

**APPENDIX C – FINAL IMPACT ASSESSMENTS
Brecon and Gwernyfed High Schools**

	Page
1. Equalities Impact Assessment	2
2. Community Impact Assessment	15
3. Integrated Impact Assessment	23



Powys County Council

Equality Impact Assessment (EqIA) – Decision Assessment reporting template

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

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

<p>Proposal</p>	<p>a) To close Brecon High School and Gwernyfed High School on the 31st August 2017, and to establish a new English-medium 11 – 16 secondary school that will operate across the current sites of the two schools from 1st September 2017;</p> <p>b) From the 1st September 2017, Post-16 provision (academic and vocational) to be delivered by NPTC Group of Colleges in Brecon;</p> <p>c) From the 1st September 2017, Welsh-medium secondary education to be delivered at the Builth Wells site of the proposed new school in Mid Powys (provided that the Proposal is approved by Cabinet following consultation; and</p> <p>d) To close the school sites at Gwernyfed and Brecon upon the opening of a new build campus in Brecon, in 2019/20.</p>	<p>Lead Person undertaking the assessment</p>	<p>Marianne Evans</p>
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Service Area	Schools Service	Relevant Head of Service who has agreed this assessment	Ian Roberts Head of Schools
Date of Assessment	March 2016		

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

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

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

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

1. AIM or PURPOSE

Briefly describe the aim or purpose of the change proposal being assessed.

The School Review Process as outlined within the School Transformation Policy 2014 was restarted in September 2015. The stages of the Process are outlined below:

- An Initial Assessment of Schools in accordance with Stage 1 of the School Review Process was carried out, during which data for all schools was considered. Schools were considered against the criteria outlined in the School Transformation Policy. As a result of this Initial Assessment of Schools, SORP agreed to carry out a detailed review of the two schools.
- Dialogue took place with the governing bodies, headteachers and local members during 2015 and 2016 in accordance with Stage 2 of the School Review Process as described in the School Transformation Policy, as follows:
 - Initial meetings held on 21st September 2015 to agree data in respect of the school and to discuss future options relating to the school;

	<ul style="list-style-type: none"> - An opportunity for the governing bodies to provide feedback on the options presented to them; <ul style="list-style-type: none"> • Following the initial meetings with governing bodies, headteachers and local members, the Council carried out a review of secondary education across South and Mid Powys, and developed a business case which considered the case for change in both areas, assessed and costed a range of options and included Proposals relating to the secondary schools under review. • The business case and its Proposals were considered by the SORP on the 20th January 2016, and the SORP agreed draft Proposals in respect of the all schools under review. • Feedback meetings were held with the governing bodies, local members and the headteachers on the 26th January 2016 to discuss the SORP's draft Proposals and to give the governing bodies a further opportunity to present additional evidence. • On the 23rd February 2016, Cabinet considered the SORP's Proposals, together with the business case and additional evidence presented by the governing bodies following the feedback meeting. Cabinet resolved to commence formal consultation on the Proposal outlined above. • The consultation period commenced on the 6th April 2016, and ended on the 1st June 2016. • The Consultation Document was available on the Council's website throughout the consultation period. The Document was also distributed to stakeholders as required by the School Organisation Code (2013).
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2. OBJECTIVES	
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Please state the current business objectives of the change proposal.	<p>Investment Objectives</p> <ul style="list-style-type: none"> • To significantly improve the learning outcomes for learners across the ability range; • To maximise the curriculum benefits at key stages 3 and 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, whilst maximising the percentage of the budget spent on teaching and learning.
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3. BENEFITS and OUTCOMES	
i) What are the intended benefits or outcomes from the change proposal?	<ul style="list-style-type: none"> • Creates a critical mass of pupils that meets the Authority’s agreed minimum threshold of 600 pupils at KS3 and KS4 • Creates 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. • Meets the requirements of the Learning and Skills Measure in a single location, with the added bonus of the proximity of NPTC Group of Colleges and therefore opportunities to broaden the offer for pupils, both academically and vocationally. • Reduces overall surplus places. • Improves learning environment. • Provides for a more cost-effective delivery of learning • Removes backlog maintenance costs • Provides an opportunity to develop an infrastructure that is resilient to future demographic or financial challenges • Provides a net saving to the Authority which can be reinvested in the education sector • Provides a capital receipt to the Authority which can be reinvested in the education sector • Enables Welsh-medium education to be delivered in a more cost – effective way, providing improved linguistic progression and more subject choice for learners • Creation of a greater mass of Welsh-medium secondary learners in a single school which will enable the Authority to build on the linguistic continuity already present • Social and educational benefits to Welsh-medium pupils from being part of a larger group of Welsh-medium pupils • Additional Welsh-medium opportunities would be provided to Welsh-medium pupils from Brecon through access to the wider range of Welsh-medium subjects than the offer currently provided • More opportunity for pupils to take part in extra-curricular activities through the medium of Welsh • An increased number of Welsh-medium pupils would enable the school to further develop its Welsh ethos • Given the location of Ysgol Gyfun Ystalyfera, Ysgol Gyfun Gwynllyw and Ysgol Gyfun Rhydywaun, Builth Wells is in a more central location for the majority of Welsh-medium primary providers in mid / south Powys.
4. CORPORATE RELEVANCE	
How does this change proposal relate to the Powys	The proposal supports Powys County Council’s vision for education, which is outlined within the One Powys Plan for 2014-17. ‘Transforming Learning and Skills’ is one of the priorities within this plan, and within this priority, the Plan states

Change Plan and/or Powys One Plan?	that <i>'We need to re-organise schools (primary, secondary and post 16) to ensure affordability, sustainability and appropriate leadership capacity'</i>
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5. DATA USED

5.1. What data has been used to conduct this assessment? Tick/shade boxes as appropriate.	Profiling of service users, providing a breakdown of who uses the service by the protected characteristics.	✓
	Service user satisfaction rates, broken down by the protected characteristics.	
	Qualitative data (analysed against the protected characteristics) which provides evidence about current services users experience accessing the service.	✓
	Qualitative data gathered from those that are not currently using the service.	✓
	Complaints monitoring against the protected characteristics	
	Wider research reports and findings.	
Relevant service based Equality Impact Assessment		
5.2. Are there any gaps in the data?	Yes <input type="checkbox"/>	No ✓

6. DATA ANALYSIS

6.1 Quantitative Summarise the key quantitative data analysis results, providing key headline statistics. Include data that relates to existing provision and also data relating to proposal. E.g. statistics generated from a consultation questionnaire. Key questions:	Information on pupils who attend both High Schools, along with information on pupils who attend each feeder school in both catchment areas is obtained via the Pupil Level Annual School Census 2016 (PLASC), which shows the profile of pupils according to a range of criteria, including age, free school meals, gender, special educational needs, ethnicity, use of Welsh and disabilities. In relation to the protected characteristic groups, the profile of pupils at the school is provided below: <u>Brecon High School</u> - 565 pupils in total including 92 pupils in the Sixth Form.
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- i) Are certain groups currently underrepresented in service user figures? Will a change affect this?
- ii) How do satisfaction levels compare across the protected characteristic groups? How will a change affect this?

