

# **Appendix E**



## **Consultation on the proposal to close the Welsh-medium stream at Brecon High School from the 31<sup>st</sup> August 2016**

### **Consultation Report**

**September 2015**

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# **CONSULTATION ON THE PROPOSAL TO CLOSE THE WELSH-MEDIUM STREAM AT BRECON HIGH SCHOOL FROM THE 31<sup>st</sup> AUGUST 2016**

## **1 OVERVIEW OF THE CONSULTATION**

Powys County Council consulted on a proposal to close the Welsh-medium stream at Brecon High School with effect from the 31<sup>st</sup> August 2016 during the period 15<sup>th</sup> June 2015 to the 27<sup>th</sup> July 2015.

### **1.1 CONSULTATION METHODS**

The consultation documentation was available on the council's website throughout the consultation period. Copies were also distributed to stakeholders, as required by the School Organisation Code (2013). A separate version for young people 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 Modernisation Team at County Hall, or writing to the School Modernisation Team.

Meetings were also held with the following:

- Pupils, staff and governors of Brecon High School
- Pupils, staff and governors of Builth Wells High School
- Pupils, staff and governors of Ysgol y Bannau
- Pupils, staff and governors of Sennybridge CP School

In addition, two public consultation events were held. These were in the form of 'drop in' events, and were held in Brecon High School and Builth Wells High School. Approximately 105 people attended these two events.

### **1.2 RESPONSES RECEIVED**

A total of 193 written responses were received to the consultation. These included:

- i) 114 responses to the online questionnaire
- ii) 44 other written responses
- iii) 35 responses from pupils using the questionnaire included in the young people's version of the consultation document.

These included responses from the following:

- Parents / guardians / grandparents of pupils currently attending the affected schools
- Staff at the affected schools
- Governors at the affected schools

- Pupils and past pupils of the affected schools
- Members of the community from the catchment areas of Brecon High School and Builth Wells High School
- Rhondda Cynon Taff County Borough Council
- Maescar Community Council
- Headteacher and Chair of Governors of Gwernyfed High School
- Estyn
- County Councillors
- Cylch Meithrin Aberhonddu
- Kirsty Williams AM
- Rhieni dros Addysg Gymraeg / Parents for Welsh-medium Education
- Brecon Town Council
- NUT Cymru

In addition, a copy of an online petition opposing the closure of the Welsh-medium stream at Brecon High School was received. This was signed by 390 people, and included 124 comments on the proposal.

## **2 CONSULTATION WITH PUPILS**

### **2.1 WRITTEN RESPONSES FROM PUPILS**

35 responses were received from pupils using the questionnaire included in the young people's version of the consultation document. The majority of these were filled in by pupils in the English-medium stream at Brecon High School, however a few responses were received from Welsh-medium pupils attending Builth Wells High School and Ysgol y Bannau.

The questionnaire asked 3 questions, in-line with the questionnaire included in the full consultation document. The issues raised in the responses were as follows:

#### **1 If the Welsh language stream at Brecon High School closed, how would it affect you?**

- It wouldn't affect me much
- A bigger bus would be needed to Builth Wells High School as there would be more pupils
- Would cause pupils to be upset
- Would be detrimental to pupils' social lives
- There would be less Welsh in the Brecon area
- Friends in the Welsh stream would be in a different school
- Would diminish the Welsh learning for pupils not in the Welsh stream
- There would be less money in the pot
- There would be less people in classes
- It wouldn't feel like a Welsh community / school

#### **2 If the Welsh language stream at Brecon High School didn't close, how else could we improve Welsh language education in south Powys?**

- PE to be provided in Welsh at Builth Wells High School
- Boost the Welsh language by creating a home for it in the new school to attract pupils back from other schools to increase numbers
- Mix up English and Welsh speaking pupils in the school
- Invest in / employ good teachers
- Provide more help for pupils that can't speak Welsh fluently
- Give the Welsh stream more support / resources
- Improve the Welsh language teaching at the school
- Having extra English lessons so that they are at the same level as pupils in the English stream
- Having one school with a specialist Welsh stream for all pupils in Powys to go to
- Try to encourage pupils from the Sennybridge area to go to Brecon High instead of Ystalyfera
- Make the Welsh stream bigger
- It doesn't need to be improved – it's fine as it is

#### **3 Do you have any other concerns or comments that you think the Council should think about?**

- Think about the impact on Ysgol y Bannau
- It won't be possible to attract the best teachers without a 6<sup>th</sup> form

- Once the Welsh has gone from Brecon it will disappear forever
- Unfair to force pupils to go to a different school because they speak a different language
- Education is the building block of all our futures and should not be cut.
- Concerned about the impact on overall pupil numbers at Brecon High School
- It would cost more to pay for transport than it costs to fund the Welsh-medium education
- You are killing the Welsh language

## **2.2 MEETINGS WITH PUPILS**

In addition, officers from the local authority discussed the proposal with the following groups of pupils:

- Ysgol y Bannau
- Sennybridge CP School
- Brecon High School Welsh-medium Pupils
- Brecon High School English-medium Pupils
- Builth Wells High School Welsh-medium Pupils
- Builth Wells High School English-medium Pupils

Each of these groups were asked to discuss a number of questions related to the proposal. The responses received from each of the groups are summarised in the table on the following pages.

## 2.2.1 ISSUES RAISED IN MEETINGS WITH PUPILS

	Ysgol y Bannau	Sennybridge CP School	Brecon High School Welsh-medium pupils	Brecon High School English-medium pupils	Builth Wells High School Welsh-medium pupils	Builth Wells High School English-medium pupils
<b>1. What do you like about the current arrangements?</b>	<ul style="list-style-type: none"> <li>- Go to school with friends from Brecon</li> <li>- Sports activities</li> <li>- Family have been to BHS and were happy with the education they received</li> <li>- Musicals</li> <li>- Can go to the leisure centre after school</li> <li>- School clubs</li> <li>- We can go to school locally</li> <li>- Dual stream is good – opportunity to mix with English medium pupils but not all the time</li> </ul>	<ul style="list-style-type: none"> <li>- Flexibility – can choose to go to either Brecon High School or Ystalyfera</li> <li>- If brothers or sisters or friends go to a certain school, you can go too</li> </ul>	<ul style="list-style-type: none"> <li>- When we started in year 7 nearly all subjects were in Welsh. Now in year 10, there is less provision</li> <li>- Like having lessons in small classes</li> <li>- Closer to our homes</li> <li>- Helps English-medium pupils at BHS</li> <li>- Good Welsh speaking teachers</li> <li>- Small groups – we are like a family</li> <li>- There is lots of Welsh in the community</li> <li>- We speak Welsh to each other all the time</li> <li>- We have friends in the English stream</li> </ul>	<ul style="list-style-type: none"> <li>- School reflects the bilingual community</li> <li>- Good to have the Welsh stream pupils to learn from</li> <li>- Having a Welsh stream gives Brecon High a better reputation</li> <li>- Promotes Welsh culture</li> <li>- Brings a mix of languages to the school</li> </ul>	<ul style="list-style-type: none"> <li>- Small classes in the Welsh stream, so pupils get more attention from the teachers</li> <li>- Pupils like being in one class</li> <li>- Good relationship between the Welsh and English streams</li> <li>- We are in a class with the same people as primary school</li> <li>- Like the fact that there are 2 secondary streams in the area</li> <li>- Welsh stream is consistently growing</li> <li>- Good opportunities for trips</li> <li>- Like having some lessons in English</li> <li>- Most of the teachers are nice</li> </ul>	<ul style="list-style-type: none"> <li>- More opportunities to speak Welsh and practice</li> <li>- Good to have dual stream in secondary as it follows on from primary for pupils who attended dual stream primaries</li> </ul>

	<b>Ysgol y Bannau</b>	<b>Sennybridge CP School</b>	<b>Brecon High School Welsh-medium pupils</b>	<b>Brecon High School English-medium pupils</b>	<b>Builth Wells High School Welsh-medium pupils</b>	<b>Builth Wells High School English-medium pupils</b>
<b>2. Is there anything you don't like about the current arrangements?</b>	<ul style="list-style-type: none"> <li>- BHS building doesn't look very good</li> <li>- Not enough Welsh speaking teachers</li> <li>- Not enough lessons in Welsh so pupils might forget their Welsh</li> </ul>	<ul style="list-style-type: none"> <li>- If you go to Brecon High School and other pupils go to Ystalyfera, you could lose your old friends</li> </ul>	<ul style="list-style-type: none"> <li>- Our Welsh gets worse as we go through the school</li> <li>- No science teacher arranged for us for next year</li> <li>- Not many Welsh lessons</li> <li>- The building is old</li> </ul>	<ul style="list-style-type: none"> <li>- Welsh stream pupils can be mean to you in Welsh</li> <li>- Teachers speak Welsh when a Welsh stream pupil is with you which is annoying</li> <li>- The Welsh pupils talk to each other in Welsh</li> <li>- The Welsh pupils don't really mix with other pupils</li> </ul>	<ul style="list-style-type: none"> <li>- Not much choice of subjects in Welsh</li> <li>- Not many extra-curricular activities in Welsh</li> <li>- Don't meet many Welsh speakers in the area</li> <li>- Our education should be available entirely in Welsh</li> <li>- Pupils tend to leave Welsh in the classroom</li> <li>- Not enough A level subjects available</li> <li>- Not a very Welsh area</li> </ul>	<ul style="list-style-type: none"> <li>- Welsh stream have more trips than the English stream and more opportunities to do things</li> <li>- Welsh stream pupils pick on me</li> </ul>
<b>3. How do you think the proposal would affect you?</b>	<ul style="list-style-type: none"> <li>- Would have to travel further</li> <li>- More difficult to go to after school clubs</li> <li>- More difficult to go to after school activities e.g. swimming lessons</li> <li>- Wouldn't see our friends as much</li> </ul>	<ul style="list-style-type: none"> <li>- Socialising outside of school would be difficult</li> <li>- Distance to travel to Builth Wells</li> <li>- You could lose touch with friends in the English stream who go to Brecon High School</li> <li>- There would be an impact on</li> </ul>	<ul style="list-style-type: none"> <li>- Additional travel</li> <li>- Would be difficult to take part in clubs and activities in school and out of school</li> <li>- Would lose friends, but could make new friends</li> <li>- Would lose teachers</li> </ul>	<ul style="list-style-type: none"> <li>- Would lose our Welsh stream friends</li> <li>- Would lose Welsh stream pupils from the orchestra</li> <li>- No-one would be speaking Welsh around us</li> <li>- The school would be an English school in a Welsh community</li> </ul>	<ul style="list-style-type: none"> <li>- There won't be enough teachers in Builth</li> <li>- The school isn't big enough</li> <li>- We will have less opportunity to be in sports teams</li> <li>- Will lose friends if there are two Welsh classes</li> <li>- Additional travel for pupils from</li> </ul>	<ul style="list-style-type: none"> <li>- There would be more fights as Brecon and Builth Wells don't get on</li> <li>- Wouldn't be enough room in the building</li> <li>- Bwyty is already crowded and the queues would be worse</li> </ul>



Ysgol y Bannau	Sennybridge CP School	Brecon High School Welsh-medium pupils	Brecon High School English-medium pupils	Builth Wells High School Welsh-medium pupils	Builth Wells High School English-medium pupils
<ul style="list-style-type: none"> <li>- I would be sad because the Welsh stream has been open for more than 31 years</li> <li>- Some don't know any pupils in Builth Wells, some do know children there</li> </ul>	<p>friendships, this is very important</p>	<ul style="list-style-type: none"> <li>- Would be too tired to do school work and homework</li> <li>- The community would lose the Welsh language</li> <li>- There is less Welsh in Builth Wells</li> </ul>	<ul style="list-style-type: none"> <li>- There would be more room in school</li> <li>- Welsh speaking pupils would have an advantage in Welsh lessons</li> </ul>	<p>Brecon will mean they have to get up early, get home late, will have difficulty accessing after school clubs and attending after school activities in the community</p> <ul style="list-style-type: none"> <li>- Would enable the unit to grow, if it continues to grow perhaps there will be a chance of having a Welsh-medium school?</li> <li>- We want Brecon pupils to come here</li> <li>- Could cause bullying and negative attitudes</li> <li>- Classes would be bigger</li> <li>- Teachers will concentrate on the new pupils</li> <li>- The atmosphere in our class would change</li> <li>- More noise in the class if there are more pupils</li> </ul>	<ul style="list-style-type: none"> <li>- Won't affect me much as the numbers are small</li> <li>- Less chance to be in sports teams if there are more pupils</li> </ul>

