college and a sixth form college, offering further education through a full range of courses, both vocational and academic, primarily to the 16-19 age group. In a pure tertiary model, schools within a given area do not operate sixth forms, but instead young people progress to a single local institution that provides both their 16-19 education and adult learning for the wider community.</i></p> <p><i>Tertiary Colleges offer, within one institution, readily accessible pathways of progression from foundation level to level 3 qualifications and beyond, across a wide range of subjects and skills sectors. They promote personalised programmes for young people and adults alike, enabling individuals to combine academic and vocational studies. The breadth of offer and the opportunity for individuals to fulfil their potential by moving from lower to higher levels of programmes are key characteristics of Tertiary Colleges.</i></p> <p><i>In addition to their considerable portfolio of 16-19 provision, Tertiary Colleges are important providers of adult education and training. They play a major role in developing employer responsive provision, working closely with local enterprise, business and industry, to meet their demands and local, regional</i></p> |

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| | <i>and sometimes national skills needs; they successfully deliver Apprenticeships and traineeships and have been key in supporting individuals and businesses</i> |
| <p>2.12.3 The Welsh Government’s School Organisation Code requires that “Relevant bodies should also consider the ability of the school... to deliver the full curriculum... This consideration should include the quality of curriculum delivery and the extent to which the structure or size of the school is impacting on this. “Explain how handing over post-16 education to the <i>NPTC Group of Colleges of Colleges</i> Group achieves this.</p> | <p><i>NPTC Group of Colleges has no results available yet for the Brecon campus because the A level provision is too new. However, the results for Neath should be seen as a reliable predictor of those achievable in Brecon. Courses are being delivered by the same staff in Brecon and under the same 6th Form Academy management team as in Neath. Teaching methods and materials will be identical. NPTC Group of Colleges is confident that the results achieved in Neath can be replicated on the Brecon campus.</i></p> |
| <p>2.13 NPTC – Sustainability</p> | |
| <p>2.13.1 What commitment is in place for this 6th form after it is handed over to Neath Port Talbot and the pupil numbers don’t match the costs? Are they under any obligation to keep the campus open in Brecon or will the offer only be there whilst it suits?</p> | <p><i>If the Proposal is implemented, the Authority, as stated in the Consultation Document, will not receive any funding from Welsh Government to deliver post-16 provision in Brecon – this will be the sole responsibility of NPTC Group of Colleges, funded and monitored by Welsh Government directly. NPTC Group of Colleges will be fully accountable, as it is currently, to Estyn for the quality of its provision. The Authority has proposed a tertiary model in Brecon for a number of reasons, and believes that there are significant benefits to this model, as outlined previously.</i></p> |
| <p>2.13.2 What is the contingency plan if <i>NPTC Group of Colleges of Colleges</i> withdraws their service?</p> | <p><i>NPTC Group of Colleges has a track record of delivering A levels in Neath Port Talbot for the past 35 years. Its senior management and Board of Governors have made a commitment to deliver A levels in Brecon through the College’s strategic planning process. The College is planning a considerable investment in time and money and its intention to deliver A levels as part of its long term operations should be clear to all.</i></p> |
| <p>2.13.3 What is there to prevent the College from pulling out at any time, reducing provision or cancelling courses?</p> | <p><i>NPTC Group of Colleges has a track record of delivering A levels in Neath Port Talbot for the past 35 years. Its senior management and Board of Governors have made a commitment to deliver A levels in Brecon through the College’s strategic planning process. The College is planning a considerable investment in time and money and its intention to deliver A levels as part of its long term operations should be clear to all.</i></p> |
| <p>2.13.4 Has cabinet considered the possibility that, should NPTC’s Brecon Campus prove unviable, NPTC may threaten to withdraw unless the other south Powys sixth forms are closed also? What</p> | <p><i>NPTC Group of Colleges does not intend to deliver A levels to Brecon and Gwernyfed based learners in Neath. Their full A level programmes will be delivered in Brecon.</i></p> |

stance will cabinet take on this? What do you plan to do to prevent this scenario evolving?

2.13.5 What assurances and guarantees are POWYS COUNTY COUNCIL seeking from *NPTC Group of Colleges* since they could pull out at any time?

2.13.6 Can you also comment on the fact that as Powys County Council will not have any say as to how NPTC run their courses and that should they decide that it is not financially viable, they could close their facility and there would be no provision for post 16 education in the Brecon and Gwernyfed area?

2.13.7 We feel POWYS COUNTY COUNCIL's Proposal to hand over post 16 education to NPTC is a complete abdication of its responsibilities. Powys county council would relinquish any influence over its post 16 education - what happens in the future if standards drop or NPTC decide the Brecon campus is peripheral or loss making and leave?

2.13.8 Please answer me - what happens if NPTC withdraw the courses that they can offer? The Proposal hasn't been approved and NPTC cannot categorically state exactly what they can offer at this point. Please answer for me - will you then ship pupils to their site at Neath?

- 2.13.9** Why is Powys County Council prepared to absolve responsibility for our youngsters' higher education.
- 2.13.10** If NPTC can no longer support a course at Brecon Campus and directs its students to Neath to complete their education will Powys County Council still run a bus down to south wales? I think not. I live in a ward with NO PUBLIC TRANSPORT, the young people of my area could seriously find themselves without access to post-16 education and the Council, having given away its responsibility for providing post-16 education in this area, will tell me it's not their responsibility while continuing to educate the rest of the population through sixth forms. How is this rural progressive equality and how can a rural County even contemplate endorsing it?
- 2.13.11** You have adopted and are proposing different models of education provision (both Welsh and post 16) across Powys and pupils in south Powys have been sold short. Can you explain why the difference in proposed approaches? Why are you opting out of your responsibilities for managing post 16 education?
- 2.13.12** What guarantees have you received from NPTC which will assure us parents that the appropriate levels of teaching standards, subject availability and facilities will be available at the outset from the Brecon campus and will remain in the long term? Please provide evidence.

| 2.14 NPTC – Detachment from Powys County Council | |
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| 2.14.1 | <p>Why does the LEA insist on spending £24m on improving the college campus so that an out of county provider can take control with no input from Powys?</p> <p><i>As stated in the Consultation Document, the Welsh Government has approved a Strategic Outline Case for investment in the New School Building in Brecon – the total estimated cost for this is £20m. A further £24m would be required to be provided by NPTC to rebuild the college’s facilities.</i></p> <p><i>NPTC Group of Colleges is not an out-of-county provider. Following the merger with Coleg Powys in 2013, the College has been delivering post-16 courses to learners throughout Powys.</i></p> <p><i>The LEA will not be paying to improve the College campus; NPTC Group of Colleges will be responsible for meeting this cost. NPTC Group of Colleges will be eligible to apply for capital funding from Welsh Government to meet up to 50% of their investment.</i></p> |
| 2.14.2 | <p>When evidence suggests that a school managed 6th form achieves better education standards than a tertiary model?</p> <p><i>There is no evidence to suggest that a school managed 6th form achieves better education standards than a tertiary model.</i></p> |
| 2.14.3 | <p>Explain how Powys County Council would guarantee continuous improvements in post-16 education in a privately run FE college that is outside its control.</p> <p><i>NPTC Group of Colleges is not a private college. It is a Further Education (FE) College and is classified by the National Office for Statistics as NPISH (Not for Profit Institution Serving Households). All FE Colleges in Wales are classified in this way and they are largely treated in the same way as any charity, but they are regulated by Welsh Government, not the Charities Commission.</i></p> |
| 2.14.4 | <p>How will Powys County Council hold the College accountable for the quality of provision for Powys 6th formers?</p> <p><i>Estyn holds the College accountable for the quality of its provision.</i></p> |

| 2.15 NPTC Standards | | |
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| 2.15.1 | If this Proposal goes ahead where my son will get quality A level teaching? It won't be at NPTC. The results they boast have nothing to do with the Brecon campus. There is no confidence in the college locally and you will drive people away. | <i>NPTC Group of Colleges has no results available yet for the Brecon campus because the A level provision is too new. However, the results for Neath should be seen as a reliable predictor of those achievable in Brecon. Courses are being delivered by the same staff in Brecon and under the same 6th Form Academy management team as in Neath. Teaching methods and materials will be identical. NPTC Group of Colleges is confident that the results achieved in Neath can be replicated on the Brecon campus.</i> |
| 2.15.2 | What assurance can Powys County Council give that the A level standards achieved at Gwernyfed school will be achieved let alone improved upon if delivered by NPTC? | |
| 2.15.3 | How will Powys guarantee that educational standards at A' Level will be at least as good as at GWERNYFED HIGH SCHOOL? | |
| 2.15.4 | What assurance can POWYS COUNTY COUNCIL give that the A-level standards achieved at Gwernyfed school will continue to be achieved let alone improved upon if delivered by NPTC? | |
| 2.15.5 | The data in the report indicates that GWERNYFED HIGH SCHOOL pupils achieve a high standard of "A" level results. Transferring the education provider for "A" levels to NPTC would appear to go against the school organisation code paragraph 1.3 where it cannot guarantee the standard of education will be the equivalent or better that the current system. If you are not in control of a system you cannot guarantee its outcome and POWYS COUNTY | |

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| <p>2.15.6</p> | <p>COUNCIL must take ownership of their education responsibilities to Powys pupils. How does POWYS COUNTY COUNCIL justify proposing this course of action against WG policy?</p> <p>POWYS COUNTY COUNCIL talk about the Proposal as something to combat falling pupil numbers. How will this work if existing pupils simply move to a different school?</p> | |
| <p>2.16 NPTC Group of Colleges of Colleges Vs. Gwernyfed High School Results</p> | | |
| <p>2.16.1</p> | <p>How comfortable are the Council - officers and councillors with signing up to a partnership with a College where the fact that the A' Level results for NPTC Group of Colleges A*-B and A*-C are less than GWERNYFED HIGH SCHOOL provision?</p> | <p><i>The Authority has proposed a tertiary model for consultation, and explains in the Consultation Document, why it believes the Proposal is beneficial.</i></p> <p><i>NPTC Group of Colleges delivers A levels to students progressing from 9 secondary schools. Therefore, their results should be compared with the all Powys figure, not against any one individual school. This is a particularly unreliable measure when one factors in the comparative levels of social deprivation of students from many of the Neath Port Talbot schools. Neath Port Talbot secondary schools have a typical free school meal entitlement of around 19-20% although several are around 40%. Gwernyfed High School is identified from the same data source as having less than 5% of students entitled to free school meals.</i></p> |
| <p>2.16.2</p> | <p>Gwernyfed' s A level results are getting better every year currently 67.6% of pupils get an A*-C grade. The NPTC results may be "above the Welsh average" at 50.2% A*- C grade but this is 17.6% lower than Gwernyfed' s current performance. Worryingly, it's been falling year on year in stark contrast to Gwernyfed. 'How are these statistics meant to convince me that the council has my children's best academic interests as their priority?</p> | |
| <p>2.16.3</p> | <p>Can the Council explain the justification for replacing an A-level provision that produces 67.7% A* to B with one that produces only</p> | <p><i>The information was not withheld from the Consultation Document. Page 28 refers to the Estyn Inspection of 2012, with a single reference to the outcome of the outcome of the Adult Community Education inspection of 2007. Page 29 of</i></p> |

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| <p>50.2% A* to B? It is said that the evidence on quality provided in the POWYS COUNTY COUNCIL Consultation Report dates back to 2007 and that a 2014 Estyn Inspection describes a less positive picture. The Governing Body asks: why was this more recent information withheld from the consultation document?</p> | <p><i>the Document refers to Estyn’s Annual Review of Performance that took place in 2014, post-merger with Coleg Powys.</i></p> |
| <p>2.17 NPTC Quality of Education</p> | |
| <p>2.17.1 I have yet to see evidence of the college’s success rate in individual subjects and the reassurance conveyed by the college principal during said evening was less than reassuring.</p> | <p><i>All subjects within the provisional offer from NPTC Group of Colleges for Brecon have 100% pass rate at A*-E, except for Maths which was 94.4% last year.</i></p> |
| <p>2.17.2 The current standards and results of NPTC in Neath are difficult to transfer to Brecon and the surrounding area with its particular challenges. Have you considered your response if standards and results in the 6th form provision as proposed are inadequate?</p> | <p><i>Courses are being delivered by the same staff in Brecon and under the same 6th Form Academy management team as in Neath. Teaching methods and materials will be identical. NPTC Group of Colleges is confident that the results achieved in Neath can be replicated on the Brecon campus. NPTC Group of Colleges would be responsible for ensuring standards and results of all post-16 provision, and would be fully accountable to Estyn.</i></p> |
| <p>2.17.3 Explain how ‘first class teaching and learning provision’ will be guaranteed by the NPTC Group of Colleges that has no achievement record whatsoever for A levels in Brecon, no rapport with the local community, inadequate facilities for A level education, and a Director and staff that will not be based in Brecon five days a week.</p> | <p><i>NPTC Group of Colleges has no results available yet for the Brecon campus because the A level provision is too new. However, the results for Neath should be seen as a reliable predictor of those achievable in Brecon. Courses are being delivered by the same staff in Brecon and under the same 6th Form Academy management team as in Neath. Teaching methods and materials will be identical. NPTC Group of Colleges is confident that the results achieved in Neath can be replicated on the Brecon campus.</i></p> <p><i>Facilities in Brecon for the delivery of A levels from September 2017 will be at least the equal of those in the schools.</i></p> |

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| | | <i>NPTC Group of Colleges teaching staff and managers are used to operating across multiple campuses rather than being based in one location for the whole week. They are extremely effective at setting up communication lines with students on all campuses. A dedicated management and support team is available on each campus to deal with day to day and urgent issues. NPTC Group of Colleges staff travel, so that their learners don't have to.</i> |
| 2.18 | NPTC Facilities | |
| 2.18.1 | From what I've heard ... they have no science labs. Is this true? And where would I go to use science labs? | <i>This is not true. NPTC Group of Colleges has a fully equipped science lab on its Brecon campus. This will be utilised to deliver A levels in Biology, Chemistry and Physics at various stages of the week.</i> |
| 2.18.2 | Are there appropriate student facilities on this site for science? | <i>Yes. NPTC Group of Colleges of Colleges has a fully equipped science lab on its Brecon campus. This will be utilised to deliver A levels in Biology, Chemistry and Physics at various stages of the week.</i> |
| 2.18.3 | Is there an area for students to study in free periods or will they be hanging around Brecon with nowhere to go? | <i>Yes, the Learning Resource Centre on NPTC's Brecon campus is well equipped for independent study with text books for all courses and computers for on-line research and assignment work. The campus also has a cafeteria/coffee shop area which is fully Wi-Fi enabled if students prefer to work in this area.</i> |
| 2.18.4 | How does moving A-Level Science studies to a single laboratory in Brecon "significantly improve the learning outcomes for learners"? And even if all A-Level Science lessons can be timetabled in this one laboratory, will the apparatus available for students compare with the excellent facilities currently available in Gwernyfed? | <i>Timetabling has been modelled and NPTC Group of Colleges are confident that the current facilities can support the delivery of Biology, Chemistry and Physics A levels. Existing equipment is good, but NPTC Group of Colleges are committed to investing in purchasing further equipment if required to meet changing syllabuses and student demand. Labs in Neath are equipped to a very high standard and teachers in Brecon will be given the same level of equipment.</i> |
| 2.18.5 | What facilities will NPTC incorporate into the campus to support A Level students? | <i>Facilities on the Brecon campus are good and will support the needs of all students, including those studying A levels. Teachers review syllabuses annually and upgrades to equipment and facilities are made as a matter of course.</i> |

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| 2.19 Parents/Pupils moving out of County/Wales | |
| 2.19.1 Why should we send our children to school in England to secure a decent education? It is shameful. Why should Brecon be the only area without a school sixth form? Why are you ruining the future of Brecon's children? | <p><i>The local Authority believes that NPTC Group of Colleges will provide a good standard of education to the Brecon learners and the Proposal states that NPTC Group of Colleges will provide both the traditional 6th form education and the vocational education all on one site. The Proposal is not taking away 6th form education, it is proposing a tertiary model whereby a further education provider will provide Post 16 education to the Brecon learners.</i></p> <p><i>Tertiary Colleges provide the solution to the dilemma facing many young people today as they ponder their future - Tertiary colleges are a single establishment meeting educational and skills needs for all young people, their communities, and local employers.</i></p> <p><i>Tertiary colleges were originally defined as educational establishments which combined the functions of a further education college and a sixth form college, offering further education through a full range of courses, both vocational and academic, primarily to the 16-19 age group. In a pure tertiary model, schools within a given area do not operate sixth forms, but instead young people progress to a single local institution that provides both their 16-19 education and adult learning for the wider community.</i></p> <p><i>Tertiary Colleges offer, within one institution, readily accessible pathways of progression from foundation level to level 3 qualifications and beyond, across a wide range of subjects and skills sectors. They promote personalised programmes for young people and adults alike, enabling individuals to combine academic and vocational studies. The breadth of offer and the opportunity for individuals to fulfil their potential by moving from lower to higher levels of programmes are key characteristics of Tertiary Colleges.</i></p> <p><i>In addition to their considerable portfolio of 16-19 provision, Tertiary Colleges are important providers of adult education and training. They play a major role</i></p> |

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| | | <i>in developing employer responsive provision, working closely with local enterprise, business and industry, to meet their demands and local, regional and sometimes national skills needs; they successfully deliver Apprenticeships and traineeships and have been key in supporting individuals and businesses.</i> |
| 2.19.2 | Have you considered the number of parents and pupils who want their child educated in a high school 6th form and will therefore move their child to Crickhowell, Abergavenny or Christ College for example and the impact this will have on the 'predicted' pupils' numbers for NPTC college courses? | <i>During this consultation, many consultees have stated their preference for a sixth form education rather than a FE tertiary education.</i> |
| 2.19.3 | I understand that it has been proposed that £24 million is "given" to NPTC to improve their facilities in Brecon. Is this not foolhardy, considering the fact that following surveys in Gwernyfed, the vast majority of Year 11 and Year 10 pupils stated that they will go to Herefordshire for their education rather than to NPTC in Brecon and POWYS COUNTY COUNCIL will not have any say as to how this is spent? | <i>It is not proposed that £24m is 'given' to NPTC Group of Colleges. The College will have to find the funding for its element of the build. Powys County Council will not be paying to improve the College campus; NPTC Group of Colleges will be responsible for meeting this cost. NPTC Group of Colleges will be eligible to apply for capital funding from Welsh Government to meet up to 50% of their investment. NPTC Group of Colleges believes that the surveys in Gwernyfed were not carried out independently and as such the accuracy of the results is unreliable.</i> |
| 2.19.4 | How likely is it that students who leave Powys to do their A Level qualifications will return to Wales for University and/or employment? | <i>All learners have freedom of choice to follow their own career pathways wherever they wish to do so.</i> |
| 2.19.5 | <i>'It is anticipated that the number of learners choosing to follow AS/A level provision at any of the affected schools....rather than at the proposed new Post-16 facility in Brecon would be small, and the impact on outcomes, provision</i> | <i>This statement is based on the assumption that provision of a wide range of high-quality AS/A levels in new, purpose-built facilities in Brecon would be attractive for post-16 learners. The benefits of a tertiary model have been outlined previously.</i> |

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| | <p><i>and leadership and management would be minimal.....'Where is the research - please cite?</i></p> |
| <p>2.19.6 How will Powys County Council deal with more students going across the border to Hereford College for their post-16 provision? This number will increase, as there is increasing uncertainty for those pupils in current year 10 and below.</p> | <p><i>During this consultation, many stakeholders have voiced their opinion that pupils would travel to Hereford College for post-16 provision. The Authority acknowledges that any school reorganisation proposals create a period of uncertainty for pupils, and that this could lead to more learners travelling to other post-16 providers in the short term. However, in the longer term, the Authority believes that provision of a wide range of high-quality AS/A levels in new, purpose-built facilities in Brecon would be attractive for post-16 learners.</i></p> |
| <p>2.19.7 How will NPTC compete with Hereford Sixth Form Centre? Research shows that current Yr. 10 and 11 students will travel to Hereford in preference to Brecon or Neath.</p> | |
| <p>2.19.8 There is no guarantee that standards will improve at NPTC and POWYS COUNTY COUNCIL will have no jurisdiction over the education given to Powys pupils at the site. Taking away student choice of sites for “A” levels is likely to drive students out of county and country for “A” level education. POWYS COUNTY COUNCIL want to make the transfer of “A” levels to NPTC to ensure students stay in Powys and protect post 16 funding for POWYS COUNTY COUNCIL. However it is likely the opposite effect will happen reducing POWYS COUNTY COUNCIL post 16 funding even further. How does POWYS COUNTY COUNCIL justify driving pupils out of County and Country and encouraging the Powys “brain drain” and its knock on effect on local business and future of the rural economy, particularly in respect of its One Powys Plan and Welsh cultural policies?</p> | |

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| 2.19.9 | Does the Council accept that there will be a significant number of pupils who would find it easier to commute to a school in England rather than Brecon? | |
| 2.19.10 | Has any attempt been made to assess the number of pupils that will move to education in England if Gwernyfed closes, and the effect on the Welsh Language this will inevitably have? | |
| 2.20 Finances of the New Site | | |
| 2.20.1 | Powys County Council is prepared to invest in new facilities (for this <u>private</u> FE college) to the tune of £24M. This is highly irresponsible. Is the amount to be invested by the College itself in addition to the Powys County Council allocation? The College’s investment plans should have been included with this consultation? | <i>NPTC Group of Colleges is not a <u>private</u> college. It is a Further Education (FE) College and is classified by the National Office for Statistics as NPISH (Not for Profit Institution Serving Households). All FE Colleges in Wales are classified in this way and they are largely treated in the same way as any charity, but they are regulated by Welsh Government, not the Charities Commission. POWYS COUNTY COUNCIL will not be paying to improve the College campus; NPTC Group of Colleges will be responsible for meeting this cost. NPTC Group of Colleges will be eligible to apply for capital funding from Welsh Government to meet up to 50% of their investment.</i> |
| 2.20.2 | The Proposal states that the Beacons Campus Project “may also include new facilities for NPTC Group of Colleges of Colleges”. Is it the intention to publicly fund the facilities offered by a private company (NPTC) which operates for commercial gain, in order to make this Proposal commercially viable for that company? Does NPTC have a legally binding agreement to provide the required 25 A Level subjects from one location, in Brecon? What is the duration of any such agreement? | <i>NPTC Group of Colleges is not a private company. It is a Further Education (FE) College and is classified by the National Office for Statistics as NPISH (Not for Profit Institution Serving Households). All FE Colleges in Wales are classified in this way and they are largely treated in the same way as any charity, but they are regulated by Welsh Government, not the Charities Commission. NPTC Group of Colleges are currently funded for around 80% of their annual income from public funding via the Welsh Government. <i>The Authority does not have a legally binding agreement with NPTC Group of Colleges to provide the required amount of A levels from one location.</i></i> |

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| <p>2.20.3 What facilities might NPTC, a private company operated for profit? Expect to be gifted by Powys in order to deliver the promised post-16 curriculum? What legally-binding guarantee does Powys Council have to protect this investment of public money into a private company, and over what period of time does NPTC Group of Colleges guarantee to deliver these services in return for the investment in the facilities it will use to underwrite its business?</p> | <p><i>NPTC Group of Colleges is not a private company. It is a Further Education (FE) College and is classified by the National Office for Statistics as NPISH (Not for Profit Institution Serving Households). All FE Colleges in Wales are classified in this way and they are largely treated in the same way as any charity, but they are regulated by Welsh Government, not the Charities Commission.</i></p> <p><i>The College will not be gifted any facilities by Powys County Council. The College is required to fund its element of the capital funding needed for the Beacons Campus.</i></p> |
| <p>2.21 Loss of Quality Teaching Staff</p> | |
| <p>2.21.1 What guarantees can you give that experienced A level teaching staff will not leave these schools to find employment in an establishment that continues to provide post 16 education, therefore removing these specialist teachers and potentially forcing a second rate education on the pupils remaining ?</p> | <p><i>The Authority has recognised this as risk in the Consultation Document, with appropriate mitigation. However, the Authority cannot guarantee that experienced A level teaching staff will not leave, if this Proposal is implemented.</i></p> <p><i>The impact on learners from the possible loss of specialist teachers should not be significant. NPTC Group of Colleges will be providing a good standard of education utilising current Post 16 staff and specialist staff of their own.</i></p> |
| <p>2.21.2 Can you confirm that the education of the present and future pupils will not be compromised by the quality of teachers who will be left or employed in the future?</p> | <p><i>The Authority expects that the quality of education is not compromised by this Proposal. There are a number of 11 – 16 schools in Wales and beyond. There is evidence that good quality teachers choose to teach in these schools, as well as 11 – 18 schools: Evidence can found in Estyn Inspection Reports, and in the National Categorisation of Schools. In 2015/16, both 11 – 16 and 11- 18 schools appear in all four support categories, indicating that no specific model is better than the other.</i></p> <p><i>NPTC Group of Colleges are happy to confirm that teachers delivering post 16 education including A levels will be of the highest calibre.</i></p> |

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| 2.22 Limited equivalent options to Gwernyfed | |
| 2.22.1 The First Minister has a responsibility to provide equivalent 6th Form Education – I would like to know where this is in Wales? Where do POWYS COUNTY COUNCIL propose the equivalent facility is? | <p><i>The Authority is of the view that NPTC Group of Colleges will be able to provide high-quality A level provision that is equivalent in terms of standards to that of Gwernyfed High School, and broader in terms of range of provision, without the need to travel between schools/providers during the school day.</i></p> <p><i>Part II of the Learning and Skills Act 2000 (LSA 2000) makes specific provision for further education in Wales and sets out the Welsh Ministers' powers and duties in relation to further education. Persons over compulsory school age in Wales are not obliged to participate in education or training but the Welsh Ministers are obliged to make provision for this education and training and to encourage people to participate in it.</i></p> <p><i>The Welsh Ministers (with the assistance of local authorities and the governing institutions of schools and further education institutions) are responsible for devising local curriculums for the further education of 16 to 18 year olds. Different curriculums may be devised for different local areas but the courses that make up those curriculums must fall into the categories listed in section 33A of LSA 2000.</i></p> <p><i>Post-16 education may be provided in school sixth-forms, in which case it will fall into the category of secondary (school) education rather than further education. Further education in Wales is, however, usually provided in further education institutions which are either further education corporations or existing educational institutions that have been designated by the Welsh Ministers to become part of the further education sector. The Further and Higher Education Act 1992 sets out provisions relating to the establishment, dissolution, powers and responsibilities of further education institutions.</i></p> |

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| 2.23 Benefits of having Sixth Form in School | |
| 2.23.1 | <p>How are you going to compensate those pupils in the lower years who would benefit from the mentoring and tutoring provided by 6th formers in school, for example in maths, reading, drama and sports? How are you going to compensate for the lack of opportunity for those 6th formers who would mentor and tutor younger pupils? The benefit to their self-esteem, consolidation of their own learning and the opportunity to add such opportunities to their university applications and CVs? Have you considered the impact of the loss of 6th formers in school on Sex and Relationship education, especially through the Apause Peer Mentor Training? Pupils in Year 11 currently deliver Peer Mentor Training to those pupils in Year 9 - how is this going to be facilitated with no Year 11 pupils in school?</p> |
| | <p><i>There are many schools in Wales and wider that provide education for 11 – 16 year olds. In these schools, the older pupils in Years 10 and 11 take on wider leadership and mentoring roles with younger pupils. This helps the self-esteem and learning of these pupils, rather than waiting until the sixth form to have these opportunities.</i></p> |
| 2.24 Suggestions | |
| 2.24.1 | <p>Why must the sixth forms at both Brecon and Gwernyfed be removed? If the council aspires to having sixth forms that have over 150 pupils and Brecon currently has 83 pupils with Gwernyfed having 79 pupils making a combined total of 162, why can't the two sixth forms be combined and delivered from a single site at Brecon High School, the larger of the two sites?</p> |
| | <p><i>The Authority has consulted on a Proposal for a 'tertiary' further education college in Brecon, as it felt that this would provide more opportunities for the young people of the area. Tertiary Colleges provide the solution to the dilemma facing many young people today as they ponder their future - Tertiary colleges are a single establishment meeting educational and skills needs for all young people, their communities, and local employers.</i></p> <p><i>Tertiary colleges were originally defined as educational establishments which combined the functions of a further education college and a sixth form college, offering further education through a full range of courses, both vocational and academic, primarily to the 16-19 age group. In a pure tertiary model, schools within a given area do not operate sixth forms, but instead young people progress to a single local institution that provides both their 16-19 education</i></p> |

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| | | <p><i>and adult learning for the wider community.</i></p> <p><i>Tertiary Colleges offer, within one institution, readily accessible pathways of progression from foundation level to level 3 qualifications and beyond, across a wide range of subjects and skills sectors. They promote personalised programmes for young people and adults alike, enabling individuals to combine academic and vocational studies. The breadth of offer and the opportunity for individuals to fulfil their potential by moving from lower to higher levels of programmes are key characteristics of Tertiary Colleges.</i></p> <p><i>In addition to their considerable portfolio of 16-19 provision, Tertiary Colleges are important providers of adult education and training. They play a major role in developing employer responsive provision, working closely with local enterprise, business and industry, to meet their demands and local, regional and sometimes national skills needs; they successfully deliver Apprenticeships and traineeships and have been key in supporting individuals and businesses.</i></p> |
| 2.24.2 | <p>Why cannot Gwernyfed High School work with one of the large agricultural colleges and establish another arm to the Educational High Value that is presently being delivered and enjoyed at Gwernyfed High School. There is plenty of parking and ample ground to extend facilities.</p> | <p><i>Gwernyfed High School will be delivering a collaborative agricultural course with Coleg Sir Gar from September 2016.</i></p> |
| 2.25 Other Questions | | |
| 2.25.1 | <p>What would actually happen to us while the new buildings were being built?</p> | <p><i>There are no plans to demolish the current school buildings until the new school in Brecon is built.</i></p> |
| 2.25.2 | <p>Explain why Powys County Council isn't planning for future demand by designing both Brecon and Gwernyfed High Schools accordingly.</p> | <p><i>The Authority wishes to deliver a sustainable, high quality secondary education system, within the context of falling pupil numbers.</i></p> |

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| 2.26 Parents choosing to travel out of County | | |
| 2.26.1 | Parents in Llangors area also consider sending children to Christ College. It is noted that on page 62 & 67 - details of other affected schools - Christ College both as a secondary school and a provider of Key stage 2 education has been omitted from the analysis and appears not to have been consulted on this matter. How does POWYS COUNTY COUNCIL explain this scenario? | <i>It is reasonable to assume that the WG's School Organisation Code relates to local Authority maintained schools only. However, it was the Authority's view that the number of pupils likely to choose to attend Christ College would not be significant, due to the fact that it is a fee-paying school and that the Proposal would have a new school with new facilities and available places for all pupils in the Brecon and Gwernyfed catchments.</i> |
| 2.26.2 | Why is the council content to approve a Proposal that will lose pupils, not only out of County but from the Welsh education system completely? How does this in any way address the issue of falling pupil numbers and surplus places? | <i>During this consultation, many respondents have voiced their opinion that pupils will choose to attend schools in England. The Authority acknowledges that, if this happens, this will potentially lead to a reduction in pupil numbers and increase surplus places.</i> |
| 2.26.3 | Could this movement of pupils result in surplus places in the new build primary schools? How will the Welsh Language Commissioner feel about pupils leaving the Welsh education system? How will this help rural community cohesion? | <i>During this consultation, many respondents have voiced their opinion that pupils will choose to attend schools in England. The Authority acknowledges that, if this happens, pupils will not have access to the Welsh Curriculum or community cohesion.</i> |

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| 3 Travel | | |
| 3.1 Times, distances to and from School | | |
| 3.1.1 | And South Powys is renowned for its inclement weather conditions; how will attendance and standards be affected when pupils cannot access education because the journey is insurmountable? | <i>As stated in the Consultation Document, the Authority has already identified that additional travel may pose a risk to pupils' well-being and attainment. The Council's intention is for the New School to provide the highest quality education, with the appropriate care and support for all pupils, in the best possible facilities</i> |
| 3.1.2 | The bus journey from Hay to Gwernyfed is already up to 45 minutes, so why are you suggesting that my time learning is better spent travelling? | <i>However, the Council recognises that there would be additional travel requirements once the New School Building is opened in Brecon, especially for those pupils living in Clyro and Hay-on-Wye Primary School catchment areas</i> |
| 3.1.3 | You can claim it is perfectly reasonable to expect pupils to travel 16 miles to school and back. Please answer for me how would that not be derogatory to the learners? | <i>An assessment of the home postcodes of pupils currently attending Gwernyfed High School has been carried out, and it is expected that the maximum travel time for pupils currently attending Gwernyfed High School to travel to the New School in Brecon would be not normally more than an hour</i> |
| 3.1.4 | Pupils within the current Gwernyfed catchment will spend up to 2 hours per day travelling to and from a school in Brecon. This is simply unacceptable. It is widely recognised that childhood obesity is one of the major health problems faced in the UK, with massive society wide implications going forward. Has POWYS COUNTY COUNCIL undertaken a Health and wellbeing assessment of this travel time on the effected pupils? Does POWYS COUNTY COUNCIL consider that 10 | <i>The Council already transports pupils with special educational needs from the Gwernyfed catchment area to Ysgol Penmaes, Brecon; the ASD Unit at Brecon High School and other primary specialist provision. The Council's view is that the current transport arrangements for these pupils are suitable because the journey does not take an unreasonable amount of time. As such, the proposed travel arrangements for secondary pupils to the New School Building in Brecon are deemed suitable.</i> <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. This would be done on an individual basis, if the Proposal is approved.</i> <i>However, the old Learner Travel Operational Guidance April 2009 stated that Welsh Ministers considered that normal journey times should be no more than 60 minutes</i> |

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| <p>hours per week of dead time is an acceptable imposition on anyone?</p> | <p><i>for secondary school aged pupils. This is reflected in the Council's proposed new School Transport Policy</i></p> <p><i>The provision of post-16 education on a single site would remove any requirement for additional inter-school/college travel during the school day</i></p> |
| <p>3.2 Road Safety</p> | |
| <p>3.2.1 Have you considered the effect this will have on their safety?</p> | <p><i>The Authority views that all adopted roads are deemed safe for home-to-school transport. The additional mileage required for the pupils to travel to Brecon is along the A40 which is considered by the Highways Authority as a safe route.</i></p> |
| <p>3.3 Cost of Travel</p> | |
| <p>3.3.1 Children will have to travel too far to access school. Surely this will be very expensive in our austerity and climate change agenda?</p> | <p><i>The Authority acknowledges that there will be an additional cost and environmental impact of transporting learners. However, the Proposal aims to address a number of issues that are affecting secondary schools, with the intention that the New School will provide the highest quality education, with the appropriate care and support for all pupils, in the best possible facilities</i></p> |
| <p>3.3.2 And if county are willing to pay for transport to out of county schools (as has been the practice to date), are they also willing to pay for transport for parental choice of English medium provision such as King Henry VIII? Surely this money would be better spent improving the existing provision at a local level to secure high standards of teaching and learning.</p> | <p><i>Home-to-School transport will be provided in accordance with the Authority's agreed policy which includes transport to the closest schools, even if these are in other authorities.</i></p> |
| <p>3.3.3 Has the council even considered the cost of travel for all the Gwernyfed pupils who will have to travel to Brecon every day?</p> | <p><i>Cost of transport has been factored into the financial evaluation within the Consultation Document.</i></p> |

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| <p>3.3.4</p> | <p>What will be the extra cost per year of providing transport for the extra miles to Brecon or further afield to provide the full subject range that pupils require if there a no school A level provision?</p> | <p><i>A level provision will be available at NPTC Group of Colleges. Learners will be provided with free home-to-college transport if this is their closest post-16 A level provision within Powys.</i></p> |
| <p>3.3.5</p> | <p>I understand it would cost £225,000 in new transport fees. Do you not think that this is worth the difficulties it would create? Essentially you are removing one problem, and creating another.</p> | <p><i>The Authority acknowledges that there will be an additional cost of transporting learners. However, the Proposal aims to address a number of issues that are affecting secondary schools, with the intention that the New School will provide the highest quality education, with the appropriate care and support for all pupils, in the best possible facilities</i></p> |
| <p>3.3.6</p> | <p>On P36 you detail transport costs for Gwernyfed and Brecon combined as £369,275. Where is the evidence for this figure? To what extent have you used the (flawed) PWC model in which travel times are computed as the times from home postcode to school postcode by private car? How do you explain this increase in travel costs? If it derives from the cost of transporting Welsh-medium pupils to Builth Wells, why does this have no impact on student numbers?</p> | <p><i>The current and estimated travel costs were calculated following an analysis carried out by officers from the Schools Service and the Transport Unit. An analysis of the additional routes required in both catchment areas was undertaken, including the ability to amalgamate such routes, and providing an estimate for each route of the additional costs that would be incurred. The analysis also included the impact of the revised transport network on any linked transport that is used for primary education as well.</i></p> <p><i>The PWC model for travel times was not used as part of this analysis.</i></p> |
| <p>3.3.7</p> | <p>You say that replacing Brecon and Gwernyfed with a new school in Brecon will result in increased transport costs of £225,320. Please demonstrate how you arrive at this figure. What system or software model have you used to determine these transport costs? Are you able to provide us with access to this system or software? If not, please explain why.</p> | |

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| 3.3.8 | <p>Case law suggests that if Gwernyfed were closed, Powys would be obliged to foot the bill for transporting pupils to their nearest school, even if it were over the border in Herefordshire. Do the increased travel costs you have arrived at take this into account? If not, please explain why this has been overlooked, and provide alternative costings which do.</p> | <p><i>The transport costs provided in the Consultation Document assumed that all learners would attend the proposed New School in Brecon. However, if some learners obtained places in a suitable school in England, and this was their closest school, the Authority would provide free home-to-school transport at an additional costs.</i></p> <p><i>Based on other School Reorganisation Proposals, the transports costs incurred have been within an allowable variance to those projected at the time.</i></p> |
| 3.3.9 | <p>If the proposed housing developments go ahead, if GWERNYFED HIGH SCHOOL has closed, has POWYS COUNTY COUNCIL factored into the Proposals the increased costs of transporting the increased numbers of children from GWERNYFED HIGH SCHOOL catchment area to the new school in Brecon?</p> | <p><i>These have not been factored into the transport costs in the Consultation Document. However, there would be no additional costs if these additional pupils were accommodated on existing transport. Additional costs would be incurred if there was a need for an additional bus.</i></p> <p><i>The costings also do not include the impact of additional income received by the Authority from the Welsh Government through the Revenue Support Grant for these additional pupils.</i></p> |
| 3.3.10 | <p>In terms of travel costs, the Governing Body asks POWYS COUNTY COUNCIL to clarify whether the following have, or have not, been taken into account? Staff travel costs for: the leadership team travelling daily; weekly departmental teachers' and middle managers' meetings; teachers travelling to teach subjects across both schools; and non-teacher travelling. KS4 students wishing to access GCSE options only available on one school site will need to be transported every Tuesday and Thursday at an estimated cost of £20,000.</p> | <p><i>The costings included within the Consultation Document include provision for additional funding in respect of a school operating over a split-site. If this Proposal are implemented, it would be the responsibility of the governing body to budget and plan for the use of the resource.</i></p> <p><i>The Authority already provides funding through the 14 – 19 Futures Programme for learners to access additional subjects. Consideration will be given to using this funding stream to support transport costs for learners, if this was required.</i></p> |

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| 3.4 Travel Costs to Parents | |
| 3.4.1 | <p>What research has the Council done to establish the extra cost to parents, both financial and time, of collection from a school sited in Brecon?</p> <p><i>The Authority has not carried out any research in terms of the extra cost for parents. However, this issue has been raised by a number of stakeholders during the consultation and will inform Cabinet when it considers the Consultation Report.</i></p> |
| 3.5 Travel Policy | |
| 3.5.1 | <p>Is the proposed new School Transport Policy to be used to coerce families to send their children to schools in-County? If not, why has the new policy not yet been published? - wealthier families can choose to send their children to their school of choice, and poorer families must accept the new offer, meaning money will haemorrhage across the border, and choice will be rationed to those who can afford to pay. This is not an acceptable model for comprehensive education.</p> <p><i>The new Home-to-School has not yet been considered by Cabinet as was originally intended, as stated in the Consultation Document, due to the need to obtain clear legal advice around the definition of a 'suitable school' and other issues. The new Policy will be considered by Cabinet later in 2016.</i></p> <p><i>During this consultation period, many stakeholders have expressed their view that parents will choose for their children to attend schools in England, or they will move out of county. If this happens, there will be an impact on pupil numbers and the available funding for schools.</i></p> <p><i>Any revised Home-to-School Transport Policy will be subject to a separate consultation.</i></p> |
| 3.5.2 | <p>County school transport policy is to be reviewed after this consultation concludes, after it failed to consider the new policy on the scheduled date of 12th April 2016. Powys cannot therefore give any indication or guarantee of the new transport arrangements for KS3 & KS4 students. How, then, can these be considered by stakeholders during this consultation process?</p> <p><i>The transport network required for pupils currently attending the Gwernyfed catchment is unlikely to be different to the current network.</i></p> <p><i>As stated in the Consultation Document and in the impact assessments, there would be a negative impact on pupils who will not be able to access after-school activity due to reliance on transport arrangements. The Authority has carried out an analysis of travel times should the Proposal be implemented, as stated on page 42 of the Consultation Document.</i></p> |
| 3.5.3 | <p>Has there been an analysis of the additional transport for prospective</p> |

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| | <p>students (presently KS1 & KS2) learners to the new Brecon campus? What impact will this extra travel have on students travelling on scheduled public transport and on after hours travel for students attending after school clubs? Has there been an analysis undertaken to find the number of students who will be denied the opportunity to participate in after school clubs, and the likely impact on academic outcomes that will be the result? If not, why? If the council so sure of transport costs and impact on learners and their families, why has the discussion on the new School Transport Policy been postponed until after this consultation has concluded?</p> | |
| <p>3.5.6</p> | <p>Why have you brought this Proposal to consultation before publishing or implementing the New Schools Transport Policy, and what does Powys County Council plan to do to remedy its failure to give members of the public the opportunity to respond to the transport elements of this consultation in the context of the new Schools Transport Policy?</p> | |
| <p>3.5.2</p> | <p>What will be the cost of proposed school transport to the new Brecon campus for Gwernyfed catchment pupils compared to the current cost of same to the Gwernyfed site? What proportion of the proposed saving in running costs does this represent?</p> | <p><i>The current transport costs to Gwernyfed High School, as shown within the Consultation Document, is £369,275. The additional cost of transport is £225,320. The additional transport costs represent 42% of the gross savings, as detailed on page 36 of the Consultation Document.</i></p> |

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| 3.5.3 | <p>The Council questions <i>how the Proposal considers the goals in the Wellbeing of Future Generations Act 2015</i> given that some pupils from the Gwernyfed catchment area will be on a bus for up to two hours per day and that their health and well-being will be damaged by placing time, travel and cost burdens on parents to support friendships and after-school activities. It asks: <i>'when is Powys Cabinet due to consider a new travel policy and when and how will the new policy be reflected in these Proposals?'</i></p> | <p><i>A Single Integrated Impact Assessment has been carried out that considers the goals in the Wellbeing of Future Generations Act 2015, and this issue has also been identified as a risk in the Consultation Document and supporting impact assessments.</i></p> <p><i>Cabinet will be considering the new Home-to-School Travel Policy in the Autumn. This will be subject to a separate consultation.</i></p> |
| <p>3.6 Travelling between schools</p> | | |
| 3.6.1 | <p>Can I be assured that I won't have to travel to Brecon some days a week then to Gwernyfed on others (11-16 provision)?</p> | <p><i>From September 2017, the school will be run as a dual-sited school as a short transition period to the New School in Brecon and therefore it is not expected that pupils will have to move between sites. It would, however, be the decision of the governing body of the new school if it wished to combine certain KS4 subjects on one of the sites.</i></p> |
| 3.6.2 | <p>It is unclear whether pupils will need to travel between GWERNYFED HIGH SCHOOL and BRECON HIGH SCHOOL while the school is operating as one school two sites. Could POWYS COUNTY COUNCIL confirm that pupils will not be subjected to this procedure and it will be staff that move between schools rather than pupils?</p> | |
| <p>3.7 Impact of travel on after school activities</p> | | |
| 3.7.1 | <p>If my children want to take part in after school activities at the new school what transport arrangements will be in place by</p> | <p><i>The Authority acknowledges, as noted in the Consultation Document and Impact Assessments that some pupils will find it difficult to access extra-curricular activities after school. However, some activities can take place during lunch times.</i></p> |

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| | <p>the council as neither parent would be able to travel to Brecon to collect?</p> | |
| <p>3.7.2</p> | <p>What flexibility is there to accommodate students wishing to attend after school activities?</p> | <p><i>The Authority will not fund any dedicated home-to-school transport and learners will either be dependent on public transport or parental conveyance. However, the Authority will investigate with the Transport Unit the timings of public service transport.</i></p> |
| <p>3.7.3</p> | <p>If I attended this new 'super school' I would be unable to go to any after school clubs or participate in extra-curricular activities as it would be impossible for anybody to pick me up. I know what the council would say: 'take the bus home.' I could but this would mean me sacrificing my free time which I use to relax, do homework and revise in order to get home. Surely this cannot be right?</p> | |
| <p>3.7.4</p> | <p>How will these children be able to participate in after school activities? For example my son plays county golf at a high standard - how would he be able to continue with this sport during the week as he would have reduced evening study time owing to the increased travel times. The Proposal suggests that such activities will be incorporated into the school day. Just how do Powys County Council propose to do that without detracting from learning time?</p> | |

3.9 Travel Time Stats

3.9.1 I would like to question how POWYS COUNTY COUNCIL have worked out the travel times - is it based on actual bus times or on a car time from a pupils house to the new proposed school. Pupils already have long journeys to Gwernyfed, do they think that it is acceptable for children who currently catch the bus at 7.40 should have their travel time increased to go to the new proposed school - in my opinion this is without doubt unacceptable. POWYS COUNTY COUNCIL need to look at the increase in bus times from Painscastle and Rhosgoch?

The current and estimated travel costs were calculated following an analysis carried out by officers from the Schools Service and the Transport Unit. An analysis of the additional routes required in both catchment areas was undertaken, including the ability to amalgamate such routes, and providing an estimate for each route of the additional costs that would be incurred. The analysis also included the impact of the revised transport network on any linked transport that is used for primary education as well.

The following table shows the impact on travel for pupils currently attending Gwernyfed High School if they were all to transfer to the New School Building in Brecon:

| | <i>Pupil Numbers</i> | <i>Average Journey (Miles)</i> | <i><3 Miles</i> | <i>3 to 10 Miles</i> | <i>10 to 20 Miles</i> | <i>Over 20 Miles</i> |
|--|----------------------|--------------------------------|--------------------|----------------------|-----------------------|----------------------|
| <i>Gwernyfed High School (Current Travel)</i> | 442 | 6.3 | 78 18% | 296 67% | 63 14% | 5 1% |
| <i>Travel to New School Building in Brecon</i> | 442 | 10.33 | 40 9% | 181 41% | 217 49% | 4 1% |
| <i>Impact of Change</i> | | 4.04 | (38) | (115) | 154 | (1) |

3.9.2 Pg. 16 - 'there would be no need for learners to travel between school/colleges...' What impact has the council assessed there to be on the greater distance pupils would potentially have to travel at the beginning and end of day?