- Gender: Of the pupils attending the school, 286 are boys and 279 are girls.
- Free school meals: 7% are eligible for free school meals.
- SEN: 1% of pupils in the school have Statements of Special Educational Needs. Less than 1% of these pupils have physical or medical difficulties.
- 16% of pupils have additional learning needs but do not have a statement.
- English as an Additional Language: English is an additional language for 8% of pupils.
- Welsh Language: 3% of pupils are recorded as being able to speak Welsh fluently at home. 5% do not speak Welsh at home but are fluent. 0.5% speak Welsh at home but not fluently.
 - The ethnic group of pupils at the school is as follows:
 - White British –(89%)
 - Nepali – (4%)
 - Other ethnic groups (7%) – 17 other groups identified

Gwernyfed High School

- 456 pupils in total. 6 subsidiary pupils. 84 pupils are in the Sixth Form.
- Gender: Of the pupils attending the school, 219 are boys and 237 are girls.
- Free school meals: 5% are eligible for free school meals.
- SEN: 0.5% of the school have Statements of Special Educational Needs. There are no pupils with physical or medical difficulties.
- 34% have special needs but do not have a statement.
- English as an Additional Language: English is an additional language for less than 1% of pupils
- Welsh Language: less than 1% speaks Welsh fluently at home. Less than 1% speaks Welsh at home but not fluently.
 - The ethnic group of pupils at the school is as follows:
 - White British –96%
 - Other ethnic group – 4% (10 groups identified)

Primary schools in the Brecon catchment area

- 1040 pupils in total, aged between 3 and 11.
- Gender: Of the pupil attending schools in the catchment area, 51% are boys and 49% are girls.
- Free school meals: 10% are eligible for free school meals.
- SEN: 0.5% in the catchment area have Statements of Special Educational Needs, and less than half of these have physical or medical disabilities.
- 17% pupils have special needs but do not have a statement
- English as an Additional Language: English is an additional language for 7% of pupils.
- Welsh Language: 5% of pupils speak Welsh at home. 7% pupils speak Welsh but not at home.
- Race/ethnicity: PLASC only provides information about the nationality and ethnic groups of pupils aged 5 and over.
 - The ethnic groups of pupils aged 5 and over attending schools in the catchment area is as follows:
 - White British – (90%)
 - Nepali 4%
 - Other ethnic groups – 7% (22 other groups identified)

Primary Schools in the Gwernyfed catchment area

- 631 pupils in total, aged between 3 and 11.
- Gender: Of the pupils attending schools in the catchment area, 51% are boys and 49% are girls.
- Free school meals: 5% pupils are eligible for free school meals.
- SEN: Less than 1% of pupils have Statements of Special Educational Needs.
- 12% pupils have special needs but do not have a statement, and less than 0.5% of the pupils have physical or medical difficulties.
- English as an Additional Language: English is an additional language for less than 1% pupils.
- Welsh Language: 1% pupils come from homes where Welsh is spoken. 0.3% pupils come from homes where Welsh is not spoken but can speak Welsh.
- Race/ethnicity:
 - The ethnic group of pupils aged 5 and over attending schools in the

	<p>catchment area is as follows:</p> <ul style="list-style-type: none"> - White British – 96% - Other ethnic group – 4% (5 groups identified)
<p>6.2 Qualitative Summarise the key qualitative data analysis, providing key themes or patterns. Include data that relates to existing provision and also data relating to proposal. E.g. protected characteristics focus group on the proposal.</p> <p>Key questions:</p> <ul style="list-style-type: none"> i) Do certain groups have a different service user experience? How will a change affect this? ii) Have any areas for improvement been communicated by particular groups? Will a change have an impact upon these views? iii) What are the reasons behind some groups not using the service? How will a change affect this position? iv) What has consultation on your proposals revealed about impact on the protected characteristics? 	<p>Opinion Research Services (ORS) were commissioned by the Authority to support the consultation. Consultees were invited to respond to the consultation by either completing a questionnaire, online and paper, or by writing to ORS.</p> <p>A total of 1047 questionnaires were analysed, of which 625 were responses to the main consultation questionnaire, 148 to the Young Persons’ questionnaire, and 274 to the primary school consultation questionnaire;</p> <p>29 statutory written submissions were received concerning the proposals for Brecon and Gwernyfed High Schools. These were from: Assembly Members and Members of Parliament; Estyn, other political groups; school Governing Bodies; Town and Community Councils; and other affected local organisations. In addition, 409 other submissions were received from local residents and non-statutory organisations. The vast majority of submissions were sent in by those within the Gwernyfed catchment area.</p> <p>During the consultation period, meetings were also held with the following:</p> <ul style="list-style-type: none"> • School Councils and other pupils of Brecon and Gwernyfed High Schools • School Councils and other pupils of all primary schools in both catchment areas • Staff of Brecon and Gwernyfed High Schools • Governors of Brecon and Gwernyfed High Schools • Parents / community of both schools • Protected Characteristics Group <p><u>Impact of the Proposal on key characteristic groups</u></p> <p>ORS have prepared a comprehensive Consultation Report which can be found on http://www.powys.gov.uk/en/corporate/find-out-about-consultations-in-powys/past-consultations/brecon-and-gwernyfed-high-schools/, along with the Authority’s responses to issues raised. The main themes from the consultation are summarised on pages 45 – 49 of the Report. Specifically, the sections relating to:</p> <ul style="list-style-type: none"> • Quality of education • Post-16 education

	<ul style="list-style-type: none"> • Welsh-medium education • Other pupil impacts • Other staff impacts and • Community Impacts <p>describe views about the potential impact on pupils, pupils with ALN and staff. Many respondents stated their view that there would be a significant impact on equality of pupils within the Gwernyfed catchment, and Welsh-medium pupils in the Brecon catchment should the Proposal be implemented.</p>
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7. EqIA RESULT

