



Welsh-medium stream at Brecon High School

Consultation Report

March 2017

CONTENTS

	Page
1. Overview of the Consultation	3
1.1 Consultation methods	3
1.2 Responses received	3
1.3 Summary of issues raised	4
2. Consultation with Pupils	8
3. Estyn	13
4. Issues raised during the Consultation Period	16
1. Concern about the impact on pupils	16
2. Concern about the impact on parents and families	32
3. Issues relating to travel / transport	36
4. Welsh-medium pupil numbers at Brecon High School	49
5. Welsh-medium provision at Brecon High School	62
6. General issues relating to Brecon High School	78
7. Issues relating to Builth Wells High School	85
8. Issues relating to Ysgol Gyfun Ystalyfera	96
9. Impact on Ysgol y Bannau	99
10. Issues relating to equality / discrimination	105
11. Welsh-medium pupil numbers and access to Welsh-medium provision	110
12. General issues relating to Welsh-medium education	117
13. Issues relating to the Welsh language	125
14. Policies / strategies relating to the Welsh language	131
15. Issues relating to the community / the rural nature of the area	141
16. Financial issues	142
17. Alternative options	148
18. Issues relating to the consultation process	158
19. Issues relating to the consultation documentation	168
20. General criticism of the council	185
21. Reference to other proposals	189

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

1. Overview of the consultation

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

1.1 Consultation methods

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

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

Meetings were also held with the following:

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

1.2 Responses received

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

The written responses received included 39 responses from pupils.

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

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

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

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

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

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

1.3 Summary of issues raised

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

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

1. Concern about the impact on pupils

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

2. Concern about the impact on parents and families

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

- Families are moving from the area

3. Issues relating to travel / transport

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

4. Welsh-medium pupil numbers at Brecon High School

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

5. Welsh-medium provision at Brecon High School

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

6. General issues relating to Brecon High School

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

7. Issues relating to Builth Wells High School

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

8. Issues relating to Ysgol Gyfun Ystalyfera

9. Impact on Ysgol y Bannau

- Pupil numbers at Ysgol y Bannau

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

10. Issues relating to equality / discrimination

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

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

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

12. General issues relating to Welsh-medium education

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

13. Issues relating to the Welsh language

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

14. Policies / strategies relating to the Welsh language

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

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

16. Financial issues

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

17. Alternative Options

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

18. Issues relating to the consultation process

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

19. Issues relating to the consultation documentation

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

20. General criticism of the council

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

21. Reference to other proposals

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

2 Consultation with pupils

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

The issues raised by pupils are listed below.

2.1 Written responses from pupils

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

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

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

2.2 Meetings with pupils

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

i) Welsh-medium pupils at Brecon High School – 6th December 2016

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

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

ii) English-medium pupils at Brecon High School – 6th December 2016

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

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

iii) School Council of Ysgol y Bannau – 6th December 2016

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

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

iv) School Council of Sennybridge CP School – 12th December 2016

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

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

4 ESTYN

Estyn's response to the consultation is provided below:

Estyn response to the proposal to close the Welsh-medium stream at Brecon High School from the 31st August 2017

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

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

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

Introduction

The proposal is from Powys County Council.

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

Summary/ Conclusion

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

Description and benefits

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

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

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

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

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

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

Educational aspects of the proposal

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

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

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

4 ISSUES RAISED DURING THE CONSULTATION PERIOD

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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


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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	<p>find out why Welsh medium pupils numbers haven't grown in Brecon despite Brecon having the required population density, transport links and hub status within local and Welsh government to make Welsh-medium education viable and sustainable, and the council needs to act on this</p>	<p>Welsh-medium pupils in the Brecon area hasn't grown, however the authority's view is that the limited Welsh-medium provision available in the secondary sector is one of these reasons. As stated in the consultation document in respect of this proposal, one of the reasons for the proposal is the 'need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education.'</p>																																				
4.6.4	<p>What is the viable number of pupils needed for the Welsh stream to continue in Brecon High School? Please give me a breakdown of costings for this</p>	<p>In order for the Welsh-medium provision at Brecon High School to be considered 'viable', the school would need to provide an appropriate range of Welsh-medium provision for Welsh-medium pupils. The authority's view is that dual stream schools should be aiming to provide Welsh-medium provision which meets the Welsh Government definition for a category 2B school.</p> <p>Currently, Ysgol Uwchradd Caereinion is the only dual stream secondary provider in Powys which meets the Welsh Government definition of a category 2B school. The breakdown of year 7 – 11 pupils in this school in September 2016 was as follows:</p> <table border="1" data-bbox="1016 839 2002 1152"> <thead> <tr> <th>Year</th> <th>Welsh-medium</th> <th>English-medium</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>47</td> <td>36</td> <td>83</td> </tr> <tr> <td>8</td> <td>40</td> <td>36</td> <td>76</td> </tr> <tr> <td>9</td> <td>58</td> <td>37</td> <td>95</td> </tr> <tr> <td>10</td> <td>49</td> <td>38</td> <td>87</td> </tr> <tr> <td>11</td> <td>43</td> <td>43</td> <td>86</td> </tr> <tr> <td>Total</td> <td>237</td> <td>190</td> <td>427</td> </tr> </tbody> </table> <p>During 2016-17, Caereinion High School is providing the following number of subjects through the medium of Welsh, English and bilingually to pupils in years 7 – 11:</p> <table border="1" data-bbox="1016 1323 2002 1394"> <thead> <tr> <th>Year</th> <th>Welsh-medium</th> <th>English-medium</th> <th>Bilingual</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Year	Welsh-medium	English-medium	Total	7	47	36	83	8	40	36	76	9	58	37	95	10	49	38	87	11	43	43	86	Total	237	190	427	Year	Welsh-medium	English-medium	Bilingual				
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Total	237	190	427																																			
Year	Welsh-medium	English-medium	Bilingual																																			

		<table border="1"> <tr> <td>7</td> <td>14</td> <td>15</td> <td>0</td> </tr> <tr> <td>8</td> <td>16</td> <td>17</td> <td>0</td> </tr> <tr> <td>9</td> <td>16</td> <td>18</td> <td>0</td> </tr> <tr> <td>10</td> <td>13</td> <td>17</td> <td>4</td> </tr> <tr> <td>11</td> <td>12</td> <td>18</td> <td>3</td> </tr> </table>	7	14	15	0	8	16	17	0	9	16	18	0	10	13	17	4	11	12	18	3
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		<p>As with all schools, it is ultimately the responsibility of the senior leadership team, in partnership with the governing body, to agree the school's priorities and to structure the school's curriculum and timetable accordingly. When considering the historic development of Welsh-medium education across all Powys schools, it is apparent that some schools have prioritised Welsh-medium education more than others and, where this has been the case, these Welsh streams have developed in terms of pupil numbers and in terms of the breadth of Welsh-medium provision.</p>																				
4.6.5	There are a lot of Welsh speaking children in Brecon High School that have had Welsh at home and went to an English primary school	The authority notes this comment and acknowledges that some Welsh speaking parents choose for their children to be educated through the medium of English.																				
4.6.6	If the right provision was provided in Brecon, the stream would have the viable number required to run a good, robust Welsh-medium provision	The authority notes this comment, however the fact remains that the current Welsh-medium provision in Brecon High School is very limited and does not provide an appropriate level of provision for Welsh-medium learners.																				
4.6.7	<p>Has the council ever asked parents who pulled their children out of Ysgol y Bannau or Brecon Welsh stream to ask why they made that decision?</p> <p>The council should act on why families moved out of Ysgol y Bannau and Brecon Welsh stream rather than what they think the answer is</p>	<p>All parents have had the opportunity to let the council know their views as part of the recent consultation on the proposal to close the Welsh-medium stream at Brecon High School.</p> <p>Individual parents have presented their case to the authority as part of the transport appeals process, and the main reasons provided was the lack of breadth and continuity of curriculum at Brecon High School.</p>																				
5. WELSH MEDIUM PROVISION AT BRECON HIGH SCHOOL																						