3.9.3 At the consultation meeting at Gwernyfed on 20th April 2016, you stated that pupils will only travel on average an extra 5 miles per day. I am not sure how you have arrived at this figure for the Gwernyfed catchment area, some pupils will have to travel up to 2 hours per day to attend the new proposed high school in Brecon.

There would be an impact on the majority of pupils who currently attend Gwernyfed High School, due to additional travel requirements, as shown in the table above. The average journey will increase by just over 4 miles, whilst the maximum additional will be ten miles per journey.

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| 3.9.4 | <p>They estimated only an extra 4 miles to travel. ... The next community is Three Cocks, that's 10 miles, Glasbury would be 12 miles, Hay on Wye and Clyro would be 15 miles, Rhosgoch would be 20 miles, and that's not even considering the children in far more rural areas.</p> | <p><i>An analysis of the current pupils being transported to Gwernyfed High School by the Council shows that the maximum journey time is 40 minutes, which is the route from the Dolau-y-Cannau crossroads via Rhosgoch, Painscastle, Clyro and Hay-on-Wye to Gwernyfed High School. The additional ten miles from Gwernyfed High School to the proposed New School Building will normally add no more than 20 minutes to the journey time and the total journey would normally be within an hour.</i></p> |
| 3.9.5 | <p>Explain why, when Powys County Council is happy not to impose preconditions on the maximum daily return journey for pupils, preferring to rely on comparison with journey times for special needs pupils rather than the county average for school pupils.</p> | |
| 3.9.6 | <p>What time length does the council think is acceptable for children to travel to school?</p> | <p><i>Home-to-school/college transport arrangements for the Proposal would be provided in accordance with the Council's School Transport Policy and the Learner Travel (Wales) Measure 2008. The current Policy is that secondary school pupils should not normally travel more than an hour.</i></p> |
| 3.9.7 | <p>How has the assessment of home to school transport time being "normally" less than one hour been reached? What has been the method of calculation? Does it include travel from the child's residence to the pick-up/drop off point? What does "normally" mean? Might the hour be exceeded only during exceptional circumstances, or does it apply more generally to a proportion of the pupils?</p> | <p><i>The 'not normally more than an hour' criteria has been agreed following an analysis of learner travel, which recognised the very rural nature of parts of the county with only a very few secondary school learners exceeding this – the Policy was subject to extensive consultation at the time and approved by the Board of the Council. It includes travel from home residence to the pick-up/drop-off point.</i></p> |
| 3.9.8 | <p>The document contains no information on how the increased travel figures were obtained. Are they based on the 'Old'</p> | <p><i>The current and estimated travel costs were calculated following an analysis carried out by officers from the Schools Service and the Transport Unit. An analysis of the additional routes required in both catchment areas was undertaken, including the</i></p> |

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| | <p>Transport Policy or the new one that cabinet is refusing to reveal until after the consultation is over? Were the figures produced by the flawed computer program which was based on the travel time direct by private car between a pupil's home postcode and the school?</p> | <p><i>ability to amalgamate such routes, and providing an estimate for each route of the additional costs that would be incurred. The analysis also included the impact of the revised transport network on any linked transport that is used for primary education as well.</i></p> <p><i>The PWC model for travel times was not used as part of this analysis.</i></p> |
| <p>3.9.9</p> | <p>The cost of transporting children from Gwernyfed to Brecon will be far higher than the £225,000 estimated by the Council especially if population increases are accounted for. Can the council confirm the additional travel time and forecasted travel costs have allowed for the fact that many of the 500 new homes will accommodate young families?</p> | <p><i>The additional travel time and forecasted travel costs from the estimated number of additional pupils from proposed housing developments have not been factored into the costs in the Consultation Document.</i></p> |
| <p>3.9.10</p> | <p>The “<i>potential risk management measures</i>” state that the new school transport policy would reduce the number of pupils attending school out of county. Please explain how the council has arrived at this statement? I am one of those parents who will have to make this decision and I can assure you no child of mine will be going to Brecon High School. I would like to know how this statement has been arrived at, especially as there has been no consultation with the current pupils or parents prior to this document being prepared.</p> | <p><i>The comment refers to the following paragraph in the Consultation Document, which states:</i></p> <p><i>‘On the 12th April 2016, the Cabinet will be asked to consider a recommendation to consult on a new School Transport Policy, and to define what amounts to a ‘Suitable School’ for the purposes of determining the local Authority’s obligation to transport statutory-aged pupils i.e. KS3 and KS4 pupils. In the event that Cabinet approves the recommendation to consult on the new Policy, an addendum to this consultation document will be issued to all consultees, providing the draft new Policy and its potential impact on pupils’ journey to school and on school transport costs.</i></p> <p><i>In the proposed new School Transport Policy, a mainstream school will be deemed “a suitable school” by the Council if it offers and provides the National Curriculum in</i></p> |

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| | <p><i>Wales including the provision of either or both first and second language Welsh as subjects, and has adopted the universal principles of the Welsh Bacallaureate. ‘</i></p> <p><i>However, the new Policy was not considered by Cabinet on this date due to the need to have further legal advice about the definition of a ‘suitable school’. The Policy will be considered by Cabinet later in 2016 and, if approved, will be the subject of consultation.</i></p> |
| <p>3.9.11 The Governing Body questions whether <i>the impact regarding travel times been seriously considered?</i> They feel that quoting an average journey change of 4.4 miles is not relevant to those in rural communities.</p> | <p><i>Comment noted.</i></p> |
| <p>3.9.12 Does the Council accept that there will be a significant number of pupils who would find it easier to commute to a school in England rather than Brecon?</p> | <p><i>The Authority has already recognised this issue and has highlighted it as a risk within the Consultation Document.</i></p> <p><i>During this consultation, many consultees have also raised the issue that parents will choose to send their children to schools in England. Analysis of pupil postcodes shows that, for? Of current Gwernyfed pupils, their closest secondary provision is in England.</i></p> |
| <p>3.9.13 POWYS COUNTY COUNCIL talk about the Proposal as something to combat falling pupil numbers. How will this work if existing pupils simply move to a different school?</p> | <p><i>The Proposal will reduce overall surplus places – there are currently 36% surplus places at Brecon High School and 20% at Gwernyfed High School. It is currently proposed that the new school in Brecon will be built for 1100 pupils – this takes account of projected pupil numbers, (1092 by 2021) as well as an understanding of the available capacity of other neighbouring schools.</i></p> <p><i>It is currently proposed that the new school in Brecon will be built for 1100 pupils – this takes account of projected pupil numbers, (1092 by 2021) as well as an understanding of the available capacity of other neighbouring schools. If the Proposal is supported, then the Authority will carry out a more detailed analysis of demand to</i></p> |

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| | | <i>ascertain the size of the new building in Brecon before submitting the FBC for the project to WG.</i> |
| 3.9.14 | Has any attempt been made to assess the number of pupils that will move to education in England if Gwernyfed closes, and the effect on the Welsh Language this will inevitably have? | <i>A draft Welsh Language Impact Assessment has been prepared which did not find any effect on the Welsh language due to learners from the Gwernyfed area choosing to attend schools in England, as there are no Welsh-medium schools or streams in the Gwernyfed catchment area. However, the Authority recognises that all pupils living in Wales should be able to access the National Curriculum of Wales, which includes provision for Welsh 2nd Language. Many respondents have stated, during this consultation, that many pupils will choose to attend schools in England if the Proposal is implemented, which will have a detrimental impact on those pupils' abilities to access the National Curriculum of Wales.</i> |
| 3.9.15 | Parents in Llangors area also consider sending children to Christ College. It is noted that on page 62 & 67 - details of other affected schools - Christ College both as a secondary school and a provider of Key stage 2 education has been omitted from the analysis and appears not to have been consulted on this matter. How does POWYS COUNTY COUNCIL explain this scenario? | <i>It is reasonable to assume that the Welsh Government's School Organisation Code relates to local Authority maintained schools only. However, it was the Authority's view that the number of pupils likely to choose to attend Christ College would not be significant, due to the fact that it is a fee-paying school and that the Proposal would have a new school with new facilities and available places for all pupils in the Brecon and Gwernyfed catchments.</i> |
| 3.9.16 | Why is the council content to approve a Proposal that will lose pupils, not only out of County but from the Welsh education system completely? How does this in any way address the issue of falling pupil numbers and surplus places? | <i>The Cabinet has not approved the Proposal. The Cabinet has only approved to <u>consult</u> on the Proposal.</i> |
| 3.9.17 | Could this movement of pupils result in surplus places in the new build primary schools? How will the Welsh Language Commissioner feel about pupils leaving | <i>During this consultation, many consultees have raised the issue that parents will choose to send their children to schools in England – this was a key risk that was identified on page 19 of the Consultation Document. The Authority acknowledges, as stated in the Consultation Document, that there is a risk that parents will choose to</i> |

the Welsh education system? How will this help rural community cohesion?

leave the Welsh education system. The Welsh Language Commissioner is not a named key stakeholder in the WG's School Organisation Code. As stated in the Community Impact Assessment, the Authority recognises that there would be a detrimental impact on a rural area such as Gwernyfed if the Proposal were to be approved.

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| 4 | Welsh Medium Education | |
| 4.1 | Welsh-medium | |
| 4.1.1 | <p>Brecon high has many activities carried out in welsh, it has its annual eisteddfod taking place on the 15th April with categories in welsh, second language welsh and English that will involve the whole school celebrating the welsh culture in and around Brecon. The carol service held at Christmas in the cathedral in Brecon was a memorable occasion with both welsh readings and songs by welsh speaking students that was very well attended and enjoyed by the community. Students from the welsh stream are regular contributors to ‘papur bro, y Fan a’r lle’ the Brecon and Radnor welsh supplement. Regular Welsh for adults’ courses are held on the campus numerous times a week. Some children even attend a local welsh group in our village of Talybont helping people who are learning the language. None of these are mentioned in the document. Why?</p> | <p><i>This information was not known to the Authority until the consultation took place. The Authority published a draft Welsh language impact assessment alongside the Consultation Document, which will be updated with information gathered during consultation.</i></p> |
| 4.1.2 | <p>Explain why, when the demand for Welsh-medium education is larger in the Brecon HIGH SCHOOL catchment than the Builth Wells catchment, Powys County Council considers it wise to remove it from Brecon?</p> | <p><i>The demand for Welsh-medium education is significantly greater in the Builth Wells catchment than the Brecon catchment. It is therefore logical to centralise it in Builth Wells to create a critical mass of learners.</i></p> <p><i>According to Teachers Centre 28/07/16, there are a total of 107 pupils in primary Welsh schools/streams in the Brecon catchment area, compared to 248 in the Builth Wells catchment.</i></p> |

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| 4.2 Facts and Figures | | |
| 4.2.1 | I do not believe that the numbers used in the consultation regarding the numbers of pupils transferring to Builth from Brecon are in any way correct. All of the many parents I have spoken to in the Brecon welsh stream none are thinking of transferring to Builth. We ourselves have not been asked where we would send our children if Brecon were to no longer be able to educate children in welsh. How were these numbers arrived at? Who plucked these numbers out from the data? Are they just a guess? | <i>Data relating to pupil numbers in the Consultation Document are taken from the PLASC 2016 data.</i> |
| 4.2.2 | Creation of a greater mass of Welsh-medium secondary learners - what evidence supports this theory? | <i>This is based on an analysis of pupil numbers in the current Welsh streams at Brecon and Builth High Schools, along with the numbers in each year group in the feeder primary Welsh-medium school and streams.</i> |
| 4.3 Decision to Support Welsh in Brecon has been overturned, why? | | |
| 4.3.1 | In 2014 a report done by the council identified that the largest number of respondents who would prefer a designated welsh medium school were those in the Brecon catchment area. In 2014 the council also insisted they would bring Brecon up to 2B status. At some point the council has reneged on this commitment to Brecon High school welsh stream. Why has this been the case? As it is a fundamental reason that the decision has been made to favour Builth over Brecon for the Welsh streams location. | <i>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. Early discussions took place with Brecon High School about providing additional support, however due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil this. The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools.</i> |

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| 4.4 Main Consultation Document | | |
| 4.4.1 | On page 6 of the formal consultation document it states that 'continued reductions in Welsh Government funding, meaning that it is becoming impossible to sustain schools as they are, without impacting on standards and limiting the range of subjects provided;' What evidence and research supports the use of the word impossible? | <p><i>PwC carried out a review of the viability of secondary provision in Powys in 2014, which came to the conclusion that secondary schools were becoming increasingly finance-led rather than curriculum-led.</i></p> <p><i>As stated in the Consultation Document, the current Estyn Inspection Profile for secondary schools in Powys is unsatisfactory.</i></p> |
| 4.5 Proximity of Welsh Primary Schools to Brecon | | |
| 4.5.1 | I must confess that I for one fail to see the sense in this Proposal for a number of reasons, not least given that there is a Category 1 Welsh language primary school fewer than 100 meters away from Brecon High School. Where is the nearest Category 1 school to Builth High School? | <i>Ysgol y Bannau is the closest Category 1 school to Builth Wells High School.</i> |
| 4.5.2 | Why should Brecon suffer for Builth? Someone decided that Builth should be a Welsh School?? Why? Brecon High is across the road from Ysgol Y Bannau. Anyone with an ounce of intelligence can see that providing a well-funded Welsh Stream, as has happened historically, is the right thing to do for wellbeing of the children. | <i>There is no Proposal for Builth Wells HIGH SCHOOL to become a designated Category 1 or 2A Welsh-medium school.</i> |
| 4.5.3 | There is a strong feeling that Welsh medium secondary education should be a part of any new school for Brecon. Even if a Welsh stream; with POWYS COUNTY COUNCIL can offer strong guidance, influence and leadership (that guidance and support evidentially has not | <i>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</i> |

demonstrated over the past few years to date) the provision can strengthen. If this cannot be made to work in Brecon then how can it succeed at Builth Wells?

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.

The Welsh Government's Welsh – medium Education Strategy states 'Welsh-medium education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing future bilingual citizens.'

'The 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 9 Welsh-medium Education Strategy April 2010 Information document No: 083/2010 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.'

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.'

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. 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.

| 4.6 Risks to Welsh Language – Going to English Schools | | | | | | | | | | | | | | | | | | | | | | | | | |
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| <p>4.6.1 If the decision is taken to close the Welsh stream the young Welsh community in the Brecon area would be destroyed. Is this the aim of Powys county council?</p> | <p><i>The Authority's view is that the current level of Welsh-medium provision in Brecon High School is not sufficient to enable pupils to develop their Welsh language skills throughout their time in secondary school. This is particularly true in terms of pupils from homes where no Welsh is spoken. The Authority's view is that the increased level of Welsh-medium provision at Builth Wells High School will enable pupils to continue to develop their Welsh language skills throughout their time in secondary school.</i></p> | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.6.2 Surely it is more cost effective to invest in Welsh education locally to ensure home grown Welsh speakers are supported? You should consider investing within county rather than transporting children out of county for their education; something which you ... seem to be actively encouraging!</p> | <p><i>The Authority's view is that the provision in Brecon High School does not provide equality of opportunity for Welsh-medium pupils. The local Authority would provide free transport for eligible pupils to the nearest Welsh-medium provision. For some pupils, this provision could be outside Powys. Should the Proposal be implemented, parents would still be able to choose between accessing Welsh-medium provision at Ysgol Gyfun Ystalyfera or Builth Wells High School, or accessing English-medium provision at Brecon High School.</i></p> | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.6.3 Do all but a few children transfer to the English medium in Brecon on progressing to Secondary School or choose to travel to Builth Wells? There is a need to provide evidence of which secondary school, pupils of the Brecon Welsh medium primary schools transfer to.</p> | <p><u>September 2015</u></p> <table border="1" data-bbox="996 869 2072 1013"> <thead> <tr> <th></th> <th><u>Brecon High School</u></th> <th><u>Ysgol Gyfun Ystalyfera</u></th> <th><u>Builth Wells High School</u></th> </tr> </thead> <tbody> <tr> <td><u>Ysgol y Bannau</u></td> <td><u>14</u></td> <td><u>3</u></td> <td><u>0</u></td> </tr> <tr> <td><u>Sennybridge</u></td> <td><u>0</u></td> <td><u>3</u></td> <td><u>0</u></td> </tr> </tbody> </table> <p><u>September 2016</u></p> <table border="1" data-bbox="996 1117 2072 1260"> <thead> <tr> <th></th> <th><u>Brecon High School</u></th> <th><u>Ysgol Gyfun Ystalyfera</u></th> <th><u>Builth Wells High School</u></th> </tr> </thead> <tbody> <tr> <td><u>Ysgol y Bannau</u></td> <td><u>3</u></td> <td><u>1</u></td> <td><u>9</u></td> </tr> <tr> <td><u>Sennybridge</u></td> <td><u>0</u></td> <td><u>4</u></td> <td><u>0</u></td> </tr> </tbody> </table> | | <u>Brecon High School</u> | <u>Ysgol Gyfun Ystalyfera</u> | <u>Builth Wells High School</u> | <u>Ysgol y Bannau</u> | <u>14</u> | <u>3</u> | <u>0</u> | <u>Sennybridge</u> | <u>0</u> | <u>3</u> | <u>0</u> | | <u>Brecon High School</u> | <u>Ysgol Gyfun Ystalyfera</u> | <u>Builth Wells High School</u> | <u>Ysgol y Bannau</u> | <u>3</u> | <u>1</u> | <u>9</u> | <u>Sennybridge</u> | <u>0</u> | <u>4</u> | <u>0</u> |
| | <u>Brecon High School</u> | <u>Ysgol Gyfun Ystalyfera</u> | <u>Builth Wells High School</u> | | | | | | | | | | | | | | | | | | | | | | |
| <u>Ysgol y Bannau</u> | <u>14</u> | <u>3</u> | <u>0</u> | | | | | | | | | | | | | | | | | | | | | | |
| <u>Sennybridge</u> | <u>0</u> | <u>3</u> | <u>0</u> | | | | | | | | | | | | | | | | | | | | | | |
| | <u>Brecon High School</u> | <u>Ysgol Gyfun Ystalyfera</u> | <u>Builth Wells High School</u> | | | | | | | | | | | | | | | | | | | | | | |
| <u>Ysgol y Bannau</u> | <u>3</u> | <u>1</u> | <u>9</u> | | | | | | | | | | | | | | | | | | | | | | |
| <u>Sennybridge</u> | <u>0</u> | <u>4</u> | <u>0</u> | | | | | | | | | | | | | | | | | | | | | | |

| 4.7 Risks to Welsh Language – Leaving for Secondary School in England | | |
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| 4.7.1 | <p>Losing a percentage of pupils to English in the short term is highly likely to be permanent consequence. Significantly more resources will be required to re-establish uptake than continuing to support Welsh in this area. Can you explain how this complies with the Welsh Government’s strategic aims for the Welsh Language including those outlined within the Donaldson report?</p> | <p><i>During this consultation, many respondents have voiced their opinion that many pupils would access education in England. The Authority recognises that this would not allow pupils to access the National Curriculum of Wales. However, the Proposal is intended to create a long-term sustainable secondary education infrastructure that can provide high-quality education.</i></p> <p><i>The Proposal is aligned with the strategic aims of the Welsh Government’s Welsh-medium Education Strategy.</i></p> <p><i>The Donaldson Report states that the school curriculum should be designed to help all children and young people to develop in relation to clear and agreed purposes. The Authority believes that the proposal will deliver this aim.</i></p> |
| 4.7.2 | <p>Please explain how the Proposal takes into account the aims of the Welsh Language Strategy 2012-17, as defined in Section 1.1 of the School Organisation Code, in view of the data demonstrating that parents will choose to educate their children in England if Gwernyfed is closed.</p> | <p><i>The Authority is not aware of any data demonstrating that parents will chose to educate their children in England if Gwernyfed High School is closed. However, the Authority believes that the Proposal will enable Welsh-medium pupils in Powys to have robust linguistic continuity throughout their education, which isn’t the case for Welsh-medium pupils in Brecon currently. According to the Welsh Government’s Welsh-medium Education Strategy ‘Welsh-medium education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing future bilingual citizens.’</i></p> |
| 4.8 Risks to Welsh Language/Heritage in General | | |
| 4.8.1 | <p>The removal of teaching in Welsh sends a negative cultural message for the community, particularly when considering the recent changes to the Welsh Language Act. How are you going to address this and develop a population of Welsh speakers within the community of Brecon? The Welsh language grows and develops not only through the teaching of subjects in Welsh, but by the</p> | <p><i>Pupils would still live in the Brecon area even if they were receiving their education elsewhere. The improved choice and linguistic experience for pupils at Builth Wells High School would enable them to be even more confident Welsh speakers who could still contribute to the development of the Welsh language in Brecon.</i></p> <p><i>There is no evidence that the interaction of those in the Welsh stream with those in the English stream leads to an increase in Welsh speakers. The Welsh Government’s Welsh – medium Education Strategy states ‘Welsh-medium education from the early years, with robust linguistic progression through every</i></p> |

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| <p>interaction of those in the 'Welsh' stream with those in the 'English' stream. How are you going to address this deficit by the loss of the Welsh Stream in Brecon High?</p> | <p><i>phase of education, offers the best conditions for developing future bilingual citizens.'</i></p> <p><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 9 Welsh-medium Education Strategy April 2010 Information document No: 083/2010 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></p> <p><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></p> |
| <p>4.8.2 Your plan to build a new multi million pound school in Brecon with a Welsh medium primary school across the road yet there will be no Welsh stream on the new site. This appears illogical and unfair. Why should Welsh speakers be denied access to this new school? You should be investing in Welsh in this area. You refer to dwindling numbers attending the Welsh stream but these would increase significantly if you invested properly. If you go ahead with your plans the Welsh language will die in the Brecon area.</p> | <p>See 4.5.3, 4.6.1, 4.6.2</p> |

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| 4.8.3 | <p>Explain how, in the eventuality of no Welsh-medium provision at Brecon HIGH SCHOOL and the consequent eroding of Welsh culture that this will achieve "... an infrastructure that is resilient to future demographic or financial challenges."</p> | <p><i>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></p> |
| 4.8.4 | <p>If Welsh is to be encouraged for future generations then education at school age must be accessible now. Neighbouring Welsh County Councils appear to be promoting the development of education in the Welsh Language. Withdrawal of the Welsh Stream in Brecon when there is a Welsh language primary school serving the area would seem a backward step when 21st Century schools is supposed to be a transformational project. How does POWYS COUNTY COUNCIL justify this reduction in parental options and backward step against the Welsh Language strategy?</p> | <p><i>The Authority believes that the Proposal will provide an improved choice of Welsh-medium provision compared to that currently available at Brecon High School, as evidence in the Consultation Document.</i></p> |
| <p>4.9 Impact on Primary Provision</p> | | |
| 4.9.1 | <p>The lack of a Welsh language educational provision in Brecon High School will have a negative impact on Ysgol y Bannau and the Brecon community. Parents will either relocate, chose another area to move into rather than Brecon, or chose an English medium school. What are your Proposals to address this?</p> | <p><i>The Authority acknowledges that the Proposal could have a negative impact on Ysgol y Bannau in the short term, and this is identified in the consultation document. However, whilst Welsh-medium pupil numbers in other parts of Powys have grown over recent years, this hasn't been the case at Ysgol y Bannau. The Authority believes that the uncertainty in relation to secondary progression has contributed to this. Whilst there may be some impact on pupil numbers at Ysgol y Bannau in the short term, the Authority would work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-</i></p> |

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| | | <i>medium education, and believes that in the longer term, any reduction in pupil numbers would be reversed, with the potential that they could increase.</i> |
| 4.9.2 | Explain how removing Welsh-medium education from Brecon HIGH SCHOOL will not undermine dual stream provision at Sennybridge Primary School and first language provision at Ysgol y Bannau. 31. Present evidence to demonstrate how Ysgol y Bannau will remain viable under current Proposals. | <i>Ysgol y Bannau will continue to receive funding in accordance with the Fair Funding Formula.</i> |
| 4.9.3 | Explain how, in the face of falling pupil numbers, Ysgol y Bannau would be expected to “be flexible to ensure that it continues to offer appropriate provision to pupils.” | <i>Ysgol y Bannau will continue to receive funding in accordance with the Fair Funding Formula. If pupil numbers at the school decrease, the school would be expected to provide appropriate provision to pupils within its approved budget.</i> |
| 4.9.4 | Given that Powys County Council does not know the effect upon pupil numbers at Ysgol y Bannau, explain how this bolsters Powys County Council’s argument in favour of achieving a critical mass for the Welsh-medium curriculum in Builth Wells. | <i>Evidence has shown that parents are already choosing to send their children from Ysgol y Bannau to Builth Wells to access suitable progression routes through the medium of Welsh. Welsh-medium pupil numbers in other parts of Powys have grown over recent years, however this hasn’t been the case at Ysgol y Bannau.</i> |
| 4.10 Risk to Education Attainment | | |
| 4.10.1 | Who will take responsibility when educational standards start falling? (Owing to strain of travelling). My eldest child is excelling in Brecon High Schools welsh stream. If this discrimination is allowed to manifest itself I believe his education will suffer. | <i>From the initial calculations made, travel time for the vast majority of learners would be within the 45 minutes stated in the Authority’s Home to School Transport Policy. The provision in Builth Wells already serves both the Builth Wells and Llandrindod Wells catchment areas and the distance from the north of the Llandrindod catchment area to Builth Wells is similar to the distances learners would have to travel under this Proposal.</i> <i>Should the Proposal be supported, Builth Wells High School, like all schools, has a duty to provide the best possible education for all learners.</i> |

4.11 Financial Support

4.11.1 You state that the same level of support has been provided to the Welsh streams in Brecon High School and Brecon High School yet you claim Brecon High School has succeeded in strengthening and increasing the provision. If this were true, how did POWYS COUNTY COUNCIL allow the provision at Brecon High School to diminish to its current vulnerable position? Please provide details of financial and other resources you have provided to Brecon High School L and Brecon High School over the last five financial years to support Welsh medium education and the monitoring and reporting arrangements in place to ensure sufficient and equitable Welsh medium education in both schools and the action taken by you when the disparity was identified?

The funding of the Welsh-medium streams at both schools is currently provided by the County Council through its Fair Funding Formula. The basis of the allocation of monies to the Authority does not currently take account of the language of education. The Authority's Fair Funding Scheme does provide additional support based on the number of subjects delivered through both languages, and currently amounts to approximately £175,000 across the two schools in the current financial year, in addition to the usual age weighted factors.

All schools are required to complete an Annual Return which provides the current delivery of Welsh, English and Bilingual Education.

In November 2011, the Cabinet agreed a strategy that all dual-stream schools should aspired to provide a curriculum equivalent to that of a Category 2B school. Officers have annually monitored the progress each school has, or has not made, to reach this target, and discussions have taken place with each school about ways to make progress. A Learning Partnership was established in 2012 - Clwstwr y Ffynnon- to include all Welsh-medium/dual-stream schools in the Brecon and Builth Wells catchment areas, to explore and implement ways of strengthening provision.

The following table provides the information relating to financial support for both Builth and Brecon High Schools for Welsh-medium provision over the last five years:

| School | Allowance | 2011-2012 | 2012-2013 | 2013-2014* | 2014-2015 | 2015-2016 | Total |
|--------------|-----------------|---------------|---------------|------------|---------------|---------------|----------------|
| Brecon | Bilingual | 88,406 | 84,601 | - | - | - | 173,007 |
| | Language Choice | - | - | - | 72,320 | 74,659 | 146,979 |
| Total | | 88,406 | 84,601 | - | 72,320 | 74,659 | 319,986 |

| School | Allowance | 2011-2012 | 2012-2013 | 2013-2014 | 2014-2015 | 2015-2016 | Total |
|--------|-----------|-----------|-----------|-----------|-----------|-----------|-------|
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|---------------|------------------------------|----------------|----------------|--|---------------|----------------|----------------|
| <i>Builth</i> | <i>Bilingual</i> | 109,137 | 110,047 | | | | 219,184 |
| | Language Choice | | | | 98,394 | 101,069 | 199,463 |
| | Additional Welsh Agreed SSMT | | | | | 33,503 | 33,503 |
| Total | | 109,137 | 110,047 | | 98,394 | 134,572 | 452,150 |

4.11.2 The historic lack of investment in Welsh medium secondary education in Brecon High School has meant that there has been very limited uptake of Welsh language learning. That, together with a lack of any Welsh medium provision in the Gwernyfed and Crickhowell catchment areas will do nothing to help improve the uptake in the south locality. This is discriminatory and will mean another opportunity missed by POWYS COUNTY COUNCIL to promote Welsh language. In your December 2015 update of the Welsh in Education Strategic Plan, you discount the opportunity to increase Welsh provision in primary schools within these areas concluding that provision for the area should be delivered through Ysgol y Bannau, Brecon. You should reconsider this approach to encourage an extension of provision into these catchment areas. Are you basing the outcome of your review on recent parent survey within those catchment areas? If not, what are you basing your review on?

As the current position at both schools does not fully meet the aspirations of the Authority's WESP for linguistic continuity, the Authority has identified the need to centralise provision, in order to ensure that a greater level of provision can be offered to pupils. In particular, the Authority is concerned that the Welsh-medium provision available at Brecon High School is limited, and does not provide sound linguistic progression from one phase of education to the next.

The Authority carried out a survey to identify parental preference with regard to Welsh-medium secondary education in the autumn term 2013.

The survey was sent to the parents of all pupils currently attending a Welsh medium primary school or a Welsh stream in a dual stream primary school, including parents of pupils in the Ystradgynlais area who currently transfer to Ysgol Gyfun Ystalyfera for their secondary education. 36% of surveys sent out were returned.

In the survey, parents were asked which type of secondary provision they would prefer for their children to attend.

The results were broken down by primary school, and by high school catchment. The results for the area currently under review were as follows:

| Catchment | Number of surveys issued/response rate | Designated Welsh medium secondary school | Welsh stream in dual secondary school | English stream in dual secondary school | English medium secondary school |
|------------------|---|---|--|--|--|
| Brecon | 182/44% | 71% | 29% | 0% | 0% |
| Builth Wells | 130/35% | 43% | 46% | 8% | 4% |

4.11.3 Explain how greater investment in Welsh-medium provision, for example through providing Welsh language apprentices and more peripatetic teachers in the Brecon HIGH SCHOOL catchment, would not provide opportunities for Welsh-medium pupils of all abilities to achieve high levels of attainment.

The Authority does not believe that this model would deliver the same benefits as outlined in 5.1 above, due to the fact that there needs to be a critical mass of pupils for this model to work, and this is not the case currently at Brecon High School.

4.12 Builth Build

4.12.1 Explain why the existing, relatively recently built Builth Wells High School, is no longer fit for purpose. Explain where, and by when, the new school will be built

There are no Proposals for a new school in Builth Wells – the Consultation Document for Builth Wells and Llandrindod High Schools puts forward a Proposal to establish one school across two sites. It states on page 17 of that document - ‘The Proposal is the first stage of potential wider plans for secondary education in the area. The second stage, which aims to establish the New School on a single site in the locality of Builth Wells, requires further work to understand the overall capital cost and feasibility.’ Builth Wells High School is not considered ‘no longer fit for purpose’, and is categorised as a Condition B building – this is stated in both Consultation Documents for the four high schools.

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| 4.13 Choice | |
| 4.13.1 | <p>NPTC does not provide post 16 Welsh medium education. Moving the Welsh medium stream from Brecon High School to Builth, including the post 16 age group, appears to be another way in which POWYS COUNTY COUNCIL is removing obstacles in order to hand over the 6th form education in Brecon and Gwernyfed catchment area to the inadequately prepared Neath Port Talbot group. Is this equitable or fair?</p> |
| | <p><i>Secondary schools in south Powys have struggled to offer post-16 Welsh-medium provision in recent years due to the small number of pupils involved. With this Proposal, post-16 Welsh-medium subjects will continue to be provided at Builth Wells High School, and as Welsh-medium pupil numbers in the school grow, it is expected that the school will be able to offer a greater number of Welsh-medium subjects. NPTC Group of Colleges has no experience of offering Welsh-medium provision.</i></p> |
| 4.13.2 | <p>What research / modelling has been conducted by POWYS COUNTY COUNCIL Educational Officers into how new learning / teaching technologies could enable a Welsh A level stream to be retained in all South Powys High Schools?</p> |
| | <p><i>POWYS COUNTY COUNCIL has facilitated and funded a number of alternative ways of delivering Welsh-medium post-16 education over the last few years e.g. Cam wrth Gam – Welsh-medium Childcare provision through Mudiad Meithrin; Video-conferencing with Coleg Llandrillo; Agricultural courses through collaboration with Coleg Sir Gar; agriculture and engineering in collaboration with Ysgol Penweddig, Aberystwyth.</i></p> <p><i>Whilst these models can provide additional courses, they do not address the fundamental issue of low pupil numbers, high costs and viability of courses.</i></p> |
| 4.14 Travel/Transport | |
| 4.14.1 | <p>Those pupils wishing to learn through the medium of Welsh are currently travelling to Builth. However there are also question marks over the future of Builth so how far are you prepared for your Welsh students to travel in order to learn in the language of their culture?</p> |
| | <p><i>The Proposal that has been the subject of a recent consultation in Builth Wells and Llandrindod Wells is to establish one school across two sites, with Welsh-medium provision being retained in a dual-stream school that operates across the current sites of Builth and Llandrindod High Schools.</i></p> <p><i>The Authority would not support an educational model that did not have Welsh-medium provision in the South and Mid of the county.</i></p> |

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| 4.14.2 | Our daughter and son in law have invested in educating our grandchildren in Welsh medium primary education at Ysgol y Bannau expecting this to be continued at Brecon High School. It makes no sense geographically to now expect them to travel to Builth to continue this provision | <i>See 4.5.3, 4.6.1, 4.6.2</i> |
| 4.14.3 | How can you assure us that the management of your transport policy for Welsh Medium education is fit for purpose, legally robust and is being implemented consistently to ensure equality across the county? | <i>Home-to-School transport for Welsh-medium pupils is implemented in accordance with the Council's Policy. Any parental appeals for transport are managed on a two-stage process, with the Senior Manager Central Services considering the initial appeal, and then any subsequent appeals being taken to the Transport Appeals Panel, which is supported by the Authority's Legal Dept..</i> |
| 4.14.4 | Please explain how paying for children to be transported to BRECON HIGH SCHOOL prior to the start of the consultation is not considered predetermination. | <i>The provision of transport to Builth Wells High School has only been provided following parents making a successful transport appeal and being awarded transport by the transport appeals committee or, more recently, by the portfolio holder with responsibility for schools.</i> |
| 4.14.5 | Prove that families with pupils from the Brecon catchment are not choosing to send them to the Welsh-medium education in either Builth Wells or Ystalyfera as a consequence of the uncertainty created by Powys County Council. Prove that Brecon parents will choose for their children to travel the extra distances to study Welsh-medium curriculum in Builth Wells. | <i>There is evidence that parents are already choosing to send their children to Welsh-medium provision in Builth Wells or in Ystalyfera. Information from admissions dept.</i> |
| 4.15 Impact of Travel to Builth on social, sporting activities | | |
| 4.15.1 | Why are you so adamant that Sennybridge Welsh stream should feed to YGY when the distance to YGY is 18 miles, ten miles further than to BRECON HIGH SCHOOL? What are your motives? | <i>The transport provided to Ysgol Gyfun Ystalyfera was provided following a transport appeal where it was recognised by the panel members that the level of Welsh-medium provision in Brecon was far below that provided in Ystalyfera.</i> |

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| 4.16 Opposed to moving the Welsh Stream from Brecon | |
| 4.16.1 | <p>Explain why it is preferable to relocate Welsh-medium secondary education to Builth Wells HIGH SCHOOL, which is categorised as Red under the National School Categorisation System.</p> <p><i>Builth Wells High School was placed in Special Measure by Estyn following an inspection in 2015. The school has been placed in the ‘red’ support category in the 2015/16 National Categorisation of Schools. Brecon High School was also placed in Special Measures by Estyn in 2012, and was placed in the ‘amber’ support category in 2015/16.</i></p> <p><i>The National Categorisation of Schools is a system which considers the performance of schools against a range of criteria – the colour-coding system shows how much support the school will receive from ERW’s Challenge Advisors.</i></p> <p><i>It is preferable to relocate Welsh-medium education to Builth Wells High School due to the reasons outlined in 4.5.3 above, regardless of the categorisation of the school.</i></p> |
| 4.16.2 | <p>Explain why pupils wishing to study the Welsh-medium or dual language curriculum would be denied the opportunity to do so in a new Condition A School Building in Brecon.</p> <p><i>As the current position at both schools does not fully meet the aspirations of the Authority’s WESP for linguistic continuity, the Authority has identified the need to centralise provision, in order to ensure that a greater level of provision can be offered to pupils. In particular, the Authority is concerned that the Welsh-medium provision available at Brecon High School is limited, and does not provide sound linguistic progression from one phase of education to the next.</i></p> |
| 4.17 Impact on Primary Welsh Provision | |
| 4.17.1 | <p>If this provision is removed the number of pupils starting at Ysgol y Bannau will decline, some are already questioning their decisions even before the consultation has been completed. With two thirds of the children coming from English speaking families they will not consider putting them into welsh education if they then have to travel to Builth to continue with their welsh education, they will choose English medium from the beginning. Some parents are already</p> <p><i>As noted in the Consultation Document, The Authority recognises the risk to pupil numbers at Ysgol y Bannau, and would work closely with the school and organisations such as TWF and Menter Brycheiniog to promote the benefits of Welsh-medium education in the local area.</i></p> <p><i>Ysgol y Bannau would become an official feeder school for the new dual-stream, dual-sited school in Mid Powys, and both schools would work closely to ensure clear transition and progression routes for pupils. The Authority would only provide transport for pupils to the nearest school that provides Welsh-medium education.</i></p> |

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| <p>planning to remove their children from the school next term.</p> <p>4.17.2 I have already spoken with at least 4 different families in the last 2 months School who have opted out of sending their children to Ysgol y Bannau in the next academic year for the simple reason that they have been led to believe that there will be no continuation of 1st language Welsh at the nearest Comprehensive school.</p> <p>4.17.3 Brecon has a thriving Welsh medium primary school and I am concerned that its future will be damaged if you proceed with the Proposal. Sennybridge CP School will also be damaged if Brecon lacks Welsh medium secondary provision.</p> <p>4.17.4 POWYS COUNTY COUNCIL believes that developing close links between YGY and Builth HIGH SCHOOL will increase the number of Welsh learners in the longer term. How long is the short term?</p> <p>4.17.5 Has the Council asked parents who have withdrawn from YGY or BRECON HIGH SCHOOL WS for reasons for their decision? I think the Council could learn from this.</p> | <p><i>If the Proposal is implemented from September 2017, the Authority would expect the school in Builth Wells to have developed transition plans along with Ysgol y Bannau in readiness.</i></p> <p><i>As the Authority will be providing free home to school transport, it is the authority's view that while there may be some parents who choose to opt for the English stream at Brecon High School, the majority of Ysgol y Bannau pupils will continue to transfer to Welsh-medium secondary provision in the long term.</i></p> <p><i>The Authority has not asked parents directly – however, all parents have the opportunity to provide their views in response to this consultation.</i></p> |
| <p>4.18 Criticism of the Brecon to Builth Publicity/Process/Done Deal</p> | |
| <p>4.18.1 Comments about the relocation of first language Welsh medium provision to Builth High School were publicised even before the Consultation</p> | <p><i>The Council did not announce the closure as if it was fact, however it may have been reported in this way in the press. The Council cannot control what is published by the press or by anyone else.</i></p> |

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| <p>period was over, suggesting a <i>fait accompli</i> before public discussion had even started ... There is no suggestion that Builth primaries should feed into Brecon-based Welsh provision; a huge oversight given that we are still ‘in Consultation’...? How can parents in the Builth and Brecon area be expected to make informed decisions about their children’s educational provision when a large chunk of pertinent information is omitted from the Consultation Document?</p> | <p><i>In changing the language category of any school, all local authorities have to publish Proposals and carry out the statutory consultation process.</i></p> <p><i>In the Option Appraisal carried out on potential long-list of options for Welsh-medium provision in South and Mid Powys, a Proposal for centralising Welsh-medium provision in Brecon was considered:</i></p> <p><i>Option 2: Maintain a single Bilingual Category 2B/C (“dual-stream”) Secondary School in South Powys and transfer Welsh-medium learners from Mid Powys to South Powys</i></p> <p><i>However, this was discounted due the fact that it did not meet the threshold for further consideration in the short list of options. . This information was included within the Consultation Document at page 75</i></p> |
| <p>4.19 Equality Issue</p> | |
| <p>4.19.1 A term used in the Brecon High School Consultation event was “Equality Education”. How is moving Welsh speaking children out of their community so they can move forward with their Welsh language promoting and providing “Equality Education”? It is in fact marginalising them and pushing them away from their local community, which I feel is also a serious case of discrimination towards the Welsh Language.</p> | <p><i>The Authority believes that Welsh-medium pupils are being discriminated against under the current arrangement due to the limited curriculum Welsh-medium curriculum available to them.</i></p> |

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| 5 | Finances | |
| 5.1 | Cost of Repair/Maintenance of Existing Buildings Vs Cost of New Build | |
| 5.1.1 | The finances of the proposed scheme are also extremely troubling. Powys County Council argue that the proposed scheme would save £300,000 per year. However, the modernisation would require funding totalling around £20 million, the interest on which would almost certainly eliminate any such saving. | <i>The savings included in the consultation document relate to the revenue saving the Proposal would achieve. Capital investment to achieve this is included in the Councils overarching Capital Strategy, various funding streams would be used to finance this but these costs are not included in the documentation.</i> |
| 5.1.2 | The Council has identified a back log of repairs needed at the school, as a County Councillor I find this a highly embarrassing reason for closure. If this is true, it is the failing of successive Cabinets of Powys County Council and not of the School and Governing Body. However the school is not run down, it is a fantastic setting for learning, and I believe we should be investing in this truly unique environment. | <i>Comment noted Under the schools service asset management plan and its transformation agenda, the Authority is striving to bring all its schools up to a minimum condition B standard, it is recognised by Welsh Government that there has been significant under investment in improving the condition of buildings. It is a key priority for investment under the 21st century schools capital programme. The Cabinet has recently approved that where schools are not spending their delegated premises funding on repair and maintenance they will be required to contribute to any further capital expenditure at the school. It is expected that this will increase the amount of expenditure made on Repair and maintenance.</i> |
| 5.1.3 | Why is a new school building needed? If the estimated backlog maintenance cost for Brecon High School is £15,581,541 then surely the proposed 20 million to build a brand new school is more than enough to refurbish the existing Brecon High School building and bring it up to the required standard. The school is currently large enough to be refurbished in sections, why not close off sections of the school and refurbish bit by bit. | <i>In the Strategic Outline Case for the development of the Beacons Campus, which was approved by Cabinet and the Welsh Government in 2015, a number of options were explored using the HM Treasury's Five Case Business Model. A further Outline Business Case subsequently developed. An option of remodelling Brecon High School was considered during this process but discounted as it did not meet a sufficient number of investment objectives and critical success factors.</i> <i>The new school building is needed because Brecon High School is categorised as a Condition D building and some areas have already been put out of use for teaching due to their bad condition.</i> |

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| <p>5.1.4</p> | <p>How much would it cost to carry out the repairs to Gwernyfed High School and how much to maintain this? Would the council consider help from parents to subsidise the cost?</p> | <p><i>The Cost of refurbishing Gwernyfed High School to a Condition B standard is £3.721.</i></p> |
| <p>5.1.5</p> | <p>I understand that the cost between expanding /improving the current GWERNYFED HIGH SCHOOL site and the cost between building a new one is negligible. The beautiful site at GWERNYFED HIGH SCHOOL is strategically placed offering a choice to future students. If it were removed the gap in the centre would be too large and students would have to opt for either Builth or an English choice such as Fairfield.</p> | <p><i>Comment noted</i></p> |
| <p>5.1.6</p> | <p>These buildings, which are thrown up in the cheapest way are unlikely to still be standing in 20 years, let alone 200 years. Yes Gwernyfed needs some investment, but surely long term this is more cost effective than a rebuild programme.</p> | <p><i>Comment noted</i></p> |
| <p>5.1.7</p> | <p>Jeremy Patterson noted that 'it would be possible to spend capital money on the maintenance backlog at Gwernyfed but there would need to be a proper business case' (Gwernyfed 2:02). I believe the Governors are willing to present this if they have not done so already.</p> | <p><i>Comment noted</i></p> |
| <p>5.1.8</p> | <p>How much would it cost to bring Gwernyfed school buildings to the standard required in order to correct the defects which places it in category Condition C? Please also project the</p> | <p><i>The estimated cost of improving facilities at Gwernyfed High School up to a Condition B standard is £3.72m. The cost of a new build 11 – 16 school in Brecon is £20m. The estimated additional transport costs are £225,320.</i></p> |

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| | <p>net cost of same once increased transport costs and loss of sixth form/high school delegated funding caused by pupils choosing to be educated out of county is taken into account. What proportion of the new build cost would this represent? How much investment will be required i) for the new build as a whole, and ii) in the interim to the existing Gwernyfed and Brecon sites? What is the difference in cost between rectifying the premises defects at Gwernyfed and the year on year costs of increased transportation of students and the loss of future funding due to students electing to be taught outside the catchment?</p> | <p><i>Further financial modelling will be undertaken should the Proposal be supported to the next stage of the process.</i></p> |
| <p>5.1.9 What is the square footage and volume of the proposed new-build, and what is the proposed cost of cleaning and utilities? How does this compare with existing costs of same at Gwernyfed? What is the rateable value likely to be and how does it compare with the rateable value of each of the existing schools? What is the council's contingency with regards to upkeep and running costs in the event that the new school is under-subscribed?</p> | <p><i>The costs associated with running the school including the property elements are a matter for the Governing Body. The funding provided by the Authority via the schools delegated budget is derived using the funding formula. The current formula in place for secondary schools funds the majority of the Premises allowances on 75% weighted floor area and 25% based on the pupil number element. Factors such as rateable value, condition of the school building, energy source etc. are all considered. The formula is reviewed on a regular basis to ensure that the funding elements are appropriate when compared with expenditure incurred by the schools. The new school would be funded in accordance with the formula. If the school is undersubscribed the property led elements of the formula do not change, but staffing related elements would reduce. The estimated floor area of the new build is 19,027m², the school element being 8,550m².</i></p> | |
| <p>5.1.10 How much has been spent on repairs and maintenance at Gwernyfed in each of the past five years? Has there been a reduction in maintenance of the premises over recent years in preparation for the eventual closure of this school? Does this contribute to the "significant</p> | <p><i>Repair and maintenance of the school building sits within the schools delegated budget and is the responsibility of the Governing Body. Expenditure is recorded as £407k over the past 5 years. The Authority has in addition spent £83k from its centrally held major repairs budget. Capital expenditure across all schools is allocated on an annual basis and funding is allocated against an agreed prioritisation matrix.</i></p> | |