<p>Based on an analysis of the available qualitative and quantitative data, please tick/shade the appropriate box opposite to provide the EqIA assessment result.</p>	<p>The proposal does not present any adverse impact on equality. [Proceed to question 10]</p>	
	<p>The proposal presents some adverse impact on equality. [Proceed to question 8]</p>	
	<p>The proposal presents significant impact on equality [Proceed to question 8]</p>	✓

8. AREAS for IMPROVEMENT

<p>Please provide detail of weak or sensitive areas of the proposal identified by the assessment.</p> <p>i) Which protected characteristic groups are particularly affected?</p> <p>ii) Will people on low incomes be affected?</p> <p>iii) Will Welsh speakers be affected?</p>	<p>i) All pupils at Brecon High School and Gwernyfed High School, and in the primary catchment schools fall within the protected characteristic groups of <u>sex and/or age</u>.</p> <ul style="list-style-type: none"> • The main impact on Brecon High School and Brecon catchment pupils may be due to the need to integrate with a new cohort of pupils. There are no additional travel implications for these pupils. • Pupils with statements of special needs/additional learning needs may be affected emotionally due to the transition to a much larger school.
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- The main impact on pupils living in the Gwernyfed catchment would be due to the additional travel required to attend a school in Brecon, rather than attend a school in Gwernyfed. This would mean a longer school day and longer journeys for these pupils than that currently required. This could have a detrimental impact on the performance and well-being of pupils – particularly those of a younger age or those with additional learning needs. It would also be more difficult for these pupils to access after-school activities due to their reliance on home-to-school transport, and it would be more difficult for parents to arrange their own transport due to the distance from their homes.
- Pupils who are within the protected characteristic groups of **disability** may also experience a negative impact due to the additional travel requirements. Learners with statement of special needs/additional learning needs may be affected due to the transition to a much larger school that is unfamiliar to them.

ii) Pupils on low income from the current Brecon catchment would not be adversely affected as provision would remain within the area. However, it is acknowledged that it may be more difficult for parents of pupils from low income families living in the Gwernyfed catchment to travel to Brecon if their children wished to stay in Brecon for after-school activities – the authority would not provide free home-to-school transport for this situation. Pupils would therefore be dependent on parental conveyance or public transport.

iii) As this Proposal is to establish an English medium secondary school in Brecon, replacing the current Brecon High School, which is a dual-stream school, the proposal would impact on Welsh speakers. It may be argued that the removal of Welsh-medium secondary education may have an adverse impact on Welsh speakers and Welsh-medium pupils in the Brecon area, however the authority's view is that Welsh speakers and Welsh-medium pupils in the Brecon area are not being treated

	<p>equally under the current arrangement due to the limited Welsh-medium curriculum available to them.</p> <p>Gwernyfed High School and the catchment primaries are all English-medium schools and the numbers of pupils who are fluent in Welsh is very low, therefore it is not anticipated that the draft Proposal would have an adverse impact on Welsh speakers in this catchment area.</p>	
<p>9. EQUALITY IMPROVEMENT</p>		
<p>9.1 Having identified problematic aspects to the proposal, how will this now be addressed?</p> <p><i>i.e. Are you able to involve (in some capacity) people from protected characteristic groups, Welsh Speakers, people on low incomes, to assist you in this process?</i></p> <p>i) Can the impact be mitigated, and how will this be done? ii) Does the proposal require modification to reduce or remove this impact? iii) Should the proposal be considered for removal, owing to the degree of impact it is likely to have?</p>	<p>A new recommendation will be proposed to Cabinet by the Portfolio Holder for Education:</p> <ul style="list-style-type: none"> • To abandon elements a),b), and d) of the Proposal and to bring a new report back to Cabinet with new draft recommendations for Brecon and Gwernyfed High Schools, in accordance with the Schools Reorganisation Policy 2015; • To re-consult on element c) of the Proposal, i.e. the closure of the Welsh-stream at Brecon High School from September 2017; • To immediately submit a revised Outline Business Case to Welsh Government's 21st C Schools Programme for capital investment in both campuses. This will include a new build 11 – 18 campus in Brecon and improvements to the Gwernyfed campus. 	
<p>9.2 Will the management of the impact as outlined in 9.1, be included in the Service Improvement Plan?</p>	<p>Yes <input type="checkbox"/></p> <p>Date added.....</p> <p>Reference.....</p>	<p>No <input checked="" type="checkbox"/></p> <p>If no, please explain why not: Need was not identified at time of writing Service Strategy</p>

10. ONGOING MONITORING

<p>How will the decision now be monitored on an ongoing basis to consider its impact over time?</p>		Please tick/shade
	Equality monitoring of uptake of the service within which the decision was made	
	Satisfaction monitoring of service users (broken down by protected characteristic)	
	Recording and analysing complaints/requests/compliments	
	Targeted periodic focus groups/service user interviews/feedback sessions	
	Other (please specify)	

Monitoring arrangements

The Schools Transformation Programme Board is responsible for overseeing the strategic direction of the Transformation agenda: setting direction, implementing change, monitoring and reporting to the Cabinet of the Council.

Equality monitoring will form an integral part of the County Council’s arrangements for any school reorganisation and will be undertaken where a significant or material change in provision is proposed.

The Head of Schools Service will be responsible for on-going monitoring.

Publication of results of the Impact Assessment

The results of the Impact Assessment will be published on the Council's website

Equality Impact Assessment Action Plan

Any actions identified as a result of this Impact Assessment will be taken forward for inclusion in the Schools Service Business Plan

Final Community Impact Assessment

1. Introduction

Further to the decision made by Cabinet on the 23rd February 2016, the Authority has carried out formal consultation on the following proposal:

- a) To close Brecon High School and Gwernyfed High School on the 31st August 2017, and to establish a new English-medium 11 – 16 secondary school that will operate across the current sites of the two schools from 1st September 2017;
- b) From the 1st September 2017, Post-16 provision (academic and vocational) to be delivered by NPTC Group of Colleges in Brecon;
- c) From the 1st September 2017, Welsh-medium secondary education to be delivered at the Builth Wells site of the proposed new school in Mid Powys (provided that the Proposal is approved by Cabinet following consultation; and
- d) To close the school sites at Gwernyfed and Brecon upon the opening of a new build campus in Brecon, in 2019/20.

The Council published a draft Community Impact Assessment on the Proposal as outlined in 1) above, as part of a Formal Consultation that took place between the 6th April and the 1st June 2016.