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	Are you happy with the number of pupils in the cohort at Builth Wells High School now?																																														
7.3.2	Welsh-medium pupil numbers in the Builth catchment are decreasing year on year, numbers in the Brecon catchment are increasing	<p>The number of Welsh-medium primary pupils in the current catchment area of Brecon High School is provided on page 12 of the consultation document. This information does not show that pupil numbers are consistently increasing year on year.</p> <p>The number of Welsh-medium primary pupils in the current catchment area of Builth Wells High School are as follows:</p> <table border="1" data-bbox="1016 568 1964 987"> <thead> <tr> <th></th> <th>Builth Wells CP School</th> <th>Llandrindod C. in W. School Trefonnen</th> <th>Rhayader C. in W. School</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>R</td> <td>22</td> <td>8</td> <td>8</td> <td>38</td> </tr> <tr> <td>1</td> <td>11</td> <td>20</td> <td>9</td> <td>40</td> </tr> <tr> <td>2</td> <td>16</td> <td>8</td> <td>11</td> <td>35</td> </tr> <tr> <td>3</td> <td>14</td> <td>8</td> <td>7</td> <td>29</td> </tr> <tr> <td>4</td> <td>21</td> <td>12</td> <td>13</td> <td>46</td> </tr> <tr> <td>5</td> <td>19</td> <td>11</td> <td>4</td> <td>34</td> </tr> <tr> <td>6</td> <td>14</td> <td>6</td> <td>5</td> <td>25</td> </tr> <tr> <td>Total</td> <td>117</td> <td>73</td> <td>57</td> <td>247</td> </tr> </tbody> </table> <p>This shows that the number of Welsh-medium pupils in the current catchment of the Welsh-medium stream at Builth Wells High School is larger than the number of Welsh-medium pupils in the current catchment of the Welsh-medium stream at Brecon High School in all year groups.</p>		Builth Wells CP School	Llandrindod C. in W. School Trefonnen	Rhayader C. in W. School	Total	R	22	8	8	38	1	11	20	9	40	2	16	8	11	35	3	14	8	7	29	4	21	12	13	46	5	19	11	4	34	6	14	6	5	25	Total	117	73	57	247
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Total	117	73	57	247																																											
7.3.3	<p>If the extra hypothetical Welsh-medium children don't go to Builth, Builth won't be able to offer the predicted improvements</p> <p>It's clear that Builth High School will not achieve the critical mass of Welsh-medium pupils needed</p>	<p>The authority has identified in the consultation document in respect of this proposal that there are a number of risks linked to implementation of the proposal. These include the risk that 'pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school' and that 'pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon'.</p>																																													

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

15. ISSUES RELATING TO THE COMMUNITY / THE RURAL NATURE OF THE AREA

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

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

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

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

16.3 Fair Funding Formula

16.3.1	PCC's Fair Funding Formula does not take into account the size of the school compared to the stream, therefore Brecon has always been unfairly the poorer stream of the two	The fair funding formula is based on various elements which include premises allowances. Additional funding to support the teaching element of provision is provided by the language uplift.
16.3.2	The money provided to dual stream secondary schools is only for the Welsh stream, but if you want to be able to create an ethos across the school with all letters etc bilingual, it will incur extra costs	The money provided through the funding formula is based on the school delivering through both languages. No uplift is provided to single language schools.

16.4 General issues relating to the council's budget

16.4.1 What is the total budget for education in Powys and how much goes on administration?

The pie chart below shows the total Education budget in Powys in 2016-17. The chart shows the split of the total £99m.

SSSR totalling £2.1m is the total cost of administration.

Category	Amount (£m)	Percentage
Schools Delegated Budgets	£65.4m	66%
Home to School Transport	£9.5m	10%
ALN	£8.7m	9%
Operational	£4.6m	5%
Capital Charges	£6.3m	6%
Other	£1.2m	1%
School Meals	£1.2m	1%
SSSR	£2.1m	2%
Total	£99m	100%

16.4.2	Why do you budget forward transport costs but not education costs?	All of the authority's costs are considered as part of the overarching financial strategy for the authority, and are considered on an annual basis when the budget is approved by the council. Individual schools are provided with 3 year funding estimates to inform a 3 year budget planning cycle.
16.4.3	It may be that Powys needs more money from central government to enable pupils to operate on a level playing field with the rest of Wales	The authority notes this comment, however reducing funding to local government is the situation we are faced with. Because of this reduction in funding to local government, the authority's school transformation programme is essential to ensure that the authority can continue to provide high quality Welsh-medium and English-medium education within a reducing funding envelope.
16.4.4	The authority is spending £110976 transporting children away from Brecon simply because Brecon does not have a category 2B Welsh stream – can you explain how this is not serious financial mismanagement by the council?	The provision of home to school transport to both Builth Wells High School and Ysgol Gyfun Ystalyfera was awarded following a transport appeal which was managed by the legal services section of Powys County Council. Once the appeal panel had concluded that the level of Welsh-medium provision in Brecon High School was significantly lower than the provision in Builth Wells High School and Ysgol Gyfun Ystalyfera, the authority had no choice but to provide transport. The authority is content that the procedures followed were correct. The authority does not accept that this is financial mismanagement.
16.5 Other		
16.5.1	If Brecon was 2B status, the £3000 per child that the Welsh assembly pays to Ystalyfera for Powys children to go there would be paid to our schools rather than out of county schools – this would amount to £120,000 extra from the Welsh assembly going to Brecon High School rather than Ystalyfera	If the pupils were attending Powys schools rather than Ysgol Gyfun Ystalyfera, it is true that the authority would receive additional funding from Welsh Government through the settlement procedure. The additional funding allocated to Brecon High School would be calculated through the schools funding formula, and Brecon High School would have to support the additional pupils within the funding provided.
16.5.2	Plea for the council to withdraw this negative proposal and start investing the money wasted in	As stated in the consultation document in respect of this proposal, the reasons why the authority is proposing to close the Welsh-medium stream at Brecon