	<b>Ysgol y Bannau</b>	<b>Sennybridge CP School</b>	<b>Brecon High School Welsh-medium pupils</b>	<b>Brecon High School English-medium pupils</b>	<b>Builth Wells High School Welsh-medium pupils</b>	<b>Builth Wells High School English-medium pupils</b>
<b>4. Is there anything you think would be better if Welsh language pupils went to another school instead of Brecon High School?</b>	<ul style="list-style-type: none"> <li>- Could do more things in Welsh which would help their Welsh to improve</li> <li>- Would have more friends because there would be more pupils in the class</li> <li>- Would be nice to have pupils from other schools joining us in year 7</li> </ul>	<ul style="list-style-type: none"> <li>- Nothing</li> <li>- More subjects would be available in Welsh</li> </ul>	<ul style="list-style-type: none"> <li>- More lessons in Welsh</li> </ul>	<ul style="list-style-type: none"> <li>- We might have more opportunities</li> <li>- The school would concentrate more on the needs of English speaking pupils</li> <li>- Worksheets wouldn't have Welsh on them</li> </ul>	<ul style="list-style-type: none"> <li>- The stream in Builth would grow, so there would be more opportunities</li> <li>- Opportunity to make more friends – to mix with new pupils from different places</li> <li>- More Welsh-medium extra curricular activities could be provided</li> <li>- BWHS would have more funding which would mean more opportunities</li> <li>- Better sports teams</li> </ul>	<ul style="list-style-type: none"> <li>- More people speaking their language</li> <li>- More subjects</li> <li>- More chance to make friends</li> </ul>
<b>5. Is there anything you think would be worse if Welsh language pupils went to another school instead of Brecon High School?</b>	<ul style="list-style-type: none"> <li>- Additional travel</li> <li>- Would be more difficult for our parents</li> <li>- Would have to get up early</li> <li>- Would be more tired because it would be a longer day</li> <li>- Concerned about what would</li> </ul>	<ul style="list-style-type: none"> <li>- No response</li> </ul>	<ul style="list-style-type: none"> <li>- Many activities in the school happen because of the Welsh stream e.g. sports activities, eisteddfod, orchestra</li> <li>- Pupils wouldn't go to Ysgol y Bannau</li> </ul>	<ul style="list-style-type: none"> <li>- There wouldn't be Welsh spoken in the school</li> <li>- They would have to travel further</li> <li>- Would lose talent and enthusiasm</li> <li>- Could lose Welsh teachers</li> <li>- We would lose friends</li> </ul>	<ul style="list-style-type: none"> <li>- Additional travel for pupils from Brecon</li> <li>- The Welsh language would be weakened in Brecon</li> <li>- Pupils might go to an English-medium secondary school instead</li> </ul>	<ul style="list-style-type: none"> <li>- It's a long way to travel</li> <li>- Would cause difficulties with friendship groups</li> <li>- Pupils could choose to move to English-medium education instead</li> </ul>

	Ysgol y Bannau	Sennybridge CP School	Brecon High School Welsh-medium pupils	Brecon High School English-medium pupils	Builth Wells High School Welsh-medium pupils	Builth Wells High School English-medium pupils
	happen if you were running late and missed the bus		<ul style="list-style-type: none"> <li>- Less people would speak Welsh</li> <li>- We would lose friends</li> <li>- Teachers would lose their jobs</li> <li>- Work isn't challenging in Builth Wells</li> <li>- More Welsh subjects but the standard wouldn't be as good</li> <li>- Bigger groups</li> <li>- There is no Welsh medium primary school in Builth Wells so the pupils speak English to each other</li> </ul>		<ul style="list-style-type: none"> <li>- Longer queues at lunch time</li> </ul>	
<b>6. Are there any other ideas you think we should consider to improve Welsh language education in south Powys?</b>	<ul style="list-style-type: none"> <li>- Bilingual teachers</li> <li>- Ask teachers from Ysgol y Bannau to go and work in the high school</li> <li>- Offer sessions for parents to learn Welsh</li> <li>- Improve the building</li> <li>- Clubs only for the Welsh stream</li> </ul>	<ul style="list-style-type: none"> <li>- Move Welsh-medium education to Gwernyfed</li> <li>- Share teachers between Builth and Brecon</li> <li>- Build a new Welsh school between Builth and Brecon</li> </ul>	<ul style="list-style-type: none"> <li>- Need teachers who are in the school all the time – consistency</li> <li>- A Welsh-medium school</li> <li>- Bring Builth pupils to Brecon</li> <li>- Welsh stream in the new school</li> </ul>	<ul style="list-style-type: none"> <li>- More teachers that speak Welsh</li> <li>- Promote Welsh-medium education so that more choose it</li> <li>- Separate Welsh school would give them more opportunities</li> </ul>	<ul style="list-style-type: none"> <li>- More extra-curricular activities</li> <li>- Welsh-medium school – standard of Welsh would be better and more opportunities, would improve Welsh culture in the area</li> </ul>	<ul style="list-style-type: none"> <li>- No response</li> </ul>

	<b>Ysgol y Bannau</b>	<b>Sennybridge CP School</b>	<b>Brecon High School Welsh-medium pupils</b>	<b>Brecon High School English-medium pupils</b>	<b>Builth Wells High School Welsh-medium pupils</b>	<b>Builth Wells High School English-medium pupils</b>
	<ul style="list-style-type: none"> <li>- More money for Brecon High School</li> </ul>		<ul style="list-style-type: none"> <li>- Share teachers between Brecon and Builth Wells</li> </ul>		<ul style="list-style-type: none"> <li>- However a Welsh-medium school would mean we would lose contact with English-medium friends</li> <li>- More Welsh teachers</li> <li>- Don't close Gwernyfed school</li> <li>- Don't make BWHS a Welsh only campus</li> </ul>	
<b>7. Do you have any concerns or questions about the proposal?</b>	<ul style="list-style-type: none"> <li>- Concerns about parents having to pick them up from after school clubs</li> <li>- Children will forget their Welsh if they still go to Brecon High School and there is no Welsh there</li> <li>- Concerned that less pupils will come to Ysgol y Bannau</li> <li>- Concern that they wouldn't be chosen for sports teams if they were unable to</li> </ul>	<ul style="list-style-type: none"> <li>- Who pays for transport?</li> <li>- Will affect the Welsh language in the community</li> <li>- Will affect parents – Difficult to go to after school clubs – this will have an impact on fitness and health</li> <li>- Additional travel – pupils will be tired, could get travel sick</li> <li>- Don't like pupils from Builth Wells High School</li> <li>- Concern about what would</li> </ul>	<ul style="list-style-type: none"> <li>- The Welsh language community would be destroyed</li> <li>- Why should the English-medium pupils have a huge amount of money spent on a new building for them but not us?</li> <li>- There should be a Welsh stream in every school in Powys / Wales in order to promote the Welsh language</li> <li>- Concern that the council is</li> </ul>	<ul style="list-style-type: none"> <li>- Concern about the additional travel cost for parents / families</li> <li>- Pupils will go to English-medium secondary instead of travelling</li> <li>- The Council is killing the Welsh language and Welsh traditions</li> <li>- Will the Welsh stream pupils come back?</li> <li>- Friends might get bullied</li> </ul>	<ul style="list-style-type: none"> <li>- Concern about losing the English stream from the school</li> <li>- The proposal is the second best option for the area at the moment – if we can't have a totally Welsh school, this is the best option</li> <li>- Concern that the Welsh stream class will be split in 2</li> <li>- Closing Builth and Llandrindod and opening a new 'super school'</li> </ul>	<ul style="list-style-type: none"> <li>- Concern about what would happen to the teachers at Brecon High School</li> </ul>

Ysgol y Bannau	Sennybridge CP School	Brecon High School Welsh-medium pupils	Brecon High School English-medium pupils	Builth Wells High School Welsh-medium pupils	Builth Wells High School English-medium pupils
<p>stay for an after-school club</p>	<p>happen if they missed the bus</p> <ul style="list-style-type: none"> <li>- Pupils will go to the English stream instead of continuing in Welsh-medium education</li> <li>- Teachers will lose their jobs</li> </ul>	<p>changing arrangements when pupils are taking their GCSEs</p> <ul style="list-style-type: none"> <li>- Could cause arguments between children and their parents</li> <li>- Would miss school because of bad weather</li> <li>- Concern that we start a GCSE course and then you close the stream</li> </ul>		<p>would leave 2 empty buildings</p> <ul style="list-style-type: none"> <li>- Concern that the school is too small for more pupils</li> </ul>	

### **3 ESTYN**

Estyn's response to the consultation is provided below:

#### **Estyn's response to Powys County Council's proposal to close the Welsh-medium stream at Brecon High School from 31<sup>st</sup> August 2016 onwards**

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.

#### **Introduction**

The proposal is by Powys County Council. The proposal is as follows:

- Close the Welsh-medium stream at Brecon High School from 31<sup>st</sup> August 2016 to pupils in years 7, 8, 9 and 10.
- Continue provision at Brecon High School for pupils in year 11 in September 2016.
- Welsh-medium provision for pupils in years 7, 8, 9 and 10 will be available at Builth Wells High School from 1<sup>st</sup> September 2016. From 1<sup>st</sup> September 2017, this will also be the case for pupils in year 11.
- Pupils living in parts of the Brecon catchment area that live closer to alternative Welsh-medium secondary provision outside Powys will have the opportunity to transfer to those schools.

#### **Summary**

It is Estyn's opinion that this proposal is likely to offer access to more Welsh-medium subjects for pupils in Brecon High School's catchment area. However, the proposal does not give sufficient consideration to the possible effect on pupil numbers and staffing implications at Ysgol y Bannau as a result of closing the Welsh-medium stream at Brecon High School.

Although the effect of travel on pupils' access to extra-curricular activities is given due consideration, the proposal does not give sufficient consideration to its effect on pupils' health and wellbeing.

### **Description and benefits**

The council sets the background for the proposal clearly in the context of secondary school reorganisation and establishing one Welsh-medium school in the county, and consolidating Welsh-medium streams into larger units. It identifies clearly the logic behind the proposal. Specifically, closing the Welsh-medium stream in Brecon will lead to providing stronger linguistic progression for Welsh-medium pupils and will ensure a greater concentration of Welsh-medium secondary learners in one location.

The proposer gives appropriate consideration to three possible options, identifying valid advantages and disadvantages. The options considered are closing the Welsh-medium stream at Brecon High School, closing the Welsh-medium stream at Builth Wells High School, and maintaining the status quo. The proposer concludes from the evidence that is presented that the most advantageous option is to close the Welsh-medium stream at Brecon High School.

The proposal asserts reasonably that consolidating Welsh-medium streams will provide more Welsh-medium opportunities for pupils, and access to a wider range of subjects through the medium of Welsh. It seems reasonable that it would be easier for schools to plan the curriculum and take advantage of the ability of more staff to teach through the medium of Welsh. The proposal also ensures appropriate linguistic progression to post-16 education that is not available at Brecon High School.

In general, the local authority has identified relevant risks associated with the proposal. It offers appropriate responses to reduce the risk, for example providing free transport to the nearest Welsh-medium school. However, a minority of possible strategies to reduce the risk are not addressed in enough detail. The proposal includes reasonable steps that the council would take to manage any necessary changes to staffing levels within agreed policies and procedures. However, the proposal does not assess the possible effect on staff at Ysgol y Bannau sufficiently, should pupil numbers decrease as a result of closing the Welsh-medium stream at Brecon High School.

There is a detailed and comprehensive analysis of financial risk, and it is agreed that there would be no additional costs or significant savings as a result of implementing the reorganisation.

The local authority would provide free transport for eligible pupils to the nearest Welsh-medium school. For some pupils, this provision could be outside Powys. The proposal gives appropriate consideration to the effect that travelling to Builth Wells could have on provision for pupils from Brecon. This includes problems with extra-curricular activities and after-school events. However, the proposal does not give enough consideration to the effect of travelling 17 miles or more each way on pupils' health and wellbeing.

The proposal gives due attention to equality. It affects Welsh-medium pupils in the main. Within this group, pupils with additional learning needs and those who are eligible for free school meals were identified. An equality impact assessment was not published due to the small pupil numbers affected. However, it seems that both schools have the same provision for additional learning needs. The council recognises that full access to extra-curricular activities could be difficult for pupils who are eligible for free school meals due to transport costs.

The council outlines clearly the effect of this change on pupil numbers in the secondary schools. Estyn believes that implementing this proposal would not have a significant effect on pupil numbers at Brecon High School. As the pupil numbers are so small, it would not add excessively to pupil numbers at Builth Wells High School or secondary schools outside the county.