The draft Community Impact Assessment was prepared in accordance with the Welsh Government's School Organisation Code 2013. In order to prepare the assessments, a questionnaire was sent to each school on the 10th December 2015 to gather initial information about the community's use of school facilities. Following the Council's School Organisation Review Panel (SORP)'s feedback meetings with the school on the 26th January, the schools were invited to review and resubmit the questionnaires, having been informed of the SORP's draft recommendations. An example of the questionnaire is attached at the end of this document.

The draft Impact Assessment was based on the information received from the schools via the questionnaire.

Following the consultation period, this Community Impact Assessment has been updated to incorporate relevant information gathered during the consultation.

2. The communities served by Brecon and Gwernyfed High School

The catchment of Brecon High School includes the town of Brecon itself as well as the surrounding rural area. The catchment area for the school's Welsh-medium stream is larger, and includes the catchment areas of Gwernyfed High School and Crickhowell High School. However, as there is no Welsh-medium primary provision in either of these catchments, pupils wishing to access Welsh-medium provision travel from these catchment areas to Ysgol y Bannau, Brecon.

The catchment of Gwernyfed High School includes the towns of Talgarth and Hay-on-Wye and a number of smaller villages and hamlets.

- Brecon Town Council
- Crai Community Council

- Felinfach Community Council
- Glyn Tarrell Community Council
- Honddu Isaf Community Council
- Llanddew Community Council
- Llanfrynach Community Council
- Llywel Community Council
- Maescar Community Council
- Merthyr Cynog Community Council
- Trallong Community Council
- Talybont on Usk Community Council
- Ysgir Community Council
 - Gwernyfed Community Council
 - Hay-on-Wye Town Council
 - Bronllys Community Council
 - Clyro Community Council
 - Glasbury Community Council
 - Llangors Community Council
 - Talgarth Town Council
 - Erwood Community Council
 - Painscastle Community Council
 - Bronllys Community Council
 - Llanigon Community Council

4. Community Impact Assessment

4.1 Extra-curricular activities

Brecon High School

The following clubs are provided by the school outside school hours:

- Sports Clubs – Rugby, Football, Cricket (Summer), Netball, Basketball
- Subject catch up sessions – a range of subjects
- Art Club
- Additional Maths GCSE

The following extra-curricular activities are provided by the school:

Duke of Edinburgh award; Drama – School Play; Lunchtime Art Club; Revision Sessions – KS4 and KS5; Music – additional study for KS4 pupils; Peripatetic Music Lessons.

Gwernyfed High School

The following clubs are provided by the school outside school hours:

- GCSE Revision Clubs – English, Maths, Science
- GCSE Additional Maths
- Homework Club
- KS3 and KS4 Arts Club
- Duke of Edinburgh
- Film Club
- 5x60 activities
- Badminton Club

- Fitness for Sixth Form
- Music Tuition and Clubs – Junior choir, junior band, peripatetic lessons

The following extra-curricular activities are provided by the school:

Sports teams year 7-11 – Netball, Rugby, Football, Gymnastics, Cricket, Athletics, Badminton, Table Tennis, Hockey

4.2 Community Use of School Building

Brecon High School

The school's facilities are used by the community for the following activities:

- Regional Eisteddfod – annual
- South Powys Music groups
- Brecon Athletic Club
- Brecon Basketball Club
- Brecon Fit Club
- Brecon Netball Club
- Brecon Triathlon Club
- Welsh National Karate Squad
- Hosting Charity Events – e.g. Dementia Awareness
- Provide facilities for local community events – Nepalese Community celebrations

Gwernyfed High School

The school's facilities are used by the community for the following activities:

- Local Sports Teams (Hay Juniors Football, Branson FC, GRFC minis, Rebecca Saunders Football, Kasasian Norris Badminton, Gwernyfed Hockey Team, Talgarth Town Junior FC, Hay St Marys FC, Steve Wouldiams FC, Mertyr Town FC, Simone Hodges Fitness, Fencing Draig Wern Club, 14's Gwernyfed RFC, Cadence Cycle Club, Dawn Edwards Badminton, Powys Rugby, Gwernyfed RFC Warriors, Richard Jenkins Football)
- 5x60 activities
- All Wales Ploughing Championship
- Welsh Netball Association
- South Powys Badminton Association

The school building and facilities are also used by the following:

Sports Centre, Glasbury Arts, Gwernyfed RFC, Church Groups – summer holidays and weekends, Scout Camps, Private Childrens Parties, Car Boot Sales, Hay Festival wet weather parking.

The school took ownership of the Sports Centre in 2015.

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.

4.3 Other links between the schools and the community

Brecon High School

The school has strong links with the community, which include the following:

Use of school facilities by Penmaes Special School – pupils also attend some lessons, Mount Street Primary use hall for rehearsals, Rugby Development Officer – Formal links to Brecon Rugby Club, Links with Army Base, Links with Brecon based organisation e.g. Brecon Food Bank, Brecon Rotary – Cooking competitions and interview experience for year 11 students, Fire Service – Road Safety Events

Brecon High School also makes their facilities available for other organisations.

Gwernyfed High School

The school has strong links with the community, which include the following:

Sporting events for surrounding areas e.g. Llangors, Felin Fach, Brecon Volleyball Club, Gwernyfed Geckos Netball Club, Strong Links with Gwernyfed RFC, Glasbury Arts, Friends of Clyro, Hay Veterinary Clinic – Work Experience, Shepherds Ice Cream – Trains students in customer relations.

5. Feedback from the Consultation

Opinion Research Services (ORS) were commissioned by the Authority to support the consultation. Consultees were invited to respond to the consultation by either completing a questionnaire, online and paper, or by writing to ORS.

ORS have prepared a comprehensive Consultation Report which can be found on <http://www.powys.gov.uk/en/corporate/find-out-about-consultations-in-powys/past-consultations/brecon-and-gwernyfed-high-schools/>, along with the Authority's responses to issues raised. The main themes from the consultation are summarised on pages 45 – 49 of the Report. A summary of respondents' views about community impact can be found on pages 29 – 31 of the Consultation Report and pages 214 – 223 of the Consultation Report – Responses.

6. Conclusion

The conclusion that was included in the earlier draft Community Impact Assessment is confirmed by evidence gathered during the consultation period:

Brecon

- It is clear that the community of Brecon makes use of the school's facilities for a range of activities. However, the Proposal would involve retaining secondary provision in Brecon, therefore school facilities would continue to be available. It is likely that the proposed new building for the school would provide additional opportunities for the community to make use of the school's facilities.
- The school provides a range of extra-curricular activities for pupils. The expectation is that a similar range of activities would be provided in the new school, and the proposed new school could offer opportunities to offer additional activities.