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| | backlog” cited in the consultation document, and has this contributed to its Category C status? Why cannot Capital investment be allocated to improve existing premises? | |
| 5.1.11 | What is the breakdown of the difference between the £20million cost of development of the new school building and the £44million of the total Beacons Campus Project cost? There is no legitimate reason why capital funding cannot be spent on improving existing premises as part of a planned schedule of improvement. It is a lie to suggest that only new-builds can be funded using capital resources. Why does County refuse to consider this option? | <p><i>The Strategic Outline Case and subsequent Outline Business Case has examined all options in detail. The best economic and educational model is to build a new school in Brecon.</i></p> <p><i>The difference of £24m relates to the NPTC Group of Colleges element of the build.</i></p> |
| 5.1.12 | Can POWYS COUNTY COUNCIL explain exactly why it will not consider funding maintenance of GWERNYFED HIGH SCHOOL from its capital funds? If a new school is built what funding has been put aside for ongoing annual maintenance in order that the new school does not fall into disrepair, as many POWYS COUNTY COUNCIL owned buildings have for decades? | <p><i>Revenue maintenance costs cannot be funded from capital, the Authority is bound by accounting regulations that prevent this.</i></p> <p><i>Ongoing maintenance costs of the proposed new school would be met from the schools delegated budget. The funding for which is included within the figures provided in the consultation documents.</i></p> |
| 5.1.13 | The Governing Body asks: <i>how the ‘backlog of repairs’ figure of £3,721,200 has been arrived at? If this is the true cost why have they not been made aware of it until now? And does this figure include the renovation and re-fit of the Mansion House as estimated at £196,500?</i> With regard to the latter question, they argue that this cost includes works no longer required to make teaching spaces accessible and estimate this to | See 6.2.2 |

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| | <p>now be nearer £70,000. The Governing Body also asks whether this figure is based upon the cost of the POWYS COUNTY COUNCIL FMS service providing the work. If so, they suggest there are externally-procured alternatives available that could reduce the cost by between 25% - 50%.</p> | |
| <p>5.2 School Budget</p> | | |
| <p>5.2.1</p> | <p>I believe Gwernyfed school has operated with in its budget for a long time,</p> | <p><i>Comment noted. Gwernyfed High School ended the 2015/16 financial year with a £206,716 cumulative surplus and has a projected cumulative surplus of £186,076 for the year ending 31st March 2017.</i></p> |
| <p>5.2.2</p> | <p>Gwernyfed is managing to deliver excellent quality education to their pupils, whilst operating within a balanced budget.</p> | <p><i>Gwernyfed High School ended the 2015/16 financial year with a £206,716 cumulative surplus and has a projected cumulative surplus of £186,076 for the year ending 31st March 2017.</i></p> |
| <p>5.2.3</p> | <p>The true goal is to have a new high school for Brecon and in the process to be able to wipe the current 1.4million of debt that Brecon currently has. To enable them to wipe the debt they need to close 2 schools to create a new one. Gwernyfed has been proposed to be this sacrificial lamb.</p> | <p><i>The Authority disputes this comment. The Consultation Document clearly outlines the significant challenges faced by the secondary sector in Powys and the reasons for the Proposal, along with benefit, risks and impact on a number of factors.</i></p> |
| <p>5.2.4</p> | <p>Our School has fought hard to remain within budget and we must not close at Brecon's expense. We appreciate that Brecon needs a new school and we will support this.</p> | <p><i>Comment noted.</i></p> |
| <p>5.2.5</p> | <p>Alongside this, Gwernyfed is one of the few high schools in Powys to be managed effectively within a balanced budget, year on year. Where is the sense to close an 'on budget' school and</p> | <p><i>The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a</i></p> |

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| <p>merge us with a school that is currently lying under a mountain of debt?</p> | <p><i>new built facility, will enable the provision of the best possible education. There are only three secondary schools in Powys that have achieved a 'good' judgement by Estyn.</i></p> |
| <p>5.3 Brecon Deficit</p> | |
| <p>5.3.1 Why was Brecon High School allowed by the council to accumulate a deficit budget of 1.4 million and where in the Proposal are the steps that the council will take to ensure a secondary school in Powys is not allowed to do this again? (Pg. 8)</p> | <p><i>Brecon High School ended the 2015/16 financial year with a surplus of £107k. Forward projections show the impact of falling pupil numbers and the reduction in funding that this has. These figures do not take into account the action the school will take to reduce the projected deficit. All schools must comply with the Scheme for Financing schools, which also includes the powers of intervention available to the Authority should the school not comply.</i></p> |
| <p>5.3.2 Who will/is being held accountable for Brecon High schools debt?</p> | <p><i>A notice of concern has been issued to the Governing Body in line with the Scheme for Financing schools. The Governing Body must submit a financial recovery plan to the Authority in line with a Cabinet request which demonstrates the action that will be taken by the Governing Body to address the projected deficits.</i></p> |
| <p>5.3.3 Why did Powys County Council leave the debt go so high before anyone stepped in or alarm bells stated to ring?</p> | <p><i>The Authority works with all schools to offer the appropriate support and challenge to ensure they meet the requirements of the Scheme. Cabinet will review the position upon receipt of the Governing Body's proposed recovery plan.</i></p> |
| <p>5.3.4 Where has the money gone from Brecon high school? As it's obviously not been spent on the building. As a tax payer I think it's important that we know where our money had gone!</p> | <p><i>Forward projections show the impact of falling pupil numbers and the reduction in funding that this has.</i></p> |
| <p>5.3.5 Brecon will have accrued a budget deficit of around £1.4 million. Can you explain to me how has this been allowed to happen?</p> | <p><i>Of the 98 schools in Powys, 8 schools are in an unlicensed deficit position. Brecon High School ended the 2015/16 financial year with a surplus of £107k. The school is required to send in recovery plan to Cabinet to identify the action that will be taken to reduce the projected deficit. The Authority works with all schools to offer the appropriate support and challenge to ensure they meet the requirements of the Scheme. All schools must comply with the Scheme for Financing schools, which also includes the powers of intervention available to the Authority should the school not comply.</i></p> |
| <p>5.3.6 Powys County Council must go on record to explain its own culpability in allowing Brecon High School's finances to slip into the red and allowing so many of the county's high schools to slip to the point that they are now subject to Estyn monitoring and/or special measures.</p> | <p><i>Of the 98 schools in Powys, 8 schools are in an unlicensed deficit position. Brecon High School ended the 2015/16 financial year with a surplus of £107k. The school is required to send in recovery plan to Cabinet to identify the action that will be taken to reduce the projected deficit. The Authority works with all schools to offer the appropriate support and challenge to ensure they meet the requirements of the Scheme. All schools must comply with the Scheme for Financing schools, which also includes the powers of intervention available to the Authority should the school not comply.</i></p> |

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| <p>5.3.7 How is it legal and morally right to simply wipe out a deficit of £1.4 million of tax payers money by closing these schools?</p> | <p><i>All schools in Powys are monitored through the Regional School Improvement Strategy through a team of Challenge Advisers deployed through the regional consortium for South West and Mid Wales, namely ERW. This consists of a core visit during the Autumn Term annually at which a school is categorised for standards and also the capacity to improve and placed on a matrix. This matrix determines the support required by a school. The support required is then brokered through the designated Challenge Adviser to ensure appropriate improvements are made.</i></p> |
| <p>5.4 Future Financial Management</p> | |
| <p>5.4.1 There have been budget deficits within Brecon High School in the past and it would appear that this is a constant problem. Why has this happened again? Can you guarantee that this will not happen within a new school in Brecon? What will Powys County Council strategy for School Budget Management be under any new arrangements? How will the Council reward excellent budgetary management? What will be the sanctions for poor budgetary management?</p> | <p><i>Brecon High was in a deficit position at the end of March 2013 and was provided with loan to manage the repayment of the debt. The Governing Body have amended their expenditure at the school and have maintained a surplus position over the last 3 years and met the repayment requirements on the loan. The financial position for Brecon High School as at the 31st March 2016 was a surplus balance of £107k. Forward projections show the impact of falling pupil numbers and the reduction in funding that this has. These figures do not includes action that the school will take to reduce the projected deficit. The policy for the financial management of schools is in place via the Scheme for the Financing of Schools within which all schools must comply, the Scheme sets out the powers of intervention available to the Authority when schools fail to meet the requirements.</i></p> |
| <p>5.4.2 GWERNYFED HIGH SCHOOL runs the Sports Centre, hiring this and other school facilities to sports, arts and community groups. In terms of alternative arrangements, the Governing Body highlights that POWYS COUNTY COUNCIL made a £40,000 per annum loss when they ran the Sports Centre prior to the school taking it over in April 2015. They thus ask: <i>does the Council agree that should the school site close, POWYS COUNTY COUNCIL will run the facilities again at a significant annual loss? And does the Council accept that the availability of school facilities to the community is only</i></p> | <p><i>Prior to April 2015, the Sports Centre formed part of the Council's Leisure Services provision, and was staffed by Leisure Services staff including a manager and other staff. The provision transferred to Gwernyfed High School to form part of the school's accommodation, and the facility is now being run with a much-reduced staffing level, as part of the school's letting and community use arrangements. Analysis of the school's current budget and the Council's financial records show that there are no direct staffing charges to the Sports Centre, and that it is operating as a facility that is hired to community groups, rather than a centre that offers staffing support.</i></p> <p><i>If the school was to close, the Authority would, through its Asset Disposal Procedures, undertake consultation with community groups around future ownership</i></p> |

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| <p><i>financially viable whilst the school remains open?</i></p> | <p><i>and delivery from the site. It is recognised that the current delivery model has a lower financial impact on the Council's budgets.</i></p> |
| <p>5.5 Proposal is designed to wipe Brecon High Schools Debt</p> | |
| <p>5.5.1 Why is Gwernyfed High School being closed in order to write off Brecon High schools' debt when this is no fault of GWERNYFED HIGH SCHOOL and simply to save POWYS COUNTY COUNCIL money in Brecon?</p> <p>5.5.2 Is GWERNYFED HIGH SCHOOL is being put through this process solely to enable POWYS COUNTY COUNCIL to write off Brecon High School's debt and to access 21st Century schools funding from the Welsh Government?</p> | <p><i>This is not the case, the Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education.</i></p> |
| <p>5.5.3 Budgetary problems of BRECON HIGH SCHOOL and other schools in Powys would appear to suggest that the quality of leadership, advice and support issued by POWYS COUNTY COUNCIL has been of a poor standard and that POWYS COUNTY COUNCIL would like to close BRECON HIGH SCHOOL to write off this unauthorised debt, as POWYS COUNTY COUNCIL policy allows this. The Proposal is all about POWYS COUNTY COUNCIL mismanagement of BRECON HIGH SCHOOL which should never have been allowed to happen and is a problem for POWYS COUNTY COUNCIL and not GWERNYFED HIGH SCHOOL. This reason for closure regarding/due</p> | <p><i>The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education.</i></p> <p><i>There has been no mismanagement of Brecon High School by the Authority. The Authority works with all schools to offer the appropriate support and challenge to ensure they meet the requirements of the Scheme for Financing Schools. All schools must comply with the Scheme for Financing schools, which also includes the powers of intervention available to the Authority should the school not comply.</i></p> |

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| <p>to school budgetary problems is not a valid point for closure of GWERNYFED HIGH SCHOOL. How does POWYS COUNTY COUNCIL justify involving GWERNYFED HIGH SCHOOL in BRECON HIGH SCHOOL problems?</p> | |
| <p>5.6 Savings/costs from Proposal</p> | |
| <p>5.6.1 The plan “improves the cost effectiveness and efficiency in the delivery of education” so why is the projected saving only a rather pitiful £300K per year?</p> | <p><i>The Proposal produces an annual revenue saving in the region of £300,000. The Authority believes that the Proposal, if implemented, would ensure a more efficient use of resources. Due to the current use of lump-sum funding in the funding formula, the reduction in the overall percentage that these lump sums represent is more efficient;</i></p> |
| <p>5.6.2 What is the breakdown of costs comprising the secondary merger saving? How are the current transport costs calculated? How are the new travel costs calculated? Does the new travel cost include only curricular activities, or is there a sum included for transporting children to and from after school activities?</p> | <p><i>The breakdown of the savings are included in Section 7.1 of the consultation document. The current and estimated travel costs were calculated following an analysis carried out by officers from the Schools Service and the Transport Unit. An analysis of the additional routes required in both catchment areas was undertaken, including the ability to amalgamate such routes, and providing an estimate for each route of the additional costs that would be incurred. The analysis also included the impact of the revised transport network on any linked transport that is used for primary education as well.</i></p> <p><i>The costs do not include any transport costs for extra-curricular activities, as this would not be provided by the Authority.</i></p> |
| <p>5.6.3 Does the cost of the proposed plan include the Gwernyfed surplus and the Brecon deficit? If so, where are they shown in the figures, and if not, what are they?</p> | <p><i>The figures do not include the estimate of balances in relation to the individual schools if they were to close. The figures in the Proposal relate to the ongoing revenue implications. The projected balances for both schools was included in the consultations documents on page 59, revised projections submitted by the governing bodies of both schools for the 2017/18 financial year as per the Cabinet report dated the 5th July shows Gwernyfed High school projecting a surplus of £157k and Brecon High School £588k deficit. Any school with a projected deficit must submit a recovery plan to the Authority demonstrating how they would balance their budget.</i></p> |

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| <p>5.6.4</p> | <p>A stated advantage of this Proposal is that there is an opportunity to generate economies of scale efficiencies. How can this be the case when the projected saving is only a mere £300,000? And even that saving is highly questionable?</p> | <p><i>The Proposal produces an annual revenue saving in the region of £300,000. The Authority believes that the Proposal, if implemented, would ensure a more efficient use of resources. Due to the current use of lump-sum funding in the funding formula, the reduction in the overall percentage that these lump sums represent is more efficient;</i></p> |
| <p>5.6.5</p> | <p>Please explain how this new Proposal will improve the cost effectiveness and efficiency in the delivery of education for current pupils at Gwernyfed High School when their private study time is reduced significantly by spending more time travelling on a bus?</p> | <p><i>The Authority recognises that there will be additional travel time required for some pupils, once the New School Building opens in Brecon. However, The Authority believes that the Proposal, if implemented, would ensure a more efficient use of resources. Due to the current use of lump-sum funding in the funding formula, the reduction in the overall percentage that these lump sums represent is more efficient;</i></p> |
| <p>5.6.6</p> | <p>Even more students will move to Hereford Sixth Form College if Gwernyfed closes which will exacerbate the problem of less money into Powys - there will be even less money to spend on those students wishing to continue their sixth form education in Brecon. Surely this is contradictory to what the council wish to achieve?</p> | <p><i>During this consultation process a number of stakeholders have stated the risk of losing post 16 learners to Hereford sixth form college, the Authority agrees that this will impact on the funding received from welsh government. M</i></p> <p><i>However, the Authority believes that establishing a tertiary model for post-16 learners, similar to that provided in Hereford, will be attractive to learners and will therefore increase the numbers of post-16 learners staying in the county.</i></p> |
| <p>5.6.7</p> | <p>Please provide costs and savings analyses based on alternative (and more real world) pupil number models which reflect the likely reduced intake at the new Brecon school.</p> | <p><i>The estimated savings have been calculated using the 2015/16 funding formula and funded pupil numbers from January 2015 PLASC.</i></p> |
| <p>5.6.8</p> | <p>How can the Council explain the predicted management savings?</p> | <p><i>The estimated management savings have been calculated by rerunning the Authority's fair funding formula. The formula funding is only providing funding for 1 management structure instead of the 2 currently funded in each school.</i></p> |
| <p>5.6.9</p> | <p>The Governing Body also questions the proposed additional funding for a split site which they describe as a 'guess' based on POWYS COUNTY COUNCIL's only other experience of a</p> | <p><i>The figures stated for split site options have been based on the current fair funding formula with the addition of a change to the formula that will be required for 2017/18 to reflect the funding of a split-site school, which is based on an additional .25 FTE teachers for each year group in Years 7 – 11, and an additional assistant head on</i></p> |

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| <p>secondary split site at John Beddoes, which was absorbed into an existing successful school. They feel it will cost much more to manage and establish a new school that requires new policies and procedures, structures, leadership team, middle management and departments. The Governing Body asks: <i>does the Council accept that the figure introduced into the costings is insufficient for the true costs of implementing the Proposals?</i></p> | <p><i>leadership scale point 12. These proposed changes were discussed with Senior Education officers and are subject to full consultation as required under the Fair Funding Formula and Scheme for Financing Schools.</i></p> |
| <p>5.6.10 As the majority of primary parents will be sending their children to English schools, does the Council accept that this will significantly impact upon the predicted savings in the Proposals?</p> | <p><i>During this consultation a number of stakeholders have voiced a concern on impact on primary schools in the catchment, should parents choose other schools or leave the area.</i></p> <p><i>The funding received by the Authority from Welsh Government through the Revenue Support Grant (RSG) only accounts for 73% of the Council’s overall net expenditure, with the remaining 27% being funded by Council Tax. Any transfer of pupils to schools in England will only impact on the first element of the funding, with the Authority losing the majority of its responsibilities for funding the education of children living in Powys, but educated in other authorities. It is the Authority’s view that the impact of this would be, at the worst case, cost neutral to the Authority and may result in an increase in the projected savings.</i></p> <p><i>The Authority would remain responsible for Home-to-School transport to their closest school, however there is a separate funding stream within the RSG mechanism which is based on population rather than actual pupil numbers.</i></p> |
| <p>5.6.11 the Proposals take no account of the financial impact upon the area’s cluster primary schools in terms of joint procurement savings (waste management, janitorial supplies, refuse collection and educational resources for</p> | <p><i>All schools are funded on a formula basis and are required to manage fluctuations in pupil numbers as one of the key drivers of the formula delivering the funding. Schools manage these changes on a day to day basis and are required to take the appropriate actions to ensure that spend is within funding provided.</i></p> |

| <p>example) - and say that there are also plans to develop opportunities for further procurement savings for the primaries in the future. The Governing Body asks: <i>will the Council acknowledge that the Proposals will adversely impact upon the primary schools and their opportunities to make financial savings?</i></p> | | | | | | | | | | | | | |
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| <p>5.7 Proposal Queries</p> | | | | | | | | | | | | | |
| <p>5.7.1 As 371 x £4248 is £1.576m, where does the figure of £1.929m come from? (p 60)</p> | <p><i>The £1,929m is the total delegated funding provided to Gwernyfed High School at the beginning of 2015/16 financial year. The funding per pupil includes the post 16 pupils and element of the formula.</i></p> | | | | | | | | | | | | |
| <p>5.7.2 Why is the Gwernyfed budget share given as £1.929m on P60 and £1.694m on P36? What is the true funding per pupil figure for Gwernyfed?</p> | <p><i>The £1,694m on page 36 excludes post 16 pupil element of the funding of £252,198 listed further down in section 7.1. The £1,929m is the funding delegated to the school inclusive of Post 16 at the start of the 2015/16 financial year.</i></p> | | | | | | | | | | | | |
| <p>5.7.3 Where does the number 946 come from?</p> | <p><i>The pupil numbers of 946 are based on the Years 7-11 pupil numbers funded to each school for the 2015/16 financial year.</i></p> | | | | | | | | | | | | |
| <p>5.7.4 Which figures are correct - P69 or P51?</p> | <p><i>The difference between the primary forecast data shown on page 51 and page 69 of the Consultation Document are due to the fact that numbers have been 'rounded up' differently in the original Excel spreadsheet.</i></p> <table border="1" data-bbox="996 1013 1814 1260"> <thead> <tr> <th></th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>Total page 51</td> <td>1847</td> <td>1890</td> <td>1955</td> <td>2020</td> <td>2018</td> </tr> </tbody> </table> | | 2016 | 2017 | 2018 | 2019 | 2020 | Total page 51 | 1847 | 1890 | 1955 | 2020 | 2018 |
| | 2016 | 2017 | 2018 | 2019 | 2020 | | | | | | | | |
| Total page 51 | 1847 | 1890 | 1955 | 2020 | 2018 | | | | | | | | |

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| | Total page 69 | 1848 | 1892 | 1957 | 2019 | 2019 | |
| <p>5.7.5 We were furnished on request with a copy of the funding formula spreadsheet. From this spreadsheet, we can have a guess at where you obtained one of the ‘Secondary merger saving’ figures - £258,278 appears far right in the ‘dual site’ row, but the figure you give for the single site is only £558,042. This is £19,460 less than the figure on P36. Which figure is correct - £558,042 or £577,502?</p> | <p><i>The £19,460 is the additional funding the school received in relation to the Sports Centre in the 2015/16 financial year. The £577,502 is the correct figure.</i></p> | | | | | | |
| <p>5.7.6 You claim a saving of £74,659 by removing the Welsh streams, but we know these are being transferred to Builth. Surely this is a redistribution of budget, not a saving, and will in fact incur extra transport costs? Please provide clarification.</p> | <p><i>The language choice element of the formula is based on the % of the curriculum delivered through both English and welsh medium. If these pupils transfer to the Builth High School site this money would be saved as it would not impact on the % delivered through both languages in Builth. The impact of pupils transferring to Builth to access welsh medium has been factored into the transport costs included</i></p> | | | | | | |
| <p>5.7.7 ‘Lump Sum’. This provides another saving of £111,736. What is ‘Lump Sum’? Explain how this saving is made.</p> | <p><i>Lump sums are based on the group size of the school which then delivers additional teacher funding. Currently lump sums totalling 5.6 FTE Teachers based on average teacher cost for the sector, are provided to the 2 schools totalling £284k. The lump sum for one school is based on 3.4 FTE totalling £173k. Therefore generating the £111k saving.</i></p> | | | | | | |
| <p>5.7.8 ‘Admin’ provides a further saving of £30,180. Demonstrate how this saving is made.</p> | <p><i>Admin allowance is based on 26 hours lump sum per school plus 4.75 hours per FTE teacher. As 2 schools there are 2 lump sums of 26 hours funding provided, with the proposed model based on one lump sum. The number of funded FTE teachers has also reduced from 58.61 as 2 schools and 52.95 as 1 school. Which delivers the remaining reduction in funding to total £30k.</i></p> | | | | | | |

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| 5.7.9 | There is a saving under ‘Technician’ of £34,077. How can this saving be the same for both a dual site and a single site school? Demonstrate how the saving is made. | <i>Technician allowance is based on 45 hours lump sum per school plus 2.6 hours per FTE teacher. As 2 schools there are 2 lump sums of 45 hours funding provided, with the proposed model based on one lump sum. The number of funded FTE teachers has also reduced from 58.61 as 2 schools and 52.95 as 1 school. Which delivers the remaining reduction in funding to total £34k. The saving is both the same for single and dual sited as the 52.95 is based on the pupil led funding of the formula which would not change from being single or split sited as it based on pupil numbers.</i> |
| 5.7.10 | Day Supervision is determined by pupil numbers, which you say are not going to change. Show how you plan to make this saving. Why is it the same for both the dual site and single site models? | <i>A lump sum is provided per 150 pupils. Both models include a reduction in pupils due to the Proposals around Post 16 education therefore the allowance provided has reduced.</i> |
| 5.7.11 | ‘Leadership Funding’ saving of £18,185. Explain how you plan to make this saving. | <i>TLR funding is based on an allowance of £3k per Funded FTE Teacher. Currently the 2 schools receive funding based on a combined FTE of 58.61 which delivers funding of £188k. Funded FTE for 1 school would reduce to 52.95 delivering funding of £170k, as the funded FTE has reduced which delivers the £18k.</i> |
| 5.7.12 | How does the funding formula you have used to produce this spreadsheet take into account the extra requirements of the interim, dual-site model? | <i>The figures have been based on the current fair funding formula (2015/16) with the addition of a change to the formula that will be required for 2017/18 to reflect the funding of a split-site school, which is based on an additional .25 FTE teachers for each year group in Years 7 – 11, and an additional assistant head on leadership scale point 12. These changes are subject to full consultation as required under the Fair Funding Formula and Scheme for Financing Schools.</i> |
| 5.7.13 | We have searched the Powys website for a fair funding formula policy document, to no avail. Where can we obtain a copy? | <i>The Scheme for Financing schools is available via the following link: http://www.powys.gov.uk/en/schools-students/school-budgets-and-finance/</i> |

| 5.8 Proposals designed to access 21st Century Schools Funding | | |
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| 5.8.1 | What is Cabinet's position if no Welsh Government money is forthcoming? It seems that there is no 'Plan B'. | <p><i>Welsh Government has allocated £80M to Powys County Council in respect of the Council's Band A 21st Century Schools' Programme. Representatives of Welsh Government liaise with Powys County Council on a regular basis, to ensure that this money is allocated and spent accordingly (progress with business cases is a regular discussion point).</i></p> <p><i>The risk to funding is negligible given these discussion and support from WG.</i></p> <p><i>The Council will develop a contingency plan in the event that this particular Proposal does not progress.</i></p> |
| 5.9 Cost Of New Building | | |
| 5.9.1 | An Internet search indicates that a new, inner city high school for 1300 pupils might cost £25-£30 Million, so why would a new rural high school for 1100 pupils cost 50 million? | <p><i>As stated in the Consultation Document, the total estimated cost for the Beacons Campus (including both school and College elements) is £45m. This is split as follows:</i></p> <p><i>School - £20m</i></p> <p><i>College - £45m</i></p> |
| 5.9.2 | Explain why a much cheaper alternative than the current Proposals, of using the £20M for the New School Building, plus retaining Gwernyfed High School, plus revamping the existing Coleg Powys buildings in Brecon, is not considered a viable option. | <p><i>Following a detailed appraisal, the most economic option is to build a new school in Brecon, as per the current Proposal.</i></p> |
| 5.9.3 | The council wishes to spend £20 million on building a new school - this figure is likely to be grossly underestimated like most council projects! Is there a contingency plan? For example if the project exceeds the budget or the construction company goes bankrupt halfway through the build? Please also confirm how much the council will need to borrow to fund this | <p><i>The £20m is funded from a combination of Welsh Government Grant, Capital Receipts and prudential borrowing. The project is not funded through cuts to other local services.</i></p> <p><i>There is always an element of risk during any construction project, and this is no different. The Authority manages risk costs by benchmarking construction costs against known indexes and sound financial and project management.</i></p> |

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| | Proposal or what cuts to other local services will be made to fund it? | <i>All contractors are vetted financially before entering into any contract – utilising a Welsh Government approved all-Wales framework with known national contractors.</i> |
| 5.9.4 | Has the future maintenance costs of the new school been taken into account when predicting building maintenance cost savings? If not, why not? | <i>The funding provided to a new school would be in line with the formula in place which delivers funding to all schools in Powys. The funding delivered to schools includes a repairs and maintenance element, it would then be a Governing Body decision as to whether they allocated a budget heading for maintenance costs.</i> |
| 5.9.5 | Please explain how you plan to open a £20m new school having spent only £11,719,000 on its construction. (Table 9 p 22) | <i>See 11.1.4</i> |
| 5.9.6 | What is your estimate of the likely interest rates for whatever borrowing may be necessary to see this project through, and why is the cost of borrowing not included in any of the financial statements? | <i>We have not included the cost of borrowing in the Proposals. The Capital strategy for the council is funded from many sources, capital receipts, reserves, grants and borrowing. We manage this strategy on an overall basis alongside our Treasury Management activity. And if and when we borrow is continually reassessed and considered. We estimate the level of borrowing required to finance the capital strategy and use PWLB Public works Loans Board interest rates to calculate the revenue implications, we have based current projections on estimated interest rate forecasts supplied by our Treasury Management advisors.</i> |
| 5.9.7 | Given the Welsh Government’s concern about your ability to fund the construction of the Beacons Campus, it is reasonable that we ask you to explain exactly how you would fund construction of the new school, in the event that money from Welsh Government was not forthcoming. | <i>As noted in the Consultation Document, the Authority would need to identify whether it could fund the school from its own capital resources, in the event that Welsh Government funding was not forthcoming.</i> |
| 5.9.8 | Given that the Welsh Government has questioned funding streams open to NPTC, please explain where NPTC will get the money to ‘invest in new facilities which will enhance the post-16 learning environment’. | <i>NPTC Group of Colleges is currently investigating ways to fund its element of the capital development in Brecon – this information is not yet known.</i> |

| 5.10 Other Questions | |
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| 5.10.1 | <p>Will we have a reduction in Council Tax/rent if Gwernyfed High closes? If not, then why?</p> <p><i>Any decision on council tax/rent is made by Cabinet and Council on an annual basis as part of the overall budget setting process. Financial settlements received by Welsh Government are a key factor in the decision making.</i></p> |
| 5.10.2 | <p>Define what is meant by “more cost-effective delivery of learning” and explain what the objective criteria are for this.</p> <p><i>The Proposal will reduce the overall funding required under the current Fair Funding Formula, and will allow the Authority to increase the pupil-led funding element of that formula.</i></p> |
| 5.10.3 | <p>How does this Proposal provide a “net saving to the Council”? Please factor in all associated new-build costs, additional transport, potential loss of pupil revenue, and the projected Brecon High School deficit.</p> <p><i>The Proposal provides an ongoing annual revenue saving to the council due to the change in the delivery model, which also nets off the additional transport costs as part of the estimated saving calculation.</i></p> <p><i>The funding received by the Authority from Welsh Government through the Revenue Support Grant (RSG) only accounts for 73% of the Council’s overall net expenditure, with the remaining 27% being funded by Council Tax. Any transfer of pupils to schools in England will only impact on the first element of the funding, with the Authority losing the majority of its responsibilities for funding the education of children living in Powys, but educated in other authorities. It is the Authority’s view that the impact of this would be, at the worst case, cost neutral to the Authority and may result in an increase in the projected savings.</i></p> <p><i>The Authority within its Schools Service Asset Management Plan has identified the need to bring all its school buildings up to a minimum of condition B over the medium term. The building in Brecon has been assessed as a condition D (life expired) building, while much of Gwernyfed has been assessed as condition C (In need of significant investment), and the Authority has built in this essential required investment into the Council Capital budget.</i></p> <p><i>On the closure of a school any cumulative deficit or surplus is written off as a one off cost to the council. The level of cumulative deficit at Brecon has reduced significantly over the last two financial years and the Authority continues to support the school in maintaining this progress.</i></p> |

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| <p>5.10.4 Why is it an acceptable mitigation for the reduction in revenue caused by pupils choosing to be educated out of county to be offset against the reduction in the new school’s delegated budget? This defeatism is the very worst sort of capitulation to the easy solution universally sought by mediocre managers – the catchment families want sustainable, good quality education in their community, and it is the job of County to ensure that this is achievable.</p> | <p><i>The funding provided to schools is primarily driven by pupil numbers, if pupil numbers decrease, then there is a reduction in the available funding for schools. This is dictated by Legislation.</i></p> |
| <p>5.11 Buildings/21st Century Schools</p> | |
| <p>5.11.1 “The 21st Century Schools Programme is designed for the rebuilding or refurbishment of schools and colleges in Wales”. This infers that the money that you are proposing to borrow could, therefore, be used for refurbishing the sites in Brecon and Gwernyfed. Can you comment on this and let me know whether this has been considered as a solution?</p> | <p><i>Option 1 within the business case addresses the refurbishment of both Brecon and Gwernyfed High Schools.</i></p> <p><i>This option was short-listed for more detailed appraisal (i.e. economic and qualitative appraisal), but failed to address key issues such as:</i></p> <ol style="list-style-type: none"> <i>1. Removal of surplus places;</i> <i>2. Size of curriculum; and</i> <i>3. Viability of schools and 6th forms.</i> <p><i>In terms of appraisal, this option performed:</i></p> <ul style="list-style-type: none"> <i>• 4/5 in the Economic Appraisal</i> <i>• 5/5 in the Benefit Appraisal</i> <i>• 5/5 in the risk appraisal</i> <p><i>This option was therefore discounted.</i></p> |
| <p>5.11.2 What guarantee has POWYS COUNTY COUNCIL received that the necessary funding will be forthcoming from the Welsh Assembly? What is the fall-back position should such funding not materialise?</p> | <p><i>Welsh Government has allocated £80M to Powys County Council in respect of the Council’s Band A 21st Century Schools’ Programme. Representatives of Welsh Government liaise with Powys County Council on a regular basis, to ensure that this money is allocated and spent accordingly (progress with business cases is a regular discussion point).</i></p> |

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| | <p><i>The risk to funding is negligible given these discussion and support from WG.</i></p> <p><i>The Council has developed a number of contingency plans in the event that this particular Proposal does not progress. These will shortly be considered by Elected Members (September Cabinet) and it is therefore inappropriate to share details at this stage.</i></p> |
| <p>5.11.3 Options 1 & 4 of the Council's Monte Carlo Appraisal include exactly the same Refurbishment Cost of £19.3m. So does that mean the "New School "in Brecon (Option 4) retains all the existing school buildings and therefore is not a "New" Building?</p> | <p><i>The refurbishment cost under this option is in respect of Gwernyfed High School and the Vocational College only, with a total new build (value £20.473M) for Brecon High School.</i></p> |
| <p>5.11.4 If buildings are retained in Options 4 and 7, please set out, for both, what the approximate Gross Internal Floor Areas are for the buildings to be (a) retained and (b) Newly Built?</p> | <p><i>Firm plans have not been developed and it is not known what elements of existing building may be retained.</i></p> |
| <p>5.11.5 Please itemise and quantify each of the Financial Opportunities that comprise the £4.3m attributed to the Gwernyfed Site and over what period they have been discounted for NPV?</p> | <p><i>For the purpose of this response, we have assumed that the £4.3M you refer to is in respect of the 'opportunities foregone' figure (i.e. the difference between £6.976M and £2.670M).</i></p> <p><i>The £4.3M difference is actually the combined (balance sheet) value of Gwernyfed HIGH SCHOOL and the Vocational College.</i></p> <p><i>The standard period of NPV discount is 60 years (based on Welsh Government guidance) and the full amount of opportunities foregone (under each option) is shown to fall in year 5 (the sixth year, as appraisals start in year zero).</i></p> <p><i>The standard discount factor for capital projects is provided by the 'green book' (guidance to five case business case model) and is shown at 3.5% for 30 years and 3% thereafter.</i></p> |

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| <p>5.11.6 Please itemise and quantify each of the estimated Cash Releasing Benefits that comprise the £5.8m attributed to the Gwernyfed Site?</p> | <p><i>We assume that this query refers to Option 1 and the treatment of ‘opportunities foregone’ as a cash releasing benefit.</i></p> <p><i>Similar to a previous question, under this option the value stated (£6.976M undiscounted, £5.873M discounted over 60 years).</i></p> <p><i>The value is actually the combined (balance sheet) value of Gwernyfed HIGH SCHOOL, Brecon High school and the Vocational College.</i></p> |
| <p>5.11.7 Please explain how the Lifecycle Costs in Option 1 are so high if the buildings are approaching the end of their useful life, (as quoted in the Consultation Document?) Isn't this just a straightforward double-counting of the Refurbishment Cost?</p> | <p><i>The approach to Lifecycle costs has been taken this way, to ensure consistency in appraisal.</i></p> <p><i>There is some truth that elements of lifecycle costs may be double counted, however, that is equally true for new schools, where much of the new build will not require ‘upgrade’ for many years.</i></p> <p><i>In four of the five options, lifecycle costs are all over £19m in value, the exception being Option 7 – which will have lower costs, due to the fact that the floor area is significantly less.</i></p> |
| <p>5.11.8 Please reconcile the Cost Contingencies built into the Refurbishment and New Build Capital Costs appraisals in options 1, 4 and 7, against the Optimism Bias (to demonstrate the safeguarding against double counting).</p> | <p><i>There are no items double counted between risk and optimism bias. Welsh Government routinely check for this when evaluating business case submissions.</i></p> <p><i>Risk has been calculated in respect of specific construction biased items (items to achieve planning permission, late start on site, business continuity failure etc.) while optimism bias must be included and includes:</i></p> <ul style="list-style-type: none"> • <i>Procurement items, mainly to do with frameworks and contractor capabilities</i> • <i>Complexities of design</i> • <i>Project Management capabilities</i> • <i>The case for change and economic/financial viability</i> • <i>Public relations issues</i> • <i>Environmental issues and</i> • <i>Impact of external influences.</i> |

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| 5.12 Comments on the Savings | |
| 5.12.1 | <p>As I understand this Proposal, as stated in the consultation document, the total monetary savings will be in the region of £350,000. Is it really a forward thinking and “transformational” for Powys County Council to propose to uproot communities, force children to sit on transport for hours per week, move pupils and staff to a school that none of them want to attend, all to save £350,000?</p> |
| | <p><i>The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education. There are only three secondary schools in Powys that have achieved a ‘good’ judgement by Estyn.</i></p> |
| 5.12.2 | <p>This Proposal is a short term solution to the financial cuts in the education budget in Powys. Is the saving of £300,000 –really worth all the upheaval?</p> |
| | <p><i>The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education. There are only three secondary schools in Powys that have achieved a ‘good’ judgement by Estyn.</i></p> |
| 5.13 Financial Advantages of the Proposal? | |
| 5.13.1 | <p>How much money will this merger actually cost and will it lead to any realistic savings for Powys Council? At the moment I have seen no evidence of any real financial advantages to this Proposal</p> |
| | <p><i>The financial assessment has been completed and is within the consultation document which consider both revenue and capital savings/costs in Section 7.1 and 7.2.</i></p> |

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| 5.14 Big Lottery Funding | |
| 5.14.1 Can the Authority give a precise figure of the Big Lottery grant funds received in respect of Gwernyfed High School? | <p><i>The Council received a grant of £345,403 in 2004 from the New Opportunities Fund (operating as the Big Lottery Fund) for the development of Playing Fields at Gwernyfed High School. The Council's liability period for this grant is from 2006 to 2026.</i></p> <p><i>The Big Lottery Fund is a consultee of this consultation. If the Proposal is implemented, it is possible that a proportion of the grant may need to be repaid. If this happens, the Council would need to identify the funding for this.</i></p> |
| 5.15 Other Comments on Finance | |
| 5.15.1 Has a valuation of Gwernyfed been carried out? What would Powys County Council hope to gain from a capital receipt for reinvestment and would any capital receipt from the sale of Gwernyfed be ring fenced for educational purposes in South Powys? How will this be demonstrated? | <p><i>Every property held by the Council carries a valuation for accounting and asset management purposes. The disposal of any asset and the use of the capital receipt is governed by the Asset Management Policy and Capital Strategy of the Council.</i></p> |
| 5.15.2 Can the Authority provide precise information on other grants for capital projects obtained for Gwernyfed HIGH SCHOOL (drama studio/dining hall/sports hall/all-weather pitches) and the terms on which those funds were given? | <p><i>No other Capital Grants have been received by the Authority in relation to Gwernyfed High School.</i></p> |
| 5.15.3 What measures will the Council be putting in place to ensure the financial mis-management at Brecon High School leading to such a chronic over spend and underinvestment (at both Schools) is not repeated (a) in any New school if it goes ahead and (b) if the two schools remain open. Will the Council be adopting a PbR framework? | <p><i>The financial position for Brecon High School as at the 31st March 2016 was a surplus balance of £107k. Forward projections show the impact of falling pupil numbers and the reduction in funding that this has. These figures do not includes action that the school will take to reduce the projected deficit. The policy for the financial management of schools is in place via the Scheme for the Financing of Schools within which all schools must comply, the Scheme sets out the powers of intervention available to the Authority when schools fail to meet the requirements.</i></p> |

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| <p>5.15.4 Figures in the table suggest that Powys makes an annual profit of roughly £35,000 on post-16 education at the expense of the Welsh Government. More importantly, and taken together with the following line, it introduces a mystery. The Welsh Government contribution to post-16 education is listed, but not the much larger contribution to 11-16 education. There may be some technical reason for this, but it is not one that the target audience for the document can be expected to understand. This is not a mere debating point. Clarity is essential in any Consultation Document</p> | <p><i>11-16 funding for Schools is provided by the Authority from its overall Budget which it delegates to individual schools this is shown as a cost to the Authority in the consultation document. Various sources of funding support the overall budget part of which is funded by Welsh Government in terms of the Revenue Settlement Grant. The funding for Post 16 Education is provided by direct grant and is hypothecated, this is therefore identified separately. The post 16 funding is governed by terms and conditions and the expenditure associated with it is subject to Annual Audit to ensure compliance. The Authority has spent 100% of the grant every year.</i></p> |
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| 6 | School Buildings | |
| 6.1 | Justification for New Buildings | |
| 6.1.1 | <p>Why does a brand new school need to be built? Although some of the buildings at Gwernyfed are old. A lot of them are relatively new. Why can they not be adapted to use as the new school site? Instead of trying to sell off such a large site which must surely have a limited market?</p> | <p><i>The overall condition of Gwernyfed High School is categorised as a C, although a few blocks are categorised as condition B.</i></p> <p><i>The Proposal is intended to create a sustainable secondary education infrastructure, with a number of benefits as outlined in the Consultation Document, that will serve both Brecon and Gwernyfed catchment areas, in facilities that are Condition A rather than the current condition C and D of the existing schools.</i></p> <p><i>The build project is not reliant on capital receipts from either site.</i></p> |
| 6.1.2 | <p>Pg. 17 - could the 'better facilities' that the new school building will incorporate be listed and explained how they will improve education?</p> | <p><i>The construction of the new school will be being funded via the 21st Century Schools Programme as a joint enterprise between Welsh Government and Powys County Council.</i></p> <p><i>It is a major, long-term and strategic capital investment programme with the aim of creating a generation of 21st century schools in Wales. The programme will focus resources on the right schools in the right places, for early years through to post-16.</i></p> <p><i>It will deliver:</i></p> <ul style="list-style-type: none"> <i>• learning environments in Wales that will enable the successful implementation of strategies for improvement and better educational outcomes;</i> <i>• greater economy and efficiency for learning environments through better use of resources;</i> <i>• A sustainable education system in Wales that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings.</i> |


The new school building would be designed to provide the appropriate level of accommodation for a 21st Century Schools Programme project. Space standards will be derived from Building Bulletin 99, and will provide appropriate teaching, social and administration accommodation for 1100 pupils. In accordance with Welsh Government requirements the school would be designed to achieve a BREEAM 'Excellent' rating as an indication of project-wide sustainability. BREEAM is the world's leading sustainability assessment method for master-planning projects, infrastructure and buildings. It addresses a number of lifecycle stages such as new Construction, Refurbishment and In-Use.

The new school building would be Condition A buildings. Investment in Information and Communications technology will provide appropriate opportunities for pupils to develop a high level of digital competency. It would be designed to be fully accessible in terms of the Equalities Act 2010.