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

19.1.3	Why are the other feeder schools numbers for Builth not in this consultation document as we should be able to see how they compare to the numbers in Ysgol y Bannau and Sennybridge	This proposal relates to the closure of the Welsh-medium stream at Brecon High School due to the small number of pupils currently attending this provision. The number of pupils in the primary schools that feed the Welsh-medium stream in Builth Wells are not relevant to this consultation.
19.1.4	Unfair that you only publish the figures that support your case and omit the figures that don't support your case	The data included in the consultation document is factual data which reflects the position at the time of writing. The data included is in line with the requirements of the School Organisation Code.
19.1.5	The document doesn't include the number of pupils that have left Welsh-medium education	The data included in the consultation document is factual data which reflects the position at the time of writing. The data included is in line with the requirements of the School Organisation Code.
19.1.6	The document doesn't refer to the low numbers coming into Ysgol y Bannau's new year intake	Information about the current number of pupils in each year group at Ysgol y Bannau is provided on page 12 of the consultation document.
19.1.7	The document does not take into consideration that although there will be more Welsh medium opportunities for pupils and access to a wider range of subjects through the medium of Welsh, it will be less available / accessible to the majority of pupils in Welsh-medium education now	<p>On page 15 of the consultation document, the authority identified 'loss of Welsh-medium secondary provision in Brecon' and 'increased travel times for Welsh-medium learners from the Brecon catchment' among the disadvantages of the proposal. This reflects the fact that the provision will be less accessible to pupils.</p> <p>In addition, on page 16 of the consultation document, the authority identified a risk that 'pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'. This also reflects the fact that the provision will be less accessible to pupils.</p>
19.1.8	<p>Why was the £110976 current cost of transporting Welsh-medium pupils out of the Brecon catchment and the £47000 cost to make Brecon a 2B Welsh-medium stream not included in the consultation document?</p> <p>The consultation document does not state what it</p>	<p>As stated in the consultation document:</p> <p>'Following previous successful transport appeals, transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. As this transport is already provided, implementation of the proposal would not incur any additional transport costs.'</p>

	<p>would cost to bring the school up to 2B status</p>	<p>During the recent consultation period on the proposal to close the Welsh-medium stream at Brecon High School, a county councillor requested details of the additional funding that would be required for the Welsh-medium provision at Brecon High School to meet the definition of a Category 2B school. The figure provided was £47000, which is the additional funding that would be provided to the school through the authority's funding formula to support the provision of Welsh-medium subjects for 80% of curriculum time in years 7 to 11.</p> <p>However, whilst the funding provided to dual stream schools through the authority's funding formula is based on the % of curriculum time where Welsh-medium options are available to pupils, the Welsh Government's definition of a category 2B school is as follows: 'At least 80% of subjects (excluding Welsh and English) are taught through the medium of Welsh but are also taught through the medium of English.'</p> <p>In relation to the funding provided through the formula to support dual stream provision in key stage 4, the authority considers that Welsh-medium curriculum time is available when a minimum of 1 Welsh-medium options subject is available in each options block. For example, a dual stream school offering 1 Welsh-medium subject and 5 English-medium subjects in each options block, as well as all core subjects through the medium of Welsh, would receive the maximum funding available from the authority to support its dual stream provision, and would be providing 80% of curriculum time through the medium of Welsh. However, this school would not necessarily meet the Welsh government definition for a category 2B school, as the school would not be providing 80% of subjects through the medium of Welsh and English.</p> <p>Therefore, whilst the figure of £47000 provided during the consultation is the maximum additional funding that would be provided to support dual stream provision at Brecon High School based on the authority's funding formula, this would not be sufficient to enable the school to provide Welsh-medium provision which would meet the definition for a category 2B school.</p>
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		The authority is unable to calculate the cost of bringing the school up to 2B status because the calculation is based on the number of subjects being delivered through the medium of English, and would vary from school to school and from year to year, particularly in terms of Key Stage 4 provision.
19.1.9	The proposal doesn't give appropriate consideration to the effect travelling to Welsh-medium provision will have on pupils from Brecon	<p>On page 15 of the consultation document, the authority identified 'increased travel times for Welsh-medium learners from the Brecon catchment' as a disadvantage of the proposal.</p> <p>Further to this, on page 17 of the consultation document, the authority identified a risk that 'additional travel has an adverse impact on pupil well-being and attainment'.</p> <p>In addition, consideration is given to the impact of additional travel on the pupils currently attending the Welsh-medium stream at Brecon High School on page 22 of the consultation document, and on pupils attending Welsh-medium primary provision in the catchment on page 23 of the consultation document.</p>
19.1.10	The document doesn't include information about bus journey times to Builth from the many locations Ysgol y Bannau children live	As Ysgol y Bannau serves the catchment areas of Brecon, Gwernyfed and Crickhowell, it is the authority's expectation that some of the pupils would choose to transfer to closer schools in other authorities rather than Builth Wells High School. However it is the authority's expectation that the travel times required would be within the 1 hour maximum travel time to and from school for the vast majority of pupils currently attending Ysgol y Bannau.
19.1.11	The consultation document does not explain the context of the situation	The consultation document provides factual information based on the situation at the time the consultation commenced. Information about the background to the current consultation is provided on pages 7-9 and page 19 of the consultation document.
19.1.12	Request for historical figures to see the impact the consultation has had on pupil numbers in the Welsh stream	Historical figures showing the number of Welsh-medium pupils in years 7-11 at Brecon High School since 2010/11 are provided on page 11 of the consultation document.
19.1.13	We need more data about transport costs over a	The figure of £111,000 provided at the consultation meetings relate to the

	longer period, say 5 years	current costs incurred in transporting children from the Brecon catchment to Builth and Ystalyfera. The vast majority of these costs commenced following the admission appeals in 2015, but a second bus has been provided due to the increased numbers travelling to Builth.
19.1.14	You should have stated at the beginning of the document that the fall in the number of Welsh-medium pupils has had an impact on the school	<p>Information about the background to the current consultation is provided on pages 7-9 and page 19 of the consultation document.</p> <p>On page 13 of the consultation document, the authority states that ‘It is acknowledged that it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School’.</p>
19.1.15	Section 9.5 – you have not submitted any data relating to quality of education as you state that as the numbers are small it would not be valid to compare performance, yet in other parts of the document you are using data that goes back to 2010	<p>As stated in section 9.5 on page 35 of the consultation document ‘The information provided in respect of the quality of education at the affected schools is in-line with the requirements of the School Organisation Code’.</p> <p>The authority also states that as ‘the number of Welsh-medium pupils at each school, particularly Brecon High School, is small...it would not be valid to compare the performance of Welsh-medium pupils in these schools.’ This statement is supported by Estyn, who state in their response to the consultation, which is provided on page 13 of this report, that: ‘The proposer has not provided any performance data on standards in the Welsh medium stream in any of the affected schools, but reasonably makes the statement that as numbers are small in Brecon High School, it would not be valid to compare the performance of Welsh-medium pupils in these schools.’</p>
19.1.16	The document is not in line with the school organisation code as the code states that information on quality of education is required – could you please include in the consultation report the section of the School Organisation Code that states that the quality of education data does not need to be included?	<p>The Welsh Government’s School Organisation Code (2013) states that the consultation document must include the following information about Quality and standards in education:</p> <ul style="list-style-type: none"> • ‘The likely impact of the proposals on the quality of the following: <ul style="list-style-type: none"> a. outcomes