- As the proposed new school would be located on the current high school site, there would be no impact on travel for English-medium pupils currently attending Brecon High School. However, the proposal to centralise Welsh-medium provision in the Builth Wells area means that there would be additional travel for Welsh-medium pupils from the Brecon area. Whilst free home to school transport would be provided for Welsh-medium pupils, the authority accepts that it would be more difficult for them to access after school activities due to their reliance on home to school transport.

Gwernyfed

- From the evidence gathered during the consultation, it is clear that the communities served by Gwernyfed High School make significant use of the school's facilities for a wide range of activities and events. There are no similar facilities in the area that would meet the needs of the users – the centre is extremely popular with local groups, with at least 34 different user groups.
- Due to the fact that there is no other suitable location to hold these activities in the area. It is currently unclear where these activities could take place within the catchment area, should Gwernyfed High School close.
- If these facilities were removed from the area, then it may be more difficult for clubs/groups to meet, leading to a reduction in the number of clubs/groups – this would have a detrimental impact on people's ability to contribute to the community, and could potentially have a negative impact on people's health and wellbeing, as well as the social cohesion of the community.
- School journey times would be longer therefore may impact on the ability of pupils to access out-of-school activities and clubs.
- Brecon Leisure Centre may not be a feasible alternative for these clubs/groups due to its geographic location. If the usage of Brecon Leisure Centre increases due to these recommendations, then it may be more difficult for groups/clubs to book slots at the Centre, leading ultimately to the demise of groups/clubs.
- In terms of extra-curricular activities for pupils, it would be expected that the new school in Brecon would have a range of different activities. If these were provided after school hours, then it would be more difficult for those pupils for whom Gwernyfed High School is their closest school to access these activities if they were reliant on home to school transport.
- Gwernyfed High School has a drama studio that is well used as a venue for local arts activities, and without this facility, it may be difficult for arts societies to operate. For example, there is a strong linkage between Glasbury Arts, a community-based charity, and Gwernyfed High School. This manifests itself in arts-based partnership work with pupils of the school and also as a centre for the promotion of visual and performing arts within the community. There are no other non-commercial facilities that would be a suitable alternative within the community.
- Removing a secondary school from a rural area would impact negatively on the future housing market – people would not want to move to the area if there isn't a local, medium sized secondary school that they can access.

- There may be a possibility that families move away from the area to be closer to secondary provision. In the Gwernyfed area, many families live closer to secondary schools in England, and may prefer to transport their children to these schools. This may lead to a loss of skilled, educated and experienced workers in the area.
- Without a local secondary school, the area may not be attractive to young families, and the demographic of the area becomes unbalanced, with more of an ageing population. This could have an impact on pupil numbers in the primary schools.
- Local rural businesses would be negatively affected. Businesses in the vicinity of Three Cocks and other areas would be particularly affected through the removal of over 400 pupils from the area – loss of sales from shops, loss of fuel sales to parents - parents also use these businesses when they pick-up or drop-off their children, and therefore are critical to supporting the local rural economy.
- The future social interaction of pupils would become Brecon-centred, which would have an impact on businesses within the communities served by Gwernyfed High School. There would also be a further impact on the current supply chain that serves the school.
- Many local people are employed by Gwernyfed High School, or in the supply chain that supports the high school – leading to a loss of employment which would affect the local economy.
- Impact on the agricultural sector. In a traditional farming area such as Gwernyfed, many children offer a valuable additional resource for family farms. The impact of a longer school day, due to additional travel requirements, could have a detrimental effect on the industry.



Community use of school facilities - questionnaire

School:

Date questionnaire completed:

1. Please list any after-school clubs provided by the school:

2. Please list any other extra-curricular activities provided by the school:

3. Please list any other facilities or services the school accommodates e.g. youth club, play group:

4. Please list any other use by the community of the school building:

5. Please list any other links between the school and the community:

6. Please provide any additional comments you would like to submit:

Please return this questionnaire to:

School Transformation Team, Schools Service, Powys County Council, County Hall, Llandrindod Wells, Powys, Ld1 5LG

Or by e-mail to school.modernisation@powys.gov.uk.

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



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

Service Area	Schools Service	Head of Service	Ian Roberts	Strategic Director	Jeremy Patterson	Portfolio Holder	Cllr Arwel Jones
Policy / Change Objective / Budget Saving	School Transformation Policy						
Outline Summary							
This Impact Assessment relates to the following proposal:							
<p>a) To close Brecon High School and Gwernyfed High School on the 31st August 2017, and to establish a new English-medium 11 – 16 secondary school that will operate across the current sites of the two schools from 1st September 2017;</p> <p>b) From the 1st September 2017, Post-16 provision (academic and vocational) to be delivered by NPTC Group of Colleges in Brecon;</p> <p>c) From the 1st September 2017, Welsh-medium secondary education to be delivered at the Builth Wells site of the proposed new school in Mid Powys (provided that the Proposal is approved by Cabinet following consultation; and</p> <p>d) To close the school sites at Gwernyfed and Brecon upon the opening of a new build campus in Brecon, in 2019/20.</p>							

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

Version	Author	Job Title	Date
1	Marianne Evans	Senior Manager Schools Transformation	26/08/16

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

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Council Priority	How does the policy / change objective impact on this priority?	<u>Inherent Judgement</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>Residual Judgement</u> Please select from drop down box below	Source of Outline Evidence to support judgement
<p>Supporting people in the community to live fulfilled lives</p>	<p>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 for pupils in the Brecon and Gwernyfed catchment areas. The reasons for change are documented in the Consultation Document.</p> <p>For the Brecon community, the Proposal will support people in the community to live fulfilled lives by providing a new sustainable secondary school in brand new facilities, along with investment in a sixth form centre and College Campus. It is clear that the community of Brecon makes use of the school's facilities for a range of activities. However, the Proposal would involve retaining secondary provision in Brecon, therefore school facilities would continue to be available. It is likely that the proposed new building for the school would provide additional opportunities for the community to make use of the school's facilities.</p> <p>Concern has been expressed during the formal consultation about the potential impact of closure of Gwernyfed High School on the communities served by the school, as outlined in the Consultation Report The draft</p>	<p>Very Poor</p>		<p>Very Poor</p>	<p>Consultation Report Community Impact Assessment</p>