The new school building will be based on the following design principles:

- *safe, well-lit and naturally ventilated teaching spaces throughout;*
- *naturally lit and attractive circulation spaces;*
- *flexible main hall, centrally located resource /library spaces;*
- *purpose designed teaching areas;*
- *other external areas used for educational purposes;*
- *extensive linkage options between teaching spaces to give flexibility in class sizes to suit educational requirements;*
- *special provision for pupils with disabilities;*
- *quiet areas for 1 – 1, small group provision for pupils with additional learning needs*
- *kitchen and dining areas;*
- *fully integrated, modern ICT equipment for teaching and learning;*
- *areas for community use;*
- *Sports facilities.*

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| <p>6.1.3 Explain what the realistic cost is of bringing school buildings up to Grade A or B. Explain what it is costing for each year of further delay on remedial repairs at Brecon HIGH SCHOOL.</p> | <p><i>Utilising a desktop survey, we have identified the minimum investment for upgrading the school, (please note, this is the minimum investment). Please note that the costs utilise BCIS (Building Cost Information Service), with a baseline data of March 2017. I have enclosed the spreadsheet for Brecon High School, including the methodology and caveats. We do not have the costs for each year of further delay on the remedial repairs at Brecon HIGH SCHOOL.</i></p>  <p>Copy of Brecon HS upgrade estimates 1</p> |
| <p>6.1.4 Explain why Powys County Council hasn't simply gotten on with designing and building the New School Building.</p> | <p><i>As stated in the Consultation Document, the Authority faces a number of challenging issues in delivering a sustainable high-quality secondary education, which this Proposal is intended to address.</i></p> <p><i>The Authority hasn't started the work on designing and building the new school, because it must be considered in the context of the Authority's Secondary School Reorganisation Programme and must adhere to principles of WG's 21st C Schools Programme, which are:</i></p> <ul style="list-style-type: none"> <i>• learning environments in Wales that will enable the successful implementation of strategies for improvement and better educational outcomes;</i> <i>• greater economy and efficiency for learning environments through better use of resources;</i> <i>• A sustainable education system in Wales that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings.</i> |
| <p>6.1.5 Define what is meant by "improves learning environment" and explain what the objective criteria are for this. Based upon evidence, explain why building a new Brecon High School with an in-school sixth form would not provide an</p> | <p><i>It was recognised at all consultation meetings that the condition, suitability and sustainability of Brecon High School does not provide a fit-for-purpose learning environment. Under the Schools Service Asset Management Plan, the Authority aspires to bring all its school buildings up to a minimum of Condition B. Condition A schools are new buildings.</i></p> |

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| | improved learning environment or achieve more cost-effective delivery of learning. | <i>The Proposal aims to deliver a tertiary model of education for post-16 learners. The benefits of a tertiary model are outlined in an earlier section of this Report.</i> |
| 6.1.6 | Explain why Powys County Council could not commence a new school building now with the current allocation of £24 Million, and, apparently, a further £20 Million allocated for the benefit of the NPTC Group of Colleges. | <i>Welsh Government funding is required for 50% of the Council's allocation. WG approval of three stages of business case is required to obtain that funding, and all statutory processes related to school reorganisation must be completed before WG can approve the Final Business Case.</i> |
| 6.1.7 | How dare a council, too incompetent to keep on top of these basic requirements, turn around and use them as an excuse to close a beloved community high school? It beggars belief. | <i>As stated in the Consultation Document, the Authority faces a number of challenging issues in delivering a sustainable high-quality secondary education, which this Proposal is intended to address.</i> |
| 6.2 Gwernyfed Buildings | | |
| 6.2.1 | What business case has been prepared to show how Powys County Council can retain sports facilities at Gwernyfed and sell off the school buildings? | <i>The Authority has not developed a business case around retaining the sports facilities at Gwernyfed and disposing of the school buildings, as this would pre-empt the outcome of consultation.</i> |
| 6.2.2 | Some of the best schools in the country provide education out of buildings that were built many hundreds of years ago. Please could you explain what the major defects are at Gwernyfed and provide a breakdown of exact costs? |  Gwernyfed HS Condition Survey Re |
| 6.2.3 | Gwernyfed will never be a "Condition A" building simply because of the very nature of the building. I suspect that the expenditure needed has been based upon bringing Gwernyfed up to a "Condition A" from a "Condition C" building, please confirm whether or not this is the case? | <i>The expenditure has been based on a desk top survey, which identifies the minimum investment required to upgrade the school (enclosed). But there is no reason why the building could not be brought up to a "Condition A" with adequate investment.</i> |

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| 6.3 Sale of Gwernyfed | |
| 6.3.1 | <p>Given that Powys County Council suggest the site should be sold seriously below market value can the Local Authority: Explain why the valuation is so far below market value? How they arrived at this conclusion? The process of calculation used? Or is this just a figure plucked out of the air?</p> |
| | <p><i>The Council, in disposing of any surplus asset, has the responsibility to gain best value, this has to be gauged with other priorities such as the provision of affordable housing, community delivery etc.</i></p> <p><i>All valuation exercises are undertaken by professional staff and based on special assumptions which are considered reasonable to assume given the individual circumstances of every case.</i></p> |
| 6.4 Brecon Buildings | |
| 6.4.1 | <p>The site is very small, so can you confirm that true consideration has been given to there being sufficient room for a school of 1100 pupils as envisaged by yourselves?</p> |
| | <p><i>The grounds area use at Brecon High School is 148,000 sq. m. The proposed area for the Beacons Campus is 19,027m2</i></p> |
| 6.4.2 | <p>What are the governments' recommendations for the square footage legally needed for each pupil and does the new school comply with this?</p> |
| | <p><i>The capacity of the school will be assessed in accordance with the Measuring Schools Capacity in Wales Regulations, which takes account of the use of each classroom area and provides different weightings in accordance with that usage. The calculation also includes an utilisation factor.</i></p> |
| 6.4.3 | <p>There appears to be only 9 or so spare places within this new school. Given the projected rise in primary school pupils both in Brecon and Gwernyfed catchments, do you feel that sufficient consideration has been given to the size of the school needed and should further building work be needed would there be money available for this?</p> |
| | <p><i>It is currently proposed that the new school in Brecon will be built for 1100 pupils – this takes account of projected pupil numbers, (1092 by 2021) as well as an understanding of the available capacity of other neighbouring schools.</i></p> <p><i>As stated in the Consultation Document - the current situation is that WG have only approved the first business case – the Strategic Outline Case – for the project. The next stage – Outline Business Case - was submitted in February 2016, without prejudice to the outcome of consultation. WG requested that further clarification was sought about specific issues before the OBC could be re-submitted.</i></p> <p><i>During SOC and OBC stages, there is still flexibility about the details of a project – these are only developed during the last stage – the Full Business</i></p> |

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| | <p><i>Case stage. The Authority has not carried out a more detailed survey at this stage, as that would be pre-determining the outcome of consultation. If the Proposal is supported, then the Authority will carry out a more detailed analysis of demand to ascertain the size of the new building in Brecon.</i></p> <p><i>WG would not be happy to provide capital funding for a project which opened with significant surplus places i.e. more than 25% - without a robust rationale. The impact could be a loss of capital funding from WG or reduced capital funding from WG.</i></p> |
| <p>6.5 Proposed Site in Brecon – Grounds</p> | |
| <p>6.5.1 The playing fields at Gwernyfed are vast and expertly kept; can you guarantee that pupils will have the equivalent quality and size of ground within which to take part in physical education?</p> | <p><i>The overall grounds area in Gwernyfed is an 116,000sq meters compared to the 148,000sq meters at Brecon High School.</i></p> <p><i>The grounds will be sufficient to undertake the required curriculum activity.</i></p> |
| <p>6.5.2 There seems to be little or no space for car parking and buses and still be able to provide facilities for physical education. What are the council's plans for this?</p> | <p><i>Car parking and access, including bus transport, will be an integral part of the design. As part of the planning application for the New School Building, the Highways Authorities will be one of the statutory consultees.</i></p> |
| <p>6.5.3 It is surprising that this consultation is about the closure of two schools when planning permission for a new school on the proposed site has not been sought/granted. It would appear to pre determine any future planning application. In this regard, can POWYS COUNTY COUNCIL justify its position regarding the timing of the consultation to close two schools? If building on recreational land is to go ahead how does POWYS COUNTY COUNCIL mitigate this? Is alternative recreational land being offered nearby? Where will a new school be built if</p> | <p><i>The timing of the consultation exercise is appropriate and aligned with the Business Case and RIBA stages.</i></p> <p><i>Formal consultation is required on any Proposal for a new school building – obtaining planning permission is a stage that happens during the development of the Full Business Case, and prior to Welsh Government approval of the Full Business Case.</i></p> <p><i>The New School in Brecon will be built to meet the requirements of the Building Bulletin 99 in terms of the internal and external spaces. The availability of recreational land will be considered as part of the planning process. The Authority has already had initial discussions with the planning Authority and is satisfied that the development approval can be obtained for the proposed site.</i></p> |

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| <p>planning permission is not granted at the proposed site?</p> | |
| <p>6.6 Proposed site in Brecon – Security</p> | |
| <p>6.6.1 Pupils at Gwernyfed feel safe and secure at their school without the need for fences and are country children whose parents have chosen to live in this area. Why should they have to move to a school with fences around to ensure they are secure?</p> | <p><i>Safeguarding of pupils is a key factor in the design of any new school.</i></p> |
| <p>6.7 Other Comments</p> | |
| <p>6.7.1 In order to be fair to all pupils please answer for me why that building could not be built somewhere in between Brecon and Gwernyfed, which would make the impact of the travelling time for pupils fairer.</p> | <p><i>It was agreed to build the new school in Brecon because a) the Council owns the land that has been identified for the development b) there are educational benefits of being close to other provision and facilities e.g. NPTC Group of Colleges and Brecon Leisure Centre c) it would not be cost-effective as all pupils will need to be transported, rather than some of the pupils.</i></p> |
| <p>6.8 What happens to Gwernyfed High School Site if Closed?</p> | |
| <p>6.8.1 What are the plans for Gwernyfed if it closes? If it doesn't sell we will have another Talgarth hospital and if ever there was something to be embarrassed about, that is!</p> | <p><i>If the school is closed, the School Service will commence its Asset Management Disposal Procedures as follows:</i></p> <ul style="list-style-type: none"> • <i>The sports facilities currently form part of the school estate. If the Proposal was implemented, discussions will take place with the current community users of these facilities to investigate whether a Community Asset Transfer would be feasible.</i> • <i>Investigations will take place to see if there are any other POWYS COUNTY COUNCIL or partner agency services who wish to make use of part of all of the site. If there are no expressions of interest for this, the Authority would dispose of the site and receive a capital receipt, subject to any covenants attached to the site.</i> |

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| <p>6.8.2 Pg. 17 - sale of existing school sites. Who does the council consider to be potential buyers of the school sites? In particular, Gwernyfed as a listed building and with, I believe, listed views, may prove difficult to sell.</p> | <p><i>No investigations have been undertaken about potential buyers – this will not happen until all the statutory procedures have been completed.</i></p> |
| <p>6.8.3 Jeremy Patterson also stated there was no intention to close the community sports facilities (Gwernyfed 1:50). Who does he think Powys will be able to sell a supposedly crumbling building to when the potential buyer does not have any control over the surrounding sports facilities and pitches?</p> | <p><i>If the school is closed, the School Service will commence its Asset Management Disposal Procedures as follows:</i></p> <ul style="list-style-type: none"> • <i>The sports facilities currently form part of the school estate. If the Proposal was implemented, discussions will take place with the current community users of these facilities to investigate whether a Community Asset Transfer would be feasible.</i> • <i>Investigations will take place to see if there are any other POWYS COUNTY COUNCIL or partner agency services who wish to make use of part of all of the site. If there are no expressions of interest for this, the Authority would dispose of the site and receive a capital receipt, subject to any covenants attached to the site.</i> |
| <p>6.8.4 Please explain how the closure of this school is in line with government planning policy and ensures the future sustainability of rural communities?</p> | <p><i>The Proposal is intended to create a long-term sustainable secondary provision that could provide high-quality education.</i></p> <p><i>The New School in Brecon would serve a wider catchment area which will include rural communities. However, during this consultation, many respondents have stated their view that the Proposal will have a negative impact on the community of Gwernyfed, and this has been reflected in the draft Community Impact Assessment, which will be updated and considered by Cabinet alongside this Consultation Report.</i></p> |
| <p>6.9 New Buildings in Brecon</p> | |
| <p>6.9.1 You say it improves cost effectiveness in the delivery of education, but what about the enormous capital costs.</p> | <p><i>There is a need, as evidence in the Consultation Document and raised at many consultation meetings, for a new school to replace the current Brecon High School, which is a Category D school.</i></p> |

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| | <i>Funding for the delivery of education is part of the Council's annual revenue budget whilst capital expenditure, although finance through revenue, is sourced from supported borrowing, use of capital receipts or capital grants.</i> |
| 6.9.2 If the Proposal to have a 'super school' does not go ahead I trust that Powys are still going to honour our pupils with a new build which is well overdue and certainly deserved? | <i>The Authority is acutely aware of the condition of the school buildings in Brecon, and if the current Proposal does not proceed, it will further consider actions required to provide better accommodation for the pupils.</i> |
| 6.9.3 The pupils, teachers, parents, governors and the community of Brecon and its surrounding areas have no objection to the need to replace the outdated, ill-fitting and frankly unsuitable building that is Brecon High School. However, your methods of doing so are questionable. This is the second Proposal for building a new school building, the first involved the leisure centre and this latest, the college. Neither have been acceptable to the community. What other Proposals do you have? | <p><i>The Proposal is intended to create a long-term sustainable secondary provision that could provide high-quality education.</i></p> <p><i>Both leisure and further education services form an important part of the lifelong learning strategy that the Authority and its partners are aiming to achieve.</i></p> <p><i>The Authority is acutely aware of the condition of the school buildings in Brecon, and if the current Proposal does not proceed, it will further consider actions required to provide better accommodation for the pupils.</i></p> |
| 6.9.4 Welsh Government has confirmed it does not have a workable OBC from you. This is completely at odds with the information in the CD (P37) Please explain the contradiction. | <p><i>There is no contradiction. As stated in the Consultation Document, (p37), the OBC was submitted to Welsh Government on 29th February 2016 on a without prejudice basis to any decisions that Powys County Council's Cabinet may make in connection with any statutory Proposals for school organisation following the formal consultation period, or any other decisions that might be necessary in order for the project to proceed.</i></p> <p><i>The OBC was considered by the Welsh Government Capital Funding Panel in March, and the Council is now liaising with Welsh Government officers to clarify specific elements. Once these are clarified, the OBC will be reconsidered by the Capital Funding Panel.</i></p> |
| 6.9.5 You say on P21 of the CD that '[NPTC] is also planning to invest in new facilities which will | <i>NPTC Group of Colleges are clarifying how they are to finance the investment – this will be included in the updated OBC.</i> |

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| <p>enhance the post-16 learning environment,' but you do not provide any explanation of how NPTC plans to finance this investment.</p> | |
| <p>6.10 Big Lottery Funding Prohibits Sale of Gwernyfed Site</p> | |
| <p>6.10.1 The all-weather sports pitches at Gwernyfed were purchased using £371,000 lottery fund and they retain an interest in the property for 80 years, if that is the case and Powys County Council proceed to close Gwernyfed, will they have to pay back the £371,000?</p> | <p><i>As stated in paragraph 7.3 of the Consultation Document, 'The Council received a grant of £345,403 in 2004 from the New Opportunities Fund (operating as the Big Lottery Fund) for the development of Playing Fields at Gwernyfed High School. The Council's liability period for this grant is from 2006 to 2026.</i></p> <p><i>The Big Lottery Fund is a consultee of this consultation. If the Proposal is implemented, it is possible that a proportion of the grant may need to be repaid. If this happens, the Council would need to identify the funding for this.</i></p> |
| <p>6.11 Leisure Facilities</p> | |
| <p>6.11.1 At the Gwernyfed HIGH SCHOOL consultation evening it was suggested that the sports facilities could be still used by the community. Please explain Proposals as to how the sports facilities could still be used, while not interfering with any future sale.</p> | <p><i>If the school is closed, the School Service will commence its Asset Management Disposal Procedures as follows:</i></p> <ul style="list-style-type: none"> • <i>The sports facilities currently form part of the school estate. If the Proposal was implemented, discussions will take place with the current community users of these facilities to investigate whether a Community Asset Transfer would be feasible.</i> • <i>Investigations will take place to see if there are any other POWYS COUNTY COUNCIL or partner agency services who wish to make use of part of all of the site. If there are no expressions of interest for this, the Authority would dispose of the site and receive a capital receipt, subject to any covenants attached to the site.</i> |
| <p>6.11.2 Pg. 20 ' As part of this process, the Council will consider any Proposals from the community for continued use of the community facilities located at Gwernyfed High School'. Surely this is the job of the council? It may be suggested by the community that they still want access to all the facilities. Who will allow this if the school is not there to run these facilities - an additional cost to the council? If the site is sold, this becomes even more problematic.</p> | |

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| 6.12 Gwernyfed Site/Buildings – Other | |
| 6.12.1 You state that Gwernyfed is a category C building. Can you confirm this is partly because of a lack of lifts? Has anybody done a cost analysis of installing lifts in the building? | <i>The overall assessment of Category C in terms of condition is based on the age and physical quality of the building infrastructure, with a separate analysis around the suitability of the school to provide a 21st C education. In respect of the lack of lifts in the Mansion House, part of the assessment is related to DDA compliance. Of the four blocks in the school, two blocks including the Mansion House was given a rating of C/D, with the Mansion House being rated as a D. The Mansion House is a multi-storey building.</i> |
| 6.13 Maintenance Issues | |
| 6.13.1 One of the reasons given for the Proposal is the current backlog of maintenance issues at both the Gwernyfed and the Brecon sites. It is the ongoing responsibility of POWYS COUNTY COUNCIL to manage these costs, to anticipate them and make provision for them. The current backlog is therefore a clear indicator of incompetence at POWYS COUNTY COUNCIL. Why does POWYS COUNTY COUNCIL highlight its own incompetence and use it as a justification for their own Proposals? | <i>In terms of annual repairs and maintenance, the Authority provides Gwernyfed High School with an annual revenue stream of £67,500 through the Fair Funding Formula to carry out repairs and maintenance, and statutory testing requirements. As this forms part of the delegated budget, the school can choose how much of this funding it wishes to use for repairs and maintenance.</i> <i>The Authority's capital funding for schools is either through the 21st C Schools Programme, or through the Major Repairs and Improvements Capital Budget. The Authority can fund refurbishments or remodelling of schools through either of these capital streams. However, the Authority can only fund new-build schools through the 21st C Schools Programme.</i> <i>The Authority could decide to refurbish or remodel Gwernyfed High School, but has decided to consult instead on establishing a new school in a new building.</i> |
| 6.13.2 What assurances are there that if a new school was built that there would not be a backlog of maintenance in 35 years after completion of new build? | <i>As part of the conditions of a 21st C Schools –funded building, Welsh Government would require the Authority to ensure that the buildings are maintained on a long-term basis as Condition A or B buildings. The Authority's Cabinet, as part of the Schools Service Asset Management Plan, approved in April 2016 a schools requirement to fund capital expenditure if their revenue spend is lower than an agreed level. The Cabinet also approved a five year rolling programme of condition reassessments, which will be utilised to plan future investment to ensure all buildings are maintained.</i> |

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| <p>6.13.3 Will the suggested new school not eventually become an old school building? What long term plans does the council have to prevent the suggested new site becoming 'poor quality'? Has it found a contractor and will there be guarantees in the contract? Should this Proposal go ahead until these details are sorted?</p> | <p><i>As part of the conditions of a 21st C Schools –funded building, Welsh Government would require the Authority to ensure that the buildings are maintained on a long-term basis as Condition A or B buildings. The Authority’s Cabinet, as part of the Schools Service Asset Management Plan, approved in April 2016 a schools requirement to fund capital expenditure if their revenue spend is lower than an agreed level. The Cabinet also approved a five year rolling programme of condition reassessments, which will be utilised to plan future investment to ensure all buildings are maintained.</i></p> <p><i>The New School in Brecon will be commissioned on a Design and Build basis, with the Authority’s robust contracting procedures being used to manage all aspects of the project, including post-occupancy processes. However, the Authority is not able to enter into a contract with a Contractor until Welsh Government have approved the Outline Business Case.</i></p> |
| <p>6.14 Finances – alternative Proposals</p> | |
| <p>6.14.1 It is stated in the consultation document that the amount needed to refurbish both school, namely around £20 million, is the amount you are proposing to borrow from the 21st Century Schools Programme. Would this not be better used to refurbish both schools allowing education to continue on both sites as preferred by the community, pupils and staff, rather than subjecting Gwernyfed and Brecon pupils to education in a “super school”?</p> | <p><i>There is a need, as evidence in the Consultation Document and raised at many consultation meetings, for a new school to replace the current Brecon High School, which is a Category D school.</i></p> <p><i>The project is funded on a 50/50 basis, with £10m being provided by the Welsh Government as a capital grant.</i></p> |
| <p>6.14.2 Q.16 Why has the council not looked at other ways to finance the update of Brecon High without creating such dissension within the local community. Why have Powys not considered the sale of aspects of their large property portfolio (have many tenant farmers in place on land worth</p> | <p><i>The Authority, as part of its Strategic Asset Management Plan, is reviewing its property portfolio, which includes the farm estate. Any capital receipts released through this review will be utilised to either fund its share of any new capital programmes, such as 21st C Schools, or to pay off existing capital debt. It needs to be noted that a capital receipt received from the disposal of an asset cannot be used to fund ongoing annual revenue.</i></p> |

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| <p>a lot of money) to release assets to clear the debt/provide future provisions?</p> | |
| <p>6.15 Brecon Site</p> | |
| <p>6.15.1 Have they secured land/site for this building? My understanding is that the site currently identified has deeds attached to it and it has been given to Brecon for recreational use only. If this is true and they have to look at another plot how easy will that be and where will it be and how long will it delay the build?</p> | <p><i>The land at Brecon High School which is identified for the development is already in the Council's ownership. The Authority is not aware of any deeds attached to the land.</i></p> |
| <p>6.16 Timetable for New Site</p> | |
| <p>6.16.1 Will the dual site Proposal not become two schools, left in limbo, for many years to come?</p> | <p><i>It is proposed that the dual-sited school is in place for the short period of time.</i></p> |
| <p>6.16.2 If Gwernyfed closes and my daughter has to attend a school in Brecon how can I be assured that the building work will be completed by the time she is 11? Currently she attends Hay-on-Wye CP School and we are still waiting for a new school building (this was meant to have been built by the time she started in 2015).</p> | <p><i>Once the Outline Business Case is submitted and approved by Welsh Government, the Authority will begin work on the Full Business Case, which includes procuring a Design and Build contractor, agreeing designs, submitting designs for planning approval and finalising costs. Once the Full Business Case is approved by Welsh Government, work will commence on site. It is planned that the new school will be open by 2019/20.</i></p> |

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| 7 | Surplus Places and Capacity | |
| | 7.1 Surplus Places | |
| 7.1.1 | Reduces overall surplus places' - how much research has POWYS COUNTY COUNCIL conducted to determine actually how many pupils from Gwernyfed will transfer to Brecon and not to other schools? Surely some current Gwernyfed pupils would then be nearer other secondary schools, potentially outside the county. Listening to views in the consultation evening, provision of transport is not the issue, it is the distance. | <i>The Authority has undertaken a modelling exercise which shows the closest secondary provision for Gwernyfed pupils if Gwernyfed should close based on PLASC 2014 data and PLASC 2015 data. This showed that a number of pupils live closer to Lady Hawkins and Fairfield's High School than Brecon High School.</i> |
| 7.1.2 | Reduces overall surplus places-- Does it? What about all the pupils who will travel over the border? Lady Hawkins are already offering to run a bus service from the Clyro area!! | <i>The Proposal will reduce overall surplus places – there are currently 36% surplus places at Brecon High School and 20% at Gwernyfed High School. It is currently proposed that the new school in Brecon will be built for 1100 pupils – this takes account of projected pupil numbers, (1092 by 2021) as well as an understanding of the available capacity of other neighbouring schools. As stated in the Consultation Document, Fairfield's High School is over capacity, although Lady Hawkins has spare capacity. Crickhowell High School is at capacity, whilst Builth Wells has spare capacity.</i> |
| 7.1.3 | Gwernyfed has the lowest surplus places at 20% and according to the data provided by the Council will achieve the required 15% by 2019, that's only three years away. The catchment is growing and only last week the National Park Planning Authority gave permission for over 80 houses in the Hay area. This number was not factored in at the time of the Proposal and will need to be considered along with other potential building developments. | <i>Comment noted – in any new build project, the Authority considers potential housing developments in any area.</i> |

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| <p>7.1.4 If we assume Gwernyfed closes and also assume that you fulfil the commitment to build new primaries in the catchment, I foresee that you will in very short time face a greater surplus of places in the newly built primaries caused by the emigration of families to areas served by a secondary school i.e. Herefordshire, Monmouthshire High School, etc. Can you confirm that this scenario has been considered and planned for?</p> | <p><i>The size of the new primary schools in the catchment has been based on an assessment of pupil projections in agreement with all the schools.</i></p> |
| <p>7.1.5 Recognise that increased demand makes so-called “surplus places” a red herring.</p> | <p><i>The Authority recognises that Increased demand for school places would lead to a reduction in the level of surplus places at any school. Please see 3.1.2</i></p> |
| <p>7.1.6 Powys County Council must go on record to explain its own culpability, as to why 262 pupils aged 16-19 are studying outside the county.</p> | <p><i>The Authority supports schools to deliver a post-16 curriculum that meets the requirements of the Learning and Skills (Wales) Measure 2009. The Authority has received a decreasing post-16 settlement from the Welsh Government for a number of years, which has meant that schools, with support from the Authority, have implemented a collaborative partnership model, where learners can travel (during the school day) between schools/college to study subjects in different option blocks.</i></p> <p><i>However, as funding reduces, the number of subjects available at each school and collaboratively has also reduced. Post-16 providers outside the county are able to provide a broader range of subjects which allows real choice for learners – they are not constrained to subjects within the option blocks, as they are in Powys.</i></p> <p><i>During the consultation, a number of pupils – pre and post-16, have provided their views about the current state of post-16 education in Powys. Some pupils stated that they are content with the collaborative model that Powys schools offer; others choose subjects within their own institution, sometimes at the detriment of their preferred choice whilst others have suggested that the opportunities provided at larger institutions are more attractive to them, and they are willing to travel in order to get these opportunities in one location.</i></p> |

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| <p>7.1.7 The impact of parents seeking alternative secondary provision may negate the requirement for a secondary school of this size and could result in the new school operating significantly under capacity. Why has the Council not proceeded with more detailed survey to determine the likely effects of such a scenario? What would be the financial implications if it is forced to operate at significant under capacity, with the associated loss of delegated funding?</p> | <p><i>As stated in the Consultation Document - the current situation is that WG have only approved the first business case – the Strategic Outline Case – for the project. The next stage – Outline Business Case - was submitted in February 2016, without prejudice to the outcome of consultation. WG requested that further clarification was sought about specific issues before the OBC could be re-submitted.</i></p> <p><i>During SOC and OBC stages, there is still flexibility about the details of a project – these are only developed during the last stage – the Full Business Case stage. The Authority has not carried out a more detailed survey at this stage, as that would be pre-determining the outcome of consultation. If the Proposal is supported, then the Authority will carry out a more detailed analysis of demand to ascertain the size of the new building in Brecon.</i></p> <p><i>WG would not be happy to provide capital funding for a project which opened with significant surplus places i.e. more than 25% - without a robust rationale. The impact could be a loss of capital funding from WG or reduced capital funding from WG.</i></p> |
| <p>7.1.8 Please explain how a surplus in a school impacts education? Surely the less crowded the classroom, the more one to one tuition a pupil can enjoy?</p> | <p><i>The Welsh Government and the Welsh Audit Office have identified that the funding and provision of excessive surplus places results in funding being spent on unrequired places rather than directly on the education of children. The position in the secondary sector is not as significant as it is in small primary schools. The Authority is required to plan and manage the level of surplus places and to ensure that it provides a cost-efficient and effective education. The Proposal will reduce the overall funding required under the current Fair Funding Formula, and will allow the Authority to increase the pupil-led funding element of that formula.</i></p> |
| <p>7.1.9 Please explain why you want to spend tens of millions of pounds building a new school to resolve a surplus places issue which - by your own admission – will not exist by the time building is complete.</p> | <p><i>The Proposal is not intended to resolve a surplus places issue alone, but is intended to solve a number of issues in order only to create a sustainable secondary education infrastructure, with a number of benefits as outlined in the Consultation Document, that will serve both Brecon and Gwernyfed catchment areas, in facilities that are Condition A rather than the current condition C and D of the existing schools.</i></p> |

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| <p>7.1.10 Uncertainty over the last 6 years has meant that parents have and continue to source alternative schools (Crickhowell, Fairfield, and Christ College) to ensure a secure education for their children. Likewise, surplus places are rising in BRECON HIGH SCHOOL with it continuing to be in special measures and running in substantial debt LLCC argue that certainly around the future of GWERNYFED HIGH SCHOOL would reverse this trend and pupil numbers at GWERNYFED HIGH SCHOOL would increase. How does POWYS COUNTY COUNCIL justify its role in allowing such a situation to happen and then use the surplus places factor as a reason to close GWERNYFED HIGH SCHOOL?</p> | <p><i>Any school reorganisation programme causes uncertainty – the issues facing secondary education in particular triggered a review of secondary schools in 2010/11, and Cabinet, at the time, agreed certain recommendations. However, the problems facing the secondary sector have not gone away, but have increased. Powys, along with every local Authority, has a duty to ensure the sustainability of its education infrastructure, to manage school places and to ensure that schools can deliver the highest quality education within the financial and demographic constraints placed upon them.</i></p> |
| <p>7.1.11 Considering the proposed size of the new school and based on numbers in the report, it would appear that transferring pupils from GWERNYFED HIGH SCHOOL and BRECON HIGH SCHOOL and deducting the number of Welsh Language and post 16 pupils (not to mention those who will potentially move out of County) means there will be a high percentage of surplus places. If one of the reasons for closure is to reduce surplus places how does POWYS COUNTY COUNCIL explain this position?</p> | <p><i>It is currently proposed that the new school in Brecon will be built for 1100 pupils – this takes account of projected pupil numbers, (1092 by 2021) as well as an understanding of the available capacity of other neighbouring schools. If the Proposal is supported, then the Authority will carry out a more detailed analysis of demand to ascertain the size of the new building in Brecon before submitting the FBC for the project to WG.</i></p> |

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| 8 | Impact on Pupils and Wellbeing | |
| | 8.1 General Questions | |
| 8.1.1 | Explain how the loss of in-school sixth forms, loss of the Welsh-medium secondary education stream, having no choice locally but to attend a FE College to study A levels, and travelling further means that pupils in Brecon and Gwernyfed High Schools will enjoy opportunities that are <i>equal</i> (in terms of the 'best possible education') to those of all other high school pupils in Powys. | <i>The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education.</i> |
| 8.1.2 | Given Powys County Council is claiming to comply with UN Convention for the Rights of the child, where in the documentation is it evidenced that Articles 3, 12, 19, 24, 28 and 31 have been complied with, as applied to Gwernyfed High School? | <p><u>Article 3</u> <i>The Proposal is aligned with the requirements of the Welsh Government's School Organisation Code, which states that 'Relevant bodies should place the interests of learners above all others. With reference to the key questions of the Office of Her Majesty's Chief Inspector of Education and Training in Wales (Estyn), they should give paramount importance to the likely impact of the Proposals on the quality of: • outcomes (standards and wellbeing); • provision (learning experiences, teaching, care support and guidance, and learning environment);and • leadership and management (leadership, improving quality, partnership working and resource management)'</i></p> <p><i>Section 5 of the Consultation Document addresses all these issues. The Draft Equality Impact Assessment has assessed the impact on pupils from the Gwernyfed catchment area.</i></p> <p><u>Article 12</u> <i>In accordance with the School Organisation Code, all pupils in Gwernyfed High School received the Consultation Document, either the main document or the</i></p> |

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| | <p><i>young people’s version. Both were made available on the Council’s website. In the Consultation Report, the views of children and young people will be highlighted and given due weight. This is evidenced on page 2 of the Consultation Document – Consultation Details.</i></p> <p><u>Article 19</u> <i>This is evidenced at 5.1. i)</i></p> <p><u>Article 24</u> <i>This is evidenced at 5.1 i)</i></p> <p><u>Article 28</u> <i>The Proposal is intended to ensure a long-term sustainable model of secondary education, with access to academic and vocational provision available at the New School in Brecon. This is evidenced in section 4.1 and section 5 of the Consultation Document.</i></p> <p><u>Article 31</u> <i>The Consultation Document, and the Equality Impact Assessment, identifies that there would be a negative impact on pupils from the Gwernyfed catchment who would be less able to access after-school activities due to the travel requirements. Section 4.3 provides the mitigation for this risk.</i></p> |
| <p>8.2 Impact on Primary School Provision</p> | |
| <p>8.2.1 Has the Council attempted to quantify the social and economic effect of the long threatened closure of Gwernyfed High School on the local primary schools?</p> | <p><i>No, the Authority has not quantified the social and economic effect of the closure of Gwernyfed High School on the local primary schools. However, during this consultation exercise, many respondents have expressed a view that parents will choose to send their pupils to primary and secondary schools in England, should the Proposal be implemented, which would have an impact on the local primary schools.</i></p> |

| 8.3 Emotional Impact | | |
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| 8.3.1 | How will morale be maintained among children and pupils during and following the transition period? | <i>It is the responsibility of schools to ensure the well-being of their pupils and the schools would be expected to provide appropriate support to their pupils during and after the transition period.</i> |
| 8.3.2 | Do you realise what you are doing and the worries and pressures that you are enforcing on pupils that are attending the school? Think of all the children that are in Primary schools, especially year six pupils who are anxious about transferring as it is. The pressure YOU are putting on pupils, parents and families is not acceptable. | <p><i>The Authority is committed to ensuring the welfare of all children, and accepts that any school reorganisation Proposal creates a period of uncertainty for the pupils involved.</i></p> <p><i>The Proposal is aligned with the requirements of the Welsh Government's School Organisation Code, which states that 'Relevant bodies should place the interests of learners above all others. With reference to the key questions of the Office of Her Majesty's Chief Inspector of Education and Training in Wales (Estyn), they should give paramount importance to the likely impact of the Proposals on the quality of:</i></p> <ul style="list-style-type: none"> <i>• outcomes (standards and wellbeing);</i> <i>• provision (learning experiences, teaching, care support and guidance, and learning environment);and</i> <i>• leadership and management (leadership, improving quality, partnership working and resource management)'</i> <p><i>Should the schools close, the new school would be expected to provide support to pupils to aid their transition. The Authority is keen to conclude this process as swiftly as possible in order to minimise this period of uncertainty for pupils.</i></p> |
| 8.4 Mental Health Impacts | | |
| 8.4.1 | This is not an acceptable way to treat young people. Who will take responsibility for increased mental health problems when all these things start getting on top of them? | <i>As stated in the Consultation Document, 'Any change of school and any disruption not of the learner's or their family's choosing is going to have some impact on feelings of wellbeing. Mitigation of the negative effects of this especially for those with additional needs will need to be well planned and allow for individual plans of support to be in place.</i> |
| 8.4.2 | Please answer for me what welfare and counselling provision will you put in place to assist children who are emotionally affected by these changes? | <i>Those with difficulties in managing change; many of whom may be on the autistic spectrum, will be of particular concern given the number attending Brecon High School. However, with careful planning and professional support, the process of</i> |

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| <p>8.4.3 The pupils are also affected. As a pupil in a school labelled as a ‘failing school’, means that the children consider themselves failing. There is increased pressure to succeed, because to fail means responsibility for the failing of the school as a whole. What are your strategies for dealing with these additional stressors on the mental health and wellbeing of the pupils?</p> | <p><i>change to what will be a new and better environment may be seen as a potential for learning that will enable those young people to cope better with adult life.</i></p> <p><i>The school would be encouraged to conduct person-centred reviews and planning which will be very helpful in providing the circles of support and hearing the voice of the young people during this period.’</i></p> |
| <p>8.5 Other Health/Wellbeing Impacts</p> | |
| <p>8.5.1 Will the obesity rate increase if the School closes as many pupils will turn to social media to keep in touch with friends in different area of Powys?</p> | <p><i>The Authority does not believe that the obesity rate will increase if the Proposal is implemented. The new school in Brecon will have modern sports facilities, and children will be encouraged to participate in sporting activities.</i></p> |
| <p>8.5.2 Explain how the Final Business Case and Proposals fulfil each goal of the <u>Well-Being of Future Generations Act 2015</u>.</p> | <p><i>A Single Integrated Impact Assessment has been completed – this includes the impact of the Proposals on the goals of the Well-being of Future Generations Act 2015.</i></p> |
| <p>8.5.3 What support is being given to pupils, primary pupils, parents and teachers with all of this uncertainty to enable them to maintain well-being for all students?</p> | <p><i>The Authority acknowledges that any school reorganisation Proposal will lead to a period of uncertainty for staff working in any school affected by the Proposal. As stated in the Consultation Document:</i></p> <p><i>‘It is hoped that the transparency of the process and the ability of staff to participate in the consultation exercise will help to reduce the levels of demotivation</i></p> <p><i>It is also hoped that the prospects of being part of a transformational development including a New School with better facilities may go some way to mitigating this risk</i></p> <p><i>Should the Proposal be implemented, the Council would establish a Management of Change work stream to work closely with the staff and shadow governing body, ensuring that transition arrangements are managed well.’</i></p> |

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| <p>8.5.4 The questions for the local Authority to answer, given the above, are if you destroy most of the activities for young people in our 12 communities, how will Powys County Council comply with the Wellbeing and Future Generations Act 2016 to ensure that: Young people in the Gwernyfed catchment area will have a society in which to grow up where their physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood? Young people in the Gwernyfed catchment area will have attractive, viable, safe and well-connected cohesive communities in which to grow up? Young people have a society in which to grow up that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, sports and recreation? Given the range of statutory breaches why are the Chief Executive and senior Legal Adviser still in post?</p> | <p><i>A Single Integrated Impact Assessment has been completed which considers the goals of the Wellbeing and Future Generations Act. A draft Community Impact Assessment, along with an equality and Welsh Language impact assessment, were published as part of this consultation and will be updated to include information gathered during the consultation. Cabinet will need to consider these alongside the Consultation Report prior to making any further decisions about the two schools.</i></p> <p><i>The Authority is not aware of any statutory breaches that would require the Chief Executive and senior Legal Advisor to leave their posts.</i></p> |
| <p>8.6 Intercommunity/School tensions</p> | |
| <p>8.6.1 There is bit of a rivalry when it comes to Brecon and Gwernyfed, in both school sports, and in club sports (rugby), so what would happen if we were to come together? Would the two clubs remain as they are, or would they again close down to make one big rugby club? Over 50 years of fierce competition and rivalry would be lost forever, and for the actual players themselves, cutbacks on the teams would have to be made. For example, in my team (Gwernyfed R.F.C under 14's), we have around 20 players on our team, which is perfect as we are able to evenly make subs and give</p> | <p><i>Comment noted. The arrangements for team sports would be the responsibility of the school and any sports clubs.</i></p> |

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| <p>people game time. But if we add in Brecon's under 14 side, we'd have around 40 players, for one team, which is completely out of the question!</p> | |
| <p>8.7 After School Clubs/Sports Teams – Risk to Sustainability of Clubs</p> | |
| <p>8.7.1 What measures will be taken to ensure pupils are able to participate?</p> | <p><i>As stated in the Consultation Document, the Authority has recognised that pupils from the Gwernyfed area may not be able to access after-school activities due to reliance on home-to-school transport. As a way of mitigating this, the Consultation Document states:</i></p> |
| <p>8.7.2 Some pupils from the current Gwernyfed catchment area will be on a bus for up to 2 hours per day. How will these pupils be able to participate in after school activities such as sports training?</p> | <p><i>'The New School would be encouraged to provide as many extra-curricular opportunities during the school day, and the Council would work with the school to explore possible transport solutions, including the use of public transport</i></p> |
| <p>8.7.3 You are saying the school will be encouraged to put on extra-curricular activities during the day - will that not have an impact on the learning time?</p> | <p><i>The majority of pupils attending Gwernyfed High School are currently reliant on home-to-school transport and their ability to access after-school activities would be similarly affected if the Proposal is approved.'</i></p> |
| <p>8.7.4 I go to Gwernyfed High School for football training with my twin brother. Where will we train if the school closes? Can Powys County Council explain how they are going to address the needs of Gwernyfed catchment children and the provision of after school clubs at both secondary and primary level?</p> | <p><i>If the Proposal is implemented, the Council would investigate the possibilities for retaining leisure facilities at the Gwernyfed High School site.</i></p> |
| <p>8.7.5 How will these children be able to participate in after school activities? For example my son plays county golf at a high standard - how would he be able to continue with this sport during the week as he would have reduced evening study time owing to the increased travel times.</p> | |

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| 8.7.6 | What plans does the Council have to help community groups, sports clubs and cultural groups continue in light of the fact that they may lose many pupil members and volunteers as a result of these changes. | |
| 8.7.7 | What measures will be taken to ensure pupils are still able to participate in community life in and around the Gwernyfed catchment area? | |
| 8.8 After School Clubs/Classes – Impact of Transport Problems on Participation | | |
| 8.8.1 | What measures will be taken to ensure that all pupils have equal access to such activities given the transportation difficulties? | See 8.7 |
| 8.8.2 | I want to know how they (my children) will continue this vital part of their education if they have to go to school in Brecon. They will not be able to walk home from there. Is POWYS COUNTY COUNCIL going to provide transport? The consultation document suggests that extra-curricular activities could be included in the school day - how could that happen without having a negative effect on their regular lessons? | See 8.7 |
| 8.8.3 | How will pupils be able to fairly access important extracurricular activities and revision sessions? | See 8.7 |
| 8.8.4 | How will these pupils be able to participate in after school activities such as sports training? | See 8.7 |
| 8.8.5 | How will the New School provide extra-curricular activities during a school day which is already packed from registration to the end of the day, especially for year 10 and 11 students who | See 8.7 |

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| | <p>already have an over-full timetable? How does a school timetable “accommodate extra-curricular activities during the school day”, when It is already filled with academic, vocational and wider educational commitments? From where, within a full timetable, will this additional ‘extra-curricular time’ be conjured?</p> | |
| 8.8.6 | <p>How will children outside of the main public transport routes, be able to take advantage of public transport. There is no public transport to Llanfihangel Talyllyn and many other villages.</p> | <p><i>Children will be reliant on parental transport outside the main public transport routes, in the same way as they are currently are.</i></p> |
| 8.8.7 | <p>How will the contingency put forward by POWYS COUNTY COUNCIL address the impact that moving children to a Brecon based school will have on Talgarth, Glasbury, Hay etc... Clubs and societies.</p> | <p><i>The Authority has not put forward a contingency plan. However, the issue has been identified within the draft Community Impact Assessment. This will be updated and finalised to take account of issues raised during the consultation period.</i></p> |
| 8.8.8 | <p>What measures will be taken to ensure pupils are still able to participate?</p> | <p><i>See 8.7</i></p> |
| 8.8.9 | <p>POWYS COUNTY COUNCIL omits to mention the additional financial burden that transport would place on families, and which may compound the problem of reduced access to these activities. Has there been an analysis of the improvement in grades gained by students who attend after school homework clubs? What reduction in attainment does the Council find an acceptable price to pay for this Proposal, how did it reach the decision, and how has it been measured?</p> | <p><i>The aim of the Proposal is to ensure a sustainable, long-term model of high-quality education. The Authority’s aim is to increase attainment rates. The Authority is also aware of the additional value that after-school homework clubs can bring to a pupil.</i></p> |

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| <p>8.8.10 The Formal consultation document should have included detailed planning / research, to show if it is realistic to increase school day activities / achieve public transport solutions. So as to determine if it is possible to alleviate this serious risk to the wellbeing of children. We ask POWYS COUNTY COUNCIL to answer the case that it has a moral and ethical requirement to conduct this work to inform its judgement, prior to any decision to close Gwernyfed school.</p> | <p><i>Comment noted. This has been already been identified as a significant risk in Consultation Document, and reflected in the impact assessments that will be considered by Cabinet alongside the Consultation Report.</i></p> |
| <p>8.8.11 The Statutory Schools Organisation Code: Where Proposals involve the transfer of learners to alternative provision there should normally be evidence that the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners. (Paragraph 1.3). -Can the local Authority explain why it thinks a breach of statutory responsibility is acceptable?</p> | <p><i>The Authority is not in breach of its statutory responsibility. In accordance with the School Organisation Code which states 'Where Proposals involve the transfer of learners to alternative provision there should normally be evidence that the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners (including learners with SEN)' the Code states that 'Advice from Estyn might reasonably be judged as evidence in relation to alternative provision which is brand new.'</i></p> <p><i>Estyn is a statutory consultee and would be compromised if it gave an opinion on a Proposal before the consultation process. Estyn's response is included in the Consultation Report.</i></p> |

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| 9 Impact on Staff, Leadership and Management | | |
| 9.1 Insecurity | | |
| 9.1.1 | What happens to the current staff at Gwernyfed and Brecon high schools? | <p><i>As stated in paragraph 7.2 of the Consultation Document, 'If the Proposal is implemented, a new staffing structure would be developed in conjunction with the shadow governing body. The structure would be developed to deliver the school's business plan and implemented in accordance with the relevant HR Policies for teaching and support staff'.</i></p> <p><i>'If the Proposal is implemented, there would be a reduction in the number of the cleaning, caretaking and catering staff. The catering staff at both schools are employed centrally by the Council, whilst the cleaning and caretaking staff are funded through the schools; delegated budget, with a mixture of employment status across both schools.' For all staff where a reduction in numbers is being implemented a fair and transparent process will be followed</i></p> |
| 9.2 Disruption | | |
| 9.2.1 | As year 11 pupils, we raised concerns about whether we would lose A-level teachers in GWERNYFED HIGH SCHOOL sixth form halfway through our courses due to closure and lack of job security for staff. ... How can you justify allowing this to happen and for pupils to be placed in this situation? | <p><i>The Consultation Document explains the reasons why change is necessary. The Consultation Document also highlights a risk for staff 'Staff at both current schools are demotivated and some may choose to leave before the New School is established, affecting their ability to deliver the curriculum.</i></p> <p><i>It is hoped that the transparency of the process and the ability of staff to participate in the consultation exercise will help to reduce the levels of demotivation</i></p> <p><i>It is also hoped that the prospects of being part of a transformational development including a New School with better facilities may go some way to mitigating this risk</i></p> |

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| | | <i>Should the Proposal be implemented, the Council would establish a Management of Change work stream to work closely with the staff and shadow governing body, ensuring that transition arrangements are managed well.'</i> |
| 9.3 Retention/Recruitment | | |
| 9.3.1 | What is the impact of the possible loss of high quality staff due to the loss of post-16 provision? | <i>The Consultation Document has recognised that staff retention may be an issue should the Proposal be implemented. It states:</i> |
| 9.3.2 | Have you considered the potential loss of inspirational and talented teachers we currently have? Workers in Powys are currently on average the lowest paid in Wales, have you considered the additional impact this decision will make on the difficulty of attracting bright, talented and motivated teachers for our children in Brecon? | <i>'It is hoped that the transparency of the process and the ability of staff to participate in the consultation exercise will help to reduce the levels of demotivation</i> <i>It is also hoped that the prospects of being part of a transformational development including a New School with better facilities may go some way to mitigating this risk</i> |
| 9.3.3 | What is your plan to hold on to good teachers, who with so much uncertainty will surely be looking to secure alternative positions at other schools? What incentives are you offering them whilst their workload and class sizes increase, job security decreases, uncertainty and lack of job satisfaction increases? Lack of commitment and support from the local Authority may result in lack of commitment and support from teachers to children. | <i>Should the Proposal be implemented, the Council would establish a Management of Change workstream to work closely with the staff and shadow governing body, ensuring that transition arrangements are managed well.'</i> <i>There are a number of 11 – 16 schools in Wales and beyond. There is evidence that good quality teachers choose to teach in these schools, as well as 11 – 18 schools: Evidence can found in Estyn Inspection Reports, and in the National Categorisation of Schools. In 2015/16, both 11 – 16 and 11- 18 schools appear in all four support categories, indicating that no specific model is better than the other.</i> |
| 9.3.4 | Why has Retention not been included as a risk of increased travel time? How will this negative impact be addressed? | <i>Discussions have taken place with a number of other authorities, where there are 11 – 16 and 11 – 18 schools. As evidenced by Estyn reports and the National Categorisation of Schools, performance of schools within both categories is varied.</i> |
| 9.3.5 | What evidence has been looked at to see if there is a detrimental effect on staff morale and | |

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| | <p>continuing professional development when A' Level teaching is removed from their portfolio. What work has been done to analyse the risk assessment on staff retention, for those staff who would lose A' Level teaching?</p> |
| <p>9.3.6 Does the Council agree there can be no savings on the cost of technicians and that any cuts to technicians would create an increased Health and Safety risk?</p> | <p><i>Technician allowance is based on 45 hours lump sum per school plus 2.6 hours per FTE teacher. As 2 schools there are 2 lump sums of 45 hours funding provided, with the proposed model based on one lump sum. The number of funded FTE teachers has also reduced from 58.61 as 2 schools and 52.95 as 1 school. Which delivers the remaining reduction in funding to total £34k.</i></p> |
| <p>9.3.7 Mid-Day Supervisors: the provision for these is based upon a pupil/staff ratio. The Governing Body asks: <i>does the Council agree that with the same number of pupils there can be no savings here?</i></p> | <p><i>A lump sum is provided per 150 pupils. Both models include a reduction in pupils due to the proposals around Post 16 education therefore the allowance provided has reduced.</i></p> |
| <p>9.4 Morale</p> | |
| <p>9.4.1 What are your strategies for addressing the stresses and negative impact of these current Proposals on our children and their staff?</p> | <p><i>The Authority is committed to ensuring the welfare of all children, and accepts that any school reorganisation Proposal creates a period of uncertainty for the pupils involved.</i></p> <p><i>The Proposal is aligned with the requirements of the Welsh Government's School Organisation Code, which states that 'Relevant bodies should place the interests of learners above all others. With reference to the key questions of the Office of Her Majesty's Chief Inspector of Education and Training in Wales (Estyn), they should give paramount importance to the likely impact of the Proposals on the quality of:</i></p> <ul style="list-style-type: none"> <i>• outcomes (standards and wellbeing);</i> <i>• provision (learning experiences, teaching, care support and guidance, and learning environment);and</i> <i>• leadership and management (leadership, improving quality, partnership working and resource management)'</i> |

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| | | <i>Should the schools close, the new school would be expected to provide support to pupils to aid their transition. The Authority is keen to conclude this process as swiftly as possible in order to minimise this period of uncertainty for pupils.</i> |
| 9.5 Travel Between Sites | | |
| 9.5.1 | It has not yet been confirmed that it will be teachers who will travel between the two sites to deliver the subjects and not the children travelling between the two sites therefore this needs to be clarified. | <i>Pupils will not be expected to travel between sites during the transition period. It is not expected that teachers will travel between sites either, apart from the senior leadership team. However, it will be the decision of the governing body whether it wishes to teach some subjects on one of the sites.</i> |
| 9.5.2 | (Will there) be compensation for travel costs and time or will staff lose lunch, breaks etc.? | <i>The school will be funded in accordance with the Authority's Fair Funding Formula which includes a split-site allowance. It is the responsibility of the governing body how it wishes to utilise the split-site allowance.</i> |
| 9.5.3 | What about staff without cars, how will you ensure that they are not discriminated against when considering their application for employment? | <i>The recruitment process will be implemented in accordance with HR Policies – staff without cars will not be discriminated against.</i> |
| 9.6 Staff Contracts | | |
| 9.6.1 | How do you propose to staff the new school (on two sites) using existing contracts? | <i>As stated in paragraph 7.2 of the Consultation Document, 'If the Proposal is implemented, a new staffing structure would be developed in conjunction with the shadow governing body. The structure would be developed to deliver the school's business plan and implemented in accordance with the relevant HR Policies for teaching and support staff'. Staff would receive new contracts which will specify their location of work during the transition phase to the new school.</i> |
| 9.6.2 | Are you confident that the Human Resources department is sufficiently staffed to deal with this matter efficiently, as the timeframe is very tight? | <i>The HR department is sufficiently resourced.</i> |

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| <p>9.6.3 Do you think that you have sufficient time in your timetable to appoint a new Head, re-structure, negotiate new contracts and slot in's plus redundancies all before September 2017. All of which need to comply with employment law and your employment policies?</p> | <p><i>The Authority has experience of stablishing a new school through the amalgamation of two schools within a period of two terms. However, the Authority recognises that it is now more challenging, due to the Cabinet decision date slipping by 3 weeks from that originally planned.</i></p> |
| <p>9.6.4 Will staff contracts reflect that staff will be expected to work on two sites?</p> | <p>See 9.6.1</p> |
| <p>9.6.5 Will there be pay protection for <u>ALL</u> staff who lose a higher paid post?</p> | <p><i>Under Powys County Council Policy pay protection does not apply where staff are appointed to a lower paid post as a result of change processes. Instead a compensatory payment for so-called loss of office will be pro rata of the redundancy payment and is based on the actual reduction; i.e. if the employee accepts a 50% reduction in hours, then the compensatory payment will be 50% of the amount payable as if the whole post had been made redundant. (These compensatory payments are subject to both tax and national insurance deductions). The exception to pay protection relates to Teaching and learning responsibility (TLR) payments which are safeguarded for a period of 3 years.</i></p> |
| <p>9.7 Governing Body</p> | |
| <p>9.7.1 The Governing Body is dismayed that the governing body's good work over the last 5-6 years has been swept aside by POWYS COUNTY COUNCIL and ask: <i>how can the Council declare an ambition to establish an effective and resilient leadership team and then destroy one that already exists?</i></p> | <p><i>As this issue relates to Gwernyfed High School, the Authority acknowledges that the governors and leadership of the school have worked very hard over the last 5 – 6 years, and, in particular, the Authority congratulates the school for its work in coming out of the category of Estyn Monitoring, earlier this year.</i></p> <p><i>Estyn, in its 2013 inspection report, applauds the governance and leadership of the school</i></p> <ul style="list-style-type: none"> • <i>the leadership has established a clear strategic direction that has secured an upward trend of improvement;</i> • <i>a strategic group of effective middle leaders works well with the management team in implementing changes that are contributing the further improvement in outcomes; and</i> |

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| | <ul style="list-style-type: none"> • <i>The Headteacher and senior management team have a thorough understanding of the strength and areas for development improvement for the school.</i> <p><i>However, the aim of the Proposal is to establish a secondary school infrastructure that is sustainable in the long-term, and can provide the highest quality education. The reasons for change are documented in the Consultation Document.</i></p> <p><i>With any school reorganisation, the establishment of a new school would require an effective and resilient leadership team.</i></p> |
| <p>9.8 Leadership Team</p> | |
| <p>9.8.1 'The new leadership team should be at least as good as the current leadership and management teams.' What performance criteria are POWYS COUNTY COUNCIL using for the Leadership of its schools in its Secondary Schools' Transformation Programme?</p> | <p><i>Leaders and Managers in Powys schools are expected to meet the standards set out in the Revised Professional Standards for Education Practitioners in Wales 2011.</i></p> |
| <p>9.9 Leadership in General</p> | |
| <p>9.9.1 Can POWYS COUNTY COUNCIL guarantee that they can create a leadership team that is as dynamic, and as effective as the current Gwernyfed team, under their new Proposals, and if so, how?</p> | <p><i>The Shadow Governing Body would be formed from amongst those governors currently serving on the governing bodies of Llandrindod and Builth Wells. Expressions of interest to serve on the shadow governing body would be invited, and it is anticipated that those individuals would be best placed to determine whether they have the available time to commit.</i></p> <p><i>The new governing body would be established in accordance with the the Education Act 2002, Part 3, Chapter 1, which sets out the framework for the establishment of governing bodies. All school governing bodies are a combination of appointed or elected governors of various types. The composition of each governing body will depend upon the number and age range of pupils at the school and the category of the school i.e. community,</i></p> |

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| | <p><i>community special, foundation, voluntary aided (VA), voluntary controlled (VC) or maintained nursery (MN). The membership of each governing body will be set out in the Instrument of Government of the particular school, which is produced under section 20 of the Education Act 2002. The Instrument of Government will be made in accordance with The Government of Maintained Schools (Wales) Regulations 2005.</i></p> <p><i>The appointment of a Headteacher is the responsibility of the shadow governing body, and the appointment of a senior leadership team is the responsibility of both the Headteacher and the governors.</i></p> |
| <p>9.9.2 A merger would conveniently write off the large debts accumulated by Brecon High School. What assurance do we have that the culture of mal-administration that has got Brecon into these difficulties does not get carried over to the new school on the same site?</p> | <p><i>The Proposal would require the establishment of a shadow governing body to oversee the strategic and operational transition to the new school. A permanent governing body would be established upon the formal opening of the new school, replacing the current governing bodies of Gwernyfed High School and Brecon High School.</i></p> <p><i>The new permanent governing body would be responsible for ensuring that there is not a culture of mal-administration.</i></p> |
| <p>9.9.3 pg. 26 'There would be opportunities to share best practice from both existing school, and to develop partnerships with the wider catchment primary schools, and other secondary schools and providers.' This is already happening. The school has a positive working relationship with the primary schools and excellent transition arrangements. What evidence has Powys County Council gathered to show that there are gaps in this partnership working? Where is the evidence to show that the New School will be more successful in this area?</p> | <p><i>The Authority agrees that partnership working is already happening. The Authority is not suggesting that there would be more opportunities to do this with a new school, but it is expected that this practice would continue with the New School.</i></p> |

9.9.4 The Council asks POWYS COUNTY COUNCIL to describe how it envisages a shared Headteacher, governing body and leadership will operate effectively and efficiently on a dual-sited school and what the impact on either school will be when Gwernyfed High School's standards are already improving and Brecon High School is struggling financially and educationally?