From the evidence provided, Estyn agrees with the council's assessment that there is a more Welsh environment in Builth Wells High School, that there are more staff who are qualified to teach through the medium of Welsh, and more opportunities for pupils to access Welsh-medium activities outside the classroom. This proposal will ensure access to more subjects through the medium of Welsh to more pupils in south Powys, and linguistic progression across all key stages.

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

For all schools affected, the local authority has submitted the Welsh Government's categorisation details, details of the schools' recent inspections and the secondary schools' performance in Welsh as a first language at the end of key stage 3 and 4. The proposal does not consider the full range of performance indicators or compare the performance of these schools with that of other schools in the authority, nationally or similar schools in terms of eligibility for free school meals.

Due consideration is given to the effect on leadership and management at the schools. It is agreed that implementing this proposal would not have a negative effect on standards within the schools. It appears that there would be a positive effect on the quality of Welsh-medium provision, bringing a greater choice of subjects and creating larger groups of pupils to enrich experiences.

The proposal gives due consideration to the effect on the curriculum at each school. It also gives suitable consideration to post-16 Welsh-medium provision.

The proposer gives due consideration to the effect on vulnerable groups of pupils, including those with additional learning needs and pupils who are eligible for free school meals. The impact assessment has not been published due to the low numbers.



#### 4 ISSUES RAISED DURING THE CONSULTATION PERIOD

The following tables list the issues raised during the consultation period, including issues raised in writing and in the other consultation events that took place, along with the authority's response to these.

##### 4.1 COMMENTS OPPOSING THE PROPOSAL

REF	ISSUE	LOCAL AUTHORITY RESPONSE
<b>1</b>	<b>ADDITIONAL TRAVEL</b>	
1.1	Pupils would have to travel longer distances to access Welsh-medium education	The authority acknowledges that there is additional travel required, however the authority believes that there are significant educational and linguistic benefits to the provision at Builth Wells High School in terms of wider choice for pupils. From the initial calculations made, travel time for the vast majority of learners would be within the 45 minutes stated in the authority's Home to School Travel Policy.
1.2	Pupils from the Sennybridge area will have to travel out of county to Ysgol Gyfun Ystalyfera	As stated in the consultation document, the majority of Welsh-medium pupils from Sennybridge Primary School already transfer out of county to Ysgol Gyfun Ystalyfera, where they are able to access full Welsh-medium provision.
1.3	The additional time spent travelling will have a negative impact on pupils academically and socially	From the initial calculations made, travel time for the vast majority of learners would be within the 45 minutes stated in the authority's Home to School Transport Policy. The provision in Builth Wells already serves both the Builth Wells and Llandrindod Wells catchment areas and the distance from the north of the Llandrindod catchment area to Builth Wells is similar to the distances learners would have to travel under this proposal. As the majority of pupils in Powys' secondary schools are transported to school, Builth Wells High School is well equipped to meet the social and academic needs of learners who travel to school.
1.4	Pupils that currently live within walking distance to Brecon High School will	The authority acknowledges that those who currently walk to school would have to be transported should the proposal be implemented.

	have to travel by bus to school	
1.5	Concern about the environmental impact of additional travel	The authority acknowledges that additional transport routes would have an environmental impact.
1.6	Concern that the roads pupils would be travelling on are unsafe / dangerous	The authority is content that the roads that would be used to transport pupils 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 involving that transport in recent years.
1.7	Concern about pupils travelling in bad weather	The authority and contractors will have alternative routes available to travel from Builth Wells back to Brecon in times of bad weather. As a school, Builth Wells High School serves a wide catchment area, and like all our schools, has the appropriate emergency processes in place.
1.8	The proposal is contrary to the road risk strategy as it is putting additional journeys onto the roads	Although the authority recognises that a number of Welsh-medium learners walk to Brecon High School, some of the learners who do not qualify for transport are transported to the school by their parents. The proposal will potentially reduce the number of journeys, and not increase them as suggested by the response. The authority does not have a Road Risk Strategy, and is not aware of any such document, however the authority is confident that pupils would be safe when travelling on school transport. 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 involving that transport in recent years. All pick up points are subject to a risk assessment, undertaken by the contractor and provided to the authority. It is the authority's view that all routes used for home to school transport are suitable, subject to the vehicles travelling at the appropriate speed for the road type.
1.9	Will free home to school transport be offered to parents on very low incomes who may not be in receipt of Free School Meals?	Free home to school transport will be provided to all pupils who live 3 miles or more from their nearest Welsh-medium provision, regardless of whether or not their parents receive Free School Meals, although some pupils may be required to travel up to 2 miles to the nearest pick up point.

1.10	Powys County Council's Welsh in Education Strategic Plan for 2014 – 17 states that “the Council is committed to providing the highest quality Welsh-medium education to every child and young person in Powys within a reasonable distance from their homes”. The proposal to move Welsh-medium education to Builth Wells places it outside of being at a reasonable distance.	From the initial calculations made, travel time for the majority of learners to their nearest provision would be within the 45 minutes stated in the authority's Home to School Travel Policy, therefore the authority does not agree that the provision would be outside of being at a reasonable distance.
1.11	Why hasn't the authority carried out a Travelling Impact Assessment outlining the risks of children having to travel additional distances to receive their education?	There is no requirement for the authority to carry out a Travelling Impact Assessment. All pick up points are subject to a risk assessment, undertaken by the contractor and provided to the authority. It is the authority's view that all routes used for home to school transport are suitable, subject to the vehicles travelling at the appropriate speed for the road type.
1.12	Parents will be financially worse off due to the additional travel	The authority accepts that parents would have to travel further to attend parents evenings etc. in Builth Wells.
1.13	Parents with lower incomes will find it more difficult to send their children to Builth due to	As the authority provides home to school transport to all qualifying pupils, there will be no impact in terms of pupils' ability to access the provision in Builth Wells, however it is recognised that parents without their own transport may experience difficulties in attending parents evenings etc., and that there would be an additional cost implication for parents in terms of attending these events.

	the additional travel required	
1.14	Travel time will be longer than the 20 – 30 minutes maximum journey time outlined by Brecon parents in a report produced by Powys County Council in 2014.	Whilst the majority of parents stated that the maximum journey time they would consider to be acceptable was 20 – 30 minutes, the purpose of this exercise was to get an idea of parental views. In a rural county such as Powys it is likely that travel time will exceed 20 – 30 minutes in many cases, and there are already examples of travel time that exceeds this. The Authority's Home to School Transport Policy states that where possible, travel time for learners should be within 45 minutes, and the authority is confident that travel time for the majority of learners to their nearest provision would be within this.
1.15	Pupils will have to get up earlier and are concerned about what would happen if they missed the bus	The authority acknowledges that pupils would have to get up earlier in order to ensure that they do not miss their school transport, however this is in-line with other pupils across Powys.
<b>2</b>	<b>PUPILS WILL BE UNABLE TO TAKE PART IN EXTRA-CURRICULAR ACTIVITIES</b>	
2.1	Welsh-medium pupils from the Brecon area will be unable to take part in after-school activities due to the extra travel	As stated in the consultation document, the authority acknowledges that there could be a negative impact on learners who live in the Brecon area if they are unable to access after-school activities at Builth. The authority would encourage the school to work with parents to find a solution to this issue.
2.2	Welsh-medium pupils from the Brecon area will be unable to take part in activities in the community as they won't arrive home in time	The Builth Wells High School day runs from 8.50 until 3.15, and it is therefore expected that learners living in the Brecon area would arrive in Brecon at or around 4pm.
2.3	Pupils are concerned that they wouldn't be picked for sports teams if they	At Builth Wells High School, pupil performance in Physical Education determines who is picked for school teams, therefore not being able to attend after-school clubs would not be a reason why a pupil wouldn't be picked for a sports team.

	were unable to stay for an after-school club	
<b>3</b>	<b>THE PROPOSAL WOULD CAUSE DIFFICULTIES WITH FRIENDSHIPS</b>	
3.1	Children may not be able to see / socialise with their peers / friends from school outside school as they will be so far apart	Many of the authority's high schools serve a wide catchment area, however it is noted that the inclusion of the Brecon pupils within Builth Wells High School will potentially increase the distances between the home locations of peer groups.
3.2	English-medium pupils at Brecon High School would lose their Welsh stream friends	The authority recognises that it might be difficult for pupils in both streams in the short term, however the authority believes that the positive benefits for Welsh-medium pupils in the longer term would make up for this.
3.3	Children want to go to school with their friends	The authority recognises that it might be difficult for some pupils to move schools, particularly if they already attend secondary schools. However, we 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.
3.4	Some pupils don't know anyone that goes to Builth Wells High School	The authority recognises that it might be difficult for some pupils to move schools, particularly if they already attend secondary school. However, we 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 and to ensure that they make new friends.
3.5	The proposal would impact on friendship groups	The authority recognises that it might be difficult for some pupils to move schools, particularly if they already attend secondary school. However, we 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 and to ensure that they make new friends.
<b>4</b>	<b>THE PROPOSAL WOULD IMPACT NEGATIVELY ON PUPILS' WELSH LANGUAGE SKILLS</b>	
4.1	Pupils' Welsh language skills will deteriorate	The authority's view is that the current level of Welsh-medium provision in Brecon High School is not sufficient to enable pupils to develop their Welsh language skills throughout their time in secondary

	because the quality of Welsh in Builth Wells High School isn't as good	school. This is particularly true in terms of pupils from homes where no Welsh is spoken. The authority's view is that the increased level of Welsh-medium provision at Builth Wells High School will enable pupils to continue to develop their Welsh language skills throughout their time in secondary school.
4.2	Children will have to transfer to English-medium provision if they want to be educated locally, and will lose their Welsh language skills	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 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.
4.3	Concern that pupils in the Brecon area will miss out on the opportunity to benefit from the many advantages of a bilingual education	Welsh-medium education will continue to be available for pupils in the Brecon area, through primary provision at Ysgol y Bannau and Sennybridge Primary School, and secondary provision at Builth Wells High School or an alternative out-of-county provider.
4.4	Would impact negatively on the Welsh language skills of English-medium pupils at Brecon High School	All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2 <sup>nd</sup> Language to pupils, and would be expected to maintain a Welsh ethos, which would ensure that opportunities would continue to be available for English-medium pupils to develop their Welsh language skills.
<b>5</b>	<b>IMPACT ON PUPILS</b>	
5.1	The proposal will particularly affect pupils attending Ysgol y Bannau who live outside Brecon	The authority acknowledges that there will be a greater impact on pupils living outside Brecon due to the additional travel time. However the authority is committed to providing free transport to the nearest provider of Welsh-medium provision for all pupils.
5.2	The proposal will affect pupils in lower socio-	As the authority provides home to school transport to all qualifying pupils, there is no impact in terms of pupils' ability to access the provision in Builth Wells, however it is recognised that parents without their

	economic groups the most	own transport may experience difficulties in attending parents evenings etc., and that there would be an additional cost implication for parents in terms of attending these events.
5.3	Pupils in the Brecon catchment will miss out on the social advantages of having a Welsh-medium education	Should the proposal be implemented, Welsh-medium education would continue to be available to pupils in the Brecon catchment, through Ysgol y Bannau and Sennybridge Primary School in the primary sector, and the authority would provide free transport to Builth Wells High School or the nearest provider of secondary Welsh-medium education.
5.4	Pupils won't be able to access Welsh-medium secondary provision locally	The authority's intention is to provide equality of provision. Builth Wells High School provides a more equitable distribution of subjects between English-medium and Welsh-medium streams. The authority believes that building the critical mass in one school will develop a vibrant and viable Welsh stream. The improved choice and Welsh-medium experience will enable them to be even more confident Welsh speakers who can still contribute to the development of the Welsh language in Brecon. We believe that learners will be more attracted to Welsh-medium provision in future if there are clear progression routes and continuity of provision throughout their educational life – this is currently not the case in Brecon High School
5.5	The children are being treated disgracefully	The authority recognises that uncertainty is caused by any school reorganisation proposal. However, the affected schools would be expected to support pupils to understand how these proposals will affect them. Pupils have had many opportunities to let the authority know of any concerns they have during the consultation process.
5.6	Concern about the pupils who are about to start year 10 in Brecon High School – what will happen to them?	As stated in the consultation document, Welsh-medium provision will continue at Brecon High School for pupils due to enter year 11 in September 2016 to enable them to complete their GCSEs at the school.
5.7	Current Year 7 children at Brecon High School are facing turmoil and uncertainty throughout 2015 and 2016, but they will also have turmoil	The authority recognises that uncertainty is caused by any school reorganisation proposal. However, we would expect the affected schools to support pupils to understand how these proposals will affect them. Pupils have had many opportunities to let the authority know of any concerns they have during the consultation process.