		<ul style="list-style-type: none"> b. provision c. leadership and management <ul style="list-style-type: none"> • Information about the most recent Estyn reports for each school likely to be affected; • The likely impact of the proposals on the ability of school or schools which are the subject of the proposals or any other school which is likely to be affected, to deliver the full curriculum at the foundation phase and each key stage of education' <p>The information provided in the consultation document on pages 25-30 and page 35 meets these requirements.</p> <p>As stated in section 9.5 on page 35 of the consultation document 'The information provided in respect of the quality of education at the affected schools is in-line with the requirements of the School Organisation Code'. The authority also states that as 'the number of Welsh-medium pupils at each school, particularly Brecon High School, is small...it would not be valid to compare the performance of Welsh-medium pupils in these schools.' This statement is supported by Estyn, who state in their response to the consultation, which is provided on page 13 of this report, that: 'The proposer has not provided any performance data on standards in the Welsh medium stream in any of the affected schools, but reasonably makes the statement that as numbers are small in Brecon High School, it would not be valid to compare the performance of Welsh-medium pupils in these schools.'</p>
19.1.17	The consultation document does not mention the number of pupils expected to leave Welsh-medium education in Brecon – what in your opinion is the acceptable number of Ysgol y Bannau pupils leaving Welsh-medium education at key stage 3 if there is no provision available locally?	<p>The consultation document identified on page 16 a risk that should the proposal be implemented, 'Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school.'</p> <p>The authority's view is that the Welsh-medium provision currently available at Brecon High School does not provide appropriate linguistic continuity for Welsh-medium pupils, and the aim of the proposal is to provide greater</p>

		<p>equality in terms of the provision available to Welsh-medium pupils. Whilst it is acknowledged that this may lead to a decrease in the proportion of pupils continuing to access Welsh-medium provision in the secondary sector, the authority's view is that pupils would benefit from the increased Welsh-medium opportunities available at the alternative providers.</p> <p>As stated in the consultation document, 'Retaining pupils within the Welsh-medium sector is one of the Welsh Government's priorities'. The authority is required to monitor pupil progression within Welsh-medium education annually, this information is reported annually to Welsh Government in the WESP. The authority does not have a view on the 'acceptable number of Ysgol y Bannau pupils leaving Welsh-medium education at key stage 3', the authority aims for all pupils educated through the medium of Welsh in the primary sector to continue to be educated in Welsh in the secondary sector. However, the authority acknowledges that on some occasions, pupils or their parents may choose to transfer to alternative provision.</p>
19.1.18	The consultation document does not give a true reflection of the current situation and the benefits of having a Welsh stream in Brecon High School	<p>The information contained in the consultation document is in line with the requirements of the School Organisation Code. The authority's view is that it reflects the position at the time of writing, and the document includes factual data which reflects the position at the time of writing. The data included is in line with the requirements of the School Organisation Code.</p> <p>In addition, the document outlines the advantages and disadvantages of the proposal on pages 15 to 16.</p>
19.1.19	It is mentioned that numbers in Ysgol y Bannau have stayed the same for the last few years, but it is not mentioned that across the whole of Wales numbers in Welsh-medium education have declined	<p>In the draft Welsh in Education Strategic Plan (WESP) for 2017-20, the council acknowledges that 'over the period of the authority's previous Welsh in Education Strategic Plan (2014-17), the percentage of pupils assessed in Welsh first language at the end of the Foundation Phase decreased.'</p> <p>However, as stated in the consultation document in respect of the proposal to close the Welsh-medium stream at Brecon High School, 'Whilst Welsh-medium pupil numbers at Sennybridge C.P. School have increased slightly, this has not been the case at Ysgol y Bannau. This is contrast with the two other designated Welsh-medium primary schools in Powys, Ysgol Dafydd</p>

		Llwyd in Newtown and Ysgol Gymraeg Dyffryn y Glowyr in the Ystradgynlais area, where pupil numbers have increase over the same period.'
19.1.20	The document doesn't mention that the percentage of children opting to go to Builth from Ysgol y Bannau is decreasing every year even though there is free transport and more Welsh-medium subjects available	The document provides factual information about the number of pupils attending the Welsh-medium stream at Brecon High School at the time of writing. In addition, on page 13 of the consultation document, information is provided about the number of year 6 Welsh-medium pupils that were attending Ysgol y Bannau and Sennybridge CP School during 2015/16 that transferred to Welsh-medium and English-medium providers in September 2016.
19.1.21	The consultation document doesn't explain how pupils whose mother tongue is Welsh, and pupils who have been educated at Ysgol y Bannau, who choose to attend their local High School will be able to keep up and develop their mother tongue and study literature in their first language, as those whose first language is English do. Is it the proposal that these pupils attend second language Welsh lessons?	<p>Should the Welsh-medium stream at Brecon High School close, the school would be categorised as a 'Predominantly English Medium secondary school'</p> <p>The Welsh Government document 'Defining Schools according to Welsh medium provision' (2007) provides the following definition for the curriculum provision of this type of school: 'Pupils are mainly taught through the medium of English. Welsh is taught as a second language up to KS4. One or two subjects (which would include Welsh first language) may be taught as an option through the medium of Welsh or using both languages.'</p> <p>Whether or not to provide the opportunity for pupils who study Welsh First Language would be a decision for the school. There are examples of 'Predominantly English Medium secondary schools' in Powys that do provide the opportunity for pupils to study Welsh First Language, however no funding is provided by the authority to support this provision.</p>
19.1.22	The consultation document does not explain why Powys tax payers money is being used to transport Powys children to be educated in Neath Port Talbot	The authority receives funding in respect of home to school transport based on the population of children of the relevant age living within the authority and not based on the location of the schools they attend. The authority recognises that some Powys council tax payers money is used to transport pupils to out of county provision.
19.1.23	The document states the savings by moving the Welsh stream to Builth, but does not state the	The authority accepts that if the proposal is implemented and the number of pupils travelling to Builth Wells increase significantly, this may result in an

	cost of bussing these children to Builth should numbers rise	increase in transport costs. This cannot be quantified until the increase in numbers occurs.
19.1.24	Would like to see a proper comparison of what the school transport for Welsh-medium pupils is costing	The authority notes this comment, however it is unclear what comparison is being requested.
19.1.25	There is no evidence that the proposal will create a more educationally viable model	The authority does not agree with this statement. The current number of Welsh-medium pupils at Brecon High School is very small, which makes this provision unviable. The number of Welsh-medium pupils at Builth Wells High School is larger, therefore this provision is more viable.
19.1.26	The document does not refer to the stream of children leaving Welsh-medium education because of the proposed closure of Brecon Welsh stream	The authority has identified on page 16 the potential risk should the proposal be implemented that 'Pupils choose to attend English-medium secondary provision instead of continuing to access Welsh-medium provision on transfer to secondary school'.
19.2 Inaccurate information		
19.2.1	The numbers in the consultation document have been falsified due to the council providing free transport to Builth	The consultation document provides factual information about the number of pupils that were attending the Welsh-medium stream at Brecon High School at the time.
19.2.2	The document is full of inaccuracies The document has been released with errors and omissions Do you agree that there is information included in the consultation document which is incorrect?	The authority does not agree with these statements. The consultation document provides factual information about the situation at the time of writing, and the information included is in line with the requirements of the School Organisation Code.
19.2.3	The consultation document says that Welsh-medium provision will continue to be provided to years 11 and 12 – will there be an amendment to the document?	The proposal on page 3 of the consultation document states the following: 'From the 1 st September 2017, there would be no Welsh-medium provision in Brecon High School for pupils in years 7, 8, 9 and 10. However, Welsh-