The benefits of the Interim Proposal are as follows:

- 1) *Improved leadership at all levels: When streamlining the leadership structure following the joining of two schools into one split site secondary school, the newly appointed governing body are able to place the strongest leaders in each position within the new leadership structure. This means we can have the strongest governors, senior leaders, subject leaders and pastoral leaders – those who have the best track record of securing high outcomes and delivering the highest level of care - leading school improvement across the two sites. The joining of two schools represents an opportunity for a step change improvement in the quality of leadership.*
- 2) *Improved leadership leads to improved teaching: Professor David Reynolds has stated: 'We know that effective leadership of a school from the Headteacher and through to other 'middle leadership' positions is important in its own right and important in generating...high quality classroom teaching' (WG PDG guidance 2013-15). Leadership and teaching quality are linked. The research is clear, by securing a step change improvement in leadership, we are able to secure a step change improvement in teaching quality.*
- 3) *Improved coaching and mentoring support opportunities for staff: It is essential that time is allocated to enable the best teaching staff in different subject areas to travel between sites (or communicate regularly via video conferencing arrangements) in order to provide mentoring/coaching/resources for their colleagues on the other campus. This ongoing mentoring support and training can have a considerable impact on teaching quality. One there is a world of difference between the potential impact of loose school-to-school collaboration between separate schools, and the level of collaboration and support in a single school with split sites. The extent to which leaders are willing to invest finite time into engaging in mentoring, coaching and training of staff on the second campus of a single school*

is considerably higher if leaders are going to be held to account for standards and provision on both sites.

- 4) *Economies of scale leads to greater investment in teaching and learning:* *By having a single leader of each curriculum area across the two school sites and a more streamlined senior leadership structure, savings can be generated over time. The new leadership team would be able to invest these savings in whatever way they believe would make the greatest impact on standards.*

| REF | ISSUE | AUTHORITY'S RESPONSE | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--|------|------|------|-------|-------|------|-------|-------|---|-----|-----|-----|-----|-----|-----|-----|--------------------|-----|-----|-----|-----|-----|-----|-----|
| 10. The Proposal and Facts and Figures | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10.1 Student Numbers | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10.1.1 | <p>One of the biggest concerns cited as being responsible for POWYS COUNTY COUNCIL Proposal to close and merge the schools is falling pupil numbers. However, is this not a self-fulfilling prophecy? If you create uncertainty over the availability of secondary education, are you not going to, at the very least, make people with children not move to the area or to consider to move away if already resident here? Furthermore, on reviewing your consultation document, this admits that pupil numbers are increasing. Whilst they are currently low, they are forecast to increase over the next 3-4 years to levels they were at in 2012. So, what are you saying? Are pupil numbers falling or not falling? Or are you just hoping that they will fall given your disastrous handling of this situation? Perhaps you're hoping that Welsh children will be absorbed into the English schools system and stop being POWYS COUNTY COUNCIL's responsibility or concern? I know from being resident in the Hay area that there are house-building programmes currently underway, bolstering the assertion that was made at the meeting that this is an area that people with families could and would move to if there were education facilities in the community. What you, with help from the local primary schools, should be</p> | <p><i>The Authority wishes to deliver a sustainable, high quality secondary education system, within the context of falling pupil numbers.</i></p> <ul style="list-style-type: none"> <i>Falling pupil numbers year on year at secondary schools (19% over the last 6 years) making it difficult to provide the full curriculum</i> <i>Population projections show the position will deteriorate over the next 20 years – the child population (0-15) is projected to fall from 22,761 in the 2011 census to 18,958 by 2036</i> <i>Projections over that 20 year period can be seen in all age groups with the largest falls in the 0-1, 5-9 and 15-19 age groups, the smallest fall is in the 10-14 but even that shows more than 300 less by 2036. The 5-9 shows a temporary increase in the coming years but an overall decline of more than 1000 by 2036</i> <i>Pupil numbers in Powys are already falling with numbers dropping from 9,284 in January 2006 to 7,467 in January 2016</i> | | | | | | | | | | | | | | | | | | | | | | | | |
| | | <table border="1"> <thead> <tr> <th></th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021*</th> <th>2022*</th> </tr> </thead> <tbody> <tr> <td>GWE RNYF ED HIGH SCH OOL</td> <td>450</td> <td>429</td> <td>429</td> <td>416</td> <td>424</td> <td>419</td> <td>422</td> </tr> <tr> <td>BREC ON</td> <td>556</td> <td>538</td> <td>537</td> <td>523</td> <td>528</td> <td>556</td> <td>565</td> </tr> </tbody> </table> | | 2016 | 2017 | 2018 | 2019 | 2020 | 2021* | 2022* | GWE RNYF ED HIGH SCH OOL | 450 | 429 | 429 | 416 | 424 | 419 | 422 | BREC ON | 556 | 538 | 537 | 523 | 528 | 556 | 565 |
| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021* | 2022* | | | | | | | | | | | | | | | | | | | |
| GWE RNYF ED HIGH SCH OOL | 450 | 429 | 429 | 416 | 424 | 419 | 422 | | | | | | | | | | | | | | | | | | | |
| BREC ON | 556 | 538 | 537 | 523 | 528 | 556 | 565 | | | | | | | | | | | | | | | | | | | |

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|--|---|--------------------|-----|-----|-----|-----|-----|--|--|--------------|------|-----|-----|-----|-----|-----|-----|
| <p>doing is getting together and working out how we boost our school numbers not accepting any fall as a fait accompli.</p> | <table border="1"> <tr> <td>HIGH SCHOOL</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total</td> <td>1006</td> <td>968</td> <td>966</td> <td>939</td> <td>952</td> <td>975</td> <td>987</td> </tr> </table> <p>Authority has now updated the pupil projections based on PLASC 2016 data, which indicates the following:</p> <p>The Authority acknowledges that any school reorganisation Proposal creates a period of uncertainty. During this consultation, many consultees have raised the issue that parents will choose to send their children to schools in England – this was a key risk that was identified on page 19 of the Consultation Document.</p> | HIGH SCHOOL | | | | | | | | Total | 1006 | 968 | 966 | 939 | 952 | 975 | 987 |
| HIGH SCHOOL | | | | | | | | | | | | | | | | | |
| Total | 1006 | 968 | 966 | 939 | 952 | 975 | 987 | | | | | | | | | | |
| <p>10.1.2 Pupil numbers at Gwernyfed High School are already set to rise and by 2021 reach well over 500. Where has Powys County Council’s ‘aspiration to have schools with at least 600 pupils’ come from and where has the number of 600 come from? Lots of successful, well-run and in-budget schools operate with less than 600 pupils. Why does Powys County Council think this is unachievable here? Where is the evidence base for the statement that a school requires at least 600 pupils at KS3 and 4? Please cite all relevant research used to make this statement.</p> <p>10.1.3 How has this threshold of 600 pupils been derived and on what basis? And what evidence supports this nationwide?</p> | <p>The figure of 600 pupils was agreed by officers of the Authority, in discussions with PriceWaterhouseCoopers (PwC), following their Study into the Viability of Secondary Schools. The Authority currently funds KS3 and KS4 classes that deliver core curriculum subjects on a teacher-pupil ratio of 1- 23, apart from subjects which have a health and safety aspect where it is expected that no class has more than 20 pupils. e.g. science – (these classes make up approximately 20% of the curriculum), In future, it is expected that the maximum teacher-pupil ratio will not exceed 1 – 30/31 for core curriculum subjects.</p> <p>The county council commissioned a study by Price Waterhouse Cooper to report on the potential financial viability of each of the secondary and of the overall provision of secondary education across the county. The report concluded that ‘all the schools appear to be reaching a point where their options are extremely limited and there is a tangible risk that schools will become finance, rather than curriculum led’, and that ‘in light of the forecasted, deteriorating financial position of the whole county provision, even a concerted, joint effort of cost management may not be enough to avoid the requirement to examine structural changes to the education provision across the county’.</p> | | | | | | | | | | | | | | | | |

| 10.1.4 | <p>Has the projected increase in pupil numbers arising out of proposed housing developments within 5 miles of Gwernyfed been factored in to any case for retaining the existing school? Has a review of falling pupil numbers across Powys been broken down by existing secondary school catchments across Powys and does this include data on pupils from ‘out of county’?</p> | <p><i>The Consultation Document states the following with regard to housing developments:</i></p> <p><i>There may be an impact on pupil numbers from proposed housing developments within the Local Development Plan. The Council estimates one child for every five houses within any new proposed developments – if implemented, these will need to be factored into any future projections.</i></p> | | | | | | | | | |
|------------------|---|---|--|-------------------------------------|--|---------------|-----|----|------------------|-----|-----|
| | | <table border="1"> <thead> <tr> <th></th> <th>Number of proposed dwellings</th> <th>Maximum additional number of primary aged children on a 1:5 basis (estimated)</th> </tr> </thead> <tbody> <tr> <td>Brecon</td> <td>405</td> <td>81</td> </tr> <tr> <td>Gwernyfed</td> <td>518</td> <td>104</td> </tr> </tbody> </table> | | Number of proposed dwellings | Maximum additional number of primary aged children on a 1:5 basis (estimated) | Brecon | 405 | 81 | Gwernyfed | 518 | 104 |
| | Number of proposed dwellings | Maximum additional number of primary aged children on a 1:5 basis (estimated) | | | | | | | | | |
| Brecon | 405 | 81 | | | | | | | | | |
| Gwernyfed | 518 | 104 | | | | | | | | | |
| 10.1.5 | <p>What evidence does Powys County Council have to demonstrate that parents in the Gwernyfed catchment will send their children to the New School Building in Brecon? Evidence from the public consultations indicates that this won’t happen.</p> | <p><i>Evidence about parental preference has been gathered during this review. During this consultation, many consultees have raised the issue that parents will choose to send their children to schools in England.</i></p> | | | | | | | | | |
| 10.1.6 | <p>The Final Business case explains that primary pupil numbers in Brecon and Gwernyfed catchments will grow by 148 and 119 pupils respectively between 2015 and 2020. Explain why this justifies a Proposal to close both high schools and reopen a single New School Building with a smaller capacity?</p> | <p><i>There are a number of factors that affect potential pupil number growth, one of which is the potential housing growth on the Local Development Plan for the national park. Although there are significant areas of houses planned in each authorities Local Development Plan (Brecon Beacons National Park & Powys County Council) across the two catchments – historical evidence will show that only a small % of houses will be developed over the life of the plan. Both schools have a significant level of surplus places totalling 435 between them and it is the Authority’s view that the secondary education would be best delivered for this area in a single school of which the Proposal outlines the clear reasons for this. The point raised is not the sole justification for the Proposal.</i></p> | | | | | | | | | |

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|----------------------|---|---|-------------------|------------|------------|------------|------------|------------|-------------------|------------|------------|------------|------------|------------|
| <p>10.1.7</p> | <p>Explain the discrepancy in figures provided for increasing primary school pupils in the table at the top of p.18 in the Final Business Case and the top and middle of p.69 in the consultation document.</p> | <p><i>As stated on pages 15 and 16 of the business case, 'PLASC data for January 2016 is currently unavailable, therefore the data used in this section is based on January 2015 PLASC data, unless otherwise stated. The projections on page 18 of the Final Business Case were based on PLASC 2015 data, whilst the figures used on page 69 of the Consultation Document were based on PLASC 2016 data. The discrepancy between both sets of data is as follows:</i></p> <table border="1" data-bbox="987 464 1816 603"> <tr> <td><i>PLASC 2015</i></td> <td><i>695</i></td> <td><i>720</i></td> <td><i>740</i></td> <td><i>770</i></td> <td><i>765</i></td> </tr> <tr> <td><i>PLASC 2016</i></td> <td><i>696</i></td> <td><i>720</i></td> <td><i>741</i></td> <td><i>769</i></td> <td><i>766</i></td> </tr> </table> | <i>PLASC 2015</i> | <i>695</i> | <i>720</i> | <i>740</i> | <i>770</i> | <i>765</i> | <i>PLASC 2016</i> | <i>696</i> | <i>720</i> | <i>741</i> | <i>769</i> | <i>766</i> |
| <i>PLASC 2015</i> | <i>695</i> | <i>720</i> | <i>740</i> | <i>770</i> | <i>765</i> | | | | | | | | | |
| <i>PLASC 2016</i> | <i>696</i> | <i>720</i> | <i>741</i> | <i>769</i> | <i>766</i> | | | | | | | | | |
| <p>10.1.8</p> | <p>How and why has Powys County Council estimated one additional child for every five new houses built in each catchment?</p> | <p><i>The Authority has just under 60,000 houses within it which equates to the equivalent of 62,000 of Band D houses as identified within the Authority's budget book. In January 2016 there were a total of 7500 secondary aged pupils which is the equivalent of 1 pupil for every 7.7 houses. The Authority uses a lower number to ensure that is not underestimating the number of pupils arising from new developments.</i></p> | | | | | | | | | | | | |
| <p>10.1.9</p> | <p>Explain how the estimate of one child per new house in the development plan would be likely to change in the event of five new primary schools in the Gwernyfed catchment and a New School Building in Brecon. 64. Explain how this estimate would be likely to change were Powys County Council to increase its investment in Welsh-medium provision at primary school level within the Brecon catchment.</p> | <p><i>The Authority has not assumed any additional count from outside the county into the 5 new primary schools but has assumed the current trend continues. The forecast pupil numbers is based on the estimated number of additional dwellings to develop in the area. However, the increase in pupil numbers will be dependent on the increase in the number of family groups living across the two catchment areas following the developments and there would need to be an inward migration of outside Powys to affect the pupil's numbers.</i></p> <p><i>In January 2016 there were a total of 7500 secondary aged pupils which is the equivalent of 1 pupil for every 7.7 houses. The Authority uses a lower number to ensure that is not underestimating the number of pupils arising from new developments.</i></p> <p><i>The Authority recognises that its Proposal to close the Welsh Stream in Brecon may have a short term impact on the number of pupils transferring from Primary education at Ysgol Bannau and Sennybridge into Welsh medium secondary provision. However, the offer of an enhanced level of provision at YGY and</i></p> | | | | | | | | | | | | |

| | <p><i>Builth will provide learners with a greater option to complete all their studies through the medium of Welsh. If the Proposal goes forward then the Authority will provide support to the primary and secondary schools to promote Welsh Medium education.</i></p> | | | | | | | | | | | | | | | | | | | |
|---|--|-----------------|----------|--|--|---------------|-----------------|----------|----------------|----|----|---|------------------|---|---|---|--------------------|---|---|---|
| <p>10.1.10 Explain what evidence there is to demonstrate that the current £multi-million pound investment in five new primary schools in the Gwernyfed catchment, as well as building the New School Building in Brecon, now, would not create the sort of critical mass and increase in pupil numbers (through increased demand) that Powys County Council seeks.</p> | <p><i>The development of the 5 school model in the Gwernyfed catchment will result in an increase in critical demand due to the historical reduction from a 10 school model to the proposed 5 school model. The Authority has achieved this through the closure of Ffynnon Gynydd, Rosgoch, Llanigon, Glasbury on Wye and the proposed net reduction of 1 school through the Talgarth and Bronllys amalgamation. It is estimated that the new model of primary delivery has saved approximately £400,000 per annum and will result in all children receiving education in a condition A building with appropriate staffing levels. The Proposal in respect of the secondary sector will result in a small revenue saving but children will receive their education in a new facility which was recognised as an essential requirement for Brecon in all consultation meetings.</i></p> | | | | | | | | | | | | | | | | | | | |
| <p>10.1.11 Forecasted figures show that by 2020 there will be a combined total of 1092 spaces, therefore, the school will already be at capacity not allowing for any future new homes. How does the council propose to accommodate additional children over the 1100 that they have allowed for?</p> | <p><i>During the Design process for the New School Building in Brecon, the Authority will ensure that there is capacity to extend the building in future, should that be required.</i></p> | | | | | | | | | | | | | | | | | | | |
| <p>10.1.12 There are a lot of Welsh speaking children in BRECON HIGH SCHOOL who went to English primary schools. Is the Council aware of this? Are these children aware that they could be in the Welsh stream in BRECON HIGH SCHOOL? Does the Council promote options like these two primary schools?</p> | <p><i>The following is an analysis of primary school pupils in the Brecon catchment based on PLASC 2016 data, according to their proficiency in using the Welsh language:</i></p> <table border="1" data-bbox="999 1182 1805 1396"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">Welsh</th> </tr> <tr> <th>Welsh at home</th> <th>Welsh in School</th> <th>Fluently</th> </tr> </thead> <tbody> <tr> <td>Ysgol y Bannau</td> <td>42</td> <td>85</td> <td>0</td> </tr> <tr> <td>Cradoc CP School</td> <td>0</td> <td>1</td> <td>0</td> </tr> <tr> <td>Llanfaes CP School</td> <td>1</td> <td>0</td> <td>0</td> </tr> </tbody> </table> | | Welsh | | | Welsh at home | Welsh in School | Fluently | Ysgol y Bannau | 42 | 85 | 0 | Cradoc CP School | 0 | 1 | 0 | Llanfaes CP School | 1 | 0 | 0 |
| | Welsh | | | | | | | | | | | | | | | | | | | |
| | Welsh at home | Welsh in School | Fluently | | | | | | | | | | | | | | | | | |
| Ysgol y Bannau | 42 | 85 | 0 | | | | | | | | | | | | | | | | | |
| Cradoc CP School | 0 | 1 | 0 | | | | | | | | | | | | | | | | | |
| Llanfaes CP School | 1 | 0 | 0 | | | | | | | | | | | | | | | | | |

| | | | | | | | |
|---------------------------------|---|--|---|---|---|--|--|
| | | <i>Mount Street Juniors</i> | 1 | 0 | 0 | | |
| | | <i>Mount Street Infants</i> | 1 | 0 | 0 | | |
| | | <i>Priory CIW School</i> | 0 | 1 | 0 | | |
| | | <i>Sennybridge CP School</i> | 9 | 1 | 6 | | |
| 10.1.13 | In view of the fact - shown by your own data - that pupil numbers are expected to rise at Gwernyfed, please justify the reason given for closing the school on P6 of 'falling pupil numbers'? | <i>Page 6 of the Consultation Document refers to the pressures faced by the Secondary School System in Powys, where pupil numbers, as a whole, are continuing to fall.</i> | | | | | |
| 10.1.14 | Please provide alternative pupil number forecasts which factor in the additional 104 children from new housing developments, and provide a revised appraisal of surplus places at Gwernyfed. | <i>The Authority notes the comment – The provision of revised capacities resulting from housing developments would only be included once the development has commenced and the Authority has an understanding of the expected occupancy. Capacity calculations are based on the physical use of the school buildings and is agreed and signed off by the school and the Local Authority. We would not calculate additional models outside of this procedure.</i> | | | | | |
| 10.1.15 | Why, when your own data undermines your case around falling school numbers in relation to the Gwernyfed catchment area, do you still prefer an option that closes the school? | <i>The Authority has considered a number of factors that are placing pressure on Gwernyfed and Brecon High Schools, and believes that the Proposal will lead to the benefits outlined on pg.16 of the Consultation Document.</i> | | | | | |
| 10.2 New Primary Schools | | | | | | | |
| 10.2.1 | The consultation document states that five new primaries will be built in the Gwernyfed catchment by 2018. What is the current stage of development, and what timetable does the Council have for delivery of the new schools? Is there a binding schedule? What does delivery of the promised schools depend on, and why has there been so little progress thus far? | <i>In October 2015, The Welsh Government approved the Outline Business Case for the building of five new primary schools in Gwernyfed. The Authority has now appointed a contractor on a Design and Build contract. The designs have been finalised and submitted for planning approval. The Full Business Case will be submitted to Welsh Government in November 2016. Construction is planned to commence in Spring 2017, with the new schools planned to be completed during the 2017/18 academic year.</i> | | | | | |
| | | <i>The Authority acknowledges that past progress has been unsatisfactorily slow, but is pleased that there is good progress now.</i> | | | | | |

| 10.3 Size of School | | | | | | | | | | | |
|----------------------------|---|--|--|------------|-------------------|--------------------|-----------|--------------|------------------|-----------|--------------|
| 10.3.1 | <p>You claim a year group of 120 pupils would maximise the curriculum benefits but you do not mention how these figures would be broken down in class size. Please answer for me what class sizes you envisage and how you think that would be educationally of benefit to pupils?</p> | <p><i>The figure of 600 pupils was agreed by officers of the Authority, in discussions with PriceWaterhouseCoopers (PwC), following their Study into the Viability of Secondary Schools. The Authority currently funds KS3 and KS4 classes that deliver core curriculum subjects on a teacher-pupil ratio of 1- 23, apart from subjects which have a health and safety aspect where it is expected that no class has more than 20 pupils. e.g. science – (these classes make up approximately 20% of the curriculum), In future, it is expected that the maximum teacher-pupil ratio will not exceed 1 – 30/31 for core curriculum subjects</i></p> | | | | | | | | | |
| 10.3.2 | <p>If the Council truly believes that Post 16 education is better delivered by a Further Education College model offering greater choice and creating a "critical mass of pupils at post-16, enabling more subjects to be delivered from one location and minimising the requirement for additional inter-school travel and transport " (page 115) it will logically have to close the Sixth form in Crickhowell High School ... If it is not the policy of the Council to provide ALL post -16 education through this model in order to produce all the advantages detailed on page 115 then it should make clear why it is proposing to close one Sixth Form (Gwernyfed) with outstanding outcomes and keep another (Crickhowell) with lesser outcomes.</p> | <p><i>The Council's optimum model for post-16 education is for sixth forms to be able to provide 25 subjects, with a minimum class size of 12 or above. This would enable the Council and schools to meet the requirements of the Learning and Skills (Wales) Measure 2009 whilst minimising the need for inter-school travel. On this basis, the ideal size of a sixth form would be at least a 150 pupils.</i></p> <p><i>It is not the Council's current policy to provide a Further Education tertiary system across the county. The Proposal aims to create the required critical mass of post-16 learners in on setting in Brecon, with the added benefits of vocational provision delivered by NPTC Group of Colleges.</i></p> <p><i>Crickhowell Sixth Form had 169 pupils according to PLASC 2016, which enabled the school to provide 27 subjects at the school, with access to the options within the Post-16 Partnership as well.</i></p> <p><i>A comparison of the number of learners achieving the equivalent of 2 or more A* - C at A level at both schools in 2015 is as follows:</i></p> <table border="1" data-bbox="996 1209 1491 1385"> <thead> <tr> <th></th> <th><i>All</i></th> <th><i>Percentage</i></th> </tr> </thead> <tbody> <tr> <td><i>Crickhowell</i></td> <td><i>67</i></td> <td><i>70.5%</i></td> </tr> <tr> <td><i>Gwernyfed</i></td> <td><i>22</i></td> <td><i>84.6%</i></td> </tr> </tbody> </table> | | <i>All</i> | <i>Percentage</i> | <i>Crickhowell</i> | <i>67</i> | <i>70.5%</i> | <i>Gwernyfed</i> | <i>22</i> | <i>84.6%</i> |
| | <i>All</i> | <i>Percentage</i> | | | | | | | | | |
| <i>Crickhowell</i> | <i>67</i> | <i>70.5%</i> | | | | | | | | | |
| <i>Gwernyfed</i> | <i>22</i> | <i>84.6%</i> | | | | | | | | | |

| <p>10.3.3</p> | <p>We know that there are plenty of successful, well-run and in-budget schools in neighbouring Herefordshire with less than 600 pupils. If Herefordshire can do it, why can't Powys?</p> | <p><i>There are 18 secondary schools in Herefordshire. The majority of these schools are 11 – 16 academies, with a few local Authority maintained or independent schools. They are funded in a different way to secondary schools in Powys, which are maintained by the Authority. The schools range in size from just over 300 to 1400.</i></p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------|--|---|------|------|------|-------|-------|------|-------|-------|-------------------------------|-----|-----|-----|-----|-----|-----|-----|---------------------------|-----|-----|-----|-----|-----|-----|-----|--------------|------|-----|-----|-----|-----|-----|-----|
| <p>10.3.4</p> | <p>Based on the above, do you agree that the arguments of 'falling pupil numbers' and 'surplus places' have no basis in fact and should therefore be removed from this Proposal, and from the Outline Business Case for the Beacons Learning Campus submitted to the Welsh Government?</p> | <p><i>As previously stated, the projected pupil numbers have been updated, and still indicate that, across both schools as a whole, pupil numbers will continue to fall.</i></p> <table border="1" data-bbox="999 467 1899 874"> <thead> <tr> <th></th> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021*</th> <th>2022*</th> </tr> </thead> <tbody> <tr> <td>Gwer nyfed High School</td> <td>450</td> <td>429</td> <td>429</td> <td>416</td> <td>424</td> <td>419</td> <td>422</td> </tr> <tr> <td>Brecon High School</td> <td>556</td> <td>538</td> <td>537</td> <td>523</td> <td>528</td> <td>556</td> <td>565</td> </tr> <tr> <td>Total</td> <td>1006</td> <td>968</td> <td>966</td> <td>939</td> <td>952</td> <td>975</td> <td>987</td> </tr> </tbody> </table> | | 2016 | 2017 | 2018 | 2019 | 2020 | 2021* | 2022* | Gwer nyfed High School | 450 | 429 | 429 | 416 | 424 | 419 | 422 | Brecon High School | 556 | 538 | 537 | 523 | 528 | 556 | 565 | Total | 1006 | 968 | 966 | 939 | 952 | 975 | 987 |
| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021* | 2022* | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gwer nyfed High School | 450 | 429 | 429 | 416 | 424 | 419 | 422 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Brecon High School | 556 | 538 | 537 | 523 | 528 | 556 | 565 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 1006 | 968 | 966 | 939 | 952 | 975 | 987 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>10.3.5</p> | <p>There is evidence of successful, well-run and in-budget schools with less than 600 pupils: why does Powys County Council think this is unachievable here?</p> | <p><i>There is evidence of successful, well-run and in-budget schools across Wales and England of all sizes. The Authority agrees with the outcome of PwC's Study into the Viability of Secondary Schools:</i></p> <p><i>The report concluded that 'all the schools appear to be reaching a point where their options are extremely limited and there is a tangible risk that schools will become finance, rather than curriculum led', and that 'in light of the forecasted, deteriorating financial position of the whole county provision, even a concerted, joint effort of cost management may not be enough to avoid the requirement to examine structural changes to the education provision across the county'.</i></p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>10.3.6</p> | <p>Why did the options analysis not assess how small secondary schools are producing outstanding standards and results?</p> | <p><i>The options analysis did not assess how small secondary schools are producing outstanding standards and results because this is not the case in</i></p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

Powys. The following table shows the current Estyn profile for secondary schools in Powys:

| | <i>Date</i> | <i>Current Performance</i> | <i>Prospects for Improvement</i> | <i>Category</i> |
|---|---------------|----------------------------|----------------------------------|---|
| <i>Caereinion High School (494 NOR)</i> | <i>Nov 13</i> | <i>Adequate</i> | <i>Adequate</i> | <i>Estyn Monitoring</i> |
| <i>Newtown High School (1091)</i> | <i>May-15</i> | <i>Adequate</i> | <i>Adequate</i> | <i>Estyn Monitoring</i> |
| <i>Welshpool High School (900)</i> | <i>Nov-10</i> | <i>Good</i> | <i>Good</i> | |
| <i>John Beddoes (closed)</i> | <i>Oct-12</i> | <i>Unsatisfactory</i> | <i>Unsatisfactory</i> | <i>Special Measure</i> |
| <i>Llandrindod High School (558)</i> | <i>Oct-14</i> | <i>Unsatisfactory</i> | <i>Unsatisfactory</i> | <i>Special Measure</i> |
| <i>Builth Wells High School (554)</i> | <i>Oct-15</i> | <i>Unsatisfactory</i> | <i>Unsatisfactory</i> | <i>Special Measure</i> |
| <i>Ysgol Maesydderwen (447)</i> | <i>Nov-10</i> | <i>Adequate</i> | <i>Good</i> | <i>Local Authority Monitoring</i> |
| <i>Brecon High School (556)</i> | <i>Apr-12</i> | <i>Adequate</i> | <i>Adequate</i> | <i>Significant Improvement, followed by Special Measure</i> |
| <i>Gwernyfed High School (450)</i> | <i>Sep-13</i> | <i>Adequate</i> | <i>Adequate</i> | <i>Estyn Monitoring</i> |
| <i>Crickhowell High School (768)</i> | <i>Sep-12</i> | <i>Good</i> | <i>Good</i> | <i>Local Authority Monitoring</i> |

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|--|---|---|-----------------|-----------------|-------------------------|
| | <i>Llanfyllin High School (832)</i> | <i>Feb -16</i> | <i>Adequate</i> | <i>Adequate</i> | <i>Estyn monitoring</i> |
| | <i>Llanidloes High School (528)</i> | <i>April - 16</i> | <i>Good</i> | <i>Good</i> | |
| 10.4 Population, Housing, New Homes | | | | | |
| 10.4.1 | Can you confirm that proper consultation has taken place as to the projected number of homes to be built within the area? | <p><i>The Authority has analysed the potential housing development in both its and the national parks Local Development Plans, and based its estimates on these figures. The Authority would consider the mix of housing in each development as the applications are presented. Population statistics from the Office of National Statistics are used to look at population forecasts of which it drills down using super output areas across the county.</i></p> | | | |
| 10.4.2 | Can you confirm that figures being used to calculate the projected number of children moving into the area, are correct and accurate for the type of housing that will be built within the Gwernyfed catchment area? | | | | |
| 10.4.3 | The National Parks housing data reveals 137 houses could be built opposite the Brecon High School by 2020 with the total build for Brecon by 2020 could be 273. 152 houses also possible in Talgarth as well as 80 in Hay-on-Wye. I would like to ask POWYS COUNTY COUNCIL, what is the sense in their short sighted destructive plan to close Gwernyfed High School? | | | | |
| 10.4.4 | Do the forecast pupil numbers include potential new pupils from increased housing in the Gwernyfed and Brecon catchment areas? Which estate agent reports have been utilised by POWYS COUNTY COUNCIL? | | | | |
| 10.4.5 | Population forecasts are grossly underestimated. How have you arrived at these forecasted figures – please answer for | | | | |

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| | <p>Gwernyfed catchment only – not whole of Powys. Have the new builds (500 new homes within GWERNYFED HIGH SCHOOL catchment) been considered within the forecasted figures?</p> |
| <p>10.5 Criticism of Consultation Documents/Figures</p> | |
| <p>10.5.1 On pg. 5 of the Consultation document, it is stated that “The business case forms part of the supporting information for this consultation document, and can be found on the Council’s website www.powys.gov.uk/en/schools-students/plans-for-powys-schools. This consultation document updates and expands upon the business case”. This link merely takes the reader to the ‘Plans for Powys Schools’ page on the council’s website and there is no onward link to the document in question.</p> <p>10.5.2 Since the business case is, according to the Consultation Document, an integral part of the consultation process, can the process be valid if the business case is not available?</p> | <p><i>The Consultation Document clearly signposted the reader to the Business Case. Appendix B of the Consultation Document is a copy of the Option Appraisal exercise within the Business Case.</i></p> |
| <p>10.6 Timescale</p> | |
| <p>10.6.1 The health and wellbeing of members of staff and pupils of both schools should be paramount. Does the council understand that if the schools remain as a dual site, then future numbers of pupils and experienced, well trained staff may decline at Gwernyfed due to the uncertainty of this situation and is this yet</p> | <p><i>The potential impact on staff and a decline in future pupil numbers were identified as a key risk within the Consultation Document, with the following mitigation:</i></p> <p><i>‘The intention of the Proposal is for the New School to provide the highest quality education in the best possible facilities, It is hoped that the transparency</i></p> |

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| | <p>another way to close Gwernyfed, “by the back door”?</p> <p><i>of the process and the ability of staff to participate in the consultation exercise will help to reduce the levels of demotivation</i></p> <p><i>It is also hoped that the prospects of being part of a transformational development including a New School with better facilities may go some way to mitigating this risk</i></p> <p><i>Should the Proposal be implemented, the Council would establish a Management of Change work stream to work closely with the staff and shadow governing body, ensuring that transition arrangements are managed well.’</i></p> |
| <p>10.6.2 What are the timescales and how realistic are they?</p> <p>10.6.3 How long will the transition period be and given recent past experience with the primary school plans, has sufficient contingency been applied - would it be realistic to add on a few more years to your estimates?</p> | <p><i>The potential implementation timescale can be found on page 48 of the Consultation Document and are realistic – the Authority has merged schools within this timescale previously. However, following Council’s decision for the Proposal to be discussed at a full County Council meeting, the timescale for implementation by September 2017 is now more difficult to achieve.</i></p> |
| <p>10.6.4 What timetable does the council have for “engaging with stakeholders in order to share the vision”? The ‘sharing’ thus far has consisted of County officials determinedly imposing its ‘vision’ on a constituency that has legitimate and profound misgivings, and has made it clear that it does not want it. Why does the Council intend to discuss plans to mitigate any negative impact only after the consultation has ended? Why is it deemed unnecessary to discuss these issues in a transparent manner in advance of the conclusion of the consultation period?</p> | <p><i>The Council has engaged with stakeholders prior to the consultation period via the Schools Transformation Policy 2014 process. In any school reorganisation, it is essential that the Council listens to, and takes full account, of the view of stakeholders. However, as a local education Authority, it also has a duty to plan the long-term organisation of its schools estate, taking account of all known factors.</i></p> <p><i>In accordance with the Welsh Government’s School Organisation Code 2013, and the Council’s own Policy, the Authority published draft impact assessments, which will be updated to include information received during the consultation. Cabinet will be required to consider these along with the Consultation Report before it makes any further decisions about the future of either school.</i></p> |

| 10.7 Due Diligence, Options Appraisal, Identifying Preferred Proposal | | |
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| 10.7.1 | On what basis was Option 8B discounted? Establish a new English-medium 'All Through School' in Brecon, with Post-16 education delivered via a Further Education College model. | <i>As stated in the Business Case and Consultation Document, Option 8b was discounted due to the challenge of operating an All Through School in a catchment that could have 13 primary schools:</i> <i>'However, consideration must be given to whether this is an appropriate educational model for an enhanced catchment area which may have 13 primary feeder schools that will join the secondary phase at Year 7 – this could be challenging operationally and educationally, although not insurmountable if appropriate partnerships are made with all the feeder schools.'</i> |
| 10.7.2 | Has Powys Council any other Proposals or are they putting their eggs all in one basket? if they only have one I would then question if they have really looked at any other possibilities | <i>The Authority has consulted on this specific Proposal, but also considered a range of potential options to address the pressures on the secondary school system. If the Proposal is not approved, further consideration will be given to other possibilities.</i> |
| 10.7.3 | There is no equity across Powys in the recommendation. I do not understand the logic behind the recommendation. If the Cabinet are content to close Brecon High School and Gwernyfed High School, stripping the sixth forms and Welsh Language out of the educational offer in this part of south Powys and develop a new area school on the recreation grounds at Brecon for the reasons outlined, why are they not looking to do the same at Builth and Llandrindod? As a modernisation process an area school in Llandrindod would make more sense, Llandrindod is considered a hub by the Council. Why didn't this carry more weight in the options appraisals and how was the decision to retain both schools reached set against the decision made for the | <i>The preferred option for Gwernyfed and Brecon included the additional benefits that could be provided by integrating with NPTC Group of Colleges. This was not the case with the Llandrindod and Builth scenario, where the provision of Welsh-medium education to learners from Brecon was also included.</i> |

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| | Brecon/Gwernyfed schools? I do not understand this reasoning. If sixth form provision and Welsh had been provided (as a dual stream option) for both 'area schools', I would have been at least reassured that there was equity of Education in the south of the County even if I had opposed the plans. | |
| 10.7.4 | Gareth Jones admitted that there "is another option that the council could look at" that would not affect GWERNYFED HIGH SCHOOL. Why isn't this the main Proposal and what are the advantages of the actual Proposal over this and the disadvantages of the other Proposal over the actual one? | <i>The Authority has modelled various options for consideration and derived</i> |
| 10.7.5 | Your responses on seventeen occasions are "the Authority notes this point" - satisfactory responses as we and others are seeking considered, comprehensive answers. Is this because you have no answers or because the answers, if truthful, undermine your arguments? | <i>The purpose of consultation is to listen to the views of stakeholders, and if a view is put forward that has credence, this point is noted.</i> |
| 10.7.6 | On four occasions you "accept and acknowledge" comments/criticisms. Have you carried out any risk assessments to measure the impact of these and can you provide details of these together with any subsequent mitigating actions plans? | <i>In accordance with the School Organisation Code, 2015, the Consultation Document includes a list of risks and mitigating factors. Draft equality, community and Welsh language impact assessments have been carried out, which will be updated following consultation,</i> |
| 10.7.7 | On a further six occasions where you "accept and acknowledge" comments/criticisms, you put the onus on the school to work with the pupils and parents to "find a solution". Please | <ul style="list-style-type: none"> • In accordance with the Code, the Consultation Document included potential risks and mitigation. Draft impact assessments were also published as part of the Consultation. These will be updated following consultation for consideration by Cabinet before any further decisions |

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| <p>confirm what risk assessments/action plans have been identified for implementation? Will BRECON HIGH SCHOOL be given additional financial support, advice or direction from Powys County Council to address the solutions? Have these issues been raised with staff from the schools and parent representatives? Are the schools aware of their additional responsibilities to help deliver solutions you don't have an answer for? Are you putting the schools in a situation for which there may be no acceptable solution without you committing additional resources whether it is financial, staffing or otherwise, all of which will be reduced in your current Proposals? This will put BRECON HIGH SCHOOL, already in special measures, under even more pressure. Please provide evidence.</p> | <p>are taken about the future of either school. No other action plans have been developed for implementation;</p> <ul style="list-style-type: none"> • All schools are funded in accordance with the Authority's Fair Funding Formula, in both the year of any school reorganisation change and subsequent years. • All schools receive support from both ERW and the Authority in accordance with the support requirements identified via the annual National Categorisation of Schools and other information; • Schools on more than one site receive a split-site allowance, and schools delivering dual-stream education receive an additional allowance – both of these additional allowances reflect any cost additionality due to the nature of the provision. • Issues have been discussed with staff and parent representatives during the consultation process. |
| <p>10.7.8 Unfounded assumptions of Option 3B: "reduces overall surplus places" - solved by investments at primary level and by getting on with building a new high school in Brecon now; "improves learning environment" (how?); "more cost-effective delivery of learning" (how is this defined?); "... infrastructure that is resilient to future demographic or financial challenges," (what does this actually mean?).</p> | <p><i>Option 3B – (the Proposal) will:</i></p> <ul style="list-style-type: none"> • <i>Reduce the current level of surplus places at both schools;</i> • <i>Be a new-build school replacing two schools which are Condition D and C;</i> • <i>Be a larger school that is able to better the impact of falling pupil numbers and decreasing funding, compared to a smaller school; and</i> • <i>Provide a more cost-effective delivery of learning i.e. The Proposal will reduce the overall funding required under the current Fair Funding Formula, and will allow the Authority to increase the pupil-led funding element of that formula.</i> |
| <p>10.7.9 Explain how Powys County Council will avoid prejudicing the outcome of this public consultation when it is currently "liaising with Welsh Government officers to clarify specific</p> | <p><i>The OBC was submitted on a without prejudice basis to any decisions taken by Cabinet or the Welsh Government. Should Cabinet decide not to proceed with the current Proposal, the current OBC will not be pursued further.</i></p> |

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| <p>10.7.10</p> | <p>elements [of the Outline Business Case considered by the Welsh Government Funding Panel in March 2016].”</p> <p>Given that it is entirely plausible and affordable for a New School Building to be built now without the need for additional WG capital funding, explain how submitting the OBC in February 2016 isn't prejudicial to the outcome of Powys County Council's deliberations following this public consultation.</p> | |
| <p>10.7.11</p> | <p>Pg. 12: Possible options 'collaboration or federation were not pursued as it was FELT that they did not meet the Council's objectives in finding solutions to the problems.' On what basis (research/business case) was this decision to not pursue this as an option taken?</p> | <p><i>Clustering, collaboration or federation do not, on the whole, address the following investment objectives:</i></p> <ul style="list-style-type: none"> • <i>To significantly improve the learning outcomes for learners across the ability range;</i> • <i>To maximise the curriculum benefits at Key Stage 3 and Key Stage 4 for learners who study through the medium of Welsh or English;</i> • <i>To provide post-16 provision that improves access to, and participation in, both academic and vocational courses and which meets the requirements of the Learning & Skills Measure, whilst minimising the need for additional travel during the school day;</i> • <i>To reduce surplus places in schools;</i> • <i>To provide robust linguistic continuity of Welsh-medium provision across all key phases of education;</i> • <i>To achieve efficiencies through economies of scale, reduced management, premises and running costs.</i> <p><i>There is already a degree of collaboration and clustering between the schools in Mid Powys and the wider area, including the South Powys Post-16 Partnership, and the problems outlined in the Consultation Document still prevail.</i></p> |