	going into 2017 due to the problems of integrating the two streams together	
5.8	Current arrangement offers choice for pupils – can go to Brecon High School or Ysgol Gyfun Ystalyfera	The authority acknowledges that the current arrangement offers choice for pupils and their families. However, the authority’s view is that the provision in Brecon High School does not provide equality of opportunity for Welsh-medium pupils. Should the proposal be implemented, parents would still be able to choose between accessing Welsh-medium provision at Ysgol Gyfun Ystalyfera or Builth Wells High School, or accessing English-medium provision at Brecon High School.
5.9	Pupils like having their lessons in small classes	The authority acknowledges that pupils might prefer to have their lessons in small classes, however the provision of lessons in small classes is unviable. The authority also believes that there are positive benefits to pupils from being part of a larger cohort of pupils.
5.10	Impact on pupils’ health and well-being	The authority acknowledges that should the proposal be implemented, there would be additional travel for pupils from the Brecon area. However, the nearest provision for the vast majority of pupils would be within the 45 minutes maximum journey time stated in the authority’s Home to School Transport Policy, therefore the authority’s view is that the proposal would not have a significant impact on pupils’ health and well-being. Builth Wells High School already serves a wide catchment area and is well equipped and experienced in meeting the need of pupils who travel to school.
<b>6</b>	<b>IMPACT ON PARENTS / FAMILIES</b>	
6.1	It would be more difficult for parents / grandparents to support school activities	The authority acknowledges that it would be more difficult for parents / grandparents to support school activities, and would encourage the school to work with parents to find a solution to this issue.
6.2	It would be more difficult for parents to attend parents meetings	The authority acknowledges that it would be more difficult for parents to attend parents meetings, and would encourage the school to work with parents to find a solution to this issue.
6.3	Parents would have difficulty getting to Builth	The provision in Builth Wells already serves both the Builth Wells and Llandrindod Wells catchment areas and the distance from the north of the Llandrindod catchment area to Builth Wells is similar to the



	Wells during the week if there were any problems e.g. illness	distances learners would have to travel under this proposal. 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.
6.4	Parents could have children in up to 3 different schools – Ysgol y Bannau, Brecon High School and Builth Wells High School	The authority acknowledges that in the short term, due to parental choice, some parents could have children in up to 3 different schools.
6.5	Parents are considering moving house to live closer to Welsh-medium secondary provision	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.
6.6	The proposal would cause difficulties with the relationship between families and the school	The authority acknowledges that it could be more difficult for families to form a relationship with the school due to the additional distance. However, Builth Wells High School already serves both the Builth Wells and Llandrindod Wells catchment areas, and is well equipped to meet the needs of learners that live outside the Builth Wells area and their families. The authority would encourage the school to work with parents to find a solution to this issue.
6.7	Parents should not have to choose between a local school or Welsh-medium education	The authority recognises that in an ideal world there would be equality of provision in every dual stream school. However, we need to ensure that 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.
6.8	Concern about the impact on parents of having to purchase a new school uniform, and possibly having to purchase a new uniform	It is accepted that parents of pupils transferring from Brecon to Builth Wells High School will have to purchase new school uniforms. The authority will consider what, if any, financial assistance can be provided towards these costs, in particular for pupils in receipt of free school meals. Currently the authority has no proposals to close Builth Wells High School, however if this was to happen in the future, further consideration would be given to this point.

	again if Builth Wells High School closes	
6.9	Many professional Welsh speaking families have specifically chosen Brecon as their base because there is a Welsh medium primary school and they could then feed into the Welsh stream in the local High School	The authority notes this point.
6.10	Will have a greater impact on parents of children with ALN or specific medical conditions as they need to know that they can reach their child quickly	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.
6.11	The proposal could cause arguments between children and their parents	The authority notes this point, and accepts that should the proposal be implemented, pupils and their families would need to make difficult decisions with regard to pupils' future education.
<b>7</b>	<b>IMPACT ON STAFF</b>	
7.1	Concern about the impact on the jobs of Welsh-medium staff at Brecon High School	As part of the transformation process the authority would support the school through the management of change procedures. The loss of the Welsh-medium stream at Brecon High School would have an impact on the number of staff required to be employed at the school.
7.2	Will new jobs at Builth Wells High School be	The authority will work closely with the headteacher and governing body of Builth Wells High School around the transitional processes, and under the management of change procedures, will request that

	offered to staff from Brecon High School	any staff at Brecon who apply for a post at Builth Wells High School would be offered an interview as a minimum.
7.3	Concern about the possible impact on Ysgol y Bannau staff in the future	The authority is fully aware of the potential impact of the proposal on Ysgol y Bannau. Should the proposal be implemented, the authority will support the school, in collaboration with organisations such as TWF and Menter Brycheiniog, in order to promote the benefits of bilingualism and Welsh-medium education.
7.4	Loss of employment for staff at Cylch Meithrin Aberhonddu	The authority is fully aware of the potential impact of the proposal on Cylch Meithrin Aberhonddu and should the proposal be implemented, the authority will support both the Cylch and Ysgol y Bannau, in collaboration with organisations such as TWF and Menter Brycheiniog, in order to promote the benefits of bilingualism and Welsh-medium education.
7.5	Unfair that Brecon Welsh language teachers are facing possible redundancy due to the removal of a high percentage of their teaching timetable, however the Council is prepared to support Builth Wells High School in appointing more staff	Builth Wells High School will receive funding for the pupils that transfer from Brecon to Builth in accordance with the authority's Fair Funding Formula.
<b>8</b>	<b>IMPACT ON BRECON HIGH SCHOOL</b>	
8.1	The school will lose £200,000 if the Welsh stream closes	It is true that there would be a reduction in Brecon High School's budget allocation should the proposal be implemented. However, this funding is allocated to the school to provide subjects through the medium of Welsh, and the school should be using it for this purpose. Should the proposal be implemented, the school would no longer be providing subjects through the medium of Welsh, therefore would have no need for this additional funding.
8.2	Impact on the school's Welsh language ethos	All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School,

		the school would continue to teach Welsh 2 <sup>nd</sup> Language to pupils, and would be expected to maintain a Welsh ethos.
8.3	Impact on the school's links with the community	Should the proposal be implemented, the school would still be required to deliver the National Curriculum, which includes Welsh 2 <sup>nd</sup> Language, and the school would be encouraged to maintain a Welsh ethos and to maintain links with the Welsh community within Brecon.
8.4	Impact on cultural activities at the school as pupils from the Welsh stream are very actively involved in activities such as music and drama	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. A wide variety of extra-curricular activities are provided by Builth Wells High School, therefore Welsh-medium pupils would still be able to take part in these activities.
8.5	Pupils in the English stream will miss out on opportunities to learn incidental Welsh	All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2 <sup>nd</sup> Language to pupils, and would be expected to maintain a Welsh ethos and provide opportunities for pupils to use incidental Welsh.
8.6	Negative impact on standards at Brecon High School as many of the school's high achieving pupils are in the Welsh stream	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 authority's view is that the removal of the Welsh-medium stream from Brecon High School would enable the school to focus on its English-medium provision, which could lead to an improvement in standards for English-medium pupils.
8.7	No Welsh would be spoken in assemblies / celebrations	All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2 <sup>nd</sup> Language to pupils, and would be expected to maintain a Welsh ethos.
8.8	Welsh is one of the selling points of Brecon High School	All secondary schools in Wales are encouraged to develop a Welsh-language ethos, whether or not they provide Welsh-medium education. If there were no Welsh-medium stream at Brecon High School, the school would continue to teach Welsh 2 <sup>nd</sup> Language to pupils, and would be expected to maintain a

<p>Welsh ethos. The authority's priority is to ensure equality of access for Welsh-medium pupils, and believes that this can only be achieved by centralising provision in one location.</p>		
<p><b>9 IMPACT ON YSGOL Y BANNAU</b></p>		
9.1	<p>Concern about the impact on Ysgol y Bannau in the future</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. The authority believes that the uncertainty in relation to secondary progression has contributed to this. Whilst there may be some impact on pupil numbers at Ysgol y Bannau in the short term, the authority would work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education, and believes that in the longer term, any reduction in pupil numbers would be reversed, with the potential that they could increase.</p>
9.2	<p>Concern that the Council is planning on closing Ysgol y Bannau</p>	<p>The authority is not planning to close Ysgol y Bannau. Whilst Welsh-medium pupil numbers in other parts of Powys have grown over recent years, this hasn't been the case at Ysgol y Bannau. The authority believes that the uncertainty in relation to secondary progression has contributed to this. Whilst there may be some impact on pupil numbers at Ysgol y Bannau in the short term, the authority would work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education, and believes that in the longer term, any reduction in pupil numbers would be reversed, with the potential that they could increase.</p>
9.3	<p>Concern that numbers on roll will drop dramatically, making the school as a whole unsustainable</p>	<p>Welsh-medium pupil numbers in other parts of Powys have grown over recent years, however this hasn't been the case at Ysgol y Bannau. The authority believes that the uncertainty in relation to secondary progression has contributed to this. Whilst there may be some impact on pupil numbers at Ysgol y Bannau in the short term, the authority will work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education, and believes that in the longer term, any reduction in pupil numbers will be reversed, with the potential that they could increase.</p>
9.4	<p>Concern about the impact on staff at Ysgol y Bannau in the future</p>	<p>The authority acknowledges that any school organisation proposal will lead to a period of uncertainty for staff, and that staff at Ysgol y Bannau may be concerned about the school's future. However the authority is committed to Ysgol y Bannau as a provider of Welsh-medium education in Brecon, and would hope that the improved clarity with regard to secondary progression would lead to an increase in pupil numbers at the school in the long term.</p>

<b>10</b>	<b>IMPACT ON THE WELSH LANGUAGE</b>	
10.1	There will be a negative impact on the Welsh language in Brecon	Pupils would still live in the Brecon area even if they were receiving their education elsewhere. The improved choice and linguistic experience for pupils at Builth Wells High School would enable them to be even more confident Welsh speakers who could still contribute to the development of the Welsh language in Brecon.
10.2	Vacuum of Welshness would be created between Builth Wells and Ystradgynlais	The authority does not accept this statement. Children from all areas of south Powys would have access to Welsh-medium education for their primary and secondary education, with the secondary provision being at an increased level than that currently provided in Brecon.
10.3	There will be a reduction in the number of people attending Welsh for Adults classes in Brecon	The authority's priority is to provide equality of provision for Welsh-medium pupils, and the authority believes that this can only be achieved by centralising provision in one location.
10.4	It will lead to a reduction in the Welsh speaking population of Powys	Whilst there may be some impact on Welsh-medium pupil numbers in the short term, the authority's view is that in the longer term, the improved clarity with regard to secondary progression would lead to an increase in Welsh-medium pupils in the area.
10.5	The Council is making it increasingly difficult for pupils to become fluent Welsh speakers	The authority's view is that the current level of Welsh-medium provision available at Brecon High School is not sufficient to enable pupils to continue to develop their Welsh language skills throughout their time in secondary school. The proposal would lead to a greater level of Welsh-medium provision being available for pupils, which means that it would be more likely that they would be able to retain and improve their fluency in Welsh during their time in secondary school.
10.6	The proposal would take the Welsh language out of the community	With the enhanced level of continuing Welsh language provision available for pupils from the Brecon catchment in Builth Wells, and correct support networks, the authority does not agree that the proposal would take the Welsh language out of the community.
10.7	The Brecon area is the heartland of the Welsh language in south Powys	The current level of provision in Brecon High School, and Welsh-medium primary pupil numbers in the Brecon catchment do not support this statement.