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



	community Impact Assessment also highlighted the significant detrimental impact of closing Gwernyfed High School.				
Developing the economy	Whilst the economy of Brecon and its surrounding hinterland could benefit significantly from the opening of a new secondary school in Brecon, along with capital investment in the NPTC Campus, it can be argued that there would be a negative impact on the communities served by Gwernyfed High School.	Poor		Poor	Consultation Report Community Impact Assessment
Improving learner outcomes for all, minimising disadvantage	<p>The proposal aims to ensure that high quality education is accessible to all, and that it is affordable and sustainable with a focus on high quality leadership, teaching and learning.</p> <p>All children and young people (including those in receipt of free school meals and with additional learning needs) will be supported to achieve their full potential at the New School.</p> <p>Concern has been expressed that closure of Gwernyfed High School would have a negative impact on learner outcome, however the authority's view is that the proposal would maintain or improve learner outcomes.</p> <p>Concern was also expressed that post-16 outcomes and experiences would not be as good in a College-led tertiary system compared to that currently provided by the High Schools.</p>	Good	Should the schools close, transition plans would be put in place to support pupils with their move to the New School or to the new Post-16 provision to ensure that disruption is minimised and to ensure that all pupils achieve their full potential.	Neutral	Consultation Report, ERW School Improvement Strategy, One Powys Plan

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



<p>Remodelling council services to respond to reduced funding</p>	<p>The proposal will provide better value for money for the council in the long term, by ensuring more equitable distribution of funding.</p> <p>The proposal will:</p> <ul style="list-style-type: none"> i) Reduce overall surplus capacity ii) Deliver a more cost-effective delivery of learning iii) Provide an infrastructure that is resilient to future demographic or financial challenges iv) Provide a new school building, replacing two schools that are condition C and D 	<p>Good</p>		<p>Good</p>	<p>Consultation Report</p>
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3. How does your policy / change objective / budget saving impact on the Welsh Assembly's well-being goals?

<p>Well-being Goal</p>	<p>How does the policy / change objective contribute this goal?</p>	<p><u>Inherent Judgement</u> Please select from drop down box below</p>	<p>What will be done to better contribute to positive or mitigate any negative impacts?</p>	<p><u>Residual Judgement</u> Please select from drop down box below</p>	<p>Source of Outline Evidence to support judgement</p>
<p>A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.</p>	<p>The proposal will provide better value for money for the council in the long term, by ensuring more equitable distribution of funding.</p>	<p>Good</p>		<p>Good</p>	<p>Consultation Document</p>
<p>A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy</p>	<p>Brecon High School is graded D for condition, meaning it is 'life-expired', and Gwernyfed High School is graded C for condition.</p>	<p>Good</p>		<p>Good</p>	

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



<p>functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<p>The authority's long term strategy is to improve all its learning environments, and the authority supports the Welsh Government's aspiration for 21st Century Schools which are for:</p> <ul style="list-style-type: none"> - learning environments that will enable the successful implementation of strategies for improvement and better educational outcomes - greater economy and efficiency for learning environments through better use of resources - a sustainable education system in Wales that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings <p>However, the authority recognises that there will be additional travel involved for pupils that currently live closer to Gwernyfed High School.</p>				
<p>A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p>	<p>Concern has been raised in relation to the impact of the proposal on the well-being of pupils currently attending Gwernyfed High School due to the proposed change of school and the additional travel that would be required.</p> <p>Concern was also raised that the wellbeing of Welsh-medium pupils from the Brecon area would be adversely affected due to the additional travel to Builth Wells, and not being able to access after-school activities due to reliance on home-to-school transport,</p>	<p>Poor</p>	<p>Full support will be provided to pupils transferring to the named receiving school or any other school to aid their transition, in order to limit the impact on pupil well-being.</p> <p>The authority notes the concern in relation to the additional travel, however travel times would be within the authority's suggested maximum journey time.</p>	<p>Neutral</p>	<p>Consultation report</p>

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



<p>A Wales of cohesive communities: Attractive, viable, safe and well-connected Communities.</p>	<p>Concern has been raised in relation to the impact of the proposal on the communities served by Gwernyfed High School.</p>	<p>Very Poor</p>		<p>Very Poor</p>	<p>Consultation report</p>
<p>A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p>	<p>Brecon High School is graded D for condition, meaning it is 'life-expired', and Gwernyfed High School is graded C for condition.</p> <p>The authority's long term strategy is to improve all its learning environments, and the authority supports the Welsh Government's aspiration for 21st Century Schools which are for:</p> <ul style="list-style-type: none"> - learning environments that will enable the successful implementation of strategies for improvement and better educational outcomes - greater economy and efficiency for learning environments through better use of resources - a sustainable education system in Wales that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings <p>However, the authority recognises that there will be additional travel involved for pupils that currently live closer to Gwernyfed High School.</p> <p>The proposal seeks to improve the learning opportunities and outcomes for all children, and has the best interests of the child at heart. However, concern was expressed during the consultation period about the</p>	<p>Neutral</p>	<p>Full support would be provided to pupils transferring to the named receiving school or any other school to aid their transition, in order to ensure the well-being of all pupils.</p>	<p>Good</p>	<p>Consultation report</p>

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



	proposal's impact on pupil well-being, and on the well-being of the communities served by Gwernyfed High School.				
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A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.					
<p><i>Opportunities for persons to use the Welsh language</i></p>	<p>The Authority recognises that concerns were raised by many participants during the consultation period about the proposed removal of the Welsh-stream from the New School in Brecon to the Builth Wells site of the New dual-sited school in Mid Powys.</p> <p>The concerns were that the Proposal would lead to a decline in the use of the Welsh Language in the Brecon area, and a decline in the number of parents choosing Ysgol y Bannau, Brecon.</p> <p>There were also concerns that pupils from the Brecon area would be disadvantaged by not being able to access after-school activities easily, due to the reliance on home-to-school transport, which would affect the opportunities for those pupils to use the Welsh language outside the classroom.</p>	<p>Neutral</p>	<p>The Authority's intention is to provide equality of provision. Builth Wells High School currently provides a more equitable distribution of subjects between English-medium and Welsh-medium streams. The Authority believes that building 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.</p> <p>The New School in Mid Powys would be encouraged to provide as many extra-curricular opportunities for Welsh-medium pupils from Brecon during the school day, and the Council would work with the school to explore possible transport solutions, including the use of public transport</p>	<p>Neutral</p>	<p>Consultation Report Impact assessment</p>