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| | <p><i>Also, none of these models would provide a solution that addresses the condition of both school buildings.</i></p> |
| <p>10.7.12 What criteria, based on improving outcomes, did Cabinet consider when the draft recommendations were drawn up in January 2016? How did the business case under consideration at this stage impact on educational outcomes? How did the business case relate to projected outcomes, specifically when denial of access to extra-curricular activities to families on modest incomes due to increased transport costs was taken into account?</p> | <p><i>The Cabinet considered the Business Case at its meeting on the 23rd February, and this consideration was set within the context of Powys County Council's vision and aspirations for education: 'The Council aspires to have an educational infrastructure that¹:</i></p> <ul style="list-style-type: none"><i>• Provides all learners with opportunities to achieve high standards of achievement and attainment;</i><i>• Provides for first class teaching and learning provision reflecting national, regional and local priorities;</i><i>• Has high quality resilient leadership and management;</i><i>• Provides robust linguistic continuity and progression;</i><i>• Improves cost-effectiveness and efficiency;</i><i>• Has the right number of schools in the right place for the current and future pupil population of Powys;</i><i>• Has school buildings and blocks that are assessed as condition A or B;</i><i>• Minimises dependency on temporary accommodation; and</i><i>• Reduces overall surplus places in schools.'</i> <p><i>Included alongside the Business Case were draft Equality, Community and Welsh Language impact assessments, which clearly indicated that Gwernyfed pupils, in particular, would be disadvantaged by not having access to extra-curricular activities.</i></p> <p><i>The Business Case considered all key factors that are required by the Welsh Government's School Organisation Code when authorities are making Proposals for school reorganisation.</i></p> |

¹ School Reorganisation Policy 2015

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| <p>10.7.13 What evidence did Cabinet consider on 23 February and what weight was given to the feedback received from the schools under review? Please publish the mark schemes with detailed notes for the meetings where this was discussed so it can be determined how the decision to proceed with the review was reached.</p> | <p><i>It is the responsibility of each individual member of Cabinet to make his or her own decision on any matter, based on the information that has been provided to them. In this case, Cabinet was provided with a copy of feedback from the schools under review – it was the responsibility of each individual member to consider and decide how much weighting this entailed.</i></p> <p><i>There are no mark schemes or detailed notes of any meetings prior to the meeting of Cabinet on the 23rd February.</i></p> |
| <p>10.7.14 Please publish the scoring which resulted in the preferred choice for KS3 to KS5 to be options 3B & 8B. What determined the “investment objectives and critical success factors” in this decision-making process?</p> | <p><i>In accordance with the HM Treasury’s Five Case Business Model, investment objectives and critical success factors were agreed collectively by officers in response to the strategic case and case for change, using an options framework which:</i></p> <ul style="list-style-type: none"> <i>• Identified the options</i> <i>• Assessed how well each option meets the evaluation criteria – the investment objectives and Critical Success Factors; SFs</i> <i>• Decided whether each option is ‘out’ or ‘in’ or a ‘maybe’. In other words, whether it should be discounted immediately; or carried forward, either as the preferred choice in the category or a possibility for consideration.</i> |
| <p>10.7.15 Given that Powys County Council claims to be applying the Statutory Schools Organisation Code can the Local Authority explain where in its documentation it can demonstrate how it is implementing Principle 3.1 in that document as applied to Gwernyfed High School? The consultation process should: • be undertaken when Proposals are still at a formative stage; (Gwernyfed is in the final stages of consultation and neither the school, parents, children, or community organisations were consulted at the Proposals formative stage); include sufficient reasons and information for particular Proposals to enable intelligent consideration and response; provide adequate</p> | <p><i>The School Organisation Code states that consultation should:</i></p> <ul style="list-style-type: none"> <i>• Be undertaken when Proposals are still at a formative stage;</i> <i>• Include sufficient reasons and information for particular Proposals to enable intelligent consideration and response;</i> <i>• Provide adequate time for consideration and response</i> <i>• Ensure that the product of consultation is conscientiously taken into account when the ultimate decision is taken</i> <p><i>Pre-engagement took place with the governing bodies, Headteachers and local members of Gwernyfed High School. The preferred option was shared with them and they were able to submit their views to the School Organisation Review Panel and the Cabinet. It is the Authority’s view that consultation has taken place when the Proposal is still in its formative stage, because Cabinet can decide to proceed with the Proposal, modify the Proposal or dismiss the Proposal.</i></p> |

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| | <p>time for consideration and response; and ensure that the product of consultation is conscientiously taken into account when the ultimate decision is taken.</p> <p><i>The Consultation Document explains the reasons for the Proposal and provides all information required by the School Organisation Code.</i></p> <p><i>The required period for formal consultation, according to legislation, is 42 days. The original period provided in this case was 48 days, which was further extended.</i></p> <p><i>This Consultation Report provides evidence of all the issues raised during the Consultation, and Cabinet has a duty to consider all these prior to making the decision.</i></p> |
| <p>10.7.16 As the business case is – according to the Consultation Document - an integral part of the consultation process, explain why it has not been distributed as part of this consultation and explain how the consultation process is still valid, despite the business case not being generally available?</p> | <p><i>The Consultation Document clearly stated where the Business Case could be accessed. Relevant information from the business case has been included within the Consultation Document, in particular the Option Appraisal and Financial Evaluation.</i></p> <p><i>The Consultation Document was available online, and hard copies were distributed to every family within the catchment areas under review.</i></p> |
| <p>10.7.17 Why has information contained in the OBC been omitted from the consultation document, and what does Powys County Council plan to do to remedy its failure to give members of the public the opportunity to consider and respond to this important information as part of the consultation process?</p> | |
| <p>10.7.18 This Proposal is clearly an amalgamation/merger of two very different schools, both educationally and culturally. It is not the fault of GWERNYFED HIGH SCHOOL that education in Powys and particularly BRECON HIGH SCHOOL, is in such a poor state. POWYS COUNTY COUNCIL have to</p> | <p>The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education.</p> |

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| | take responsibility for that situation. Does POWYS COUNTY COUNCIL accept that it must take responsibility for this scenario and accept that it must not use its own poor performance and that of BRECON HIGH SCHOOL as a factor to close a school that is functioning well? | |
| 10.7.19 | What weighting matrix has been used in deciding which of the two options arrived at by the discredited Options Appraisal Framework was preferred? | <i>No weighting was used to decide on the preferred option.</i> |
| 10.7.20 | Why has the “clear disadvantage of [...]no secondary education in the Gwernyfed area, with additional travel for pupils” and the “requirement for significant capital investment to build a new school” been discounted in favour of an option that is described as “challenging operationally” but “not insurmountable” (when the operational challenge is predicated upon the limited view of a through school that involves all 13 primary schools as feeder schools), even when it is described as having “added benefits of improving transition between primary and secondary phases and provides a greater level of savings to the Council”? | <i>The rationale for agreeing the preferred option is stated within the Business Case and the Consultation Document.</i> |
| 10.8 Will the Council take community views on board? | | |
| 10.8.1 | Please could you explain why the panel’s attitude was so appalling, seemingly disinterested in being at the consultation such | <i>The Authority disputes this view.</i> |

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| | that it exuded through their responses both verbal & non-verbal? | |
| 10.8.2 | The consultation response of the area's community campaign group (established in response to the Powys Proposals) is highlighted, and the Governing Body seeks assurances that <i>this document, together with the impact assessments from the community groups and local businesses, will be considered and responded to in full.</i> | <i>In accordance with the requirements of the School Organisation Code, the Cabinet will consider all issues raised during the consultation along with updated community impact assessment. The Consultation Report contains detailed analysis and appropriate responses have been provided.</i> |
| 10.9 Cabinet Composition | | |
| 10.9.1 | Cllr Arwel Jones, said in his summing up in Brecon that they would be looking at the north of the county in future but 'logistics would not make it possible to do it all at the same time' (Brecon 2:06). He is right that it would not be possible to implement it all at the same time but it is possible, and indeed fundamental to the process to plan it all at the same time! I would be grateful if you could let me know where I can find this information. If it is not available I can only conclude that there is some truth in the suggestion that the cabinet members, who predominantly represent communities from the north of the county, have their own agenda. | <i>As noted in the Cabinet Report of 24th March 2015, a review of secondary education in North Powys, is taking place. An initial feasibility report on the establishment of a Category 2A school or schools in North Powys was considered by Cabinet on the 29th September 2015, and a further business case has been requested, which will be finalised by the Autumn.</i> |
| 10.9.2 | Why are the local councillors not allowed to vote on what is a monumental decision for this area. I believe the executive council of nine members, who hold all the power were chosen by the council leader Barry Thomas, | <i>On the 16th of June 2016, the County Council voted for Cabinet to retain powers of determination on school reorganisation powers. This is legally acceptable.</i> |

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| | none of who come from this area. This is totally undemocratic. Can you please tell me if this is a legal use of the council's power? | |
| 10.9.3 | How are the council cabinet members qualified to make these decisions? How many have a background in education? The participants were content to give responses (not answers) that were inaccurate, incoherent, lacking in content and unrelated to the question asked of them. | <i>Cabinet members, and their specific portfolios, are determined by the Leader of the Council, with all members of Council selected through a democratic process.</i> |
| 10.10 Lack of/Lost confidence in Powys County Council | | |
| 10.10.1 | Why on the one hand do we as a rational community understand to the nth degree the importance of education, yet on the other hand Powys County Council act to totally undermine the vehicle with which to provide this to our children – Gwernyfed High School? The answer is that no-one at Powys County Council seems to have the vision, or guts, to invest in Gwernyfed. | <i>The Consultation Document clearly explains the reasons why secondary education in Powys has to change, and the pressures that it faces. The Authority has put forward this Proposal in order to achieve the benefits described within the Consultation Document, at a time when there are significant pressures on the education system.</i> |
| 10.10.2 | How can we trust a county council education department that appears to be simply failing and ruining lives in the process? | <i>The education department of Powys County Council is not failing. It has not at any time been in the Estyn category of special measures. Estyn inspections of Local Authority Education Services for Children and Young People (LAESCYP) are wide ranging and not limited to the Education Department. LAESCYP in Powys was placed in the category of requiring “Significant Improvement” in October 2012 following an Estyn Monitoring visit. Subsequently due to the progress and improvements made it was removed from the category in June 2014.</i> |
| 10.10.3 | We have no confidence in Powys Education Department Officers – cites personal experience regarding the primary schools. How | <i>The Authority acknowledges that the progress of primary school reorganisation in the Gwernyfed catchment has been unsatisfactorily slow. However, the Authority is very pleased with the current level of progress.</i> |

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| | would Powys Education Officers rate the level of confidence that the South Powys Communities have in their ability to manage their portfolios? | |
| 10.10.4 | Do Powys Cabinet and Educational Officers really have the competence to manage finance or any educational innovation? | <i>Members of Cabinet and Officers have the required skills, knowledge and skills to manage change.</i> |
| 10.10.5 | Does Powys County Council still not understand why no one connected with Gwernyfed HIGH SCHOOL (or Brecon HIGH SCHOOL for that matter) trusts anything the local Authority states or does? | <i>The Authority acknowledges that any period of school reorganisation creates a lot of uncertainty and mistrust. However, it is the intention of the Authority for the New School to provide the highest quality education, with the appropriate care and support for all pupils, in the best possible facilities</i> |
| 10.11 Powys County Council Performance | | |
| 10.11.1 | Powys County are unable to answer specific questions and concerns raised about the decision to close. If Powys are to go ahead with this Proposals, who's to say they haven't covered all the legal work and thought of every outcome and possibility? | <i>The Proposal is still at a formative stage. If issues and concerns are raised that have not been previously considered, then they will be acknowledged and included within this Consultation Report.</i> |
| 10.11.2 | Ian Roberts did not have pupil number figures to hand during a council meeting on 16 May. Can we trust such a massive reorganisation to someone with such a tenuous grasp of what is actually going on? | <i>Comment noted</i> |
| 10.11.3 | [At GWERNYFED HIGH SCHOOL KS4 meeting] I feel that some of my questions were not answered fully and that the response from the POWYS COUNTY COUNCIL staff was simply vague and unacceptable. What they | <i>Comment noted.</i> |

appeared to fail to understand is that this Proposal is extremely selfish as Gareth Jones openly admitted that one of the driving forces behind the Proposals was that financially, the POWYS COUNTY COUNCIL education department would be better off as the huge BRECON HIGH SCHOOL debt could be simply wiped off. This, in my opinion has no bearing on GWERNYFED HIGH SCHOOL at all and therefore as pupils we questioned why such an innocent and successful school with a strong management team are being dragged into a situation through no fault of its own that doesn't even benefit it. This question was one that couldn't be answered suitably ... What the POWYS COUNTY COUNCIL staff soon established was that the GWERNYFED HIGH SCHOOL pupil's stance was strong and therefore admitted to us that there, and I quote from Gareth Jones "is another option that the council could look at" that would not affect GWERNYFED HIGH SCHOOL. From this, it must have been obvious that we asked the question so why isn't this the main Proposal? However, the POWYS COUNTY COUNCIL staff appeared foolishly unprepared and again a sensible answer was not given.

10.11.4 [At GWERNYFED HIGH SCHOOL consultation meeting] How can a meeting be viable when the 'official representatives' of the education system and Welsh cabinet, appeared to have little idea of the community's requirements, let alone the school's outstanding achievements? They were totally inconsiderate to audience

Every effort was made at the Consultation Meeting at Gwernyfed to ensure a full and robust answer was provided to all questions raised.

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| | <p>questions; all 'representatives' using avoidance language, consistently not answering specific questions and at times totally unable to respond</p> | |
| 10.11.5 | <p>A done deal?</p> | <p><i>The Authority's Proposals are never 'a done deal'. All Proposals for any school reorganisation must follow the statutory procedures as laid out in the Schools Standards and Organisation Act and the Welsh Government's School Organisation Code 2013.</i></p> |
| 10.11.6 | <p>Why, when the council were required to supply a taxi to Builth from Upper Chapel did it decide to supply two coaches from Brecon to Builth having the obvious intention of removing as many students from the Brecon Welsh stream as possible, thereby predetermining the outcome of the consultation?</p> | <p>When parents from the Brecon catchment area chose to send their children to Builth Wells High School for Welsh-medium education in 2015 and in a previous year, the decision to award home-to-school transport was initially refused by the Authority. However, following a successful appeal process, home-to-school was awarded.</p> |
| 10.11.7 | <p>Once again the suggestion of a fait accompli is strong – are the Builth feeder primaries not included as they are not directly affected given that the decision to move Welsh provision has already been made even though the Consultation period is still open? There is no suggestion that Builth primaries should feed into Brecon-based Welsh provision; a huge oversight given that we are still 'in Consultation'...?</p> | <p><i>The Proposal is still at a formative stage. Consultation Documents were distributed to all schools in the Gwernyfed and Brecon catchment, and all other affected schools. Builth catchment primaries were not deemed to be schools affected by this Proposal – according to the School Organisation Code 'an affected school is defined as 'a school to which it might reasonably be considered that pupils may wish to transfer'.</i></p> |
| <p>10.12 Primary School Proposals/Consultations</p> | | |
| 10.12.1 | <p>Despite promises to the contrary, new schools at Hay and Clyro have not been built. Who is</p> | <p><i>The Authority acknowledges that the progress of primary school reorganisation in the Gwernyfed catchment has been unsatisfactorily slow.</i></p> |

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| <p>to say that the new Brecon school will ever be built given past history?</p> | <p><i>Should the Welsh Government approve the OBC for the Brecon Campus, the next stage will be to engage a Design & Build contractor and submit a Full Business Case to Welsh Government. The current timescale for submission of the FBC is April 2017, which will mean that construction can begin in Summer 2017.</i></p> |
| <p>10.12.2 Do you not have a responsibility to give those children a more secure secondary education that they have been denied in their primary education?</p> | <p><i>It is the intention of the Authority for the New School to provide the highest quality education, with the appropriate care and support for all pupils, in the best possible facilities. It acknowledges that the development of new primary schools in the Gwernyfed area has been slow, and that some pupils who transferred from closing schools have not benefitted from having new facilities because of this.</i></p> |
| <p>10.12.3 Should GWERNYFED HIGH SCHOOL close there will be loss of friendships and change of peer groups as some pupils have no option but to go along with the proposed change whilst friends are moved to schools out of County. This does not encourage a positive school life for those involved with the changeover of schools, some of whom have already been through this process already when primary schools in GWERNYFED HIGH SCHOOL catchment area have been closed. How does POWYS COUNTY COUNCIL justify putting some pupils through this process on more than one occasion in their 3-18 years of education?</p> | <p><i>The Authority accepts that every school reorganisation Proposal creates a period of uncertainty for pupils. It is also acknowledged that some pupils in the Gwernyfed area have also been part of a primary school reorganisation. However, the aim of this Proposal is to ensure the future sustainability of high-quality secondary education in the area in light of the significant challenges that are outlined in the Consultation Document.</i></p> |
| <p>10.13 Public Consultation Events</p> | |
| <p>10.13.1 The ORS representative who chaired the meeting at Llandod told us in that meeting that his aim was "to ensure that you all get ample opportunity to ask questions". Was that</p> | <p><i>The Authority was keen to ensure that all consultation meetings at all four schools under review were consistent in terms of time and format, and therefore all public meetings were held for 2 hours. The Gwernyfed meeting continued</i></p> |

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| | <p>laudable aim achieved at Gwernyfed? You know very well that many of those who wanted to speak at Gwernyfed were unable to speak because the meeting ended before everyone had a chance to do so. Is it acceptable to allocate the same insufficient amount of time for questions at a meeting at the failing school in Builth Wells, which is to be improved and expanded under the cabinet's plans, as for the meeting at the successful school at Gwernyfed, which faces closure? If the answers to those two questions is no, as it has to be, is not the entire consultation process a sham?</p> | <p><i>for longer than this and the facilitator ensured that as many people as possible had the opportunity to speak.</i></p> <p><i>A public meeting, however, is only one part of the consultation process, and there are a number of ways of responding, which were publicised within the Consultation Document, during the consultation meetings, on the Council's website and in the press.</i></p> |
| <p>10.13.2</p> | <p>Criticises the fact that not everyone who wanted to speak at the consultation meetings was allowed to do so. Does it not demonstrate an almost unbelievable naivety on the part of your company to allocate the same time to a meeting at the failing school in Builth Wells, which is to be improved and expanded under the cabinet's plans, as for the meeting at the successful school at Gwernyfed, which faces closure? If the answers to those two questions is no, as it has to be, is not the entire consultation process a sham?</p> | |
| <p>10.14 The Questionnaire</p> | | |
| <p>10.14.1</p> | <p>On page 2 of the ... Questionnaire, I am asked to comment on whether I believe the council is right to make changes to respond to their belief that there is a case for change in Powys education. Is this not potentially misleading -</p> | <p><i>The School Organisation Code sets out the requirement to present supporting information on the case for change in a clear and coherent way. The question on page 2 of the questionnaire is designed to seek responses (either positive or negative) to that case for change. The distinction between asking about the need for change and support for the specific Proposals is important as an</i></p> |

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| <p>as responses may indicate that a change is needed but not the one suggested in the Proposal? I am concerned as to how the cabinet will present this data.</p> | <p><i>individual could agree that there is a need for change but might not necessarily agree with the solutions being proposed. Of course, they may also say there is no need to change. The questionnaire then goes on to ask for responses to the specific Proposals around the future of English and Welsh medium provision. Furthermore, open text boxes allow respondents to explain why they agree or disagree with the Proposals and to suggest alternative Proposals including no change.</i></p> <p><i>The specific concern being raised appears to be around whether or not any support for the case for change might be conflated with support for the specific Proposals, so it is worth clarifying then that ORS will present data on each question separately as they appear in the questionnaire with supporting verbatim comments to ensure that no such conflation occurs. The bottom line is that the consultation is asking for responses the specific Proposals for the reorganisation of schools and this- not response the case for change- is the key measure.</i></p> |
| <p>10.14.2 While the questionnaire states the case for change, it does not provide any reasons why the Proposal should NOT be considered. Is this not potentially creating a bias in responses and is a consultation document allowed to be one-sided?</p> | <p><i>The questionnaire was meant to accompany the Consultation Document – disadvantages and risks have been included within the Document.</i></p> |
| <p>10.14.3 Last year the response from the local community was clearly against the closure of Gwernyfed High School, so this year why would the response be any different?</p> | <p><i>In 2015, the Authority did not consult on a Proposal related to Gwernyfed High School, and it is important to adhere to the fundamental principles of consultation, as stated in the School Organisation Code, when bringing forward Proposals for school reorganisation.</i></p> |
| <p>10.15 Reporting</p> | |
| <p>10.15.1 Will Powys County Council produce a review of the consultation process, showing responses of all the groups included in the list of consultees? And if not, why not?</p> | <p><i>A Consultation Report will be published which will include reference to all the issues raised. It will also note Estyn’s response, as required by the School Organisation Code, and highlight any responses from children and young people.</i></p> |

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| 10.16 The Proposal | | |
| 10.16.1 | Explain how these Proposals fulfil the seven goals in the Well-Being of Future Generations Act 2015. | <i>A single Integrated Impact Assessment has been carried out which considers the impact of the Proposal against the seven goals of the Well-being of Future Generations Act 2015.</i> |
| 10.16.2 | For CSF 2, define what “good value for money” means. Where do quality of education experience, quality of teaching, equality of opportunity within the county, life opportunities and minimal adverse environmental impact fit in? Where does avoiding disruption to families’ lives fit in? Where does community cohesion and economic regeneration as a consequence of a stronger and growing high school fit in? Where does the added value of attracting new families into the area as a consequence of the new primary schools, New School Building and investing in better primary Welsh-medium education fit in? | <i>CSF2: ‘good value for money’ is defined as ‘The option must maximise return on the required investment (benefits optimisation) in terms of economy, efficiency and effectiveness; and the option must minimise associated risks.’ Quality of education is addressed is addressed within the Investment Objectives. Community cohesion and economic regeneration are considered via the impact assessments.</i> |
| 10.16.3 | For CSF 3, what “better outcomes” are defined? Better in what way? Better quality of teaching and education experience? Better equality of opportunity within the county? Better life opportunities as a consequence of the education? Lower environmental impact? Lower disruption to family life? Stronger community cohesion? | <i>CSF3 is defined as ‘improved attainment’ for learners.</i> |
| 10.16.4 | For CSF 4, why is Potential Achievability defined in terms of political acceptance? Whose politics, Powys County Council’s or the Welsh Government’s? This appears to reveal that the future of Brecon’s and Gwernyfed’ s | <i>CSF – Potential Achievability is a standard Critical Success Factor in HM Treasury’s guidance for Five Case Business Models. It states that there needs to be political acceptance of the Proposal across all levels of politics. The</i> |

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| | sixth form and Welsh-medium education is down to political point scoring. Education should be apolitical. | <i>Proposal is part of a statutory process where the decision-making is based on a political system.</i> |
| 10.16.5 | The consultation document states that the maintaining the status quo “will not create a sustainable resilient infrastructure for secondary education in the current and forecasted financial climate”. What is the basis for this statement? | <i>The basis for this statement is evidence from schools, as stated in PriceWaterhouseCoopers’ Study into the Viability of Secondary School in Powys. Other sources of evidence are:</i> <ul style="list-style-type: none"> - <i>Pupil projections</i> - <i>Financial projections</i> - <i>Quality profile of secondary schools</i> - <i>Condition of buildings</i> - <i>Surplus places</i> <i>Curriculum assessment</i> |
| 10.16.6 | What are the local priorities referred to on page 18 that reflect the actual expressed views and wishes of those in the Gwernyfed catchment? How does this compare with the local priorities that Powys Council has for this area of the County? Why does Powys feel it necessary to inflict this plan on a local population that is clearly antagonistic about the plan generally, in addition to questioning the motives of the local Authority? | <i>Page 18 of the document refers to the potential advantages and disadvantages of the Proposal. It states that the Proposal will lead to</i> <ul style="list-style-type: none"> • <i>Opportunities to provide excellent teaching and learning provision reflecting national, regional and local priorities</i> <i>Local priorities are defined as those of Powys County Council’s Schools Service.</i> <i>The Consultation Document explains the challenges facing the secondary sector in Powys. The Authority disputes the claim that it is ‘inflicting this plan on a local population’ – Cabinet has given its approval for the Authority to consult on the Proposal – all views will be considered before any further decisions are taken.</i> |
| 10.16.7 | Tell me, where is the enhancement of the quality of life for future generations of children in the Gwernyfed area? How is this sustainable, equitable or fair? | <i>Please refer to the Single Integrated Impact Assessment.</i> |
| 10.16.8 | What is transformational about this Proposal? | <i>The Proposal provides an opportunity to transform the secondary education infrastructure in the area.</i> |

| 10.17 Legality | | |
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| 10.17.1 | Is the Proposal to close Gwernyfed LEGAL? You are closing a yellow category school, out of ESTYN monitoring, to merge it with Brecon, a failing school in red banding and in special measures. Why should Gwernyfed be sacrificed to help Brecon get themselves out of a mess? If Gwernyfed have managed to work hard and get themselves removed from ESTYN monitoring, is it fair to then merge them with a failing school, which has had a similar amount of time to turn things around and failed to do so? | <p><i>The Proposal is legal, and is compliant with the statutory process for school reorganisation.</i></p> <p><i>The Proposal is not the merger of two schools: it is the closure of two schools and establishment of a new school.</i></p> |
| 10.17.2 | For some children affected by the closure they have already been through the closure of their primary school (Ffynon Gynon , Rhos coch, Llanigon and bronllys) Is it Legal to be able to disrupt a child's education in this way twice during their schooling. | <p><i>The Authority accepts that any school reorganisation Proposal creates a period of uncertainty for the pupils involved, and accepts that some pupils have already experienced their schools closing, due to that the reorganisation of primary schools in Gwernyfed catchment.</i></p> <p><i>However, the Authority has a duty to ensure the long-term sustainability of schools within the context of falling rolls and challenging economic times.</i></p> |
| 10.17.3 | Could you please explain how this is passed off as a legal process when you are not undertaking part of that process by listening to local opinion? Just by holding meetings does not mean you are listening. | <i>The Consultation has been carried out in accordance with the statutory requirements of the Schools Standards and Organisation (Wales) Act, and the School Organisation Code. The Consultation Report will be considered by Cabinet prior to any further decisions being made.</i> |
| 10.17.4 | If approved NPTC would offer 25 AS/A Levels but you do not confirm if they will be offering chemistry as they do not currently have a viable chemistry lab ... Surely under the Welsh Assembly Education policy which states you are not allowed to close a school if it | <i>NPTC Group of Colleges proposes to increase the range of A levels on offer, not reduce it. Chemistry was missing from the original provisional list; this was as an oversight which was pointed out during consultation. Chemistry has been added to the provisional list as will other subjects where there is demand</i> |

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| | <p>disadvantages the pupils and their welfare, you are now illegally disadvantaging them?</p> |
| <p>10.17.5 Taking Welsh education out of Brecon is bordering on illegal. Every child in Wales should have access to their language and culture.</p> | <p><i>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></p> <p><i>The Welsh Government’s Welsh – medium Education Strategy states ‘Welsh-medium education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing future bilingual citizens.’</i></p> <p><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 9 Welsh-medium Education Strategy April 2010 Information document No: 083/2010 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></p> <p><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</i></p> |

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| | | <i>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> |
| 10.17.6 | The School Organisation Code states that the consultation document must include the " <i>Likely benefits to children and young people, in accordance with the seven core aims of the United Nations Convention on the Rights of the Child.</i> " Can the council please explain how they have addressed this within the consultation document? As far as I can see, they have not and I therefore suggest that the document has not met the criteria of the SOC and hence is not legal. | <i>The Consultation Document is compliant with section 3.2 of the Code. This section outlines what proposers must include in a consultation document and does not include the statement outlined in italics (left). This statement comes from Annex C of the Code, which is an example of a Consultation Document template. It states 'The following template sets out a suggested but not mandatory format for the Information which is required to be included in a consultation document. This outline of the contents is not exhaustive and proposers would be expected to include additional elements depending on the nature and context of the Proposals under Consideration.</i> |
| 10.17.7 | The Proposal is clearly a merger of schools to deal with BRECON HIGH SCHOOL debts. To suggest that this is not a merger is not acceptable. It is noted that a merger between a successful and a failing school is illegal. How does POWYS COUNTY COUNCIL explain that this is not a merger? | <i>This Proposal will see the closure of both schools and the establishment of a new school. It is not a merger.</i> |
| 10.18 Big Lottery Issue | | |
| 10.18.1 | pg. 38 'The Big Lottery is a consultee of this consultation. If the Proposal is implemented, it is possible that a proportion of the grant may need to be repaid. If this happens, the Council would need to identify the funding for this. | <i>Whilst this issue has not been included as a risk, it has clearly been included within the Consultation Document, at page 38. Any repayment of the grant, or proportion of the grant, would be funded from Council reserves or capital budget, e.g. capital receipts.</i> |

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| <p>'Why is this not included in the Risk Assessment for the Proposal? What budget would this come out of? What guarantee can the Council give that this would not come out of the Education budget? Why is the repayment not built in as one of the costs of the Proposal?</p> | | |
| <p>10.19 Inclusiveness</p> | | |
| <p>10.19.1</p> | <p>How can developing an inclusive education model be included as an advantage in the Proposal, if it is already available in the current settings? Where is the evidence this is not currently provided at GWERNYFED HIGH SCHOOL or BRECON HIGH SCHOOL? There is no evidence given for this in the documentation. In fact, it is included as an Advantage of the status quo, pg. 11.</p> | <p><i>It is not inferred that Gwernyfed or Brecon High Schools do not have an inclusive education model. Instead, the statement asserts that here would be an opportunity, if the Proposal is implemented, to develop an inclusive model of education. This is expected of all schools, even if they are current or new schools.</i></p> |
| <p>10.20 Managing Change</p> | | |
| <p>10.20.1</p> | <p>Please explain how the Council will offer this support at a time when staff numbers at the Council are reducing due to Public Sector cuts.</p> | <p><i>The Schools Transformation Programme has been budgeted, including provision for the appropriate staffing.</i></p> |
| <p>10.20.2</p> | <p>Once a decision is made on the changes, when will the Council provide a Change Management strategy and plan to support the schools?</p> | <p><i>A Change Management Plan will be implemented on completion of the required statutory process.</i></p> |
| <p>10.21 Ethics</p> | | |
| <p>10.21.1</p> | <p>You say you have a duty to take into account the impact of your decisions on people with</p> | <p><i>As stated in the Consultation Document, the Authority has recognised that pupils from the Gwernyfed area may not be able to access after-school</i></p> |

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| <p>10.21.2</p> | <p>protected characteristics but please answer for me what about a pupil's Human Rights to have a full educational life as in being able to attend extracurricular activities?</p> <p>Llangors Community Council area, like so many areas in this rural part of Wales, has no public transport and for those travelling longer distances to a school in Brecon there is an issue of inequality as pupils will not be able to access such extra-curricular activities. How does POWYS COUNTY COUNCIL justify treating pupils on an unequal basis?</p> | <p><i>activities due to reliance on home-to-school transport. As a way of mitigating this, the Consultation Document states:</i></p> <p><i>'The New School would be encouraged to provide as many extra-curricular opportunities during the school day, and the Council would work with the school to explore possible transport solutions, including the use of public transport</i></p> <p><i>The majority of pupils attending Gwernyfed High School are currently reliant on home-to-school transport and their ability to access after-school activities would be similarly affected if the Proposal is approved.'</i></p> |
| <p>10.22 Alternative Proposals/ides – through schools</p> | | |
| <p>10.22.1</p> | <p>Why has the Proposal for a through school on the Gwernyfed site not been given due consideration? There have been plans for the rebuilding of 5 primary schools within the Gwernyfed catchment area and as yet, nearly 8 years later, not a brick has been laid. Would it not be prudent, therefore, to give further consideration to investing this money in adding to the Gwernyfed site and bringing all pupils from age 4 to 18 onto one site?</p> | <p><i>As stated in the Consultation Document, during the option appraisal exercise, an All Through School on multi-sites in the Gwernyfed area was considered. It was not considered feasible to consider an All Through School on one site in Gwernyfed due to the fact that plans to build five new schools in the catchment was in progress, and Welsh Government had already approved a Strategic Outline Case and Outline Business Case for this. The scope of the Secondary Schools Review was the secondary sector. It was necessary to define the scope of the Review, and the caveat for primary schools allowed officers to consider the inclusion of primary schools only if there were specific issues relating to the primary sector in that area e.g. leadership, quality, building condition, surplus places or the need for additional places.</i></p> |
| <p>10.22.2</p> | <p>I can understand that it is not ideal to taxi A-level students across Powys, and Gwernyfed does not offer the breadth of subjects that meets the proposed standard. So why not build a new school in Brecon from 4 years old until 19 years old, with excellent teaching facilities?</p> | <p><i>The Authority does not believe that All Through Schools in either catchment would meet the majority of the following objectives:</i></p> <ul style="list-style-type: none"> <i>• To significantly improve the learning outcomes for learners across the ability range;</i> <i>• To maximise the curriculum benefits at Key Stage 3 and Key Stage 4 for learners who study through the medium of Welsh or English;</i> |
| <p>10.22.3</p> | | |

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| <p>10.22.4</p> | <p>Have they thought of combining the primary and secondary school provision in Brecon, would this not be “transformational and creative” as Powys County Council claim they want to be?</p> | <ul style="list-style-type: none"> • <i>To provide post-16 provision that improves access to, and participation in, both academic and vocational courses and which meets the requirements of the Learning & Skills Measure, whilst minimising the need for additional travel during the school day;</i> • <i>To reduce surplus places in schools;</i> • <i>To provide robust linguistic continuity of Welsh-medium provision across all key phases of education;</i> • <i>To achieve efficiencies through economies of scale, reduced management, premises and running costs.</i> |
| <p>10.22.5</p> | <p>Explain why Powys County Council has pre-determined and limited the scope of this option by imposing an arbitrary criterion, namely that they “will only be considered if there are specific local conditions related to primary schools in a particular area ...” Explain why it would be disadvantageous to establish All-through schools in each of the Brecon and Gwernyfed catchments.</p> | <p><i>There has been no pre-determination. The Proposal has been brought forward through a detailed option appraisal exercise and business case, as evidenced in the Consultation Document. The reasons for discounting other options can be found in the Consultation Document.</i></p> |
| <p>10.22.5</p> | <p>Explain why Powys County Council has predetermined that the All-through option is only possible for the New School Building in Brecon, loading 13 feeder primary schools onto this one campus</p> | <p><i>As stated in the Consultation Document (page 100)</i></p> |
| <p>10.22.6</p> | <p>Why are we not considering building a primary school on the Gwernyfed site? This would give us the opportunity to increase the numbers at the school by increasing the age-range catered for. Locally, Christ College Brecon has done exactly that in order to improve their income streams to stay viable. Surely we could do something similar in the public sector, to make Gwernyfed a more financially secure unit by boosting numbers? We have a huge site for further buildings and it is a safe and secure site for younger pupils. There seems to be so much practical sense in this option. It keeps the</p> | <p><i>‘For the purposes of this exercise (the option appraisal exercise), the only two schools that have been considered are Mount Street Infant and Mount Street Junior Schools – all other schools in the catchment have been discounted from consideration at this stage. It is also assumed that an All Through School in Brecon would be a single-sited All Through School, given there is already a planned capital investment to replace the current building of Brecon High School. ‘</i></p> |

10.22.7

community cohesion by increasing the numbers of students on this site making it more financially viable and offering a continuity of education on one site.

10.22.8

We understand that GWERNYFED HIGH SCHOOL and BRECON HIGH SCHOOL support a Proposal to build an all through school at Brecon and include pupils from Mount Street primary school on the one site, this allowing GWERNYFED HIGH SCHOOL to remain as it is now. This would appear to be a transformational project that would meet all the 21st century schools criteria and assist with budgetary matters in Brecon. Why has this Proposal not been properly analysed in the Consultation Report and how does POWYS COUNTY COUNCIL justify putting this approach to one side when it is supported by the schools involved?

10.22.9

I believe that given the travel distances between high schools in this rural, sparsely populated county, Powys need to be seriously considering options such as federation and 3 - 16/18 through schools. These options would save money, provide scope for improving educational standards and allow children to be educated in their own communities.

If Brecon so desperately needs a new school why is Powys County Council not looking a revolutionary 21st century model of a through school in Brecon? - where they could consolidate primaries and secondary with a

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| <p>10.22.10</p> | <p>seamless transition, as modelled successfully in other areas of Wales and the primary schools could be redeveloped as much needed housing within this National Park area.</p> <p>I believe that the new Brecon Community School must be a bilingual 4-18 school with an emphasis on quality of provision and inclusivity. Alongside academic excellence, this would offer transformational vocational pathways developed through links with major employment providers in the Brecon area, e.g. public services and the National Park. ... The location of one or more primary schools into the new school.</p> | |
| <p>10.22.11</p> | <p>In view of the overwhelming opposition to your current plans, what are your alternatives, what is your plan B?</p> | <p><i>The Consultation Reports will be considered fully by Cabinet before any further decisions are made about the way forward.</i></p> |
| <p>10.22.12</p> | <p>Explain why Powys County Council has predetermined that the All-through option at Brecon and Gwernyfed High Schools has been excluded in favour of a tertiary, post-16 FE college model.</p> | <p><i>There has been no pre-determination. The Proposal has been brought forward through a detailed option appraisal exercise and business case, as evidenced in the Consultation Document. The reasons for discounting other options can be found in the Consultation Document.</i></p> |
| <p>10.22.13</p> | <p>Why has POWYS COUNTY COUNCIL not considered an option with enhanced use of ICT, leaving schools to remain open, more subjects to be offered, greater efficiency of staff, and increased choice for pupils?</p> | <p><i>The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education.</i></p> |
| <p>10.22.14</p> | <p>Why don't any of the Proposals for a transformational model make more about the potential for investing in technology to deliver</p> | <p><i>The Authority does not believe that enhanced use of ICT would address all the issues faced e.g. falling pupil numbers, financial efficiency, surplus places,</i></p> |

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| <p>the curriculum between schools in south Powys?</p> | <p><i>condition of school building, equity of provision, or meet the following investment objectives:</i></p> <ul style="list-style-type: none"> • <i>To significantly improve the learning outcomes for learners across the ability range;</i> • <i>To maximise the curriculum benefits at Key Stage 3 and Key Stage 4 for learners who study through the medium of Welsh or English;</i> • <i>To provide post-16 provision that improves access to, and participation in, both academic and vocational courses and which meets the requirements of the Learning & Skills Measure, whilst minimising the need for additional travel during the school day;</i> • <i>To reduce surplus places in schools;</i> • <i>To provide robust linguistic continuity of Welsh-medium provision across all key phases of education;</i> • <i>To achieve efficiencies through economies of scale, reduced management, premises and running costs</i> |
| <p>10.22.15 Why is it not possible to have a simple and straightforward Proposal to build a new school building? I appreciate that funds are tight, but is it not possible to replace the buildings without impacting on the fabric of the community? Perhaps, by employing an open and transparent strategy of selling off some of the land? Perhaps asking for help, financial contributions or ideas from the communities that your Proposals will affect and therefore will be motivated to act?</p> | <p><i>This is possible. However, the Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education.</i></p> |
| <p>10.22.16 Please explain to me why “alternatives such as clustering, collaboration or federation were not pursued as it was felt that they did not meet the Council’s objectives in finding solutions to the problems”.</p> | <p><i>Clustering, collaboration or federation do not, on the whole, address the following investment objectives:</i></p> <ul style="list-style-type: none"> • <i>To significantly improve the learning outcomes for learners across the ability range;</i> |

- *To maximise the curriculum benefits at Key Stage 3 and Key Stage 4 for learners who study through the medium of Welsh or English;*
- *To provide post-16 provision that improves access to, and participation in, both academic and vocational courses and which meets the requirements of the Learning & Skills Measure, whilst minimising the need for additional travel during the school day;*
- *To reduce surplus places in schools;*
- *To provide robust linguistic continuity of Welsh-medium provision across all key phases of education;*
- *To achieve efficiencies through economies of scale, reduced management, premises and running costs.*

There is already a degree of collaboration and clustering between the schools in Mid Powys and the wider area, including the South Powys Post-16 Partnership, and the problems outlined in the Consultation Document still prevail.

Also, none of these models would provide a solution that addresses the condition of both school buildings.

10.22.17 You have other options. You could build a 6 form in Brecon and have a new school for Brecon children. Why have no other options been offered?

The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education.

The Proposal has been brought forward through a detailed option appraisal exercise and business case, as evidenced in the Consultation Document. The reasons for discounting other options can be found in the Consultation Document.

An option for a single-sited All Through School in Brecon was considered, but discounted – the reasons for this are outlined in the Consultation Document.