		medium provision would continue to be provided at Brecon High School for those pupils who would be entering year 11 in September 2017. This provision would continue until July 2018....From the 1 st September 2018, there would be no Welsh-medium provision at Brecon High School.'
19.3 Language used in the consultation document		
19.3.1	<p>The proposal is biased in its use of language</p> <p>The consultation document is shockingly biased and deliberately overplays the positive and underplays the negative impacts the proposal will have</p> <p>The consultation document is one sided and does not reflect the actual truth – this will lead to an uninformed decision being made</p>	The authority does not agree that the consultation document is biased in its use of language. The document has been produced in line with the requirements of the School Organisation Code and provides factual information about the situation at the time of writing and the authority's view on the impact implementation of the proposal would have.
19.3.2	<p>Benefits are stated as generally affirmed outcomes when in reality most are pure speculation; disadvantages are stated as possibilities when in reality most can be taken as guaranteed outcomes of the proposal</p> <p>Reference to the language used on page 15 – use of 'would' in the advantages and 'may have', 'possible' under disadvantages</p>	The authority disagrees with this. The advantages and disadvantages are presented in a fair and balanced way and are written from the authority's perspective.
19.3.3	Do you agree that the language used is misleading?	The authority does not agree that the language used in the consultation document is misleading.
19.3.4	The wording in the consultation document makes it sound as though it is a 'done deal' and that Welsh-medium pupils will be unable to access the new building in Brecon	It is true that on page 15 of the consultation document, the authority identified as a potential disadvantage of the proposal that 'Welsh-medium pupils will be unable to access the new building in Brecon'. However, this does not mean that it is a 'done deal'. All issues raised during the consultation period will be

		taken into consideration by Cabinet when determining whether or not to proceed with the proposal.
19.3.5	The document is written so that everything is positive for the Welsh-medium going to Builth	The document has been produced in line with the requirements of the School Organisation Code and provides factual information about the situation at the time of writing and the authority's view on the impact implementation of the proposal would have. The reason why the authority is proposing closure of the Welsh-medium stream at Brecon High School is due to the small number of pupils accessing the provision and the need to ensure appropriate curriculum choice for Welsh-medium pupils. The number of pupils currently accessing the Welsh-medium stream at Builth Wells High School is greater than the number of pupils in Brecon, and the school provides more Welsh-medium subjects. However, the authority does acknowledge that there are disadvantages and risks associated with the proposal, these are outlined on pages 15-18.
19.3.6	The risks associated with the proposal are completely underplayed	The risks outlined on pages 16-18 of the consultation document are those identified by the authority prior to the commencement of the consultation period. The authority does not agree that the risks are 'completely underplayed'.
19.3.7	The impact on pupils on page 22 is underplayed with the use of 'could' rather than 'will', which is yet another attempt to underplay the negative impact of this proposal on people	<p>The authority does not agree with this statement. 'Could' is used on page 22 of the consultation document in the following paragraph:</p> <p>'Should the proposal be implemented, it is possible that some pupils would transfer to English-medium provision at Brecon High School rather than transferring to an alternative school to continue to access Welsh-medium provision. Whilst this would mitigate the impact of additional travel and separation from friends, this <i>could</i> have a negative impact on pupils' Welsh language skills.'</p> <p>The impact of transferring to English-medium provision on pupils' Welsh language skills will depend on the pupils' individual circumstances, therefore the authority's view is that the use of 'could' is appropriate in this context.</p>
19.3.8	The document is biased towards Builth Wells	The document provides factual information and provides the most up to date

	being the only option for Welsh-medium education	<p>data that was available at the time of writing. Alternative options are discussed on pages 19-21, however as explained in the document:</p> <p>‘The authority is currently going through the statutory process to close Builth Wells High School and Llandrindod Wells High School and establish a new secondary school across two sites. The proposal is that the new school will be a dual stream school, with the current dual stream provision being retained on the Builth Wells site. Therefore, the only options now available to the authority in relation to the Welsh-medium provision at Brecon High School is whether or not to retain this provision.’</p>
19.3.9	If you are to propose removing Welsh-medium secondary education from Brecon this consultation needs to be run correctly and honestly without contracting information and biased used of language	The consultation has been carried out in line with the requirements of the School Organisation Code.
19.4 Other issues with the consultation documentation		
19.4.1	<p>The consultation document contains inflammatory statements stating that closure of the stream would benefit the English-medium stream, these statements are intended to divide people and students – this can be said about any Welsh-medium provider in Powys</p> <p>Why would it be beneficial for Brecon to focus solely on English-medium provision but not any other Powys school that teaches Welsh-medium secondary education?</p>	<p>The consultation document considers the impact of the proposal on Brecon High School. It is likely that any consultation document on the closure of either an English-medium or Welsh-medium stream at any Powys school would conclude that closure of one stream would have a positive impact on the other stream.</p> <p>In their response to the consultation, Estyn states that the authority ‘has reasonably identified the overall positive impact that the proposal could have on English-medium education in Brecon High School.’</p>
19.4.2	Disagree with the statement in the document that says that English-medium pupils in Brecon are being disadvantaged by the Welsh stream being in Brecon	The consultation document does not say that English-medium pupils in Brecon are being disadvantaged by the Welsh stream being in Brecon. In fact, the authority acknowledges on page 23 of the consultation document that ‘the proposal could have a negative impact on the Welsh language skills



		<p>of English-medium pupils attending Brecon High School’.</p> <p>On pages 25 and 26 of the consultation document, the authority identified that the proposal could have a positive impact on the English-medium provision at the school, however this is not the same as saying that English-medium pupils are being disadvantaged by there being a Welsh-medium stream being at the school.</p>
19.4.3	Paragraph 8.1 and paragraph 8.3 contradict each other	The authority notes this comment. As stated in paragraph 8.1, ‘transport is already provided by the authority to Ysgol Gyfun Ystalyfera for Welsh-medium pupils from the Sennybridge area and to Builth Wells High School for Welsh-medium pupils from the Brecon area. As this transport is already provided, implementation of the proposal would not incur any additional transport costs.’
19.4.4	Can’t compare this situation to Ysgol Dafydd Llwyd and Caereinion – the distance from Ysgol y Bannau to Builth is a further 10 miles, plus many children have an extra journey before that to reach the main bus (YDLI to Caereinion is 11.9 miles, YyB to Builth is 20.5 miles)	The authority’s view is that these two situations can be compared. Whilst it is true that the mileage between Ysgol y Bannau and Builth Wells High School is greater than the mileage between Ysgol Dafydd Llwyd and Caereinion High School, the road between Brecon and Builth Wells is much better, therefore it is likely that the difference in terms of travel time would not be as great.
19.4.5	Disagree with the statement that any reduction in pupil numbers will be reversed in the longer term through development of close links between Ysgol y Bannau and Builth Wells High School	The authority notes this comment.
19.4.6	<p>The statistics in the consultation document are the result of the council’s own failings</p> <p>The consultation document seeks to downplay the enormously adverse effect PCC’s proposal had on the Welsh stream and then attempts to use the consequent reduced numbers as a reason for closing it</p>	<p>The consultation document includes factual data which is the latest data that was available to the council at the time.</p> <p>On page 13 of the consultation document, the authority acknowledges that ‘it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.’</p>