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



<i>Treating the Welsh language no less favourable than the English language</i>	The Authority's intention is to provide equality of provision.	Good	See above	Good	Consultation Report Impact assessment
<i>Opportunities to promote the Welsh language</i>	<p>The Authority recognises that concerns were raised by many participants during the consultation period about the proposed removal of the Welsh-stream from the New School in Brecon to the Builth Wells site of the New dual-sited school in Mid Powys.</p> <p>The concerns were that the Proposal would lead to a decline in the use of the Welsh Language in the Brecon area, and a decline in the number of parents choosing Ysgol y Bannau, Brecon.</p>	Neutral	As above	Good	Consultation Report Impact assessment
<i>Welsh Language impact on staff</i>	There will be a requirement for more Welsh-medium teachers at the New School in Mid Powys should numbers of pupils in the Welsh stream in Builth Wells increase. There will be a negative impact on Welsh-medium teachers in Brecon.	Poor	<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>	Good	Consultation Report Impact assessment

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



<p><i>People are encouraged to do sport, art and recreation.</i></p>	<p>The New School in Brecon would have new sports facilities and a larger group of pupils to be involved in sports activities. There would be appropriate opportunities for all pupils to participate.</p> <p>However, concern has been raised that if sports facilities were removed from the Gwernyfed area, then it may be more difficult for clubs/groups to meet, leading to a reduction in the number of clubs/groups – this would have a detrimental impact on people’s ability to contribute to the community, and could potentially have a negative impact on people’s health and wellbeing, as well as the social cohesion of the community.</p> <p>There were also concerns that pupils from the Brecon area would be disadvantaged by not being able to access after-school activities easily, due to the reliance on home-to-school transport, which would affect the opportunities for sport, art and recreation.</p>	<p>Poor</p>	<p>The authority will work with the Headteacher and Governing Body of the New School in Brecon to ensure that participation in all school activity is maximised for all learners.</p> <p>The New School in Mid Powys would be encouraged to provide as many extra-curricular opportunities for Welsh-medium pupils from Brecon during the school day, and the Council would work with the school to explore possible transport solutions, including the use of public transport</p>	<p>Neutral</p>	<p>Community Impact Assessment, Consultation Report</p>
<p>A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).</p>					
<p><i>Age</i></p>	<p>Please see separate Equality Impact Assessment</p>	<p>Choose an item.</p>		<p>Choose an item.</p>	
<p><i>Disability</i></p>	<p>As above</p>	<p>Choose an item.</p>		<p>Choose an item.</p>	

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



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

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

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

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



<p>Long Term: <i>The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.</i></p>	<p>The School Transformation Programme considers the general long term forecasts for the Powys population, where it is identified that the population figures for school aged children will continue to fall.</p> <p>This proposal will provide better value for money for the council in the long term, by ensuring more equitable distribution of funding.</p> <p>Pupils will be transferred to a larger school where the quality of education is at least as good as the current provision, enabling them to develop skills that will prepare them to enter the workforce.</p>	<p>Good</p>		<p>Good</p>	
<p>Collaboration: <i>Acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.</i></p>	<p>The New School will continue to work in collaboration with other schools in the cluster and regionally, and with other partners, to ensure that every pupil is fully supported.</p>	<p>Neutral</p>		<p>Neutral</p>	
<p>Involvement: <i>The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves.</i></p> <p>Communication and Engagement</p>	<p>An extensive consultation exercise has taken place on the Proposal.</p> <p>Should there be no school in Gwernyfed, it is acknowledged that it may be more difficult for parents and others to engage with the school.</p>	<p>Neutral</p>	<p>If the proposal is implemented, there will be an opportunity for any parent to seek election to the governing body of the New School in the future, and there will be an opportunity for all parents to continue to engage with the school and governing body.</p>	<p>Neutral</p>	

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



<p>Prevention: <i>How acting to prevent problems occurring or getting worse may help public bodies meet their objectives.</i></p>	<p>The proposal will provide better value for money for the council in the long term, by ensuring more equitable distribution of funding and a more sustainable model of education.</p>	<p>Good</p>		<p>Good</p>	
<p>Integration: <i>Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.</i></p>	<p>Most of the issues raised during the consultation exercise were not supportive of the proposal.</p>	<p>Poor</p>	<p>If the proposal is implemented, the authority will work with the New School to support those parents and their children to become fully integrated in the school community.</p>	<p>Neutral</p>	
<p>Preventing Poverty: Prevention, including helping people into work and mitigating the impact of poverty.</p>	<p>Should the school close, free transport would be provided to all qualifying pupils. However, it is acknowledged that it may be more difficult for the parents of pupils on low incomes for whom Gwernyfed High School is currently the closest school, due to the additional travel required of parents in order to attend activities at the school, or to collect pupils from after school activities.</p>	<p>Poor</p>	<p>The authority will work with the Headteacher and Governing Body of the named receiving school and other schools pupils may wish to transfer to, to ensure that participation in all school activity is maximised for all learners and their families.</p>	<p>Neutral</p>	<p>Equality Impact Assessment</p>
<p>Safeguarding: Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.</p>	<p>Safeguarding is of the utmost importance and safeguarding measures would be in place at the New School.</p>	<p>Neutral</p>		<p>Neutral</p>	
<p>Corporate Parenting: Enabling our looked after children to fulfil their potential.</p>	<p>The New School would need to meet the needs of looked after children, therefore the authority would have no major concerns about looked after children moving to this school.</p>	<p>Neutral</p>		<p>Neutral</p>	

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



<p>Impact on Workforce</p>	<p>Staff at both Gwernyfed and Brecon High Schools would be affected if the Proposal was implemented.</p>	<p>Poor</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 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</i></p>	<p>Neutral</p>	
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Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



			<i>transition arrangements are managed well.</i>		
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5. Achievability of Policy / Change Objective / Budget Saving?