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| <p>10.22.18 [Welsh Proposal]It was stated in the Builth Wells consultation evening that teams of teachers will travel between the two sites (being Builth Wells High School and Llandrindod-Wells High school) which would allow them to deliver lessons to both sites. Why can't a Welsh speaking team of teachers travel between Builth Wells High School and Brecon High School? Not only will it drastically cut travel costs, it would also ensure the security, safety and welfare of our children by keeping them off the roads and prevent anxiety and stress of pupils and their families.</p> | <p><i>The Proposal for Welsh-medium provision is intended to create a critical mass of learners in one place in order to be able to provide robust linguistic continuity throughout the key stages of education. This would not be possible with a peripatetic team of teachers.</i></p> |
| <p>10.22.19 What research / modelling has been conducted by POWYS COUNTY COUNCIL Educational Officers into how new learning / teaching technologies could enable a reduction in student travel, enable interschool collaboration around subjects taught and increase numbers of A levels offered, etc.?</p> | <p><i>The Authority, through its 14 – 19 grant, has already invested in installing video-conferencing equipment in every school and College Campus in Powys. Video-conferencing courses, and other distance learning technology, have been funded by the Authority. However, this alone, does not address all the issues facing the secondary sector nor meets the investment objectives listed in the Consultation Document (see 14.10.4)</i></p> |
| <p>10.22.20 Has POWYS COUNTY COUNCIL considered the WG report of March 2016? Does POWYS COUNTY COUNCIL accept that this Proposal now has to be urgently reviewed with a view to retaining individual 6th forms at both GWERNYFED HIGH SCHOOL and BRECON HIGH SCHOOL and understand that evaluating the current South Powys Consortium system and possibly updating it by using virtual learning techniques is likely to be more effective? There is a rural sixth form system operating in Pembrokeshire which Welsh Government support. Has POWYS</p> | <p><i>The Welsh Government published a 'Think Piece on the possible options for improving the performance and efficiency of sixth forms in Wales' on the 15th March 2016. This was published after Cabinet had made its decision to proceed to Consultation. The purpose of the Report was 'to set out the possible options available to the Welsh Government (WG) for improving the performance and efficiency of sixth forms in Wales, based on a review of the latest robust evidence. This included an appraisal of relevant literature and policy documentation, as well as feedback and opinion from a range of key stakeholders.' There is, to date, no clear policy direction from the Welsh Government based on this Report.</i></p> <p><i>Officers have had discussions with officers from Pembrokeshire County Council.</i></p> |

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| | <p>COUNTY COUNCIL examined the Pembrokeshire structure/case study with a view to assisting with this matter?</p> | |
| <p>10.22.21</p> | <p>The Council asks why POWYS COUNTY COUNCIL cannot <i>take the good and positive aspects of Gwernyfed and import them to Brecon to help turn it around ready for when its new building is complete.</i> It says that the South Powys Curriculum Consortium shows that communities and schools can work together.</p> | <p><i>The Authority believes that the issues facing the secondary sector are so significant that this softer approach would not, on the whole, address all the issues nor meet the following investment objectives:</i></p> <ul style="list-style-type: none"> • <i>To significantly improve the learning outcomes for learners across the ability range;</i> • <i>To maximise the curriculum benefits at Key Stage 3 and Key Stage 4 for learners who study through the medium of Welsh or English;</i> • <i>To provide post-16 provision that improves access to, and participation in, both academic and vocational courses and which meets the requirements of the Learning & Skills Measure, whilst minimising the need for additional travel during the school day;</i> • <i>To reduce surplus places in schools;</i> • <i>To provide robust linguistic continuity of Welsh-medium provision across all key phases of education;</i> • <i>To achieve efficiencies through economies of scale, reduced management, premises and running costs.</i> <p><i>There is already a degree of collaboration and clustering between the schools in Mid Powys and the wider area, including the South Powys Post-16 Partnership, and the problems outlined in the Consultation Document still prevail.</i></p> <p><i>Also, none of these models would provide a solution that addresses the condition of both school buildings.</i></p> |
| <p>10.23</p> | <p>Urban/Rural</p> | |
| <p>10.23.1</p> | <p>Scottish Government: “Commission on the delivery of Rural Education” highlights that: local Authority actions are not always joined up with community Proposals for new housing and</p> | <p><i>A draft Community Impact Assessment has been undertaken which recognised the negative impact of the Proposal on the community of Gwernyfed. This will be updated to include issues raised during the consultation, and Cabinet will be required to consider this before making any further decisions.</i></p> |

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| | <p>school closure at the same time; the impact on community wellbeing of threats to close schools; that rural school closures should be subject to thorough community impact assessments; that thriving rural communities depend in part on retaining local services and facilities like schools, shops, venues etc. If English and Scottish governments recognise the importance of rural schools, why is Powys County Council struggling to do so? Can the council please explain how they are complying with this statement within their suggested Proposal?</p> | |
| <p>10.23.2</p> | <p>In our opinion we think that closing Gwernyfed is a bad idea and instead of closing a superb high school why don't you not build a new school in Brecon but renovate and re-furbish Gwernyfed then this spectacular school will be the best school in Wales.</p> | <p><i>The Consultation Document outlines the pressures facing secondary schools in Powys. The intention of the Proposal is to establish a sustainable secondary school infrastructure that could deliver high-quality education within financial and demographic constraints. The Authority believes that a larger secondary school, in a new built facility, will enable the provision of the best possible education.</i></p> |
| <p>10.23.3</p> | <p>The Councils' Consultation Document is notable for its omission of the Option to maintain Gwernyfed High School and make new provision for schooling in Brecon.</p> | <p><i>The Consultation Document includes all the options that have been assessed, which includes 'Option 1 - Status Quo - Retain separate Brecon and Gwernyfed High Schools'.</i></p> |
| <p>10.23.4</p> | <p>What are the options available that do NOT include school closures? What are the options available that do NOT include Gwernyfed' s closure? How could the secondary provision be changed in Brecon without first looking at the Primary School provision? Why is an 'all through school at Brecon' age 4-18, excluding Gwernyfed, not a viable option?</p> | <p><i>The Consultation Document includes all the options that have been assessed, which includes 'Option 1 - Status Quo - Retain separate Brecon and Gwernyfed High Schools'. The reasons for discounting an All Through School option are outlined in the consultation Document.</i></p> <p><i>Clustering, collaboration or federation do not, on the whole, address the following investment objectives:</i></p> |

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| <p>10.23.5</p> | <p>Why was this considered too challenging? This would obviously need specific governance to ensure a level playing field for all Brecon catchment Primary schools- this should HAPPEN ANYWAY! POWYS COUNTY COUNCIL is worried there would be a two tier approach within catchment if there was combined primary and secondary school provision. What about the two tier approach that would be adopted in respect to the combination of GWERNYFED HIGH SCHOOL and BRECON HIGH SCHOOL pupils? GWERNYFED HIGH SCHOOL pupils would be severely disadvantaged compared to the Brecon pupils. See Page 105. There are No disadvantages to Brecon pupils if the Proposals are implemented. Where are the options including federation and increased collaboration? Why has this not been considered or costed? Where is the SWOT analysis for this? Closures were predetermined.</p> <p>The other options put forward by Powys were inadequate. Gwernyfed should stay as it is. Brecon needs a new school but not at the expense of Gwernyfed. Why can't Powys combine primary and secondary schools in Brecon? This is a rural area, federation and collaboration of services of different schools (keeping the sites and provision the same) would also be another option that has been disregarded.</p> | <ul style="list-style-type: none"> • <i>To significantly improve the learning outcomes for learners across the ability range;</i> • <i>To maximise the curriculum benefits at Key Stage 3 and Key Stage 4 for learners who study through the medium of Welsh or English;</i> • <i>To provide post-16 provision that improves access to, and participation in, both academic and vocational courses and which meets the requirements of the Learning & Skills Measure, whilst minimising the need for additional travel during the school day;</i> • <i>To reduce surplus places in schools;</i> • <i>To provide robust linguistic continuity of Welsh-medium provision across all key phases of education;</i> • <i>To achieve efficiencies through economies of scale, reduced management, premises and running costs.</i> <p><i>There is already a degree of collaboration and clustering between the schools in Mid Powys and the wider area, including the South Powys Post-16 Partnership, and the problems outlined in the Consultation Document still prevail.</i></p> <p><i>Also, none of these models would provide a solution that addresses the condition of both school buildings.</i></p> |
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| <p>10.23.6</p> | <p>“The provision of post-16 education on a single site would remove any requirement for additional inter-school/college travel during the school day.” So would an in-school sixth form; an All-through 4 to 18 model in Brecon and Gwernyfed, and retaining Welsh-medium provision in Brecon.</p> | <p><i>The Authority agrees that the provision of post-16 education on a single site would remove any requirement for additional inter-school/college travel during the school day, if that provision was based in Brecon. Learners would have to travel to access vocational subjects at the College if the post-16 was sited in Gwernyfed.</i></p> <p><i>There is no post-16 Welsh-medium provision for learners in Brecon, therefore they would have to travel anyway to access this.</i></p> |
| <p>10.23.7</p> | <p>THINK OUTSIDE the BOX! Include the 6th form at Crickhowell in the development of Proposals for a dedicated 6th form at the site of one of the schools (probably Brecon) and the removal of 6th form provision at Crickhowell and Gwernyfed with the NPTC to provide a complimentary vocational education (which is the bit they might be good at). This would create more 11-16 spaces at Gwernyfed and Crickhowell and allow the benefits of a critical mass of 6th students.</p> | <p><i>The Authority agrees that this option would create the necessary critical mass for post-16 learners with access to vocational subjects at NPTC Group of Colleges. However, Crickhowell HIGH SCHOOL was not included in the review as the school is over the Council’s threshold for size of school at KS3 and KS4, and at Post-16, and can deliver a range of curriculum choices.</i></p> |

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| 11 | The Consultation Process | |
| | 11.1 Timescale | |
| 11.1.1 | the timescale is so small parents need to know what is going to happen to make plans for their children | <i>The Authority acknowledges that any school reorganisation Proposals creates a period of uncertainty. However, the Authority has to adhere to the legal procedures laid out in the School Organisation Code when bringing forward Proposals.</i> |
| 11.1.2 | How is the new building at Brecon expected to be finished by 2019-2020? There has been no planning passed, Brecon Town Council is against it, and The Brecon Beacons National Parks will have to be involved. No funding has been secured. The primary school projects were to be finished at Clyro by 2016. They have not been started. Pupils are all in temporary classrooms. How will this NOT happen at Brecon? | <i>Obtaining Welsh Government funding for investment requires the approval of business cases, which are also dependent on the successful outcome of any statutory consultation processes in relation to school reorganisation Proposals. Should the Proposal be supported by Cabinet, the Outline Business Case will be submitted to the Welsh Government. It is only after approval of an Outline Business Case that the Authority can enter into a contract with a design and build contractor to develop designs. At that stage, plans will be submitted to the planning process.</i> |
| 11.1.3 | If the consultation does not follow the anticipated timescales, you MUST give all appropriate support and resources to Brecon High School to ensure the current cohort of children are not neglected for the sake of you long term vision. What assurances can you provide that will instil us with some confidence? The new school in Brecon High School, if the timescales are adhered to, will be built 10 years after it was officially classed as a Category D. If your Proposals don't proceed according to plan, what | <i>The Authority will continue to provide support to Brecon High School should the Proposal be abandoned, and a contingency plan for the school building will be developed in the event that this particular Proposal does not progress.</i> |

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| | assurances can you give us parents that our children's health and safety will not be compromised as a result of your insufficient governance in this area? | |
| 11.1.4 | <p>We refer you to the table 9 on page 22 of the Outline Business Case for the Beacons Campus Project. This table details when you plan to spend money on building the proposed school. It shows 'New Build Capital Cost' expenditure as:</p> <p>Year 0: £50,000 Year 1: £41,000 Year 2: £295,000 Year 3: £11,333,000</p> <p>Therefore, by Year 3 (2019-20) – the year the new £20m school opens – you have only spent £11,719,000. (A quarter of the £45m Beacons Campus budget). You still have over £8m to spend on the new school. Please explain how you plan to open a £20m new school having spent only £11,719,000 on its construction. [Gwernyfed Campaign Group]</p> | In this table, year 5 is 19/20 (September 2019), so year 0 is actually 2014/15 (September 2014). It is reasonable to assume that £50k was spent in this year (that may be some form of feasibility or consulting fees). |
| 11.2 Due Diligence – Options Appraisal, identifying preferred Proposal | | |
| 11.2.1 | All the Council's arguments for closure were effectively refuted (in the consultation meeting on 20 April) | <i>Comment noted</i> |
| 11.2.2 | I do have specific concerns about the Powys County Council Cabinet meeting held on 24th February . Firstly, the | <i>The decision-making process followed the process outlined in the Council's Schools Transformation Policy 2014.</i> |

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| <p>decision making process was fundamentally flawed. A previous successful legal challenge forced Powys County Council to re-start the process, having failed to comply with their own and Welsh Government published policies for developing school transition Proposals. Powys County Council brought back to the table the same Proposals with no real evidence of them having considered alternative truly transformational options in any depth whatsoever. Also, the Proposals do not reflect the fundamental change to the curriculum now taken forwards by the Welsh Assembly Government and as described in Curriculum for Life. With more foresight and imagination Powys County Council could be at the forefront of these changes. There is nothing stated in the Proposals that anyway hints at the schooling for the pupils would be at any higher standard than what is currently being taught at Gwernyfed High School.</p> | <p><i>A detailed Business Case was developed which followed an agreed methodology of appraising options.</i></p> <p><i>The Authority is fully aware of the fundamental changes to the curriculum in Wales, and the Proposal is intended to provide an infrastructure where that curriculum can be developed and flourish.</i></p> <p><i>The Authority has not attempted to ‘ram through its agenda in ignorance of the vocal and compelling views of local people’. With reference to an informal consultation on a variety of options for reorganisation secondary schools, which took place in 2011, not 2009, Cabinet listened to the views of local people and proposed a number of alternative models which maintained the current infrastructure of schools.</i></p> <p><i>This Proposal is part of a consultation which means that the Authority wishes to hear the views of local people, before taking any further decisions.</i></p> <p><i>The consultation has not been intentionally scheduled to clash with the exam period. Rather, the Authority wished to proceed with the consultation in order for the decision-making process to be carried out in a reasonable time, in order to avoid more uncertainty.</i></p> |
| <p>11.2.3 Since the Proposal to close the school was first sprung in 2009, the Council has attempted to ‘ram’ through its agenda in ignorance of the vocal and compelling views of local people. It has purposefully timetabled key and burdensome meetings during the exam period in an attempt to dissuade staff, pupils and parents from expressing their views. At a recent Cabinet meeting, the Council</p> | <p><i>The Authority does not agree with this statement. Given the scale of the responses to this consultation, it is apparent that the consultation was not scheduled to dissuade stakeholders from expressing their views.</i></p> |

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| | <p>changed the agenda fifteen minutes before hand to include discussion of the proposed closure and had not provided its scrutiny committee with the documents necessary for it to evaluate the merits of the Proposal.</p> | |
| 11.2.4 | <p>I do not think that there has been sufficient investigation of other options that allow Brecon High School to continue to offer Welsh Medium Education and to retain an 11 – 18 offering.</p> | <p><i>Comment noted</i></p> |
| 11.2.5 | <p>From the start of this process only one option has been pursued and when you failed at the first hurdle it was pursued again, maybe with slightly different wording but none the less exactly the same Proposal was on the table. This make us all think that there has been no other consideration or avenue explored to make sure that the very best outcome is reached</p> | <p><i>A number of options were considered during the option appraisal process, as noted in the Consultation Document. These options were considered to be the most appropriate to meet the investment objectives and business needs.</i></p> |
| 11.2.6 | <p>There are numerous options mentioned in the consultation document, yet none are very forward looking. I was under the impression that all options should be explored or shown to have been ruled out as part of these consultations</p> | <p><i>A number of options were considered during the option appraisal process, as noted in the Consultation Document. These options were considered to be the most appropriate to meet the investment objectives and business needs.</i></p> |
| 11.2.7 | <p>Pg. 12: Possible options 'collaboration or federation were not pursued as it was FELT that they did not meet the Council's</p> | <p><i>Comment noted</i></p> |

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| | <p>objectives in finding solutions to the problems.'</p> <p>On what basis (research/business case) was this decision to not pursue this as an option taken? [Using the word FELT demonstrates the lack of strategic approach throughout the whole of the consultation document. In the public, voluntary and commercial sectors we do not FEEL which decision is the best to take, we DECIDE based on evidence against clear expected qualitative and quantitative OUTCOMES.]</p> | |
| <p>11.2.8</p> | <p>In our opinion, the appraisal exercise beginning on P99 is flawed, and has been slanted in favour of the preferred option. 'Ticks' and 'double ticks' are arbitrary, subjective and do not appear to be directly linked to factual data. The significance of the 'X's in some columns has not been explained. Some aspects of the matrix on P101 are utterly bizarre - the first line, for example: 'To significantly improve the learning outcomes for learners...' Somehow, for this objective, every option gets a tick. Even doing nothing gets a tick.</p> <p>It comes as no surprise that Option 4 is classed as non-achievable, since it is apparently to "Establish a new English-medium Secondary School in Gwernyfed" but the school would operate "from a single site in Brecon". This sort of sloppiness makes it impossible to take</p> | <p><i>The Option Appraisal Exercise was carried out in accordance with HM Treasury's Guidance for 5 Case Business Models. The Investment Objectives including within the Option Appraisal Exercise are focused on achieving educational outcomes, rather than community/social outcomes. These are included in the Draft community impact assessment. The justification for 'doing nothing' meeting the criteria for improving learning outcomes is because it would be expected that, should the two schools remain as they currently are, standards would be continually improving.</i></p> <p><i>It is acknowledged that there was an error in the description of Option 4 – it should have read 'Gwernyfed' instead of 'Brecon'.</i></p> |

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| | <p>the matrix seriously. ... Please explain why negative impacts [such as 'Avoids negative social and economic impact on communities within the Gwernyfed catchment'] have been omitted from the appraisal exercise, and please provide an alternative appraisal which does take them into account. [Gwernyfed Campaign Group]</p> |
| <p>11.2.9</p> | <p>What is not explained is how an option meeting the criteria can receive two ticks or why, if it meets the criteria, it only gets one tick. For instance the first criteria is 'To significantly improve the learning outcomes for learners across the ability range'. Each option gets one tick including the status quo ... in this framework the appraisers consider that doing nothing will as significantly improve learner outcomes as establishing a new English-medium Secondary School ... [more examples given] ... The Framework is shown to be deeply flawed, the marking pointless and the short-list thereby arrived at of no value whatsoever. ... What weighting matrix has been used in deciding which of the two options arrived at by the discredited Options Appraisal Framework was preferred? Why has the “clear disadvantage of [...]no secondary education in the Gwernyfed area, with additional travel for pupils” and the “requirement for significant capital</p> |

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| | <p>investment to build a new school” been discounted in favour of an option that is described as “challenging operationally” but “not insurmountable” (when the operational challenge is predicated upon the limited view of a through school that involves all 13 primary schools as feeder schools), even when it is described as having “added benefits of improving transition between primary and secondary phases and provides a greater level of savings to the Council”?{</p> | |
| <p>11.3 The Council will ignore views</p> | | |
| <p>11.3.1</p> | <p>The current Proposal definitely illustrates that the learners’ opinions and concerns have not even been slightly considered and therefore has left everyone feeling completely opposed and disgusted to the Proposal.</p> | <p><i>The views of learners will be included within the Consultation Report. All comments and alternative options will be included within the Consultation Report that will be considered by Cabinet before any further decisions are made.</i></p> |
| <p>11.3.2</p> | <p>Powys knows that the community do not want this merger to go ahead and so are ignoring comments and alternatives offered by the community.</p> | |
| <p>11.3.3</p> | <p>Powys knows that the community do not want this merger to go ahead and so are ignoring comments and alternatives offered by the community</p> | |
| <p>11.3.4</p> | <p>The panel could not have made it any clearer that they did not wish to be there, did not wish to listen and could not care about what the local community and</p> | <p><i>The Authority refutes this comment. All consultation meetings were essential in order for the panel members to hear and understand the views of the community, and pupils.</i></p> |

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| | more importantly the pupils affected by the Proposal had to say. | |
| 11.3.5 | The Council is treating the above Proposal as a fait accompli which is massively frustrating, which disenfranchises people from the democratic process and denies them their say in their children's education. | <i>The Authority refutes this comment – the Proposal is subject to a formal consultation, and the Cabinet will need to consider all views before it makes any further decision.</i> |
| 11.3.6 | I know the Gwernyfed Governors have tried (as have many others) to make constructive suggestions to POWYS COUNTY COUNCIL cabinet for alternative Proposals. This has continuously fallen on deaf ears. I urge POWYS COUNTY COUNCIL to develop a strategy that builds on the success of Gwernyfed High School to drive up the standards in both schools without the continual threat of closure hanging over them. Gwernyfed must be retained as a stand-alone school or as part of a federation arrangement which crucially also includes “A” level provision. | <i>Comment noted</i> |
| 11.4 Cabinet Composition | | |
| 11.4.1 | The Powys County Council Cabinet's members are nearly <i>all</i> from Montgomeryshire and this area has only 1 representative. In Montgomeryshire, they aren't closing any schools at all because they know that they'd get voted out. In this part of Powys we can't vote | <i>The Cabinet consists of 5 councillors from Montgomeryshire, 2 from Radnorshire and 2 from Brecknockshire.</i> |

them out or do anything about it so they close *our* schools ... It means that they can do whatever they want to us and we are powerless to stop them.

11.4.2 I feel I have more of a right to say what is best for my children, business and town than councillors from Builth Wells and Montgomeryshire.

11.4.3 The cabinet system when organised (as it is presently) on broadly geographical lines disenfranchises residents of large parts of the county and is highly undemocratic.

11.4.4 Not one of the Powys County Cabinet lives in Brecon. Their lack of support for Brecon High School is obvious.

11.4.5 The decision will sit with a cabinet of nine members, most of whom live in Montgomeryshire. The members of the cabinet present at the evening did not instil confidence that any decisions will be well informed, objective and forward thinking. How are the council cabinet members qualified to make these decisions? How many have a background in education? The participants were content to give responses (not answers) that were inaccurate, incoherent, lacking in content and unrelated to the question asked of them.

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| <p>14.4.6</p> | <p>I was appalled at the recent consultation meeting at Gwernyfed to discover that most of the members proposing these changes were not from this area of Powys ...I notice that NO schools in their areas are planning to close.</p> | |
| <p>14.4.7</p> | <p>Why are the local councillors not allowed to vote on what is a monumental decision for this area. I believe the executive council of 9 members, who hold all the power were chosen by the council leader Barry Thomas, none of who come from this area. This is totally undemocratic. Can you please tell me if this is a legal use of the council's power?</p> | |
| <p>11.4.8</p> | <p>There is an apparent and/or perceived bias of POWYS COUNTY COUNCIL in favour of schools and the status quo in the north of the county.</p> | <p><i>On the 24th March 2017, Cabinet approved the start of the Secondary School Reorganisation Programme based on four priorities – this includes a review of secondary schools in North Powys, with a focus on Welsh-medium provision. This is currently underway.</i></p> |
| <p>11.5 Cabinet Decision</p> | | |
| <p>11.5.1</p> | <p>If the “Cabinet” (whom I understand are made up mainly from individuals outside the local area) are ultimately responsible for making this decision and can do so based on the facts presented by these individuals then it is a very sad world indeed.</p> | <p><i>A separate review of secondary schools in North Powys is expected to report back to Cabinet in the autumn.</i></p> <p><i>The Cabinet will be considering the Consultation Report and updated impact assessments which will reflect all views put forward during the consultation, before any further decisions are made.</i></p> |

| 11.6 Lack of/Lost confidence in Powys County Council | | |
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| 11.6.1 | I would like to take my children out of the Powys education system. It is not fit for purpose. There is a high-handed culture of presenting plans to the people and communities of Powys with very little interest in engagement and dialogue. This causes huge amounts of stress to communities directly affected and, presumably, makes the process of carrying out any plans extremely difficult, if not impossible. The cabinet at POWYS COUNTY COUNCIL need to be reminded that they exist to serve the people of Powys and not their own egos. | <i>The Proposal has been subject to an extensive consultation exercise. Cabinet will consider this information prior to making any further decisions.</i> |
| 11.6.2 | I attended the Public Meeting on Wednesday 20th April 2016 and was very disturbed at the lack of information given by the Councillors and what answers were given were not satisfactory. Clearly the community have lost faith in the Council and do not feel that our education is safe in their hands. | <i>Comment noted</i> |
| 11.6.3 | I have absolutely zero confidence in Powys county council. This is for several reasons. In 2009, Powys proposed to close Gwernyfed, but they backed down as their process was flawed and done so illegally. Then again in the summer of 2015 the Proposal to close the school was challenged successfully once more as Powys county council failed to comply | <i>In 2011, not 2009, the Council carried out an informal consultation on a number of options for secondary school reorganisation. Cabinet, following consultation, decided to proceed with an alternative initiatives which maintained the number of high schools. This process was not illegal or flawed.</i> <i>As stated in the Consultation Document, the Authority did receive a legal challenge to a Cabinet recommendation in 2015, and started the process again.</i> |

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| | <p>with their own and Welsh Government published policies for developing school transition Proposals. They then brought back to the table the same Proposals with no real evidence of them having considered alternative options in any depth whatsoever. Surely this alone proves that the people behind this plan are totally inadequate ... Also in this meeting they failed to address specific questions asked and concerns raised about the decision to close Gwernyfed.</p> | <p><i>A Business Case was developed which considered a number of different options, in accordance with an agreed option appraisal methodology.</i></p> |
| <p>11.6.4</p> | <p>I will not believe anything POWYS COUNTY COUNCIL say here because I have seen first-hand their complacent destruction to youngsters and their exclusion.</p> | <p><i>Comment noted</i></p> |
| <p>11.6.5</p> | <p>I am extremely concerned about other elements of your Proposals and have no confidence in the ability of Powys County Council to implement the elements with which I do agree.</p> | <p><i>Comment noted</i></p> |
| <p>11.6.6</p> | <p>Why on the one hand do we as a rational community understand to the nth degree the importance of education, yet on the other hand Powys County Council act to totally undermine the vehicle with which to provide this to our children – Gwernyfed High School. The answer is that no-one at Powys County Council seems to have the vision, or guts, to invest in Gwernyfed.</p> | <p><i>Comment noted</i></p> |

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| 11.6.7 | I firmly believe that if a vote of confidence in Powys County Council's ability had taken place, it would, quite rightly have ended in a 'No'. | <i>Comment noted</i> |
| 11.6.8 | The Proposal severely damages the reputation of Powys County Council among the general public, as it includes the complete closure of the only one of the four Mid Powys high schools not currently in Special Measures, to be operating within budget to at least satisfactory standards (as judged by Estyn) and in buildings some of which are barely 10 years old; and is also blessed with excellent outdoor sporting and recreational facilities. [Welsh Liberal Democrats] | <i>Comment noted</i> |
| 11.6.9 | However, TTC has much deeper concerns about the decision-making process itself: it has no confidence in the decision-making abilities of the current POWYS COUNTY COUNCIL Cabinet, which <i>does not appear to have the necessary expertise or levels of competence required to make such a fundamental decision about secondary education.</i> [Talgarth Town Council] | <i>Comment noted</i> |
| 11.6.10 | The campaign team members, obtained, via a Freedom of Information request, a copy of the County Councils outline business case for the new campus in Brecon, lodged with THE Welsh | <i>The Authority has been transparent about the status of the Outline Business Case. The Consultation Document clearly explains that it had been submitted to Welsh Government without prejudice to the outcome of any decisions taken by Cabinet following consultation, and the reasons why.</i> |

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| <p>Government before the start of the Consultation process at Gwernyfed. By withholding the document the Local Authority has acted unlawfully and has severely compromised its own Consultation process because of a major pre- determination action. This should be a reason for abandoning the whole process. At the public Consultation meeting officers kept saying the Authority was listening and we could trust them. Does Powys County Council still not understand why no one connected with Gwernyfed HIGH SCHOOL (or Brecon HIGH SCHOOL for that matter) trusts anything the local Authority states or does? [Gwernyfed Campaign Group]</p> | | |
| <p>11.7 POWYS COUNTY COUNCIL Performance at Consultation Meetings</p> | | |
| <p>11.7.1</p> | <p>I attended the consultation meeting in April at Gwernyfed ... Now I finally know what the phrase “pulling the wool over one’s eyes” means! Thank goodness for the many members of the public who DID take the time to get their facts right and spoke so eloquently and passionately for saving Gwernyfed school. Unlike those members of the council in attendance who clearly did NOT have the means to back up their reasoning for closure, evident in the stammering and spluttering and indeed the number of NON responses!</p> | <p><i>Comment noted</i></p> |

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| 11.7.2 | At the meetings I have attended Powys just do not seem to have any answers | <i>Comment noted</i> |
| 11.7.3 | I was ... unimpressed by the representatives of Powys County Council and NPTC. Fundamentally, the almost, if not total, lack of trust which the local community have in Powys County Council to do the right thing for our children was brought to bear ... | <i>Comment noted</i> |
| 11.7.4 | All of the people who asked questions, raised concerns and made statements about their fears spoke eloquently, with passion and balance. Powys County Council 'listened' and hid behind a barrage of statistics. At the end of the meeting, there was a palpable sense of a community having come together to stand up for themselves. Those members of the community left feeling buoyed by their actions and empowered to do more to support the future of their community. I got the distinct impression, all the members of Powys County Council left with their tails between their legs. | <i>Comment noted</i> |
| 11.7.5 | It was clear from the responses and expressions of the Officers and Councillors present that they held the people's views in contempt by either declining to answer questions properly or merely responding by saying that their views would be 'taken into account'. This | <i>Comment noted</i> |

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| | <p>is a legally meaningless obligation which only has significance if the Council's actions satisfy the Wednesbury test of unreasonableness, that is to say, the Proposal is "so outrageous in its defiance of logic or accepted moral standards that no sensible person who had applied his mind to the question to be decided could have arrived at it." In truth, I suspect that in light of my observations 1 above, the Council are not far away from satisfying this test.</p> | |
| <p>11.7.6</p> | <p>[At GWERNYFED HIGH SCHOOL KS4 meeting] I feel that some of my questions were not answered fully and that the response from the POWYS COUNTY COUNCIL staff was simply vague and unacceptable. What they appeared to fail to understand is that this Proposal is extremely selfish as Gareth Jones openly admitted that one of the driving forces behind the Proposals was that financially, the POWYS COUNTY COUNCIL education department would be better off as the huge BRECON HIGH SCHOOL debt could be simply wiped off. This, in my opinion has no bearing on GWERNYFED HIGH SCHOOL at all and therefore as pupils we questioned why such an innocent and successful school with a strong management team are being dragged into a situation through no fault of its own that doesn't even benefit it. This question was one that couldn't be</p> | <p><i>Comment noted</i></p> |

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| | <p>answered suitably ... What the POWYS COUNTY COUNCIL staff soon established was that the GWERNYFED HIGH SCHOOL pupil's stance was strong and therefore admitted to us that there, and I quote from Gareth Jones "is another option that the council could look at" that would not affect GWERNYFED HIGH SCHOOL. From this, it must have been obvious that we asked the question so why isn't this the main Proposal? However, the POWYS COUNTY COUNCIL staff appeared foolishly unprepared and again a sensible answer was not given.</p> | |
| <p>11.7.7</p> | <p>There is no doubt, based on the community feelings expressed at the public meeting, that the local community is against the Proposals with many questions being asked to which the assembled officers and councillors had no coherent answers.</p> | <p><i>Comment noted</i></p> |
| <p>11.8 A Done Deal?</p> | | |
| <p>11.8.1</p> | <p>I believe that the outcome of the reorganisation of schools is already predetermined by the council, from the beginning it has been implied that this must succeed and that the whole process has got behind on its schedule, from the way the consultation paper is skewed in favour of the Proposal just goes to reinforce this ... I feel not</p> | <p><i>The outcome of the consultation has not been predetermined. All school reorganisation Proposals have to be carried out in accordance with the Welsh Government's School Organisation Code.</i></p> <p><i>The Consultation Document is fully compliant with the requirements of the Code and provides both advantages and disadvantages of the Proposal, along with risks and impact assessments.</i></p> |

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| | <p>enough thought and consideration will be given to this decision (to close Welsh provision at Brecon) and it will be waved through as a small part of a 'bigger' decision (to close Gwernyfed HIGH SCHOOL ... why when the council were required to supply a taxi to Builth from Upper Chapel did it decide to supply two coaches from Brecon to Builth having the obvious intention of removing as many students from the Brecon Welsh stream as possible, thereby predetermining the outcome of the consultation?</p> | <p><i>Cabinet will be considering all issues raised, which have been included in the Consultation Report, before making any further decisions, including those related to Welsh-medium education.</i></p> <p><i>Question previously answered</i></p> |
| <p>11.8.2</p> | <p>Powys also made a number of comments during the consultation meeting held on 20th April 2016 which strongly suggests that they had pre-determined the outcome, which is outrageous. This was brought to our attention when talking about the legal challenge last summer. Powys said they had 'fallen behind' and needed to 'catch up' showing they have no intention at all of changing their decision and are not going to listen to people's views and take them on board constructively, again showing their inadequacy.</p> | <p><i>As stated in the Consultation Document, the Authority did receive a legal challenge to a Cabinet recommendation in 2015, and started the process again.</i></p> <p><i>A Business Case was developed which considered a number of different options, in accordance with an agreed option appraisal methodology.</i></p> |
| <p>11.8.3</p> | <p>I am most angry at the number of comments that came from the Powys County Council meeting that appears to suggest that the Cabinet had predetermined the outcome. This is without consultation because Powys</p> | <p><i>The outcome of the consultation has not been predetermined. All school reorganisation Proposals have to be carried out in accordance with the Welsh Government's School Organisation Code.</i></p> |

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| | County Council know full well that the community is not behind this Proposal | <i>Cabinet will be considering all issues raised, which have been included in the Consultation Report, before making any further decisions, including those related to Welsh-medium education.</i> |
| 11.8.4 | It seems to me that a decision has been taken already to close Gwernyfed High School, to move Welsh medium education from Brecon to Builth Wells and to transfer all post 16 education to NPTC, which in my opinion would be a disaster. If the representative of NPTC attending the consultation meeting was there to 'sell' the proposed provision, he failed on all counts! | |
| 11.8.5 | I believe the whole tenor of the document is contained in those words. It shows that the ideas behind the Proposals are merely to satisfy the policies of the council and have no bearing on, or thought for, the lives of children, parents, teachers or the general community. | <i>The Consultation Document outlines the case for change, and the issues facing secondary education in Powys.</i> |
| 11.8.6 | Arwel Jones stated, "We are entering a crucial phase in our secondary school plans and are determined to see them through ..." The formal consultation period has yet to end, but he appears to already know the result. | <i>Cllr Arwel Jones is fully aware of the statutory process related to School Reorganisation Proposals.</i> |
| 11.8.7 | The preferred options do not take in consideration the option of opening a new or keeping the current school in Gwernyfed. It only takes into | <i>The option appraisal includes options for retaining the status quo, and establishing the new school in Gwernyfed.</i> |

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| | consideration of the opening a new school in Brecon completely dis-regarding the needs and problems that will face the Gwernyfed community, if the new school in Brecon was to open. | |
| 11.9 Primary School Proposals/Consultations | | |
| 11.9.1 | I also went through the shambles of consultation meetings during the closure of my son's primary school, Ffynnon Gynydd. Education in Powys is becoming a joke. | <i>Noted</i> |
| 11.9.2 | The Council is not renowned for delivering on their promises. Before 2015, they closed many small primary schools in the area with the promise that we'd have a nice, new school in Hay and it would be <i>finished by</i> September 2015. Now it is April 2016, and not a single brick had been laid since then. This leads me, and many other people, to have no reason to believe that we are going to have the high school built either. We have been given no evidence that the Council isn't just going to close Gwernyfed and Brecon and then put the whole plan to the side and start on a new project. That is what happened to the primary schools and the Council shouldn't be starting to close anything else before they've built the new primary school in Hay. | <p><i>The Authority acknowledges that the primary school reorganisation in the Gwernyfed catchment has been unsatisfactory in terms of the time that it has taken. However, the Authority is confident that the new schools will be open by 2018/19.</i></p> <p><i>The Authority is committed to building a new school to replace the current Brecon High School, and the process is explained within the Consultation Document.</i></p> |

- 11.9.3** Hay Primary school. A new school was promised and POWYS COUNTY COUNCIL presented the community with a plan for how they would deliver it and what the school would look like. There was no dialogue, there was no discussion with the different user groups and there was no genuine consultation with the community. The community objected to POWYS COUNTY COUNCIL's proposed method of delivery (which involved the sale of the school site to a supermarket developer) and POWYS COUNTY COUNCIL were sent back to the drawing board with their tails between their legs. To date there is still no new primary school in Hay, although many of the smaller outlying village schools have been closed, but there are still hollow promises and rumours of supposed new school opening dates. There have been plans for the rebuilding of 5 primary schools within the Gwernyfed catchment area and as yet, nearly 8 years later, not a brick has been laid.
- 11.9.4**
- Powys have already caused problems with primary school closures in the catchment area of GWERNYFED HIGH SCHOOL, and the promised new primary schools which still ,after years, - have not been started - have they even bought the land? This does not bode well for this Proposal.
- 11.9.5**

11.9.6

Despite promises to the contrary, new schools at Hay and Clyro have not been built. Who is to say that the new Brecon school will ever be built given past history?

POWYS COUNTY COUNCIL have embarked on a similar model of closing school and building larger schools for the primary school estate, no doubt using the same arguments of falling pupil numbers and ageing buildings, it should be highlighted that despite this process being ongoing for the last 7 years, so far not a single brick has been laid for a new school with pupils being educated in porta cabins and temporary locations. Powys County Council are adamant that building will start post December (although they didn't state which December) even though in Talgarth a site hasn't been bought, planning hasn't been agreed and a school design hasn't even been out for public consultation yet. This situation has angered most local residents and eroded our ability to trust POWYS COUNTY COUNCIL. The primary school program shows that POWYS COUNTY COUNCIL is not capable of running these programs to time and budget and putting another group of pupils at risk to try and cover budgeting issues is not morally acceptable.

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| 11.9.7 | Powys County Council has a history of bungling 'Grand Schemes'. Look at Mid Wales hospital and Hay junior school. | <i>Comment noted</i> |
| 11.9.8 | How would Powys Education Officers rate the level of confidence that the South Powys Communities have in their ability to manage their portfolios? | <i>During the consultation process, many stakeholders have indicated that they are not confident in the POWYS COUNTY COUNCIL officers' ability to manage their portfolios.</i> |
| 11.9.9 | The Playgroup comments on POWYS COUNTY COUNCIL's very slow proposed changes to Clyro School under the Primary Schools Modernisation Programme and thus doubts that it is capable of successfully carrying out such extreme changes to the secondary school system. [Parents at Clyro Playgroup] | <i>Noted</i> |
| 11.9.10 | Erwood Community Council says that the lack confidence in POWYS COUNTY COUNCIL's leadership as it has failed to progress the primary schools modernisation programme – and that the plan to close Gwernyfed School without any certainty about the funding of a proposed replacement school in Brecon is very worrying. It also says that the current Proposals are only to find a fundable solution to the problems at Brecon High School so that it gets a new school. [Erwood Community Council] | <i>Noted</i> |
| 11.9.11 | The Group says it feels <i>let down</i> by unfulfilled promises made about the | <i>Noted</i> |

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| <p>closure of Rhosgoch and thus questions how it is expected to believe new promises being made about secondary education in the area. [Rhosgoch and Painscastle Toddler Group]</p> | |
| <p>11.10 Public Consultation Events</p> | |
| <p>11.10.1 The sheer numbers at the consultation meeting at Gwernyfed should tell you what the people think. This is not just a small but vocal action group. This is the people en-masse – the ones you represent.</p> | <p><i>Noted</i></p> |
| <p>11.10.2 I applied for a ticket for the public consultation meeting in Gwernyfed but was told that it had 'sold out', I was added to a 'reserve list' but heard no more. I feel that if people were refused entry that another meeting needs to be added. It cannot be regarded as a public consultation if some are excluded from the process.</p> | <p><i>The Authority ensured that everyone who applied for a ticket to any of the consultation events were accommodated.</i></p> |
| <p>11.10.3 I wish to have another meeting to hear <u>ALL</u> views (politicians and local councillors) as they have not had their say. I deemed this meeting unfair as Kirsty Williams AM was unable to attend due to the Leaders debate, to my knowledge she asked quite nicely to Powys County Council to rearrange the meeting so she could attend, but was refused. I wish you could reply to this</p> | <p><i>Public meetings are only one way that stakeholders can make their views known. It must be noted that the meeting was arranged by the Council, and therefore the responsibility for its management, remains with the Council. The Authority decided that the meeting should be ticketed to ensure that everyone who wished to attend could be accommodated.</i></p> <p><i>The public meeting at Gwernyfed HIGH SCHOOL had been widely publicised from the beginning of April, and it would not have been possible to change it to accommodate Kirsty Williams AM.</i></p> |

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| | <p>email and the last. I feel that by the meeting of Gwernyfed High, that the chair was biased as Roger Williams, our former MP for Brecon & Radnorshire, had his hand up like John Fitzgerald for most of the meeting, but was unfortunately he was unable to ask. We all know about "the time limit", but we wish for another meeting, but <u>WE WILL</u> decide what time we leave whether it'll be 8:30pm, 9:05pm or 1:00am the next morning. We ALL want answers from Powys County Council Cabinet and not a single sentence referring to "the document" coming from their lips. We all know that the document is completely false in figures and to what I can see <u>NO</u> reference to the Big Lottery Fund, to which I gather has yet to respond with an agreement letter. We also wish that if the next meeting is arranged, that it will <u>NOT</u> be ticketed. A public consultation should not under any circumstances be ticketed.</p> <p><i>The Chair of the meeting was a member of Opinion Research Services, an independent company that is supporting the Authority with the consultation. As a Chair of a meeting with over 900 people in attendance, distributed across four rooms, managing video – technology, there was a clear need to provide clear parameters for the meeting.</i></p> <p><i>The Consultation Document is fully compliant with the WG's School Organisation Code, and provides accurate facts. A reference to the Big Lottery Fund can be found on page 38.</i></p> |
| <p>11.10.4 I recently attended the Gwernyfed High School consultation meeting, as well as watching the videos of the Brecon meeting and I found it very hard to find anything that was said by the cabinet members which showed that the interests of the learners were indeed being held above all others. In particular, I heard much that made me feel that Gwernyfed students in particular could experience a decline in standards.</p> | <p><i>Noted</i></p> |

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| 11.10.5 | <p>The council has a legal requirement to hold consultation meetings but this particular meeting amounted to nothing more than a superficial attempt to tick a box. Concern with time, no answers to any questions asked and the controlling over who was able to speak does not demonstrate the Council's legal following of the School closure procedure.</p> | <p><i>There is no legal requirement to hold consultation meetings during any consultations related to school reorganisation Proposals, as evidence in the Schools Standards and Organisation (Wales) Act and the School Organisation Code. It must be noted that the meeting was arranged by the Council, in order to provide a chance for members of the public to contribute to the consultation.</i></p> |
| 11.11 Quality of Officers in Powys County Council | | |
| 11.11.1 | <p>The education service in Powys simply does not have the capability to deal with the significant and far-reaching issues at stake here ... they will hand you this Proposal and ask you to vote for it. They will try to hoodwink you into thinking it is the best option, when in fact it is just the best they can come up with. You can be hoodwinked, and you can cow down and vote it through, or you can stand up and say '<i>no – this is wrong</i>'. It's your decision – it's what you were elected to do.</p> | <p><i>Noted</i></p> |
| 11.12 Suggests to Powys County Council | | |
| 11.12.1 | <p>Really listen to the people that this is going to affect in the 21st Century, this is a unique and special area with people who really care about the community and the education of their youngsters ... Find a way to put the future of education for all young people in this area first and make it something to really be proud of.</p> | <p><i>Noted</i></p> |

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| 11.12.2 | Listen to the voices of the children, if not the adults! Remember that our future is in their hands and if they don't get the very best schooling we can provide then the outlook for Powys is very bleak indeed. | <i>The Authority has met with pupils from the high schools and the catchment primary schools as part of this consultation, and pupils views will be highlighted in the Consultation Report which will be considered by Cabinet prior to making any further decisions.</i> |
| 11.12.3 | Is it not a code of the United Nations " <i>The Local Authority must take the views of the learners with serious and consideration</i> ", to which I think you have not done so. | <i>See 11.12.2</i> |
| 11.12.4 | Due to the level of campaigning it is evident that local interests are not being taken into account neither are they being engaged. If they had developed a dialogue with the community, they would know just how vital Gwernyfed is. The reorganisation is in no way balanced or meeting the need of the community. | <i>The consultation is an opportunity for the community to give its views.</i> |
| 11.12.5 | [The Proposal] carries huge elements of educational, financial and general project risk, which far outweigh any potential educational or financial gains [Welsh Liberal Democrats] | <i>Comment noted</i> |
| 11.12.6 | The closure and consequences flies in the face of the contents of the Donaldson Report which stresses the need for creative education as well as cohesion between education and communities, the Maguire paper stressing the need for wider models of education in rural areas | <i>Comment noted</i> |

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| | <p>which are not dependent on larger buildings, the Peck study which found that smaller secondary schools are not costlier or less effective in rural areas because in part of greater community involvement, the Upton report which spelt how to turn around schools in difficulty by using support from successful schools. [Gwernyfed Campaign Group]</p> | |
| <p>11.12.7</p> | <p>It is our view that the Council's preferred option only too clearly demonstrates that no thought whatsoever has been given to the substantial curriculum changes now being developed across Wales ... This Proposal focusses on the established curriculum and fails to reference Successful Futures and Qualified for Life at all. [</p> | <p><i>Comment noted</i></p> |
| <p>11.13 The Questionnaire</p> | | |
| <p>11.13.1</p> | <p>I am choosing to write to you directly having attempted to complete your questionnaire on line and finding it very restrictive in giving me the opportunity to voice my opinion.</p> | <p><i>The School Reorganisation Code sets out the requirement to present supporting information on the case for change in a clear and coherent way. The consultation questionnaire sets out a brief summary of POWYS COUNTY COUNCILs view on why POWYS COUNTY COUNCIL believes change is needed because that is what POWYS COUNTY COUNCIL believes are the issues faced and what POWYS COUNTY COUNCIL believe the solutions to be. If it was not clearly stated that the POWYS COUNTY COUNCIL holds this position on the need for change, then the document could be accused of being misleading. The full consultation document also sets out the arguments and evidence around the case for change and details of each of the Proposals in significantly more depth and is signposted within the questionnaire.</i></p> |

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| | <p><i>The questionnaire is designed to seek responses (either positive or negative) to that case for change and then to each of the Proposals for the future of English and Welsh medium education in turn. The distinction between asking about the need for change and support for the specific Proposals is important as an individual could agree that there is a need for change but might not necessarily agree with the solutions being proposed. Of course, respondents may also want to say there is no need to change or that only some issues in the case for change need to be addresses, and that is why the questionnaire provides adequate open text space to outline why respondents might support or disagree with the case for change and Proposals -including the option for no change or to suggest alternative suggestions. Furthermore, respondents are able (if they wish) to provide additional written qualitative comments which can attached to the questionnaire or sent as standalone response directly to ORS. Each of these responses is included as a unique written submissions in our analysis and reporting.</i></p> |
| <p>11.13.2 On page 2 of the ... Questionnaire, I am asked to comment on whether I believe the council is right to make changes to respond to their belief that there is a case for change in Powys education. Is this not potentially misleading - as responses may indicate that a change is needing but not the one suggested in the Proposal? I am concerned as to how the cabinet will present this data.</p> | <p>See 11.13.1</p> |
| <p>11.13.3 While the questionnaire states the case for change, it does not provide any reasons why the Proposal should NOT be considered. Is this not potentially creating a bias in responses and is a consultation document allowed to be one-sided?</p> | <p>See 11.13.1</p> |

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| 11.13.4 | I was disappointed that the documents published by Powys County Council (POWYS COUNTY COUNCIL) for consultee responses were poorly designed. Some of the questions were leading and it was not possible to provide full and open answers. For example you may strongly agree that Brecon needs a new High School building but strongly disagree that Gwernyfed should close or merge with Brecon. | <i>Noted</i> |
| 11.13.5 | The first question asked is unsatisfactory because it lumps together eleven issues and then simply asks whether the Council is "right to makes changes to respond to these issues". How are you meant to respond if you acknowledge the legitimacy of some issues and deny any significance to others? | <i>Noted</i> |
| 11.14 Reporting | | |
| 11.14.1 | Will Powys County Council produce a review of the consultation process, showing responses of all the groups included in the list of consultees? And if not, why not? | <i>A Consultation Report will be published which will include reference to all the issues raised. It will also note Estyn's response, as required by the School Organisation Code, and highlight any responses from children and young people.</i> |
| 11.15 Council Documentation/Cabinet Meetings/Media Statements Biased | | |
| 11.15.1 | Council documentation, cabinet meetings and media statements ... pitched only to provide or consider a negative profile of Gwernyfed High School ... failing to | <i>The Consultation Document includes facts that are related to both schools. The draft impact assessments clearly show the education, social and economic impact of the Proposal.</i> |

portray in an equal way the strengths of Gwernyfed High School , or demonstrate the negative educational, social and economic consequences of closing the school

| 12 Equality and Diversity | | |
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| 12.1 General | | |
| 12.1.1 | <p>Explain why pupils of Brecon and Gwernyfed High Schools will not be given ‘opportunities’ that are <i>equal</i> to those of other High School pupils in Powys.</p> | <p><i>The Proposal aims to provide a high-quality tertiary model of post-16 education, with a number of benefits – this model can provide more opportunities than other areas of Powys.</i></p> <p><i>Tertiary Colleges provide the solution to the dilemma facing many young people today as they ponder their future - Tertiary colleges are a single establishment meeting educational and skills needs for all young people, their communities, and local employers.</i></p> <p><i>Tertiary colleges were originally defined as educational establishments which combined the functions of a further education college and a sixth form college, offering further education through a full range of courses, both vocational and academic, primarily to the 16-19 age group. In a pure tertiary model, schools within a given area do not operate sixth forms, but instead young people progress to a single local institution that provides both their 16-19 education and adult learning for the wider community.</i></p> <p><i>Tertiary Colleges offer, within one institution, readily accessible pathways of progression from foundation level to level 3 qualifications and beyond, across a wide range of subjects and skills sectors. They promote personalised programmes for young people and adults alike, enabling individuals to combine academic and vocational studies. The breadth of offer and the opportunity for individuals to fulfil their potential by moving from lower to higher levels of programmes are key characteristics of Tertiary Colleges.</i></p> <p><i>In addition to their considerable portfolio of 16-19 provision, Tertiary Colleges are important providers of adult education and training. They play a major role in developing employer responsive provision, working closely with local enterprise, business and industry, to meet their demands and local, regional and sometimes national skills needs; they successfully deliver Apprenticeships and traineeships and have been key in supporting individuals and businesses.</i></p> |

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| <p>12.1.2</p> | <p>Equality Impact Assessment - where are the contingency plans to address all of the issues identified? Where is the Action Plan?</p> | <p><i>The Authority has published a draft Equality Impact Assessment, in accordance with the Schools Transformation Policy 2014. This will be updated to reflect issues raised during the consultation, before being presented to Cabinet as part of the decision-making process. Plans to mitigate any issues identified will form part of this document.</i></p> |
| <p>12.1.3</p> | <p>Vulnerable learners may suffer: pg. 110 One of the weaknesses listed of the post-16 Proposal is: 'does not provide a clear learning pathway within a school environment.' This directly relates to vulnerable students and school be acknowledged and addressed in the Equality Impact Assessment. Where is the cross referencing between the Equality Impact Assessment and the Risk Assessment? The Equality Impact Assessment identifies many, many RISKS. Where is the evidence that the potential Equality Impacts of the Proposal have been addressed in the design of the Proposal? Currently the EIA smacks of being a paper exercise.</p> | <p><i>A draft Equality Impact Assessment is published once a Proposal has been agreed, and will be updated as outlined in 6.2. The earlier Option Appraisal process simply identifies the strengths of the High School and weaknesses of a number of options, <u>at that time.</u></i></p> |
| <p>12.2 Deprivation</p> | | |
| <p>12.2.1</p> | <p>I went to the Grammar school in Brecon. There wasn't a chance for me to stay after school for activities. My parents didn't have the money or the time to fetch me. Do you really want to prevent children having a top notch education because their families are too poor?</p> | <p><i>The Authority has recognised, as evidenced in the Consultation Document and Equality Impact Assessment, that there would be a negative impact on pupils from deprived backgrounds.</i></p> |