19.4.7	Are you expecting children from the Sennybridge area to travel out of county to Ystalyfera rather than Builth?	As stated in the proposal on page 3 of the consultation document: 'Pupils living in the Sennybridge area would continue to be able to access Welsh-medium provision at Ysgol Gyfun Ystalyfera'.
19.4.8	The consultation document relies heavily on numbers	The consultation document has been written in line with the requirements of the School Organisation Code, which requires the authority to provide a large amount of data.
19.4.9	The consultation document seems to all be based on subjective facts and assumptions – if it were a business case being put forward in the private sector, it would be thrown out at the first hurdle as there are no hard facts or figures	The authority does not agree with this statement. The consultation document has been written in line with the requirements of the School Organisation Code and includes the latest data that was available to the council at the time.
19.4.10	<p>The proposal in its current form cannot be classed as a robust proposal that could be carried to conclusion</p> <p>The council has produced a biased and partial consultation document which does not recognise, and indeed casts aspersions upon, the quality of education through the medium of Welsh currently being provided by Brecon High School</p> <p>The document is not open and truthful about the reality of the Welsh language in the area and seeks to deny parental choice</p>	The authority does not agree with these statements. The consultation document has been written in-line with the requirements of the School Organisation Code. All issues raised during the consultation period will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.
19.4.11	The document is misleading as it implies that it is a failing of Brecon High School that the school does not offer A levels through the medium of Welsh, however that is determined by the South Powys Consortium – Welsh-medium pupils can choose to study subject offered at other schools	The authority notes this comment. The south Powys consortium for post-16 education is a collaborative model that has been developed jointly by the authority and schools. For a number of years, since before the establishment of the South Powys Consortium, Builth Wells High School has provided a number of Welsh-medium post-16 courses, however Brecon High School has not provided any Welsh-medium post-16 courses. Whilst it is true that Welsh-

		medium pupils could choose to study Welsh-medium subjects at other schools, no pupils have chosen this option.
19.4.12	Why is there suddenly a desire in Powys County Council for 'more robust progression'?	<p>There is not 'suddenly' a desire for 'more robust progression'. One of the Strategic Aims in the council's Welsh in Education Strategic Plan (WESP) for 2014-17 was 'to provide robust linguistic continuity of Welsh-medium provision across all key phases of education.'</p> <p>This reflects the Welsh Government's Welsh-medium Education Strategy, which states on page 15 that 'Welsh-medium education from the early years, with robust linguistic progression through every phase of education, offers the best conditions for developing young people who are truly bilingual.'</p>
19.4.13	In order to be fair, every time you mention the low numbers in Brecon Welsh stream in any of your documents, you must state that this is mostly due to this being the third consultation to close the Welsh stream. In the impact statement it is not mentioned once that this is the reason for the small numbers	The authority acknowledges on page 13 of the consultation document that 'it is likely that the uncertainty caused by the two previous consultation exercises on closure of the Welsh-medium stream at the school has contributed to the decrease in Welsh-medium pupil numbers at Brecon High School.'
19.4.14	The authority states in the report that the children of Ysgol y Bannau will strengthen the Welsh stream at Builth Wells, but these children should be strengthening the Welsh stream at Brecon High School	The authority notes this comment, however the number of Welsh-medium pupils in Brecon High School is currently small which makes the provision unviable, and the authority's view is that the small class sizes and limited Welsh-medium provision do not provide an appropriate educational experience for pupils. In addition, the authority's view is that the current number of Welsh-medium secondary pupils in south Powys is not sufficient to support two streams
19.4.15	The consultation document states that there is 'medium' likelihood of a 'high' impact on pupil numbers at Ysgol y Bannau – this smacks of short term planning, given the money spent on building Ysgol y Bannau only a few years ago	As stated in this comment, the authority has acknowledged the risk in relation to pupil numbers at Ysgol y Bannau should the proposal be implemented on page 17 of the consultation document. The authority has also included risk management measures, which include working with other organisations to promote the benefits of Welsh-medium education. Whilst the authority acknowledges this risk, the authority is committed to Ysgol y Bannau as a

		provider of Welsh-medium education in Brecon, and would hope that the improved clarity with regard to secondary progression would lead to an increase in pupil numbers at the school in the long term.
19.4.16	The document states that the authority 'would expect pupil numbers to recover and increase' (p.29) however no evidence is given for this claim	The authority notes this comment. The use of 'would expect' in this statement reflects the fact that there is no guarantee that this would happen, therefore the authority's view is that this wording is appropriate.
19.4.17	Consultation document claims that Ysgol y Bannau will be supported and that the impact on pupil numbers may only be short term, however this cannot be known – there is real potential for numbers to continue to fall in Ysgol y Bannau	The authority has identified the risk that 'pupil numbers at Ysgol y Bannau decrease due to the lack of Welsh-medium secondary provision at Brecon' on page 17 of the consultation document. It is true that the impact on pupil numbers at Ysgol y Bannau cannot be known, however whilst there is potential for numbers to continue to fall, there is also potential for numbers to increase, due to the increased clarity in relation to secondary progression.
19.4.18	The proposal offers no clarity, no parity and no choice for Brecon Welsh learners	The current Welsh-medium provision at Brecon High School is very limited, and does not offer clarity, parity or subject choice for Welsh-medium learners. The authority's view is that implementation of the proposal would improve the equality of provision available to Welsh-medium learners, however it is acknowledged that there are a number of disadvantages and risks associated with the proposal, which are outlined in the consultation document.
19.4.19	The reasons for re-consultation were 'to provide a more sustainable, educationally and linguistically viable model of Welsh-medium secondary education' however the proposal does not meet these 3 reasons	The authority's view is that the proposal does meet these 3 reasons.
19.4.20	The consultation document does not reflect the true picture in Brecon	The consultation document provides factual information on the current situation at Brecon High School and other schools at the time of writing.
19.4.21	The arguments in the proposal are weak	The authority does not agree with this comment. The authority's view is that the current Welsh-medium provision at Brecon High School does not provide equality of opportunity for Welsh-medium pupils.

19.4.22	<p>The council sometimes refers to Builth Wells as being in south Powys and sometimes refers to it as Mid Powys – this misleads the reader by implying that Builth Wells and Brecon are both in South Powys. However, Brecon and Builth aren't in the same area. Builth Wells is holding the Urdd Eisteddfod the year that it is the turn of North Wales, this acknowledges that Builth Wells is north and not south – if Brecon held the Eisteddfod it would be the year of the south</p>	<p>The authority notes this point. Builth Wells is part of Brecknockshire, therefore the authority considers that it is part of south Powys. However, the authority has also been reviewing secondary provision in the Builth Wells and Llandrindod Wells area, therefore it is likely that this is the cause of the confusion.</p> <p>It is true that the Urdd Eisteddfod is being held on the Royal Welsh Showground in 2018. The title of this is 'The 2018 Brecon and Radnorshire Urdd National Eisteddfod', which suggests that the Urdd considers Brecon and Builth Wells to be within one area.</p>
19.4.23	<p>So much of the proposal is based on convenient, inaccurate short term judgements and very little vision and optimism</p>	<p>The authority does not agree with this comment.</p>
<p>20. GENERAL CRITICISM OF THE COUNCIL</p>		
<p>20.1 Criticism of the council's treatment of Brecon High School</p>		
20.1.1	<p>In the last consultation the council repeatedly talked of Brecon High School as a failing school</p> <p>The council has repeatedly stated over the last 2 years that Brecon is a 'failing' school – why does the council never state that Builth is a 'failing' school?</p> <p>Now that Brecon is no longer in special measures, request for the council to no longer label Brecon as a failing school</p>	<p>The authority has not described Brecon High School as a 'failing' school. The press release issued by the authority when Brecon High School went into Special Measures is provided below:</p> <div data-bbox="1084 979 1142 1043" data-label="Image"> </div> <p>PR 5977 - Brecon High School.docx</p> <p>The press release does not refer to Brecon High School as a 'failing' school.</p> <p>Whilst the above press release is what was issued by the authority to the media, the authority has no control over the headlines used by the media when reporting on council issues. If the term 'failing' was used for Brecon High School in the media, this would have been the editorial decision of that particular media outlet, not the council.</p>