10.8	There are more Welsh language organisations in the community in Brecon than there are in Builth Wells	The authority notes this statement.
10.9	Impact on the Welsh language in the Sennybridge area	The proposal to consider the inclusion of Sennybridge Primary School in the catchment area of Ysgol Gyfun Ystalyfera would enhance the educational opportunities offered to those parents wishing Welsh-medium education. The authority has received very positive feedback from many parents from the Sennybridge area whose children have received their secondary education in Ystalyfera.
10.10	The school reflects the bilingual nature of the community	Whilst the current arrangement allows Welsh-medium and English-medium pupils to be educated in one school, it does not provide equality of opportunity for Welsh-medium pupils. The authority believes that the only way to improve the provision available to Welsh-medium pupils is to centralise provision in south Powys.
<b>11</b>	<b>DISCRIMINATION</b>	
11.1	Pupils' right to have Welsh-medium education would be taken away	The Council is obliged to provide Welsh-medium education to all pupils who request it. All pupils would continue to be able to access Welsh-medium education, and free transport would be provided to enable them to access this provision.
11.2	The proposal would exacerbate the divide between English speakers and Welsh speakers	The authority does not accept this statement.
11.3	The fact that Brecon High School is in Special Measures shouldn't be a reason to close one part of the school to allegedly	In accordance with the Welsh Government's School Organisation Code, the authority is required to include information on standards in affected schools in consultation documents. This includes information about the results of recent Estyn inspections. However, the fact that Brecon High School is currently in Special Measures is not the reason for this proposal.

	benefit the other – this is discriminatory	
11.4	The Council is not treating pupils wishing to learn in Welsh fairly – they are being discriminated against	The authority believes that Welsh-medium pupils are being discriminated against under the current arrangement due to the limited curriculum Welsh-medium curriculum available to them.
11.5	The proposal is possibly racist	The authority strongly objects to this statement. The proposal is made to increase the educational opportunities for Welsh-medium learners, to ensure equal opportunity compared with those learners educated through the medium of English.
11.6	Welsh-medium pupils are being treated as second class citizens as they won't be able to access the new school building	Although the buildings at Builth Wells High School are not new, they were assessed as condition B, and provide very suitable accommodation to educate pupils in the 21 <sup>st</sup> Century.
11.7	There would be outcry if you opened a Welsh-medium school in Brecon and sent all English-medium pupils to another town	If the authority felt that the delivery of education provision would be best served by closing the English-medium stream of a dual stream school, then that is the action that the authority would take. The authority is currently undertaking a review of secondary provision in the north of the county, with a specific reference to the potential establishment of a category 2A school, which if implemented, could result in the closure of the English stream in some areas.
11.8	Lack of equal opportunity	The authority believes that the current situation demonstrates a lack of equal opportunity as the Welsh-medium curriculum available to pupils is significantly less than what is available for English-medium pupils, and believes that centralising Welsh-medium provision in one location would provide a greater level of equal opportunity for Welsh-medium pupils.
11.9	The Council is punishing the Welsh community in Brecon	The authority believes that the Welsh community in Brecon have been disadvantaged for many years by the decreasing level of Welsh-medium provision that has been available at Brecon High School. The authority's view is that implementation of this proposal would begin to address this, by providing equal opportunity to Welsh-medium pupils.



11.10	The proposal is equivalent to apartheid	The authority strongly objects to this statement. The proposal is made to improve the educational opportunities for Welsh-medium learners, to ensure equal opportunity compared with those learners educated through the medium of English.
11.11	The current system promotes cultural diversity	The authority's view is that the current system does not provide equal opportunity for Welsh-medium pupils compared with those educated through the medium of English.
11.12	It feels like the Welsh-medium pupils are being punished – there will be a new building in Brecon but they won't be able to access it	The authority's priority is to ensure that improved linguistic progression routes and equality of provision are available for Welsh-medium pupils as soon as possible. The new building in Brecon isn't planned to open until September 2018, and even if the new campus did include Welsh-medium provision, there would be no significant increase in Welsh-medium pupil numbers, therefore it would be very difficult for the new campus to provide a greater level of provision than what is currently provided by Brecon High School.
11.13	The Council acknowledges that it will be 'more difficult' for Brecon pupils to access extra-curricular activities, which contravenes schedule 85(2) of the Equality Act 2010 '...must not discriminate against a pupil'.	Whilst the authority acknowledges that should the proposal be implemented, it may be more difficult for Brecon pupils to access extra-curricular activities after school, it must be noted that Builth Wells High School, like most secondary schools in Powys, serves a large, fairly rural catchment area. In order to provide all pupils with extra-curricular activities the school ensures that there are extra-curricular activities available during the school day, in addition to after-school, so that every pupil has the chance to participate and that no pupils are discriminated against.
<b>12</b>	<b>NEGATIVES ABOUT BUILTH WELLS HIGH SCHOOL</b>	
12.1	The Welsh of pupils in the Welsh-medium stream at Builth Wells High School isn't to the same standard as that of those in Brecon High	The authority accepts that the pupils that currently feed the Welsh-medium stream at Builth Wells High School come from a different type of school to Ysgol y Bannau, and that they may be less comfortable speaking Welsh when they enter the school at year 7. The inclusion of pupils from Ysgol y Bannau will allow the school to strengthen the linguistic ability of all Welsh-medium pupils.

	School as the pupils come from Welsh streams and not a Welsh-medium school	
12.2	Duke of Edinburgh isn't offered at Builth Wells High School	The Duke of Edinburgh scheme was reintroduced at Builth Wells High School last year, therefore this statement is untrue. Further to this, the Duke of Edinburgh Co-ordinator at Builth Wells High School is a Welsh speaker, therefore pupils would be able to take part in the scheme through the medium of Welsh.
12.3	There is less Welsh spoken in the classroom at Builth Wells High School	The authority will work with Builth Wells High School to identify ways to increase the amount of Welsh spoken by pupils in the classroom.
12.4	Standards at Builth Wells High School are not significantly better than Brecon High School	The main aim of this proposal is to provide equality of provision for Welsh-medium pupils. Brecon High School is currently in Special Measures, however the authority accepts that there are several years since Builth Wells High School was last inspected. The authority is satisfied that there would be no negative impact on standards for Welsh-medium pupils if the proposal was implemented.
12.5	There is uncertainty around the future of Builth Wells High School	It is true that the Authority is currently carrying out a review of secondary provision in mid Powys. A report on the outcome of this work will be presented to Cabinet in the autumn term. The impact on Welsh-medium provision and Welsh-medium learners will be an important consideration in this work.
12.6	Builth Wells is a town that Brecon pupils have no links to and know very little about	The authority notes this point. Should the proposal go forward, transition arrangements between the feeder primary schools and Builth Wells High School would be established.
12.7	It's unreasonable to move the Welsh-medium stream to a small town that doesn't have a Welsh-medium primary school	Whilst there are no designated Welsh-medium primary schools in the Builth Wells High School catchment, there are a greater number of primary Welsh-medium streams and a greater number of Welsh-medium pupils compared with the Brecon High School catchment.

12.8	Concern about Builth Wells High School's capacity to accommodate additional pupils	As stated in the consultation document, there is sufficient capacity at Builth Wells High School to accommodate all pupils currently receiving Welsh-medium primary provision in Brecon.
12.9	Builth Wells is too far to travel	From the initial calculations made, travel time to Builth Wells for the vast majority of learners would be within the 45 minutes stated in the authority's Home to School Transport Policy. In the consultation document, the authority acknowledges that some pupils will live closer to alternative provision outside Powys.
12.10	Builth Wells isn't a feasible option for many pupils	From the initial calculations made, travel time to Builth Wells High School for the vast majority of learners would be within the 45 minutes stated in the authority's Home to School Transport Policy. In the consultation document, the authority acknowledges that some pupils will live closer to alternative provision outside Powys.
12.11	GCSE results at Brecon High School are better than Builth Wells High School	A number of indicators are used to judge GCSE performance in high schools. Over the last 3 years, the achievement of both schools in respect of these indicators has varied, with Brecon High School performing better for some indicators and Builth Wells for others. In 2014, the level 2 plus indicator, which is the main indicator used to judge performance at GCSE level, was slightly higher at Builth Wells High School.
12.12	Builth Wells High School doesn't have a permanent headteacher	The authority acknowledges that at the current time Builth Wells High School doesn't have a permanent headteacher. The governing body is actively seeking to recruit a headteacher in the near future.
12.13	Triple Science is not available in Builth Wells High School	It is true that triple science is not currently available through the medium of Welsh at Builth Wells High School, however it is available in English. The school is keen to introduce triple science through the medium of Welsh in the near future, and is hoping to do so from September 2016.
12.14	Classroom control is poorer in Builth Wells High School than Brecon High School	The authority has no evidence that this is the case.

12.15	English explanations are provided in Welsh-medium classes in Builth Wells High School	The authority has no evidence that this is the case, however should the proposal be implemented, the authority will discuss this issue with Builth Wells High School.
12.16	The provision in Builth Wells will be as precarious as the provision in Brecon has been	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 at Builth Wells High School.
12.17	Not many extra-curricular activities are available in Welsh	Whilst the majority of extra-curricular activities at Builth Wells High School are English-medium, some activities take place bilingually or in Welsh. Should the proposal be implemented, there would be more Welsh-medium pupils at the school, which would enable the development of additional Welsh-medium activities.
12.18	Pupils don't use Welsh outside the classroom	The authority accepts that the pupils that currently feed the Welsh stream at Builth Wells High School come from a different type of school to Ysgol y Bannau, and that they may be less comfortable speaking Welsh when they enter the school at year 7. The addition of pupils from Ysgol y Bannau would allow the school to strengthen the linguistic ability of all Welsh-medium pupils.
12.19	There aren't enough Welsh-medium A level subjects available	Whilst the number of Welsh-medium A level subjects available is limited compared with the English-medium subjects available, there are no Welsh-medium A level subjects offered at Brecon High School. The authority's intention is that should the proposal be implemented, the larger Welsh-medium cohort groups would enable the school to offer additional Welsh-medium A level subjects in the future.
12.20	Builth Wells is a less Welsh area	Currently there is a greater number of Welsh-medium pupils in the Builth Wells catchment area compared with the Brecon catchment area. This is the reason for locating the Welsh-medium secondary provision in Builth Wells.
12.21	Current pupils in Builth Wells High School will have less opportunity to be part of sports teams	The authority acknowledges this concern raised by current pupils at Builth Wells High School. The authority will work with the school to ensure that opportunities continue to be available for pupils to take part in sports activities.

12.22	New pupils joining Builth Wells High School could cause bullying and negative attitudes within the school	The authority acknowledges this concern raised by current pupils at Builth Wells High School. The important issue is how the school responds to bullying when it occurs, addressing the needs of both the young person who has experienced the bullying and the young person who has carried out the bullying. Builth Wells High School has an anti-bullying policy, which is regularly reviewed, and the authority is confident that any incidents of bullying would be addressed effectively by the school.
12.23	Welsh-medium classes in Builth Wells High School would be bigger and more noisy	The authority acknowledges this concern raised by current pupils at Builth Wells High School. However, the current small Welsh-medium classes are unsustainable.
12.24	Teachers at Builth Wells High School would concentrate on the new pupils instead of the current pupils	The authority acknowledges this concern raised by current pupils at Builth Wells High School. Whilst any new pupils transferring to Builth Wells High School may need some additional support in the short term to help them settle into the school, the authority does not believe that this would be detrimental to the school's ability to support current pupils.
12.25	The Bwyty at Builth Wells High School is already crowded and the queues would be worse	The authority acknowledges this concern raised by current pupils at Builth Wells High School. The authority is confident that Builth Wells High School would be able to accommodate any additional pupils from the Brecon catchment area.
12.26	The work in Builth Wells High School isn't as challenging as it is in Brecon High School	The authority has no evidence to corroborate this statement and does not believe that this is the case.
12.27	More Welsh-medium subjects are provided in Builth Wells High School but the standard isn't as good as it is in Brecon High School	The authority notes this point, however the authority does not believe that this is the case.
<b>13</b>	<b>NEGATIVES ABOUT YSGOL GYFUN YSTALYFERA</b>	

13.1	The catchment area of Ysgol Gyfun Ystalyfera is huge	The current catchment area of Ysgol Gyfun Ystalyfera is large, however the authority is aware that Neath Port Talbot County Borough Council has proposals to establish a second Welsh-medium secondary site in the south of the county, which will result in the catchment area for the Ystalyfera site being reduced.
13.2	Ysgol Gyfun Ystalyfera is very daunting for pupils from a small village school	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. One of the options being considered for the Beacons Learning Campus is the inclusion of learners from Gwernyfed, and that would result in a school that is larger than Ysgol Gyfun Ystalyfera. In addition, Neath Port Talbot County Borough Council has proposals to establish a second Welsh-medium secondary site in the south of the county, which will result in a reduction in secondary pupil numbers on the Ystalyfera site.
13.3	Ystalyfera is a large, urban school which is very different in nature to Powys schools	The village of Ystalyfera is smaller than Brecon and as the catchment area covers the whole of Neth Port Talbot together with the Upper Swansea Valley, the differential in nature is not as strong as indicated within the statement.
13.4	Pupils from Sennybridge CP School who are part of a small cohort of 1 or 2 Welsh-medium pupils in the year group would have to transfer to Ystalyfera without any peer support	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 those at the English stream at the school, however this is already happening due to parental choice.
13.5	The projections for Ystalyfera show that they are expected to exceed their capacity by January 2019 – what will happen if Neath Port Talbot is no longer willing to accept	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 Sennybridge pupils, have been taken into account in planning this work. The authority is currently in discussion with Neath Port Talbot County Borough Council to extend the official catchment area of Ysgol Gyfun Ystalyfera to include the Ystradgynlais area. If the proposal is implemented, this would be extended to include the Sennybridge area.