Impact on Service / Council	Deliverability of Policy / Change Objective / Budget Saving	Inherent Risk
High	Very High	High

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

Description of risks	
Risks outlined in the Consultation Document:	
Risk	Risk management measures
Parents choose for their children to attend schools other than the New School – potentially in England, leading to a loss of funding through the revenue support grant (RSG) system for the Council	<p>The reduction in the funding provided through the RSG mechanism would be largely offset by the reduction in the budget provided to the New School through the Fair Funding Formula</p> <p>The proposed new School Transport Policy, if approved, might reduce the number of pupils attending schools out of country</p>
Parents choose for their children to attend schools other than the New School, leading to more surplus places in the New School	<p>The Council's intention is for the New School to provide the highest quality education in the best possible facilities, and the Council will engage with stakeholders in order to share the vision during the planning and construction stages</p> <p>The current over-subscription for places in Crickhowell High School reduces the potential for pupils to obtain places at Crickhowell High School</p>
Parents choose for their children to attend schools other than the New School, potentially in England, which would mean that pupils would not be able to participate in the Welsh curriculum	<p>The Welsh Curriculum would be available in the New School and other secondary schools within Wales</p> <p>The proposed new School Transport Policy, if approved, might reduce the number of pupils attending schools out of country</p>
Negative community and economic impact on the current Gwernyfed	A draft community impact assessment has been issued as part of this consultation,

<p>catchment area</p>	<p>and will be updated to reflect information and feedback provided during the consultation. The updated community impact assessment will include the Council's plans to mitigate any negative impact and will be considered by the Cabinet at its meeting in September 2016. 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</p>
<p>Additional travel time has a negative impact on pupil well-being and attainment.</p>	<p>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</p> <p>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</p> <p>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</p> <p>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.</p> <p>The Learner Travel (Wales) Measure 2008 does not specify a time limit for journeys. However, local authorities are required to assess the individual needs of learners when considering if a journey time is reasonable. This would be done on an individual basis, if the Proposal is approved.</p> <p>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 for secondary school aged pupils. This is reflected in the Council's proposed new School Transport Policy</p> <p>The provision of post-16 education on a single site would remove any requirement</p>

	for additional inter-school/college travel during the school day
Pupils from the Gwernyfed area may not be able to access after-school activities due to reliance on home-to-school transport	<p>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</p> <p>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</p>
Additional transport has a negative environmental impact	<p>It is expected that although there would be an increase in overall level of learner mileage, the overall number of private vehicles used will be fewer than current</p>
Non-availability of Welsh Government capital funding to build the New School Building	<p>In the event that Welsh Government do not give approval for funding for the New School Building, the Council will look at the capacity to fund this from its capital programme</p>
Post-16 learners choose other providers rather than attend NPTC Group of Colleges in Brecon, making it difficult for the College to provide the expected range of subjects	<p>The intention is that the new post-16 'tertiary' provision in Brecon delivered by NPTC Group of Colleges would provide the highest quality post-16 education with a broad choice of both academic and vocational subjects, which would be attractive to the majority of post-16 learners in the area. The College is also planning to invest in new facilities which will enhance the post-16 learning environment.</p>
Difficult for both current schools to focus on improving outcomes due to the uncertainty caused by the Proposal - may affect standards	<p>The Council will continue to provide advice and support to both schools and the shadow governing body of the New School to ensure that standards and performance continue to improve during the transition period.</p>
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	<p>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</p> <p>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</p> <p>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.</p>
Heavy workload for governors who are appointed to the shadow governing body, during the transition to the New School	<p>The Shadow Governing Body would be formed from those expressing an interest and it is anticipated that those individuals would be best placed to determine whether they have the available time to commit</p> <p>The Council would provide officer support from a range of service areas – HR, Challenge Advisor, Central Services, Finance etc. The Council would also provide</p>

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



	clerking services to the shadow governing body and to the new governing body of the New School for a minimum period first school year
Challenging for governors, headteacher and SLT to focus on establishing and operating a New School across two sites, whilst also planning and overseeing the transition to the New School Building	The Council would provide officer support from a range of service areas as outlined previously and also provide support for the transition to the New School Building. Governors, headteacher, staff and pupils would be key stakeholders in the planning and transition stages of the New School Building, and would be supported by Council officers and the appointed developer
Pupils from Brecon choose to attend English-medium provision at Brecon High School instead of travelling to Builth Wells	In the short term, the Authority would expect there to be some reduction in the proportion of pupils from the Brecon area continuing to access Welsh-medium provision in the secondary sector. However, the current Welsh-medium provision in KS 4 in Brecon is very limited, and there is no provision at all at Post-16. The Council will work with the primary schools concerned and the secondary school provision in Builth Wells and the expectation is that any reduction in transfer rates into KS 3 would be reversed in the longer term
Pupils from Brecon choose to attend alternative Welsh-medium secondary provision outside Powys instead of the secondary school provision in Builth Wells	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
Pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon	In the short term, there may be a reduction in pupil numbers at Ysgol y Bannau. The Authority would work with Ysgol y Bannau, Menter Brycheiniog and other organisations to promote the benefits of Welsh-medium primary education in the Brecon area.
The school site in Builth Wells is unable to accommodate the additional pupils from Brecon	There is sufficient capacity at the current site of Builth Wells High School to accommodate the additional pupils from the Brecon area.
The new school in Mid Powys does not have sufficient staff to deliver Welsh-medium provision to 2 teaching groups per year in all year groups in the short term	The Council would support the school in appointing the required staff in readiness for September 2017, and provide additional resource in accordance with the Fair Funding Formula arrangements.

Judgement (to be included in service risk register)			
Very High Risk	High Risk	Medium Risk	Low Risk
	X		
Mitigating Actions			Residual Risk
Abandon the Proposal related to elements a,b and d of the Proposal and bring new recommendations for Gwernyfed and Brecon High Schools forward. Reconsult on element c, and submit a revised Outline Business Case to the Welsh Government for capital funding to build a new 11 – 18 school in Brecon and remodel Gwernyfed High School.			Choose an item.

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



	Choose an item.
	Choose an item.
Does the Policy / Change Objective / Budget Saving have potential to impact on another service area?	
Regeneration	

7. Overall Summary and Judgement of this Impact Assessment?

Outline Assessment (to be inserted in cabinet report)	Cabinet Report Reference:	
It is concluded that there are too many risks for the Council and stakeholders to proceed with elements a,b, and d of the Proposal, but there are benefits to proceeding with element C of the Proposal.		

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

What additional evidence and data has informed the development of your proposal?
Consultation responses, consultation report, impact assessments.

9. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?
The Schools Transformation Programme Board is responsible for overseeing the strategic direction of the Transformation agenda: setting direction, implementing change, monitoring and reporting to the Cabinet of the Council.
Equality monitoring will form an integral part of the County Council's arrangements for any school reorganisation and will be undertaken where a significant or material change in provision is proposed.
The Head of Schools Service will be responsible for on-going monitoring.
Please state when this Impact Assessment will be reviewed.
n/a

10. Sign Off

Position	Name	Signature	Date
Service Manager:	Marianne Evans	Marianne Evans	26/08/16

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Head of Service:	Ian Roberts	Ian Roberts	
Strategic Director:	Jeremy Patterson	Jeremy Patterson	
Portfolio Holder:	Arwel Jones	Arwel Jones	