20.1.2	<p>Why did the portfolio holder show support immediately for Builth Wells High School when it went into Special Measures but did not do this for Brecon and Llandrindod – why is Builth Wells High School favoured so much?</p>	<p>When a school goes into Special Measures, a press release is issued jointly by the authority and the school involved.</p> <p>The press releases issued by the authority when Brecon High School and Builth Wells High School went into Special Measures are provided below:</p> <div style="text-align: center;">   </div> <p>PR 5977 - Brecon High School.docx PR 7676 - Builth Wells High School.d</p> <p>The authority does not agree that the press release issued in respect of Builth Wells High School shows a greater level of support of this school compared with that shown towards Brecon High School.</p>
20.1.3	<p>The proposal is an insult and shows no compassion or gratitude towards the headteacher and staff of Brecon High School who have made great improvements in order to bring the school out of special measures</p> <p>Why has the council not publicly praised Brecon High School for the work it has done and the improvements it has made to come out of special measures?</p> <p>Still waiting the council's official 'well done' to Brecon High School to be published in the Brecon and Radnor</p>	<p>In the consultation document, the council acknowledges that 'there has been a good improvement trajectory of performance in recent years' at Brecon High School. In addition, officers congratulated the school on the school's improvement at the end of the meeting for parents and the community held at Brecon High School as part of the recent consultation on closure of the Welsh-medium stream.</p> <p>The current proposal is not a reflection on the headteacher and staff of Brecon High School. As stated in the consultation document, the reasons for the proposal are as follows:</p> <ul style="list-style-type: none"> - Low pupil numbers in the Welsh-medium stream at Brecon High School - Need to ensure robust linguistic progression and appropriate curriculum choice for Welsh-medium pupils throughout all key stages of education <p>The authority does not issue a press release when a school is removed from special measures, however schools are able to issue something themselves. However, the Schools Service Management Team will consider whether press</p>

		releases should be issued as a matter of course when schools are removed from the category of special measures.
20.1.4	Feel let down by the council's lack of vision and ambition regarding the provision of Welsh-medium education at Brecon High School	The authority's vision for Welsh-medium education is set out in its Welsh in Education Strategic Plan. The authority has recently carried out consultation on a revised Plan for 2017-20. The draft Plan sets out the authority's aim 'To provide equality of provision for Welsh-medium learners in Powys'. The current provision at Brecon High School does not provide equality of provision for Welsh-medium learners in Powys.
20.2 Issues relating to indecision by the council		
20.2.1	<p>Hope that this process will result in a final resolution to this issue</p> <p>A decision needs to be made ASAP and the programme needs to be moved forward to start to concentrate and focus on providing good Welsh-medium education for our children now</p> <p>Please do not prolong this situation any longer than necessary for fear of losing even more pupils from Welsh-medium education</p>	The authority notes these comments and agrees that a decision needs to be made in order to end the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School and in order to move forward in relation to the development of Welsh-medium secondary provision in mid and south Powys.
20.2.2	<p>The council has behaved in a shamefully chaotic way with these consultations</p> <p>Exasperated by the council's inability to make a decision on the future of Welsh-medium in south Powys</p> <p>The council's indecision has weakened Welsh-medium altogether and if this continues there will be no children left to make the decision for</p>	The authority acknowledges the impact of the ongoing uncertainty in relation to the future of the Welsh-medium stream at Brecon High School, and is keen to move forward with this process quickly in order to bring an end to this period of uncertainty.

	Anger at lack of decision making by the council	
20.2.3	The council is losing any thread of respect it has left among the community by repeatedly proposing to close the only Welsh stream available to many	The authority has identified a number of disadvantages and risks associated with the proposal, as well as the potential impact on pupils, in the consultation document in respect of this proposal. This includes the additional travel that would be required. These issues, and all other issues raised in the consultation period, will be taken into consideration by the Cabinet when determining how to proceed in relation to this proposal.
20.3 Issues relating to the council's financial situation		
20.3.1	<p>The next time the council tries to cut something like bin collections, we won't believe that you have no money as you seem happy to waste it on transporting children out of their local area</p> <p>The people of Powys who are constantly being told the council has to make cuts will be appalled that the council could even consider wasting such large sums of money</p>	The authority notes this comment.
20.3.2	It seems that the council accepts Westminster's 'austerity' as a matter of course and are willing, without any complaint, to cut anything in public services	The authority notes this comment.
20.4 Other		
20.4.1	The council has failed to effectively communicate a positive vision for Welsh-medium secondary education provision in Brecon over more than a decade, and this failure is now being used to justify removal of Welsh-medium provision completely in Brecon	Since 2014, the authority's vision for Welsh-medium education has been set out in its Welsh in Education Strategic Plan (WESP). Prior to this, it was set out in the Welsh-medium Education Plan. The authority has continued with the current model of delivery of Welsh-medium secondary provision via two Welsh-medium streams, one in Brecon and one in Builth Wells, however this has not led to any growth in Welsh-medium pupil numbers in the Brecon area in particular. Whilst the authority committed in 2011 that all dual stream

		secondary schools would work towards becoming category 2B schools, the challenging financial situation faced by the council meant that no additional financial support could be provided, beyond the additional support provided to dual stream schools via the fair funding formula. The authority now believes that a new approach is needed in order to improve the opportunities available to Welsh-medium pupils area, encourage confidence in the system and lead to an increase in the number of Welsh-medium pupils in the future.
20.4.2	The council is not taking the views of parents on board – you keep putting us through this process and you don't seem to listen at all	The authority is taking the views of parents on board. However, the number of pupils accessing the Welsh-medium stream at Brecon High School is small, and has reduced since the last consultation. This is making the provision increasingly unviable, and the authority's view is that the very small class sizes in the Welsh-medium stream at Brecon High School is not providing an appropriate educational experience for pupils.
20.4.3	Concerned about the Cabinet's blasé, lethargic and tiresomely bureaucratic attitude	The authority notes this comment.
20.4.4	How are Cabinet members qualified to make decisions on education? How many have a background in education?	Cabinet members, and their specific portfolios, are determined by the Leader of the council. All members of the council selected through the democratic process.
20.4.5	Convinced that the council is acting unethically, if not unlawfully	The authority disputes this comment.
21. REFERENCE TO OTHER PROPOSALS		
21.1 Proposals for Builth Wells High School and Llandrindod High School		
21.1.1	Concern that there is uncertainty about the future of Builth Wells High School How is greater clarity going to be given in relation to the proposal for secondary schools in mid Powys?	As stated on page 3 of the consultation document, 'on the 18 th October 2016, Powys County Council published a Statutory Notice proposing the establishment of a new dual-sited dual-stream school that will operate from the current sites of Builth Wells and Llandrindod High Schools from the 1 st September 2018.' The Objection Report outlining the issues raised in the objections received was considered by Cabinet on the 28 th February 2017,