	children from out of county?	
13.6	Concern that the Council is paying for pupils to travel to Ysgol Gyfun Ystalyfera, however they can study some subjects in English there	Ysgol Gyfun Ystalyfera is a category 2A school, and therefore there is a requirement that a minimum of 80% of subjects are taught through the medium of Welsh. It is recognised that some subjects can be taught through the medium of English.
13.7	Ysgol Gyfun Ystalyfera has never been a better performing school than Brecon High School	As stated in the consultation document, Ysgol Gyfun Ystalyfera is currently a better performing school than Brecon High School in terms of the outcomes of the most recent Estyn inspections at the two schools and also based on the schools' categorisations as part of the National School Categorisation System.
13.8	Concern about bullying in Ysgol Gyfun Ystalyfera	<p>Ysgol Gyfun Ystalyfera is a larger school than Brecon High School and Builth Wells High school, therefore it is possible, on the basis of numbers of pupils that there are more incidents of bullying at Ysgol Gyfun Ystalyfera. The important issue is how the school responds to bullying when it occurs, addressing the needs of both the young person who has experienced the bullying and the young person who has carried out the bullying.</p> <p>Ysgol Gyfun Ystalyfera has an anti-bullying policy, which is regularly reviewed, and the authority is confident that any incidents of bullying would be addressed effectively by the school.</p>
13.9	There is a rough element within Ysgol Gyfun Ystalyfera	The authority cannot comment on this statement.
<b>14</b>	<b>IMPACT ON WELSH-MEDIUM PUPIL NUMBERS</b>	
14.1	Children would no longer learn through the medium of Welsh in the secondary sector	Whilst it is accepted that there may be a reduction in the number of pupils transferring to Welsh-medium secondary provision in the short term, the authority's expectation is that this would be reversed in the longer term, through the development of close links between Ysgol y Bannau and Builth Wells High School

14.2	There will be an increase in the number of parents choosing for their children to transfer to private schools	Whilst it is accepted that there may be a reduction in the number of pupils transferring to Welsh-medium secondary provision in the short term, the authority's expectation is that this would be reversed in the longer term, through the development of close links between Ysgol y Bannau and Builth Wells High School. However, parents are entitled to choose for their children to transfer to private schools if that is their preference.
14.3	Parents in the Brecon catchment will not send their pupils to Welsh-medium primary provision if there isn't secondary provision in the town	<p>Welsh-medium pupil numbers in other parts of Powys have grown over recent years, however this hasn't been the case at Ysgol y Bannau. The authority believes that the uncertainty in relation to secondary progression has contributed to this. Whilst there may be some impact on pupil numbers at Ysgol y Bannau in the short term, the authority would work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education, and believes that in the longer term, any reduction in pupil numbers would be reversed, with the potential that they could increase.</p> <p>The authority has a similar arrangement in north Powys, where pupils from Ysgol Dafydd Llwyd, a Welsh-medium primary school in Newtown, transfer to Ysgol Uwchradd Caereinion in Llanfair Caereinion. Pupil numbers at Ysgol Dafydd Llwyd have grown significantly over recent years, therefore there is no evidence that the lack of Welsh-medium secondary provision in a town has a long term impact on primary pupil numbers.</p>
14.4	Will have a negative impact on pupil numbers at Ysgol y Bannau and the Welsh-medium stream at Sennybridge CP School	Whilst it is possible that there would be an impact on Welsh-medium pupil numbers at these two schools in the short term, the authority would work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education, and believes that in the longer term, any reduction in pupil numbers would be reversed, with the potential that they could increase. The authority also believes that the improved certainty in relation to secondary progression from these two schools would lead to an increase in pupil numbers in the longer term.
14.5	Cylch Meithrin Aberhonddu should be applauded for the way they introduce the Welsh language. This proposal will have a negative impact on them.	The authority acknowledges the important contribution made by Cylch Meithrin Aberhonddu and other providers of Welsh-medium early years education, and would work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education in order to limit the proposal's impact on Cylch Meithrin Aberhonddu.



14.6	Need to ensure the future of Welsh-medium secondary education locally	The authority's view is that given the current number of pupils, the only way to improve the provision available to Welsh-medium pupils is to centralise in one location.
14.7	Assumption that pupils will simply transfer to Builth Wells High School is not correct – a significant number have decided to go to Welsh-medium provision elsewhere or to leave Welsh-medium education completely	The authority accepts that there may be a reduction in the number of pupils transferring to Welsh-medium secondary provision in the short term, however the authority's expectation is that this would be reversed in the longer term, through the development of close links between Ysgol y Bannau and Builth Wells High School. Parents are entitled to choose for their children to transfer to alternative schools if that is their preference, however free home to school transport would only be provided to the nearest school offering education in the language of choice.
14.8	At a time when Welsh-medium education and provision is growing elsewhere in Wales, Powys County Council is curtailing choice and removing Welsh-medium education from its main hub in Brecon. It is appalling that Powys County Council cannot even support its existing Welsh-medium streams nor has any vision in promoting a fully Welsh-medium stream or school in South Powys	Welsh-medium pupil numbers in other parts of Powys have grown over recent years, however this hasn't been the case at Ysgol y Bannau. The authority believes that the uncertainty in relation to secondary progression has contributed to this. Given the current number of Welsh-medium pupils in the area, the authority's view is that the only way to improve the Welsh-medium provision available to pupils is to centralise in one location. Whilst the authority is not proposing the establishment of a Welsh-medium school at the current time, this centralising is a first step towards creating a critical mass of Welsh-medium learners in south Powys, which could lead to the establishment of a Welsh-medium school in the future.

14.9	When Cylch Meithrin Aberhonddu had to relocate briefly to an out of town location 2 miles away in Llanddew its numbers fell from over 20 to 3.	As the authority will be providing free home to school transport, it is the authority's view that while there may be some parents who choose to opt for the English stream at Brecon High School, the majority of Ysgol y Bannau pupils will continue to transfer to Welsh-medium secondary provision in the long term.
14.10	Concern that Welsh-medium education will become the province of those who already have Welsh, and the proposal will close the door on those who are not Welsh speakers who might consider accessing Welsh-medium education.	Whilst it is possible that there would be an impact on Welsh-medium pupil numbers in the short term, the authority will work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education to those who aren't Welsh speakers, and believes that in the longer term, any reduction in pupil numbers would be reversed, with the potential that they could increase. The authority also believes that the improved certainty in relation to secondary progression would lead to an increase in pupil numbers in the longer term.
14.11	Numbers at Cylch Meithrin Aberhonddu are already down on previous years as parents have already received the message that there is no future for Welsh medium education in the Brecon area	The authority acknowledges that any proposal to change school provision leads to a period of uncertainty for parents and communities. However, the authority has not stated that there is no future for Welsh-medium education in the Brecon area. The authority is committed to continuing to provide Welsh-medium primary education in the Brecon area at Ysgol y Bannau, and to facilitate access to a more comprehensive level of Welsh language secondary provision at Builth Wells High School. If the proposal is implemented, the authority will work with organisations such as TWF and Menter Brycheiniog to promote Welsh-medium education in the Brecon area.
14.12	Aim to improve continuity of Welsh medium education is flawed as parents in the Brecon area will not even	Whilst it is possible that there would be an impact on Welsh-medium pupil numbers and transfer rates into secondary provision in the short term, the authority would work with organisations such as TWF and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education, and believes that in the longer term, any reduction in pupil numbers would be reversed, with the potential that they

	embark on the first crucial early years step of the journey	could increase. The authority also believes that the improved certainty in relation to secondary progression could lead to an increase in pupil numbers in the longer term.
<b>15</b>	<b>IMPACT ON THE BRECON COMMUNITY</b>	
15.1	Local activities such as YFC will suffer as pupils won't be able to attend at 7.00 if they have had an extended journey home from school	The school day at Builth Wells High School ends at 3.15 pm, therefore it would be expected that pupils attending Builth Wells High School would be in Brecon at or near to 4pm, therefore the authority does not accept that this would mean that pupils would be unable to attend activities within the local community.
15.2	The proposal will force Welsh speaking families out of the area	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 so that they live closer to Welsh-medium secondary provision if they desire.
15.3	There will be less opportunities for adult learners at the Brecon campus	The proposed development of the Beacons campus will lead to increased opportunities for adult learners and not less as suggested in the comment.
15.4	The community would lose the presence of Welsh-medium students in community concerts, eisteddfodau	Whilst it is accepted there will be less Welsh-medium involvement in school based concerts etc, however it is expected that Builth Wells High School will encourage learners from the Brecon area to continue their involvement with eisteddfodau and other community activities.
15.5	The proposal may have a negative impact on the Welsh youth club at Cradoc Road	The Welsh-medium youth club is independent from Brecon High School. As the youth club takes place in the evening, after school, it is not anticipated that implementation of the proposal would impact on the youth club.

15.6	The proposal would be devastating to the community	As stated in the Community Impact Assessment, it is the authority's view that the proposal would not be devastating to the community.
15.7	Cultural activities in the community would suffer e.g. the Cathedral Choir – pupils would be unable to take part as they wouldn't be home from Builth Wells in time	The school day at Builth Wells High School ends at 3.15 pm, therefore it would be expected that pupils attending Builth Wells High School would be in Brecon at or near to 4pm, therefore the authority does not accept that this would mean that pupils would be unable to attend activities within the local community.
15.8	Given the emphasis on PSE and citizenship, parents want their children to be involved with local charities and raising the profile of Welsh in their own community – this wouldn't be the case if they attended a school in a different town	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, the school would endeavour to establish links within the Brecon community, initially by strengthening links with Ysgol y Bannau.
<b>16</b>	<b>OTHER</b>	
16.1	The case for a new school building in Brecon was always pitched as a bilingual school	Whilst the new building would be a fresh start, there would be no significant increase in Welsh-medium pupil numbers, therefore it would be difficult for the new school to offer any more Welsh-medium subjects than are currently offered in Brecon High School.
16.2	Powys states that the journey time to school should be 20 – 30 minutes – the proposal	The authority's Home to School Transport Policy states that the journey time to school for secondary aged pupils should not exceed 45 minutes. From the initial calculations made, travel time for the vast majority of learners would be within this.

	would mean that pupil journey times far exceed this	
16.3	The proposal will impact on employers in Powys as they will be unable to recruit local Welsh speaking talent	The objective of the proposal is to ensure continuity of Welsh-medium provision to the end of KS4 and into KS5, which would enable pupils to retain and improve their fluency and confidence in using Welsh as they move through school. This would improve the Welsh language skills of local people, which would improve employers' ability to recruit fluent Welsh speakers with the confidence to use their Welsh language skills in the workplace.
16.4	Parents won't be prepared for their children to travel so far for anything less than a Welsh-medium secondary school	Current Welsh-medium pupil numbers at Brecon High School and Builth Wells High School aren't enough to justify a Welsh-medium secondary school, however this initial centralising of provision is a first step towards the possibility of establishing a Welsh-medium secondary school in the future.
16.5	Concern about the impact on pupils with ALN / dyslexia who get very upset when things change	Each child is individual, and may experience difficulties dealing with change whether they have ALN or not. Certain children with Autistic Spectrum conditions may find change especially challenging, but as change is part of life, the authority's view is that it is better to prepare people for changes that do occur in the supportive environment of a school when they are young rather than avoid all change at all costs.
16.6	The Welsh-medium provision at Brecon High School doesn't need strengthening	The authority's view is that the current provision at Brecon High School does not provide equality of opportunity for Welsh-medium pupils.
16.7	This is a money saving exercise without a sound educational basis	As explained in the consultation document, this is not a money saving exercise, and it is not expected that the exercise will save any significant amount of money. The focus of this proposal is to provide equality of opportunity for Welsh-medium pupils in south Powys.
16.8	Parents of past pupils of Ysgol y Bannau have been happy with the	The authority's view is that the current provision at Brecon High School does not provide equality of opportunity for Welsh-medium pupils.