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| 12.3 Opportunities Limited by Not Being Able to Access After School Activities | | |
| 12.3.1 | How is Powys County Council going to ensure that as they live 14 miles from the school they won't be discriminated against as a result of transport constraints? | <p><i>As stated in the Consultation Document, the New School would be encouraged to provide as many extra-curricular opportunities during the school day, and the Council would work with the school to explore possible transport solutions, including the use of public transport</i></p> <p><i>The majority of pupils attending Gwernyfed High School are currently reliant on home-to-school transport and their ability to access after-school activities would be similarly affected if the Proposal is approved</i></p> |
| 12.3.2 | In closing GWERNYFED HIGH SCHOOL, POWYS COUNTY COUNCIL will be failing to support the current 107 children of these areas (and future generations) on an equal basis to all other pupils being educated in Wales and within the guidance relating to journey times. It would appear the geographical location of GWERNYFED HIGH SCHOOL is a strong reason to retain 11 to 18 education and community facilities at the site. How does POWYS COUNTY COUNCIL justify discriminating against these pupils by inevitably enforcing them not to be able to enjoy Welsh Culture and education on an equal basis to all other pupils in Wales? | <p><i>The Council's intention is for the New School to provide the highest quality education, with the appropriate care and support for all pupils, in the best possible facilities</i></p> <p><i>However, the Council recognises that there would be additional travel requirements once the New School Building is opened in Brecon, especially for those pupils living in Clyro and Hay-on-Wye Primary School catchment areas</i></p> <p><i>The Council's view is that the current transport arrangements for these pupils are suitable because the journey does not take an unreasonable amount of time. As such, the proposed travel arrangements for secondary pupils to the New School Building in Brecon are deemed suitable. The Welsh curriculum and culture would be available to these pupils.</i></p> <p><i>However, the Authority recognises that, during this consultation, many responses have stated their preference to educate in England, should the Proposal be implemented.</i></p> |
| 12.4 Why only losing Brecon/Gwernyfed 6th Form | | |
| 12.4.3 | It is noted that whilst this appears to be a Proposal for post 16 education for South Powys, there is no Proposal to change 6th form education at Crickhowell High | <p><i>In March 2015, the Cabinet of the Council agreed to commence a new Secondary School Reorganisation Programme with four priorities – one of these was to review 6th form provision at Ysgol Maesydderwen. This review was concluded and a new Local Commissioning Model for the school was approved by Cabinet in? 2015.</i></p> |

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| | <p>School and Ysgol Maesydderwen. This appears to highlight a lack of equality among the South Powys Schools which has not been recognised on the equality impact assessment. Can POWYS COUNTY COUNCIL explain this inequality issue? It is also noted that some pupils attending Crickhowell High School also attend GWERNYFED HIGH SCHOOL or BRECON HIGH SCHOOL for some “A” level provision. It would, however, appear that parents of pupils at Crickhowell High School and its catchment area primary schools have not been duly consulted about this current Proposal. Can POWYS COUNTY COUNCIL explain why that sector of the public has not been duly consulted?</p> <p><i>There were no Proposals to review Crickhowell Sixth Form provision on the basis that pupil numbers are over the County’s agreed threshold.</i></p> <p><i>Crickhowell High School was deemed to be an affected school in the consultation process i.e. ‘any school which is the subject of the Proposals and of other schools likely to be affected by the Proposals, including those that might receive any displaced pupils’. A link to the Consultation Document was sent to Crickhowell High School for distribution to governors, parents, staff and pupils.</i></p> <p><i>Primary schools in the Crickhowell catchment were not deemed to be ‘affected’ schools. The School Organisation Code includes a list of stakeholders which includes the following:</i></p> <p><i>‘In the case of Proposals affecting secondary provision, parents of pupils attending primary schools from which pupils normally transfer to that secondary school.’</i></p> |
| <p>12.4.4 Why is the Council prepared to deliberately discriminate against post-16 learners in the Gwernyfed and Brecon catchment areas by withdrawing from them alone in the whole county the option of taking A-levels in a High School?</p> | <p>See 6.1.1</p> |
| <p>12.5 Brecon Pupils Benefit Gwernyfed Pupils Do Not</p> | |
| <p>12.5.1 In closing GWERNYFED HIGH SCHOOL and shifting such expenditure to the bigger town is POWYS COUNTY COUNCIL discriminating between rural small towns and larger towns/hubs?</p> | <p><i>As stated in the Consultation Document, the draft Community Impact Assessment has identified the detrimental impact on the Gwernyfed community, and the impact on a rural area. However, the Proposal is intended to establish a sustainable secondary school model for the future.</i></p> <p><i>The School Organisation Code states the following:</i></p> |

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| | <p><i>'The prime purpose of schools is the provision of education and any case for closure should be robust and in the best interests of educational provision in the area. Nevertheless, in some areas, a school may also be the main focal point for community activity, and its closure could have implications beyond the issue of the provision of education. This may be a particular feature in rural areas if school buildings are used as a place to provide services to the local community.'</i></p> |
| <p>12.6 Loss of Choice</p> | |
| <p>12.6.1 The closure of GWERNYFED HIGH SCHOOL removes parental options/choice – for those living in the majority of Llangors Community Council area it means pupils are likely to have no option but to attend a new school at Brecon for secondary education. Llangors Community Council oppose the removal of any parental choice for secondary school education in this manner. How does POWYS COUNTY COUNCIL justify the removal of parental choice for secondary school options for the residents of Llangors Community Council area in this manner?</p> | <p><i>The Consultation Document clearly explains the reasons why secondary education in Powys has to change, and the pressures that it faces. The Authority has put forward this Proposal in order to achieve the benefits described within the Consultation Document, at a time when there are significant pressures on the education system.</i></p> |

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| 13 Community | | |
| 13.1 | Community Impact | |
| 13.1.1 | <p>Powys' method for information gathering to support the community impact assessment is not robust enough and should have included direct contact with community groups. Why does Powys County Council think it acceptable to treat this exercise as something to be dealt with superficially when the future of whole communities are at stake? • Why did the local Authority not think it important to talk direct with the thirty five community groups and members using and involved with Gwernyfed HIGH SCHOOL?</p> | <p><i>The consultation process is compliant with the Welsh Government's School Organisation Code, and a draft community impact has been prepared. The Code states the following:</i></p> <p><i>1.7 Specific factors relating to school closures</i></p> <p><i>'There is no presumption in favour or against the closure of any type of school. The prime purpose of schools is the provision of education and any case for closure should be robust and in the best interests of educational provision in the area. Nevertheless, in some areas, a school may also be the main focal point for community activity, and its closure could have implications beyond the issue of the provision of education. This may be a particular feature in rural areas if school buildings are used as a place to provide services to the local community.</i></p> |
| 13.1.2 | <p>Given that local Authority claims to be applying The Statutory Schools Organisation Code can Powys County Council explain how closing Gwernyfed High School meets the requirements of paragraph 1.7 of the code? "The prime purpose of schools is the provision of education and any case for Closure should be robust and in the best interests of educational provision In the area. Nevertheless, in some areas, a school may also be the main focal point for community activity, and its closure could have implications beyond the issue of the</p> | <p><i>The case prepared by those bringing forward Proposals should show that the impact of closure on the community has been assessed through the production of a Community Impact Assessment, and how any community facilities currently provided by the school could be maintained.</i></p> <p><i>When considering whether a closure is appropriate, special attention should be given to the following:</i></p> <ul style="list-style-type: none"> <i>• whether the establishment of multi-site schools might be considered as a means of retaining buildings, or the reasons for not pursuing this option;</i> <i>• whether alternatives to closure, such as clustering, collaboration or federation with other schools, might be considered (taking account of the scope for use of ICT links between school sites) or the reasons for not pursuing these as an alternative;</i> <i>• whether the possibilities of making fuller use of the existing buildings as a community or an educational resource could be explored; (Local authorities should</i> |

provision of education. This may be a particular feature in rural areas if school buildings are used as a place to provide services to the local community. The case prepared by those bringing forward Proposals should show that the Impact of closure on the Community has been assessed through the production of a Community Impact Assessment, and how any community facilities currently provided by the school could be maintained.” The Community Impact Assessment does not meet that requirement.”

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“The prime purpose of schools is the provision of education and any case for Closure **should** be robust and in the best interests of educational provision in the area. **Nevertheless**, in some areas, a school may also be the main focal point for community activity, and its closure could have implications beyond the issue of the provision of education. This may be a particular feature in rural areas if school buildings are used as a place to provide services to the local community. The case prepared by those bringing forward Proposals **should** show that the Impact of closure on the Community has been assessed through the production of a **Community Impact Assessment**, and how any community facilities currently provided by the school could be maintained.” The Community Impact

consider whether it would be feasible and economical to co-locate local services within the school to offset the costs of maintaining the school);

- the overall effect of a closure on the local community (including the loss of school based facilities which are used by the local community), particularly in rural areas or those receiving funding as part of regeneration activity; and*
- how parents’ and pupils’ engagement with the alternative school and any facilities it may offer could be supported (e.g. how pupils; particularly any less advantaged pupils) will be helped to participate in after school activities).’*

Until a Proposal has been recommended for consultation, the Authority is reliant on information received from the school itself about the community’s use of school facilities. At this stage, the school can provide additional information if it so wishes to be included in the draft community impact assessment.

The main method of gathering further information about the impact of a Proposal on a community is during the consultation itself, when the information provided will be used to inform the final community impact assessment that will be considered by Cabinet prior to making any further decisions.

The formal consultation process allows all those wishing to voice their opinion to do so through a number of methods. The 35 community groups with links to Gwernyfed HIGH SCHOOL have the same opportunity to participate in the consultation process as all stakeholders.

The draft Community Impact Assessment states that there would be a negative impact on the communities served by Gwernyfed High School if this Proposal is implemented, and is compliant with the requirements of the Code.

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| Assessment does not meet that requirement.” | | |
| 13.1.3 | The paragraph Communities served by Brecon and Gwernyfed HIGH SCHOOL’s 3 is completely muddled because there is no differentiation between the community council and Town Council areas’ in relation to the schools. Therefore: Why is Powys County Council insisting on this false perspective? | <i>Comment noted</i> |

The following issues relate to the impact on the community (economic and social) and have been included in the updated Community Impact Assessment. Most issues were highlighted in the draft Community Impact Assessment and will be included in the updated Final Impact Assessment

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| 13.2 Local Economy | |
| 13.2.1 | Does the Council accept that there will be huge economic downfall in the Gwernyfed catchment area when they take away the excellent school and sports facilities? |
| 13.2.2 | If you are shutting local schools you are less likely to have people moving in to the area which will then have an adverse effect on the people willing to look at the area to move for work. Please answer for me what will you do to counter-balance this affect? |
| 13.2.3 | Specifically, what long term economic impact assessment has been made on the communities around Gwernyfed (e.g. Hay on Wye, Talgarth, Glasbury, Clyro, etc.) in terms of employment, families moving into the area, loss of council tax as people leave, growth prospects, etc. |
| 13.2.4 | How can these negative effects to the local economy and job losses be overlooked and ignored? |
| 13.2.5 | Can POWYS COUNTY COUNCIL report in detail about what it judges will be the economic consequences of the GWERNYFED HIGH SCHOOL closure upon the catchment community and how it intends to mitigate such consequences? |
| 13.2.6 | Has the council calculated what financial cost the closure of Gwernyfed High School will have on the local economy? If not, why not, and if so how much? |
| 13.2.7 | Has Powys Council fully considered how local businesses, which would see a loss in revenue and would be unable to sustain their current number of employees, will fare if Gwernyfed HIGH SCHOOL closes? |
| 13.2.8 | Businesses currently within close proximity have strong links within Gwernyfed HIGH SCHOOL, offering invaluable work experience and fundraising events. Businesses have confirmed their serious concerns that these links would be lost if the school closes, how will Powys County Council counteract and reconnect these broken links between our communities and local businesses? |
| 13.2.9 | How can businesses in communities in the Gwernyfed area have confidence in work-based learning in Brecon when it is easier and more effective to link with Hereford College? |
| 13.3.1 | Has Powys Council calculated the specific number of jobs that would be lost if Gwernyfed HIGH SCHOOL were to close? |

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| 13.3.2 | How does Powys County Council suggest local businesses successfully attract and retain young professionals to this rural area if the Proposals to close Gwernyfed HIGH SCHOOL go ahead? |
| 13.3.3 | Local businesses have expressed a fear of losing the pool of flexible, young, part time employees, which the consultation document accept that this is inevitable if Gwernyfed HIGH SCHOOL closes, so will the local Authority be offering business rates reductions to absorb additional pay roll costs or are there alternative plans Powys County Council are considering and if so what are they? |
| 13.4.1 | Rural businesses will be affected by a loss of trade. How can these negative effects to the local economy & job losses be overlooked and ignored? |
| 13.4.2 | Have you considered the effect this displacement will have on the businesses which service the school? |
| 13.4.3 | Has the council calculated or made an assessment of how much revenue it will lose from local taxation as businesses that depend on a thriving community begin to close? |
| 13.4.4 | How does Powys County Council plan to support local businesses which the consultation document accepts will see a decline in revenue if Gwernyfed HIGH SCHOOL closes? |
| 13.5.1 | Pupils from farming backgrounds play a huge role in the day-to-day running of their family farms. Can the Council justify the increased travelling times for these pupils who are going to spend significantly more time on a school bus rather than helping on their farms? |
| 13.6.1 | Have you considered the long term effect this Proposal will have on the housing market as parents search for a more viable education for their children? |
| 13.6.2 | What is Powys County Council going to do to mitigate the possible downturn in house prices that the loss of a great secondary school will inevitably cause? |
| 13.6.3 | More realistically, if GWERNYFED HIGH SCHOOL is closed, then people will not want to move into the area and the housing allocation will not be built, with the knock on effect on the local rural economy, lower than anticipated council tax revenue and |

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| | negative effect on all local services. Under the One Powys Plan how does POWYS COUNTY COUNCIL justify such potential short sightedness? |
| 13.6.4 | It also questions how POWYS COUNTY COUNCIL <i>will alleviate the impact of a negative effect on the housing market and the area being less attractive to newcomers</i> , which will have a harmful effect on whole communities and their demographic balance given that families will be less keen to move to the area. |
| 13.7.1 | If the merger does go ahead what will happen to the sports facilities at Gwernyfed High School? |
| 13.7.2 | ... We will have no sporting facilities left in our area. Why would our young people want to move here when there will be nothing left? |
| 13.7.3 | There are sports groups that would cease to exist should the school closure go ahead such as Gwernyfed Ladies Hockey and Kettle Bells ... |
| 13.8.1 | We know that Powys council, and the Welsh government, are concerned about the changing age patterns and the increasingly ageing demographic in rural areas. Do they not realise how much a contribution to this is being made by the relentless programmes of school closures that have been implemented under the cover banner of 21 th Century Schools? |
| 13.8.2 | Considering the current difficulties in recruitment in Powys, how are you going to attract and retain residents to Brecon and the surrounding area if we can only offer a High School with no Welsh language provision and no 6th form provision? |
| 13.8.3 | Where other schools have closed the whole demographic of the area has changed. How will you counter that? |
| 13.8.4 | This dreadful decision will discourage families from moving into the area and thereby potentially have a long term impact on education at all levels. Have Powys even thought about these future implications? Where are our future doctors and teachers supposed to come from? Are Powys pupils not good enough to achieve this status? |
| 13.8.5 | Given that families with children do not move to an area where the local school is under prolonged threat of closure, please describe how the council has adjusted for this in its (pre-Proposal and post-Proposal) pupil demographic statistics? If this has not been attempted, please explain how the distorted demographic figures can be used to justify the Proposals? |
| 13.8.6 | What economic modelling has or will be done to quantify the financial risks of closing Gwernyfed High School in relation to a predictable demographic bias shift towards an older and absent (second) home owner population in the area? |

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| 13.9.1 | If Gwernyfed' s closure means the end of your group or sports club, ask Powys what plans they have to ensure it is able to continue. |
| 13.9.2 | Will the County Council help fund the community projects to keep them going if Gwernyfed High closes? |
| 13.9.3 | What I would like to know is what are your plans as to the relocation of the sports facilities and how far would we have to travel? |
| 13.9.4 | POWYS COUNTY COUNCIL should be striving to preserve smaller educational centres as they, "provide more functions beyond being an educational institute and provides economic, and social opportunities, an arena for local politics, a delivery point for services and a resource for community development". Why is POWYS COUNTY COUNCIL not striving to preserve High Schools as Educational Centres given their educational economic, social, political, service delivery and community development functions? |
| 13.9.5 | Where exactly are the gym classes, badminton groups, football teams, dance classes, keep fit sessions, Glasbury arts members etc. meant to take their interests? Although the council say, "This would be taken into consideration by the cabinet in making a decision in relation how to proceed" I'd like to know what, if anything, this actually means? |
| 13.9.6 | Has the council considered how the 35 community clubs provided by Gwernyfed HIGH SCHOOL will survive once the school closes? |
| 13.9.7 | Given that the local Authority claims to be applying The Statutory Schools Organisation Code can Powys County Council explain where in the code it gives any credence whatsoever to the destruction of community activities within a school, as applied to Gwernyfed High School? |
| 13.9.8 | Given that the local Authority claims to be applying The Statutory Schools Organisation Code can Powys County Council explain how the closure of Gwernyfed high School and Community Organisations meets the following statement: "where Proposals involve the transfer of learners to alternative provision there should normally be evidence that the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners. (Paragraph 1.3)" |
| 13.9.9 | Given the almost complete closure of the community activities at Gwernyfed if the high school closes and the damage to leisure and cultural activities in the area it is clear that this is a total failure to comply with article 32 (Of the UN Convention for the Rights of the Child) and we await the Powys response with interest. |

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| 13.9.10 | Can POWYS COUNTY COUNCIL explain why they have not consulted directly with these Community Groups (the groups have only been notified of the Proposal via GWERNYFED HIGH SCHOOL support groups) and why there is such little respect for these highly valued often voluntary organisations within our rural communities? Withdrawal of such community facilities would contravene all the policies listed above. Can POWYS COUNTY COUNCIL explain how it proposes to keep the Community Facilities open and accessible to all, as they are now, in order to comply with the following policies? Welsh Government circular 34/2003; Welsh Government schools organisation code 1.7; The Wellbeing and Future Generations Act 2016; UN Convention for children's rights, article 31 |
| 13.9.11 | Of the 35 groups that currently use the school facilities, 33 have indicated that they would have to cease to operate if the school closes. The Governing Body thus questions: <i>why did the Council choose to ignore such a detrimental community impact analysis?</i> |
| 13.9.12 | ... What parents realistically would want to move somewhere there is no high school for their children? Not many. How does the council intend to keep the hockey facility open to ensure our club can continue to function? How are we, as a club meant to continue to grow when we are potentially going to lose our entire junior section that we have worked so hard to develop? How can the council justify forcing a club to fold especially one that promotes women's sport and physical activity? |
| 13.9.13 | Where will my hockey team train and how can we fund training at the privately run centre in Brecon? |
| 13.9.14 | What attempts will be made to monetise the jeopardising of the future of Gwernyfed RFC, the most prolific and successful junior rugby club in Mid Wales? |
| 13.9.15 | Has the Council considered that the proposed school closure would certainly see a decline in YFC membership and participation of pupils in Gwernyfed catchment areas as a result of families moving out of the area? |
| 13.9.16 | My son plays for Hay St Mary's Junior Football club, they train on the lottery funded sports facilities at Gwernyfed - what are Powys County Council going to do to ensure that this club continues - what are their plans? |
| 13.10.1 | The potential for boredom, leading to unsavoury behaviour looms large and in the event, the finger of blame could easily be pointed at Powys County Council. Building 'Strong communities in the green heart of Wales'? Completely questionable. |
| 13.10.2 | Explain what effect the reduction in extra-curricular participation will have on a pupil's sense of belonging and involvement in their local community. |

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| 13.11.1 | Hay Primary and other primaries in the Gwernyfed cluster currently enjoy a number of benefits from their proximity to the school: the use of mini-busses; access to sports facilities; access to additional learning resources; ease of integration when pupils leave the primary school etc. These things are of great value to the primary schools. How will they be replaced under POWYS COUNTY COUNCIL's Proposals? |
| 13.11.2 | Has the Council attempted to quantify the social and economic effect of the long threatened closure of Gwernyfed High School on the local primary schools? What demographic modelling has been done to quantify the risks...? |
| 13.11.3 | The council assumes any possible drop of pupils attending Hay Primary "would not be significant" Why do they assume this? |
| 13.12.1 | I currently use the badminton courts at Gwernyfed and my daughter has gymnastic lessons at the school. Many hundreds of people in the local community make use of the sports facilities that exist at Gwernyfed. How will equal access to sporting facilities be made available to the community under POWYS COUNTY COUNCIL's Proposals? |
| 13.12.2 | The consultation document admits that there are no suitable alternative venues in which to host the activities enjoyed by the wider community. Is there not a legal obligation to provide alternative premises, or at least ensure that they exist to be utilised if these groups are to be given the possibility of survival? |
| 13.12.3 | Can Powys County Council, given it intends to sell the site make clear how those facilities could be retained for community use in the middle of another development and whether community activity charges would be maintained at an affordable level for the groups currently using the facilities? |
| 13.12.4 | Given Powys County Council states it is implementing the Statutory Schools Organisations Code then it MUST show how it will comply with the Schools Organisation code and ensuring community activities are not damaged: How will Powys County Council ensure all the current community activities can continue if Gwernyfed closes? How will Powys County Council repair the damage the local Authority has already caused to some organisations? |
| 13.12.5 | Given that Powys County Council have a responsibility under the Statutory Schools Organisation Code to facilitate replacement community facilities where a school closes can the local Authority: Explain how it plans to make it possible for community organisation's to continue in the area? Where they are going to find the £3 million + to make this possible? Explain why that this course of action is better than spending £3.5 million to make Gwernyfed disability compliant thereby negating the need to spend on replacement buildings whilst retaining one of the best schools in Powys. |

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| 13.13.1 | What is Powys County Council going to put in place to ensure local business, trade, house prices and the future of the community is not lost? |
| 13.13.2 | I'm not sure what would happen to Hay Festival because at the moment it uses the school amenities. ... What happens if the Festival can't continue? And what happens to all the community activities should the school close? |
| 13.13.4 | The potential economic impact of a school closure - Grunewald & Smith (2008) (2): 'Sixty percent of the communities with schools saw population growth from 1900 to 2000; while only 46% of those without schools grew. Average housing values in the communities with schools are 25% higher than those without schools. Communities with schools enjoy higher per capita incomes, a more equal distribution of income, less per capita income from public assistance, less poverty and less child poverty. Can POWYS COUNTY COUNCIL please explain how this ambivalence around strategic intention, is justified? |
| 13.13.5 | How does the proposed destruction of our communities meet the following objectives within the new Wellbeing and Future Generations Act 2016, as applied to Gwernyfed High School, which local authorities are required to promote? A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood. Attractive, viable, safe and well-connected cohesive communities. A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation. |
| 13.13.6 | The plans to close Gwernyfed risks diminishing quality of health as the Accessibility to local community health services will no longer be easily accessible. What if anything does, Powys County Council intend to do to remedy this? |
| 13.13.7 | Gwernyfed High School has very strong links with the local community and so the Governing Body asks: <i>how can these be sustained and developed when our young people are attending school away from their local community as the preferred option suggests?</i> |

| 14 | Alternative Options |
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| 14.1 | <p>Brecon Town Council recognises the urgent need for the development of modern, fit-for-purpose secondary educational facilities in Brecon, and calls on POWYS COUNTY COUNCIL to do all it can to access the opportunities available under the Welsh Government's 21st Century Schools programme. However, the Council also firmly believes that a new school should offer a full range of post-16 opportunities to make it an attractive choice for students and professionals – and that it should offer full Welsh medium provision to nurture and enhance the Welsh language and culture in the community. [Brecon Town Council]</p> |
| 14.2 | <p>The WLD Group recommends the following alternative Proposal:-</p> <ol style="list-style-type: none"> 1) That both Brecon and Gwernyfed High Schools be retained as 11-18 schools for the foreseeable future 2) That work on Proposals to either – <ol style="list-style-type: none"> (a) create a new 3-18 school in Brecon, or (b) build a new 3-11 school on the same or an adjacent site as a new 11-18 school in Brecon, be commenced 3) As part of 2) above that consideration and consultation begin in to the closure of Mount Street Infant and Junior Schools, with provision to transfer as per 2) above 4) That work to create a seamless, fully-integrated post-16 learning system in the Brecon, Gwernyfed and Crickhowell HIGH SCHOOL catchment areas should commence immediately (or as soon as practically possible), so that in future all post-16 learning in this part of Powys is planned and funded in a fully-collaborative system involving the 3 schools, the NPTC Group of Colleges and the main Work-Based Learning providers operating in the area 5) That as part of 2) and 3) above work begins in preparation for the disposal of the Mount Street Infant and Junior School sites, to produce a capital receipt to assist in the funding of the project [Welsh Liberal Democrats]. |
| 14.3 | <p>We understand that GWERNYFED HIGH SCHOOL and BRECON HIGH SCHOOL support a Proposal to build an all through school at Brecon and include pupils from Mount Street primary school on the one site, this allowing GWERNYFED HIGH SCHOOL to remain as it is now. This would appear to be a transformational project that would meet all the 21st century schools criteria and assist with budgetary matters in Brecon. Why has this Proposal not been properly analysed in the Consultation Report and how does POWYS COUNTY COUNCIL justify putting this approach to one side when it is supported by the schools involved? [Llangorse Community Council]</p> |
| 14.4 | <p>A rebuild of a 3 to 16 years (through) school at Brecon for Brecon pupils could centralise resources within the whole town and be part financed by the sale of primary school sites. This would allow Brecon pupils to have their own new school with no requirement to involve Gwernyfed pupils to “make up numbers “in order to seek financial support from Welsh Government. What action is being taken to assess this option? [Llangorse Community Council]</p> |

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| <p>14.5</p> | <p>I was fortunate enough to be educated at Bourne Grammar School in Lincolnshire in the 1980s. It was a high performing school at the time, and it has simply gone from strength to strength. I know of parents who, rather than take their children to their nearest school, will travel a little further to get them to Bourne Grammar School (BGS). It is a real pull to the town and not surprisingly, the reason for the school's success is a high quality management team, supported by their local Authority, receiving decent amounts of investment. Going hand in hand with the success of BGS is the continued development of the local community. People are relocating to Bourne to take advantage of the school and the related groups and facilities. They have even recently built a new primary school, taking the number in the town from 2 to 3. But I am suggesting that Powys County Council adopt the principle, i.e. to help make Gwernyfed an outstanding destination school. Wouldn't that be a feather in their cap and a superb legacy for those involved?</p> |
| <p>14.6</p> | <p>[Welsh] I am also a former pupil of Ysgol Gyfun Rhydyfelen – the first Welsh language school in South Wales established in 1962 with 80 pupils on the school roll in that inaugural year. With the support of the local Authority, parent's teachers and the local community, the school grew to over a thousand pupils within a decade. It sparked a renaissance in Welsh language education and remains through its alumni a testament to what can be achieved with passion and imagination. It also offers an example that a successful school offering excellent Welsh language provision could easily provide a critical mass of new learners to provide the numbers so desired by the Authority. It would require a broader base of Welsh language primary schools in the area to feed the secondary school. This in turn would be in keeping with the Welsh government's education strategy regarding Welsh language education.</p> |
| <p>14.7</p> | <p>I wonder if they are afraid of losing face by backing down, but maybe they can use the precedent set recently by Pembrokeshire council which did what the residents wanted and spared two schools and their sixth forms which were due to suffer the same fate as Gwernyfed High School and Brecon High School.</p> |
| <p>14.8</p> | <p>Look to Hereford if a central 6th form is proposed and take their model, not use a provider who has little attachment to the area.</p> |
| <p>14.9</p> | <p>Has POWYS COUNTY COUNCIL considered the WG report of March 2016? Does POWYS COUNTY COUNCIL accept that this Proposal now has to be urgently reviewed with a view to retaining individual 6th forms at both GWERNYFED HIGH SCHOOL and BRECON HIGH SCHOOL and understand that evaluating the current South Powys Consortium system and possibly updating it by using virtual learning techniques is likely to be more effective? There is a rural sixth form system operating in Pembrokeshire which Welsh Government support. Has POWYS COUNTY COUNCIL examined the Pembrokeshire structure/case study with a view to assisting with this matter? [Llangorse Community Council]</p> |

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| 14.10 | Surely both schools deserve the individual help to ensure that its pupils are given the best support; if the schools were to merge then the emphasis would be taken off the pupils themselves and instead be put on the financial implications. |
| 14.11 | What research / modelling has been conducted by POWYS COUNTY COUNCIL Educational Officers into how new learning / teaching technologies could enable a reduction in student travel, enable interschool collaboration around subjects taught and increase numbers of A levels offered, etc.? |
| 14.12 | YOU SHOULD LEAVE US ALONE AND CONCENTRATE ON MAKING BRECON A BETTER SCHOOL |
| 14.13 | Representatives of Powys County Council need to grasp the metal and look to other ways to sort out Brecon High School and find the money to invest in and secure the future of Gwernyfed High School. I strongly urge you to stand by your words of 'Strong communities in the green heart of Wales'. |
| 14.14 | Why has POWYS COUNTY COUNCIL not considered an option with enhanced use of ICT, leaving schools to remain open, more subjects to be offered, greater efficiency of staff, and increased choice for pupils? |
| 14.15 | We can understand that taxiing (sixth form) students between campuses is not sustainable, but with modern technology of video conferencing, webinars etc., there must be scope for some innovative link ups with other education authorities. |
| 14.16 | Why don't any of the Proposals for a transformational model make more about the potential for investing in technology to deliver the curriculum between schools in south Powys? |
| 14.17 | During the Public meeting one parent raised the suggestion that the teachers could commute between the different sites. Rather than asking the pupils to do so. Meaning the cost of staff would be reduced across the County. This idea was laughed off as impractical. This seems odd given the fact that it was also made clear that this is exactly what happens with the teaching staff within the NPTC Group of Colleges. No real thought was given to whether or not this could solve the problem. |
| 14.18 | Would combining aspects of primary and secondary school provision be more transformational? This would encourage a 'learning continuum' for pupils and keep facilities local, in line with the Donaldson Report. Were better ways of working considered, such as federation schools with shared governance, resources, facilities, staff and services, thus keeping schools in specific localities? Perhaps the option of building a new school at Brecon at the expense of Gwernyfed was only chosen to access 21st Century Schools funding from the Welsh Government? |

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| 14.19 | Why is it not possible to have a simple and straightforward Proposal to build a new school building? I appreciate that funds are tight, but is it not possible to replace the buildings without impacting on the fabric of the community? Perhaps, by employing an open and transparent strategy of selling of some of the land? Perhaps asking for help, financial contributions or ideas from the communities that your Proposals will affect and therefore will be motivated to act? |
| 14.20 | If it's student income financial input then why not consider adults learning alongside pupils. I realise that there are Child Protection Issues to overcome but there are such Models of High School Education. |
| 14.21 | My suggestion would be to fund a new building for Brecon High School as a matter of urgency, to give the hard working pupils and teachers the support and facilities they deserve. I would also urge the council to get behind Brecon High School and support the teachers, pupils and parents who want it to survive and thrive. |
| 14.22 | A tenth option that has not be considered is 'Establish a new English-medium school in Brecon that retains its Welsh medium stream'. If then there needs to be a sharing of resources or teaching staff with Builth Wells Welsh medium stream then it is simpler & safer for a three or four teachers to commute between the two sites than bus 130+ children up & down the A470 every day i.e. Geography, History & Science teachers can spend Mondays, Wednesdays & Thursdays in Brecon In Builth & Tuesdays & Fridays in Brecon - This will be the cheaper option too! |
| 14.23 | You have other option's, you could build a 6 form in Brecon and have a new school for Brecon children. Why no other option have's been offered? |
| 14.24 | I am more than happy to pay more council tax to keep Gwernyfed open for future generations which will encourage people to move to the area for its excellent school and beautiful countryside. I think most residents would pay more, providing it would be ring fenced. |
| 14.25 | Rather than trying to force the critical mass by joining Gwernyfed and Brecon High schools, build this new building, invest in the site at Brecon and I think you will find that people are naturally attracted to this building and they will want to come to the school. |
| 14.26 | Retaining GWERNYFED HIGH SCHOOL as a standalone school or as part of a federation or cooperative arrangement. |
| 14.27 | We would like Powys County Council to build Brecon a new school and use what money is left to renovate Gwernyfed. Gwernyfed High School must stay open. |

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| 14.28 | There is no objection to Brecon having a new school, but, in times of economic crisis, why spend what will no doubt be in excess of £50 million when a new school for the Brecon area could be built for much less? The amount of money saved by a merger is debatable, since the cost of transport would be huge, not to mention the congestion which already occurs outside Brecon High School every day of the week. |
| 14.29 | We think you should leave Gwernyfed High School alone and make a new school for Brecon. |
| 14.30 | Why close GWERNYFED HIGH SCHOOL to build a super school when you can use the money to help save Brecon High School. |
| 14.31 | I was promised a new school by 2016. They haven't even kept the plans up. I don't trust them to build a new school, they could just waste the money. If they don't change anything, they can spend the money for the school on improving Brecon. |
| 14.32 | Gwernyfed becomes a campus for the 'Beacons School' – a similar model to John Beddoes and Newtown |
| 14.33 | Why not simply use the £22 million to rebuild Brecon High School and leave the successful and well-loved Gwernyfed out of the equation? |
| 14.34 | <p>Alternative Proposal – as a major contribution to a Brecon Regeneration Plan</p> <ul style="list-style-type: none"> • Impose no pre-conditions on options appraisals. • Invest now in interim repairs at Brecon and Gwernyfed Schools, using the £24M already ring-fenced for the NPTC Group of Colleges. • Alongside the five new primary schools in the Gwernyfed catchment, start building the New School Building at Brecon High School now (designs and planning permissions etc. pending) using the £20M already ring-fenced for this. • Rescue Welsh-medium education in South Powys by investing now in its better provision and support in all primary schools in the Brecon catchment, creating a Welsh-medium critical mass here where demand is highest. • Consider the merits of All-through (four to 18) education encompassing all of the primary schools in each of the rural Brecon and Gwernyfed catchments. • Support FE education in Brecon to provide the traditional complementary vocational studies that are required in this rural area. |
| 14.35 | Explain why it wouldn't be advantageous to retain an in-school sixth form in Brecon and Gwernyfed High Schools, and a separate complementary vocational FE college. |

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| <p>14.36</p> | <p>When designing the New School Building adjacent to the Brecon Leisure Centre, run a thorough public consultation to maximise the other public benefits achievable on site and help to develop regional, national and international learning opportunities.</p> |
| <p>14.37</p> | <p>If this was put out as a questionnaire to area ratepayers - they would be more than happy to meet that small shortfall, so why not be fair and ask them.</p> |
| <p>14.38</p> | <p>Give Brecon the money to build a new school and leave [Gwernyfed] alone!</p> |
| <p>14.39</p> | <p>I really don't understand why you cannot just build a new school in Brecon because yes they need one desperately and then get someone in there to manage it and its finances, and have the teachers there to teach and maybe then the standard of the school will improve as I know it has since it went into special measures and the school and staff need to be recognised for this. I know there is a long way to go but they will get there with a new building and it being managed correctly.</p> |
| <p>14.40</p> | <p>I propose that Powys go ahead immediately with a new building in Brecon, and that the new school be open in 2017/18 AT THE LATEST. From a Freedom of Information Act request I have made it appears that Powys County Council has enough money to build a 1000+ student school without dependency on the 21st Century schools programme. I object to the statement in the Proposal that the sale of the existing Brecon High School site goes into the Councils General Accounts, not into the school itself or to funding the school. The new build should be a phased project, with the immediate phase 1 delivering a new school for the existing students at Brecon (1000+ spaces), with phase 2 to be developed pending a decision on closure of Gwernyfed and Phase 3 the building of a 6th form centre to include ALL pupils in the current Brecon/Gwernyfed/Crickhowell catchment. These should all be submitted as one planning application with separate build dates.</p> |
| <p>14.41</p> | <p>Yes, repair Brecon, or even give them a new school. But under no circumstances, should Gwernyfed be a part of this major act.</p> |
| <p>14.42</p> | <p><i>Build a new school in Brecon for Brecon school children but smaller than your current plans thereby giving them the new building they deserve and clear the debt that they have and keep Gwernyfed open for Gwernyfed children and spend the money required to carry out the relatively small amount of maintenance required</i></p> |
| <p>14.43</p> | <p>Why are we not considering building a primary school on the Gwernyfed site? This would give us the opportunity to increase the numbers at the school by increasing the age-range catered for. Locally, Christ College Brecon has done</p> |

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| | <p>exactly that in order to improve their income streams to stay viable. Surely we could do something similar in the public sector, to make Gwernyfed a more financially secure unit by boosting numbers? We have a huge site for further buildings and it is a safe and secure site for younger pupils. There seems to be so much practical sense in this option. It keeps the community cohesion by increasing the numbers of students on this site making it more financially viable and offering a continuity of education on one site.</p> |
| 14.44 | <p>A new school is all that's needed for Brecon HIGH SCHOOL ... forget building a fantastic school and give BRECON HIGH SCHOOL a really good facelift and maintain Welsh stream and sixth form.</p> |
| 14.45 | <p>The Governing Body urges POWYS COUNTY COUNCIL to re-visit option 7. They believe that a through school (3-18) for Brecon would achieve many of the Council's aims: it would provide the desperately needed new building; create a critical mass of learners; wipe out Brecon High School's deficit; and potentially secure the match funding being sought from Welsh Government. The Governing Body fully supports Brecon High School's wish for this to be accepted as the preferred option. For Gwernyfed, this would: retain a high performing secondary school that is ready and willing to work with the Council to explore closer working relationships with its primary cluster; safeguard the health and wellbeing of young people; and secure the future of the rural communities that depend so much on GSH's existence. [Gwernyfed HIGH SCHOOL Governing Body]</p> |
| 14.46 | <p>(welsh Proposal) Establishing the first ever designated Welsh-medium secondary schools in Powys would break the existing vicious cycle and transform the current landscape in terms of Welsh medium education throughout the county, in line with Welsh Government expectations to strengthen and increase bilingualism in Wales. More than one school is needed to realise this vision.</p> |
| 14.47 | <p>[Welsh Proposal] Fund Brecon High properly and a Welsh stream will again flow through the school.</p> |
| 14..48 | <p>[Welsh Proposal] Think outside the box. South and Mid Powys should have a 2A school and every effort should be made to try and achieve this. A parental questionnaire by RhAG in 2011 indicated 80% support for a 2A school in South/Mid Powys.</p> |
| 14.49 | <p>[Welsh Proposal] You could also boost the numbers in the Welsh stream at Brecon High School by stopping sending pupils across the border to Ystalyfera. Paying for children to be schooled out of county just seems ludicrous to me. I was also extremely shocked to hear that Sennybridge Primary School has been designated as a feeder school for Ystalyfera. Crazy! If you look at the pupil numbers in the nursery class at Sennybridge Welsh Stream and the number in the nursery class at Ysgol Y Bannau (and made parents aware that you wouldn't be paying for them to be schooled out of county or</p> |

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| | bussed to Builth) you would see that there are enough children between these two schools to have two classes in the Welsh stream at Brecon High school. |
| 14.50 | [Welsh Proposal] I would imagine the money paid out on buses would pay the salaries of quite a few Welsh medium teachers who could be used to boost the Welsh stream at Brecon High School rather than making the pupils travel. Or, as an alternative, why don't you get the teachers to travel between Brecon and Builth High Schools? Give the teachers a travel allowance, keep the Welsh streams open in both schools and save yourselves some money? |
| 14.51 | [Welsh Proposal] I urge you to reconsider this Proposal in favour of a more visionary and creative strategy for The Brecon Learning Campus where Brecon High School is supported in its bid to attain the appropriate staffing and leadership capacity to become a 2B school. For BRECON HIGH SCHOOL, to be supported, occupying as it does a key geographical hub, in a bid to become the natural school of choice for Ysgol y Bannau and Sennybridge and a centre of excellence for The Welsh Language within a state of the art new build. Given these reassurances the future of Welsh language uptake in the Brecon area would be guaranteed. |
| 14.52 | [Welsh Proposal] In the face of the proposed investment in the English medium provision, there should be the same vision for Welsh medium provision as it is an opportunity to transform Welsh language provision for the whole of Powys. A Welsh medium secondary school in Powys would break the current cycle and change the linguistic typography of Powys, also bringing the county in line with the Welsh Government's aim of strengthening bilingualism. Powys needs more than just one Welsh high school to achieve this. Providing a category 2a school in Builth Wells would be the best way to achieve this and would replicate the similar Proposal for a 2a school in the north of the county. Establishing a 2a Welsh medium school in Builth would: <ul style="list-style-type: none"> • Symbolise the growth in the Welsh medium sector, would attract more pupils to it over time and help to develop the Welsh medium primary sectors as has happened in other parts of Wales. • Provide a fully equal provision and experience for Welsh medium pupils by ensuring a full suite of subjects are available in key stages 3 and 4. • Improve and consolidate the continuity between key stages • Provide an opportunity for the school to attract qualified staff across the full subject range • Create a fully Welsh ethos in the school that will set the best foundation to foster and develop confidence in the use of the Welsh language amongst pupils • Help Powys meet the Welsh Government targets for developing and strengthening Welsh language education |
| 14.53 | [Welsh Proposals] Repatriating children taught out of county would boost the financial support available which would enable better provision in BRECON HIGH SCHOOL and make it more attractive to those parents. This provision should have been maintained years ago and not left to diminish through poor management and lack of support from the relevant authorities. Poor provision is influencing current trends rather than potential demand for Welsh-medium |

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| | <p>education.</p> <p>Deliver on the Proposals outlined within your WESP document as a minimum but also aim to achieve the targets set for other schools in KS3 and KS4 to address inequalities across the county.</p> <ul style="list-style-type: none"> • Continue to pursue a new school to replace BRECON HIGH SCHOOL with equal access to English and Welsh medium students – the inclusion of Welsh medium education would strengthen your chance of securing funding to develop a new school - more likely to attract students and high quality teaching staff which would address some of the issues around recruitment and retention. • Consider sharing Welsh teachers between primary and secondary settings. • Consider a 4-18 year old provision sharing facilities with the new BRECON HIGH SCHOOL. • Boost Welsh medium education by introducing dual streams in primary schools in the east (Gwernyfed) and south east (Crickhowell) to act as feeders to BRECON HIGH SCHOOL and reinstate Sennybridge as a feeder for BRECON HIGH SCHOOL, with the option of sharing Welsh medium teaching staff. You acknowledge no Mudiad Meithrin provision exists in the easterly catchments; you are unlikely to engage the interest of parents of preschool children without it! You should communicate any commitment clearly to parents at the outset ensuring the provision is sufficient to attract interest whilst not misleading them into pursuing an option that may be short-lived as has been the case with us. |
| <p>14.54</p> | <p>[Welsh Proposal] Using modern technology such as video conferencing, etc. would enable the continuation of a Secondary welsh stream in both Brecon and Builth Wells High Schools, reduce student travel and embed a vibrant Welsh educational culture in all areas of South Powys. What research / modelling has been conducted by POWYS COUNTY COUNCIL Educational Officers into how new learning / teaching technologies could enable a Welsh A level stream to be retained in all South Powys High Schools?</p> |
| <p>14.55</p> | <p>[Welsh Proposal] Investment in technology may be able to facilitate a small core group of Welsh medium teachers to teach lessons to pupils across multiple sites, using video-conferencing facilities, online seminar software and so forth - a more attractive and viable option than shipping pupils who want a Welsh medium education to and from Builth Wells every day.</p> |
| <p>14.56</p> | <p>[Welsh Proposal] I would much rather see a system of enhanced collaboration between existing institutions, involving imaginative use of modern technology to facilitate and enhance learning, the sharing of teaching and learning resources between existing schools, and so forth.</p> |
| <p>14.57</p> | <p>[Welsh Proposals] Consider alternative solutions for maintaining and building up Welsh-medium provision in the Brecon HIGH SCHOOL catchment, for example:</p> <ul style="list-style-type: none"> • Invest in increasing primary Welsh- medium provision through education apprenticeships and peripatetic teachers • Use the RDP Wales to increase the availability of Welsh language apprentices and peripatetic teachers, e.g., RDP |

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| | <p>Measure 7 (Rural Community Development Plan), investing in cultural services</p> <ul style="list-style-type: none"> • Recognise that increasing the support for Welsh-medium provision at primary level will boost demand at secondary level, creating the critical mass in the Brecon catchment to retain and build dual stream provision • Invest more widely in the Welsh-medium culture and learning in the Brecon catchment, e.g., using the Powys LEADER Fund Arwain to add value to local identity. |
| 15.58 | <p>[Welsh Proposal]It was stated in the Builth Wells consultation evening that teams of teachers will travel between the two sites (being Builth Wells High School and Llandrindod-Wells High school) which would allow them to deliver lesson to both sites. Why can't a Welsh speaking team of teachers travel between Builth Wells High School and Brecon High School? Not only will it drastically cut travel costs, it would also ensure the security, safety and welfare of our children by keeping them off the roads and prevent anxiety and stress of pupils and their families.</p> |
| 14.59 | <p>The Proposal may look the most suitable option on paper and may be an option for an urban environment but in a rural setting and in the real world it is a poor option. (criticism of Proposal for Welsh medium and travel implications)</p> |
| 14.60 | <p>There are significant contrasts between them. BRECON HIGH SCHOOL is a town school, where pupils are brought up in an urbanised area, and the nature of this is very different to GWERNYFED HIGH SCHOOL, a very rural school incorporating many local communities with children brought up differently to those in Brecon.</p> |
| 14.61 | <p>"Small" can be good. "Big" does not necessarily mean better, and a model that can work in densely populated urban areas is NOT the answer in a sparsely populated rural environment. If POWYS COUNTY COUNCIL wish to improve education, focus on the areas that need it (e.g. Brecon High School).</p> |
| 14.62 | <p>I would refer you to another Welsh Government document - A Think Piece on the possible options for improving the performance and efficiency of sixth forms in Wales- which says;</p> <p>3. Implement an adaptable tertiary model across Wales Given the geography of Wales and the patterns of existing provision, a 'one-size fits all' approach would be extremely difficult to operationalise. Although a tertiary model may be successful in urban areas, the capital and political costs required to introduce this model across Wales appear prohibitive.</p> |
| 14.63 | <p>Proposals are based on what has worked in urban areas where closing schools does not involve pupils in long journeys to school.</p> |

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| | Merging schools to create larger establishments is a city solution that only works when the schools are within walking distance of each other - not in a rural situation where students must be transported over tens of miles. [Talgarth Town Council] |
| | It would seem that you don't seem to think that [Crickhowell] need to be a part of this process again, we would be grateful if you could explain this? |
| 14.64 | The document also states that there are surplus places at Brecon and Gwernyfed however it does not state that Crickhowell High School have been allowed to increase their intake by twenty pupils which was confirmed at the consultation meeting. Again this smacks of mismanagement by POWYS COUNTY COUNCIL. Whichever way you look at these facts they represent a lack of parity for the communities of Brecon and Gwernyfed |
| 14.65 | The case to close Gwernyfed is very flimsy; the reasons given are to do with Brecon NOT Gwernyfed' s. There is no common sense being used at ALL. |
| 14.69 | Revise the investment objectives and CSFs for the revised Proposal to include education experience, quality of teaching, quality of leadership, the essential links between high schools and their local communities, and the integral role that both primary and secondary education, including Welsh-medium provision make to regeneration, inward investment and inward migration in the Brecon and Gwernyfed catchments. National Park Authority. |
| 14.70 | Revise the investment objectives and CSFs so that they provide the towns of Brecon and Talgarth with opportunities to develop long term Place Plans in partnership with the Brecon Beacons |
| 14.71 | Re-design these Proposals so that they are the centrepiece of a Brecon Regeneration Plan. |