		when Cabinet approved the proposal.
21.1.2	The council is trying to close Builth school to wipe out the fact that it is in special measures	The proposal to establish a new dual-sited school that will operate from the current sites of Builth Wells and Llandrindod High Schools is intended to deliver a sustainable model of secondary education in the area, which would be able to provide high quality education. The proposed new school would replace two schools that are currently in special measures. The fact that the schools are in special measures is a key reason for the proposal.
21.1.3	<p>Concern about the proposal to close Builth High School and merge with Llandrindod due to the additional distance to Llandrindod</p> <p>Request for reassurance that there will be no uncertainty about Welsh-medium provision being in Builth given the proposal around Llandrindod and Builth High Schools</p> <p>It is not clear where Welsh-medium provision will be located if the mid Powys proposal is approved, although you state that the preference is for Welsh-medium provision to be in the Builth area</p> <p>Will pupils have to move to Llandrindod?</p> <p>Unclear how it can be proposed that Welsh-medium will be provided from Builth when there are also plans to close and co-located Llandrindod and Builth</p>	<p>The proposal is to establish a new dual-sites schools that will operate from the current sites of Builth Wells and Llandrindod High Schools. The authority is proposing that Welsh-medium education remains on the Builth site of the proposed new school, however ultimately, the decision on how to structure the school will be made by the school's governing body and management team. Should the governing body wish to structure the teaching in a different way, which could have an impact on where Welsh-medium provision is provided, the authority would expect the governing body to consider the impact on the well-being of pupils and staff. In addition, there would need to be further discussions with the authority about the transport implications.</p> <p>The consultation document in relation to the proposal for Builth and Llandrindod states that the proposal to establish a new school on the two current sites is the first stage of potential wider plans for secondary education in the area. The second stage, which aims to establish the new school on a single site in the locality of Builth, requires further work to understand the overall capital cost and feasibility, and would be subject to another consultation if Cabinet decided to proceed to the second stage.</p>
21.1.5	Parents are moving their children to Hereford because of the lack of clarity in relation to what is happening to secondary education in Llandrindod	The authority is aware that there are increasing numbers of post-16 pupils who are choosing sixth form provision at Hereford Sixth Form College and other out of county providers. This has been occurring over a number of years and is due in part to the availability of subjects at those providers compared to the current availability within the Powys post-16 partnership. However, it is

		recognised that any school reorganisation process creates a period of uncertainty for pupils and that some pupils are choosing out of county providers for this reason as well.
21.1.6	The Equality Impact Assessment for Builth and Llandrindod assumes that the Brecon Welsh stream is closing – any objections will be based on the assumption that Brecon Welsh stream will be closed – this is predetermination	<p>In accordance with the requirements of the School Organisation Code, the authority published draft impact assessments (equality, community and Welsh language) as part of the formal consultation process that took place between the 6th April and 1st June 2016. These impact assessments were updated to take account of feedback received during the consultation, and were included in papers for the consideration of Cabinet on the 27th September 2016. Cabinet were also considering the outcome of consultation on an associated proposal for Brecon High School and Gwernyfed High School at the same time. Therefore, the Equality Impact Assessment (draft and final) reflected the proposals for all four schools.</p> <p>New draft impact assessments were published as part of the current consultation on closure of the Welsh-medium stream at Brecon High School, which considered the ongoing proposal in relation to Builth and Llandrindod High Schools. These will be updated to take account of feedback received during the consultation, and will be considered by Cabinet when determining how to proceed.</p>
21.1.7	Concern that the proposal for Builth and Llandrindod does not offer long term assurance in terms of Welsh-medium education	The authority's intention is to provide equality of provision. Builth Wells High School currently provides a more equitable distribution of subjects between English-medium and Welsh-medium streams. The authority believes that building a critical mass in one school will enable the development of a vibrant and viable Welsh stream. The improved choice and Welsh-medium experience will enable pupils to become even more confident Welsh speakers. The authority believes that learners will be more attracted to Welsh-medium provision in future if there are clear progression routes, and continuity of provision throughout their educational life. The authority's view is that centralising provision would provide a solid base which could be further developed in the future, through the possible establishment of designated Welsh-medium secondary provision to serve the area.

21.1.8	Should the proposal be implemented, the provision and staffing would depend on decisions made by the school's managers.	The authority acknowledges that the decision on how to structure the school would be made by the school's governing body and management team.
21.1.9	Many staff would have to work on two sites – Welsh-medium staff won't always be on the Builth site, so won't be there to answer questions or contribute to a Welsh ethos and activities.	The decision on how to structure the school would be made by the school's governing body and management team. As the sole provider of Welsh-medium secondary provision in mid and south Powys the authority would expect the new school to ensure that the provision was structured in order to enhance the Welsh-medium provision available.
21.2 Reference to previous proposals		
21.2.1	What were the critical elements which meant that the proposal to close the Welsh-medium stream in Brecon High School wasn't abandoned like the other proposals?	On the 27 th September 2016, Cabinet considered the consultation report in relation to the proposals related to Brecon and Gwernyfed High Schools. On the basis of the issues raised during the consultation period, Cabinet approved a recommendation to reconsult on element c of the original proposal, i.e. closure of the Welsh-medium stream at Brecon High School. The reasons are outlined on pages 4 and 5 of the cabinet report considered on the 27 th September 2016. The reason for the recommendation was 'To provide a more sustainable educationally and linguistically viable model of Welsh-medium secondary education'.
21.2.2	Of the 4 public consultation meetings held in 2016, Brecon was the only one where Welsh was used	This comment is noted.
21.2.3	Responses to many comments/criticisms in previous consultation reports are 'the authority notes this point' – is this because you have no answers or because the answers undermine your arguments?	The authority acknowledges that there are disadvantages and risks associated with every proposal. Whilst the authority endeavours to mitigate these, there are some issues which cannot be totally eradicated. In these cases, the only response available to the authority is to 'note' the point made. These issues, along with all other issues raised during the consultation, will be taken into consideration by Cabinet when determining how to proceed.
21.2.4	In previous consultation report you 'accept and acknowledge' comments/criticisms on four	The authority has not carried out any further risk assessments or mitigating action plans in relation to issues raised in previous consultation reports related

	<p>occasions – have you carried out any risk assessments to measure the impact of these and can you provide details of these together with any subsequent mitigating action plans</p> <p>On many occasions you ‘accept and acknowledge’ comments/criticisms and put the onus on the school to work with pupils and parents to ‘find a solution’. What risk assessments/action plans have been identified for implementation?</p>	<p>to the closure of the Welsh-medium stream at Brecon High School as no decision has yet been made to proceed with the closure of the stream.</p>
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