	provision at Brecon High School, and believe that the provision within the subjects offered has been strong	
16.9	Welsh-medium secondary schools in other authorities are not a suitable option as they are in totally different communities	The authority does not accept this statement. Many pupils from many parts of south Powys, including the Ystradgynlais area, the Sennybridge area and the Brecon area, have transferred to Ysgol Gyfun Ystalyfera for their secondary education over a number of years, and the authority has received very positive feedback from the parents of many of these pupils.
16.10	Closing the Welsh-medium stream in Brecon would go against the strategic aim in the authority's WESP	Strategic Aim 2 in the authority's WESP is 'to provide robust linguistic continuity of Welsh-medium provision across all key phases of education'. The current provision at Brecon High School does not provide robust linguistic continuity, and it doesn't offer any provision at all in KS5. The proposal is seeking to address this, to ensure that robust linguistic continuity of Welsh-medium provision is available to pupils from the Brecon catchment.
16.11	Brecon has a Welsh-medium primary school next door to the high school, so it doesn't make sense for the provision to be in Builth Wells	The authority notes this point, however the largest number of primary pupils currently accessing Welsh-medium provision live closer to Builth Wells High School.
16.12	Parents have been pushed to Builth Wells High School because of the watered down provision available in Brecon High School, which is weakening the numbers in the Welsh	The same level of support has been provided to support dual stream provision at both Brecon High School and Builth Wells High School over recent years. Builth Wells High School have succeeded in strengthening and increasing the Welsh-medium provision available, this has not been the case at Brecon High School.

	stream at Brecon High School	
16.13	If Powys is serious about developing the Welsh language in south Powys, this has to happen in large centres of population	Although Brecon is a larger community, the provision in Builth Wells currently serves the towns of Llandrindod Wells and Rhayader as well as Builth Wells
16.14	There should be Welsh-medium secondary provision in every town / city	The authority agrees that in an ideal world, there would be Welsh-medium secondary provision in every town / city. However, taking into account the current number of Welsh-medium pupils, the current level of provision at Brecon High School and the current number of pupils currently accessing Welsh-medium primary provision in south Powys, the authority believes that centralising the provision is the only way to provide equality of opportunity for pupils.
16.15	English only or Welsh only schools don't help the Welsh Government's vision of a bilingual Wales	This proposal would not result in a Welsh-medium school, it would result in a larger Welsh-medium stream in Builth Wells High School. However, the Welsh Government's preferred option for the delivery of Welsh-medium education is designated Welsh-medium schools.
16.16	Centralising Welsh-medium education is a step in the wrong direction	The authority believes that centralising Welsh-medium secondary provision in one location is the only way to improve the opportunities available to learners and to provide equal opportunity.
16.17	Brecon is the bigger town – there is more scope for Welsh-medium education to grow	The authority acknowledges that Brecon is a larger town than Builth Wells, however in terms of Welsh-medium provision, the catchment of Builth Wells High School also includes the catchment area of Llandrindod Wells High School. Given the location of other Welsh-medium secondary providers outside Powys, Builth Wells is in a more central location to serve all of these catchment areas.
16.18	There isn't a financial argument for this proposal	As stated in the consultation document, the authority is not making the proposal for financial reasons. The main aim of the proposal is to provide equality of opportunity for Welsh-medium pupils from the Brecon High School catchment.

16.19	Need to be convinced that the provision would be strengthened by centralising at Builth Wells High School – previous efforts by the Council to encourage / force High Schools to improve the Welsh-medium provision within the stream structure have not been successful	Although the provision at Brecon High School has not increased over time, the level and continuity of provision and learner numbers in the Welsh-medium stream at Builth Wells High School have increased over recent years, and if implemented, the authority would work closely with the school to ensure continuation of this improvement.
16.20	The proposal does not appear to be a significant improvement on the status quo	The authority believes that the proposal does offer an improvement on the status quo due to the increased level of Welsh-medium provision available at Builth Wells High School. In the longer term, the creation of a larger group of Welsh-medium pupils would enable the school to offer even more Welsh-medium provision, and would strengthen the school's Welsh language ethos, which would ensure a further improvement to the status quo.
16.21	Brecon High School catchment has approximately 10,000 more residents than Builth Wells High School which would suggest a greater demand for Welsh-medium education if resources were managed properly	The authority acknowledges that the population of the Brecon catchment is larger than the population of the Builth Wells catchment, however the current proposal is based on the number of pupils currently accessing Welsh-medium education in both catchment areas.
16.22	Could lead to closure of Cylch Meithrin Aberhonddu	Whilst it is acknowledged that there could be an impact on numbers at Cylch Meithrin Aberhonddu in the short term, the authority would work with organisations such as Menter Brycheiniog and TWF to raise awareness of the benefits of Welsh-medium education and bilingualism, with the aim that this is



		reversed in the longer term. The authority's view is that the improved clarity with regard to secondary provision could lead to an increase in pupil numbers in the longer term.
16.23	The authority states that Sennybridge CP School is effectively no longer a feeder school for Brecon High School, then clearly it will not become a feeder for Builth Wells. This means that the authority's aim to ensure a greater critical mass of learners is flawed	The number of pupils attending the Welsh-medium stream at Sennybridge CP School in each year group is small, therefore even without these pupils, centralising provision would lead to a greater critical mass.
16.24	SENCo at Brecon High School is a first language Welsh speaker	The SENCo at Builth Wells High School is also a first language Welsh speaker.
16.25	The proposal offers no clarity, no parity and no choice for Brecon Welsh-medium learners. It is certainly not transformational.	The authority disagrees with this point as it believes the proposal does provide clarity and improved parity and choice for Welsh-medium learners from the Brecon area into KS4 and KS5.
16.26	Brecon has the required population density, transport links and hub status within local and Welsh government to make Welsh-medium education viable and sustainable	The authority notes this point.

16.27	A report produced by Powys in 2014 states that the greatest demand for a designated Welsh language secondary school is in the Brecon area, but on the other hand the council is saying that a Welsh stream isn't viable	The authority notes this point. 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. 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.
16.28	The failure of PCC to work with Brecon High School to rectify the situation and put in place a high quality learning environment for the Welsh stream is the cause of the problem	The authority notes this point. The same level of support has been provided to support dual stream provision at both Brecon High School and Builth Wells High School over recent years. Builth Wells High School have succeeded in strengthening and increasing the Welsh-medium provision available, this has not been the case at Brecon High School.
16.29	Pupils' family members have been to Brecon High School in the past and were happy with the education they received	The authority notes this point, however the authority's view is that the current provision at Brecon High School does not provide equality of opportunity for Welsh-medium pupils.

## 4.2 COMMENTS IN FAVOUR OF THE PROPOSAL

REF.	ISSUE	LOCAL AUTHORITY RESPONSE
<b>17</b>	<b>IMPACT ON PUPILS</b>	
17.1	The proposal is a positive move for all pupils in south Powys	The authority agrees with this statement.
17.2	Centralising provision will provide more opportunity for specialist teaching and streaming	The authority agrees with this statement.
17.3	It is in the children's interest to close the Welsh-medium stream and merge with Builth Wells High School	The authority agrees that given current pupil numbers, centralising provision in Builth Wells is the most suitable way forward.
17.4	Welsh-medium pupils would have more opportunity to mix with other Welsh speaking pupils	The authority agrees with this statement.
17.5	Pupils in the Welsh stream at Brecon High School don't really mix with other pupils, so the impact on English-medium pupils would be limited	The authority notes this comment.
17.6	Welsh-medium pupils can be mean to English-medium pupils in Welsh and talk to each other and to teachers in Welsh which excludes English-medium pupils	The authority notes this comment.

17.7	Pupils could make new friends in a different area	The authority agrees with this statement.
17.8	Would be positive for Ysgol y Bannau pupils to be in a class with pupils from other schools in year 7	The authority agrees with this statement.
<b>18</b>	<b>IMPACT ON ENGLISH-MEDIUM PROVISION AT BRECON HIGH SCHOOL</b>	
18.1	The proposal would strengthen the English-medium provision, and English-medium pupils form the majority of the school	The authority agrees that the proposal could lead to an improvement in the English-medium provision available at Brecon High School, however the main aim of the proposal is to improve the provision available for Welsh-medium learners.
18.2	Many parents with children in Ysgol y Bannau would send their children to Brecon High School anyway, which would limit the impact on Brecon High School and would increase the number of English-medium pupils	The authority accepts that in the short term, it is likely that many parents with children in Ysgol y Bannau would send their children to Brecon High School anyway. However the authority's aim is for pupils who have been educated through the medium of Welsh in the primary sector to continue to do so in the secondary sector, and would work with Builth Wells High School and other organisations such as Menter Brycheiniog to address this.
18.3	There would be more options for English-medium pupils at Brecon High School, particularly at GCSE level	The authority agrees that the proposal could lead to an increase in the options available for English-medium pupils at Brecon High School, however the main aim of the proposal is to improve the provision available for Welsh-medium learners.
18.4	Brecon High School would have more resources to go around	If the proposal were implemented, Brecon High School would lose the funding associated with the pupils attending the Welsh-medium stream, but the school would be able to focus the available resources on pupils in the English-medium stream.
18.5	Would hope that the proposal will have a positive impact on general education at Brecon High School	As stated in the consultation document, the authority's view is that the proposal could improve Brecon High School's ability to deliver a full English-medium curriculum in all key stages.

18.6	So few pupils are using the Welsh-medium stream at Brecon High School that it doesn't justify having it there	The authority agrees that the small number of pupils accessing the Welsh-medium stream at Brecon High School means that it is difficult for the school to provide a comprehensive Welsh-medium education.
18.7	The Welsh-medium stream at Brecon High School is a massive drain on resources	The authority notes this comment.
18.8	The sooner the Welsh-medium stream at Brecon High School is closed, the sooner efforts can be concentrated on improving the standard of the English stream	The authority notes this comment.
18.9	There would be more room in Brecon High School	The authority notes this comment.
<b>19</b>	<b>IMPACT ON WELSH-MEDIUM PROVISION AT BUILTH WELLS HIGH SCHOOL</b>	
19.1	The proposal will strengthen the Welsh-medium stream at Builth Wells High School	The authority agrees that the proposal would enable Builth Wells High School to further strengthen the Welsh-medium provision available at the school.
19.2	Will enable provision in Builth Wells to be developed to provide true equality of opportunity	The authority agrees that the proposal would enable Builth Wells High School to further develop the Welsh-medium provision available at the school.
19.3	Will enable Builth Wells High School to offer more Welsh-medium subjects	The authority agrees that the proposal should lead to larger cohorts in the Welsh-medium stream at Builth Wells High School, which will enable the school to offer more Welsh-medium subjects.
19.4	Will improve the Welsh ethos of Builth Wells High School	The authority agrees that the proposal should lead to larger cohorts in the Welsh-medium stream at Builth Wells High School, which will improve the school's Welsh ethos.

19.5	A stronger Welsh-medium stream at Builth Wells High School would be better placed to attract Welsh speaking staff	The authority agrees that one stronger Welsh-medium stream should be more attractive to staff than two smaller Welsh-medium streams.
19.6	The proposal will build on the excellent level of provision being developed at Builth Wells High School	The authority agrees with this statement.
<b>20</b>	<b>POSITIVES ABOUT BUILTH WELLS HIGH SCHOOL</b>	
20.1	Builth Wells High School offer far more Welsh-medium subjects, therefore there will be a positive impact on the provision available to pupils	The authority agrees that the proposal will have a positive impact on the provision available to pupils.
20.2	There is more of a Welsh ethos at Builth Wells High School	The authority notes this comment.
20.3	Builth Wells is ideally situated to facilitate all of the surrounding areas	The authority agrees that taking into consideration the location of other providers of Welsh-medium secondary education, Builth Wells is the most suitable location for the centralised provision.
20.4	The pupils would have a better education in the Welsh stream at Builth Wells High School as there are more pupils	The authority agrees that being part of a larger cohort of pupils would be beneficial to Welsh-medium pupils.
20.5	Based on the Welsh-medium provision currently available, Builth Wells is the most sensible location for centralising Welsh-medium provision	The authority agrees that the current level of provision at Builth Wells High School is greater than that at Brecon High School, which suggests that centralising provision in Builth Wells is the most sensible solution.

<b>21</b>	<b>NEGATIVES ABOUT BRECON HIGH SCHOOL</b>	
21.1	Parents have already moved their children to Builth Wells High School as they believe Brecon High School is offering a sub-standard education	The authority notes this comment.
21.2	Something needs to be done as Brecon High School is obviously not fulfilling its role as a provider of Welsh-medium education	The authority agrees that the current system is not providing equality of opportunity for Welsh-medium pupils.
21.3	Unlikely anything could be done to strengthen Welsh-medium education in Brecon High School as it's unlikely the school would be able to attract teachers of the calibre required	The authority notes this comment.
21.4	There is an issue in Brecon High School with using non specialist teachers to teach subjects purely because they speak Welsh – does this happen to the same extent outside of the Welsh-medium stream?	The authority notes the concern raised in this comment. Although there are examples of non-specialist teachers teaching subjects through the medium of English and Welsh in many high schools, it is likely that this doesn't happen to the same extent in English-medium provision.
21.5	Brecon High School doesn't have the same Welsh ethos as other schools	The authority notes this comment.
21.6	None of the SMT at Brecon High School are Welsh speaking	The authority notes this comment.

21.7	Pupils in the Welsh stream at Brecon High School don't have a strong identity	The authority notes this comment.
21.8	The Welsh language skills of past Ysgol y Bannau pupils deteriorate during their time at Brecon High School	The authority notes this comment.
21.9	The management team of Brecon High School have not been supportive of the Welsh stream	The authority notes this comment.
21.10	The Welsh stream at Brecon High School has not been run very well which has caused the reduction in numbers	The authority notes this comment.
21.11	Parents lack confidence in Brecon High School's ability to provide the best possible education for their children at the moment	The authority notes this comment.
21.12	When a Welsh-medium teacher is away for any reason, more often than not the supply is not Welsh-medium	The authority notes this comment.
21.13	Welsh-medium provision available in Brecon High School has deteriorated as current pupils have moved through the school	The authority notes this comment.
<b>22</b>	<b>IMPACT ON THE WELSH-MEDIUM PROVISION AVAILABLE FOR PUPILS</b>	



22.1	The proposal would provide more opportunities for Welsh-medium pupils	The authority agrees that the proposal will provide more opportunities for Welsh-medium pupils.
22.2	The proposal would ensure that more Welsh-medium subjects were available for Welsh-medium pupils	The authority agrees that the proposal will ensure that more Welsh-medium subjects are available for Welsh-medium pupils.
22.3	The proposal would provide a better standard of education for Welsh-medium pupils	The authority agrees that the proposal will ensure that more Welsh-medium subjects are available for Welsh-medium pupils and that there will be other benefits to pupils from being part of a larger cohort of Welsh-medium pupils.
22.4	The proposal would lead to growth in Welsh-medium education in South Powys	The authority agrees that the increased clarity with regard to secondary progression should lead to growth in Welsh-medium education in South Powys in the long term.
22.5	Will enable the Council to concentrate funding in one school to provide equality of opportunity for Welsh-medium pupils	The authority agrees with this point.
<b>23</b>	<b>OTHER</b>	
23.1	Brecon to Builth Wells is not too far too travel – pupils in other areas of Wales travel much further	The authority agrees that there are many examples both in Wales and in Powys of pupils travelling great distances to access Welsh-medium education.
23.2	The proposal is financially prudent and educationally sound	The authority agrees with this statement.
23.3	The proposal is attempting to strengthen the Welsh-medium provision in south Powys to ensure that pupils have the same	The authority agrees with this statement.

	opportunities as those in other areas of Wales	
23.4	Supportive of the intention to strengthen provision by consolidation into one centre, but would like assurance that the provision won't be at the whim of any future governing body / school senior management	The authority notes this comment. 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 at Builth Wells High School.
23.5	The best option is to bring everyone together, however you must accept that some will opt out of Welsh-medium education in the short term – not everyone will transfer to Builth Wells from the start	The authority accepts that there may be a reduction in transfer rates in the short term and has noted this in the consultation document.
23.6	The current system is not sustainable, and does not provide equal opportunity for Powys pupils	The authority agrees with this statement.
23.7	Centralising provision would be an improvement on the current arrangement and would provide the best conditions to work towards establishing a Welsh-medium secondary school in the future	The authority agrees with this statement.
23.8	Parents have expressed a willingness to travel to secondary provision if the provision available justifies the journey. This is seen in the north of the county where pupils from Newtown already travel to	The authority notes this comment. The aim of centralising provision is to ensure that the provision available justifies the journey.

	Llanfair Caereinion to access secondary provision.	
23.9	Parents have realised that the proposal offers the most likely and sensible solution in the long term and have already appealed for transport in order to enable their children to transfer to Builth Wells High School	The authority agrees that the proposal offers the most sensible solution based on current pupil numbers.
23.10	In the longer term, the improved continuity from nursery provision through to secondary provision will lead to an increase in Welsh-medium pupil numbers in the Brecon area	The authority agrees with this statement.
23.11	Centralising provision would attract good, enthusiastic, talented teachers to the area	The authority agrees with this statement.
23.12	Would provide effective linguistic immersion	The authority agrees that the proposal would provide more effective linguistic immersion compared with the current system.
23.13	Would create a hub for the Welsh language which would be a focus for the language in South Powys	The authority agrees with this statement.

### 4.3 ALTERNATIVE OPTIONS

<b>ISSUE</b>		<b>LOCAL AUTHORITY RESPONSE</b>
<b>24</b>	<b>OTHER POSSIBLE OPTIONS</b>	
<b>24.1</b>	<b>IMPROVE THE PROVISION AT BRECON HIGH SCHOOL</b>	
24.1.1	Provide more Welsh speaking teachers	Under the Fair Funding Formula, the authority provides additional support to schools for the provision of education on a dual stream basis. Despite this support being in place for many years, there has been no increase in the level of provision available at Brecon High School.
24.1.2	Use the money spent on transporting children out of county to provide extra Welsh speaking teachers	The transport provided to Ysgol Gyfun Ystalyfera was provided following a transport appeal where it was recognised by the panel members that the level of Welsh-medium provision in Brecon was far below that provided in Ystalyfera. Despite the financial support that has been provided to Brecon High School for many years, the school has not increased the level of Welsh-medium provision. The authority has no confidence that if the school was provided the additional funding, that this would result in an enhanced provision.
24.1.3	Increase pupil numbers in the Welsh stream	There has been no significant increase in Welsh-medium primary pupil numbers in the Brecon catchment in recent years. This is in contrast with most other towns, where Welsh-medium pupil numbers have increased. Whilst the authority's aspiration is to increase the number of Welsh-medium pupils, the authority's view is that the uncertainty in relation to secondary provision in recent years has contributed to the lack of growth of Welsh-medium pupil numbers in the primary sector.
24.1.4	Make Brecon High School recognised as a high class Welsh school	Brecon High School has received additional support under the Fair Funding Formula to support the provision of education on a dual stream basis for a number of years, however there has been no improvement in the provision available.
24.1.5	Provide more support to Brecon High School	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. 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.
24.1.6	Provide more subjects through the medium of Welsh	The authority provides additional funding to schools based on the number of subjects taught through the medium of Welsh. Brecon High School have not made any significant increase in the number of subjects offered, partly due to the difficulty in appointing Welsh-medium teachers to a school that offers a very narrow Welsh-medium curriculum.
24.1.7	Brecon High School needs to embrace Welsh-medium education	The authority notes this point.
24.1.8	Pupils need to have the opportunity to study all subjects in Welsh	The authority agrees with this statement. However the authority's current view is that it is unrealistic to expect that it will be possible to provide all subjects through the medium of Welsh in all dual stream schools, and that centralising provision is the best way to ensure that an increased level of provision is available for Welsh-medium learners.
24.1.9	Ensure Brecon High School becomes a 2B school / provides 80% of subjects in Welsh in Key Stage 3 and 4	In 2011, the Council's Cabinet agreed to an aspirational aim that all dual stream secondary schools would become category 2B schools by 2020. However, progress towards achieving this aim has been very limited, and the authority's view is that this aspiration was unrealistic based on current Welsh-medium pupil numbers.
24.1.10	The Welsh stream at Brecon High School has suffered from many years of underinvestment and poor leadership	The authority notes this point.
24.1.11	Fund the Welsh stream properly	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. Funding has been provided on the same basis to other dual stream secondary schools, many of whom have been able to use this funding to increase the Welsh-medium provision available.

24.1.12	Recruit Welsh first language teachers with subject specific strengths	The authority notes this point.
24.1.13	Encourage Brecon High School to promote Welsh culture within the school through whole school activities eg for St David's Day	As a dual stream school, the authority would expect Brecon High School to be promoting Welsh culture through whole school activities and marking events such as St David's Day, and is concerned that this comment implies that this is not currently the case. All schools provide Welsh as a 2 <sup>nd</sup> Language, and are encouraged to develop a Welsh ethos, regardless of whether or not they provide Welsh-medium education.
24.1.14	Brecon High School needs a new building	The authority accepts that Brecon High School needs a new building, and this is currently being taken forward as part of the Beacons campus project.
24.1.15	Strengthen the links between Brecon High School and Ysgol y Bannau / Sennybridge CP School	Ysgol y Bannau and Sennybridge CP School have been part of the Brecon High School cluster for many years, therefore the authority's expectation is that links between the primary schools and the high school should already be strong.
24.1.16	Support the Welsh-medium stream at Brecon High School with external activities due to the fact that there is no Welsh speaking member of the school's SMT	The authority provides funding to all schools through the fair funding formula and relevant grants. The decision on how this money is utilised rests with the governing body and leadership team at the school. The appointment of the headteacher and senior management team rests with the governing body.
24.1.17	Consider the number of south Powys children in the Brecon, Crickhowell and Gwernyfed catchment areas currently receiving Welsh medium education in and out of county	The authority has considered the number of pupils accessing Welsh-medium from the three catchment areas both in and out of county when making the proposal.
24.1.18	Welsh-medium provision at Brecon High School should have appropriate representation at senior management level	The appointment of the senior management team rests with the governing body of Brecon High School.

<b>24.2</b>	<b>CLOSER JOINT WORKING BETWEEN SCHOOLS</b>	
24.2.1	Amalgamate the teaching staff of Brecon High School and Builth Wells High School	In addition to the current proposal around the closure of the Welsh stream at Brecon High School, the authority is undertaking further work around the configuration of schools in south Powys. Whilst it is possible that the amalgamation of staff and maintaining provision in Brecon and Builth Wells would result in an extended curriculum offer for Brecon pupils, it would not address the very low cohort numbers on the Brecon site.
24.2.2	Continue to offer a reduced number of subjects at Brecon High School, with teachers split between Builth Wells and Brecon	The current proposal is to close the Welsh-medium stream at Brecon High School, however the governing body could deliver Welsh first language from the resources available. One of the authority's schools in the north of the county currently operates under this model.
24.2.3	Teachers to travel between the two schools	The authority has considered this type of arrangement in areas such as post-16 education, however in this case, it wouldn't address the small cohort numbers on both sites.
24.2.4	Work more closely with other schools, such as Rhydywaun, Cwm Rhymni, Gwynllyw to share good practice and resources	The authority supports all its schools in developing links with neighbouring schools and schools in other authorities across Wales. The sharing of good practice and networking opportunities takes place within the ERW consortium, which includes Welsh-medium secondary providers in other authorities.
<b>24.3</b>	<b>NEW SCHOOL IN BRECON WITH A WELSH STREAM</b>	
24.3.1	The case for a new school in Brecon has already been made as a bilingual school	Whilst the new building would be a fresh start, there would be no significant increase in Welsh-medium pupil numbers, therefore it would be difficult for the new school to offer any more Welsh-medium subjects than are currently offered in Brecon High School.
24.3.2	The new building would be a fresh start for Welsh-medium provision	Whilst the new building would be a fresh start, there would be no significant increase in Welsh-medium pupil numbers, therefore it would be difficult for the new school to offer any more Welsh-medium subjects than are currently offered in Brecon High School.
24.3.3	If you offered a bilingual education in the new building, pupil numbers would really take off	Whilst the new building would be a fresh start, there would be no significant increase in Welsh-medium pupil numbers in the short term. If the inclusion of Welsh-medium provision in the new building led to a greater level of interest in Welsh-medium primary provision, it would take many years for this to filter through to the secondary sector. The authority is

		concerned about the lack of equal opportunity for pupils currently in the system, and believes that centralising provision is the best way to improve the provision available for these learners.
24.3.4	Seems appropriate to keep Welsh-medium secondary provision on the new campus as NPTC group will be offering a Welsh-medium curriculum for 16+	Secondary schools in south Powys have struggled to offer post-16 Welsh-medium provision in recent years due to the small number of pupils involved. Post-16 will continue to be provided at Builth Wells High School, and as Welsh-medium pupil numbers in the school grow, it is expected that the school will be able to offer a greater number of Welsh-medium subjects. NPTC group has no experience of offering Welsh-medium provision.
24.3.5	Can't see how a new school building can be justified without including Welsh-medium education	The new school building is being developed under the 21 <sup>st</sup> Century Schools Capital Building Programme, and is subject to robust challenge and scrutiny by Welsh Government. The business cases developed have already received support from the Welsh Government at the Strategic Outline Case stage.
24.3.6	The new school building is an ideal opportunity for Powys County Council to show how much it values Welsh-medium provision	The authority did consider maintaining the dual stream nature of the school within its Business Case development, however it concluded that the number of learners that would access that provision would still be very low, therefore it would be difficult for the school to provide equality of opportunity for Welsh-medium pupils. The buildings at Builth Wells High School are of a good condition, and although not new, meet the requirements of 21 <sup>st</sup> Century education.
24.3.7	Welsh-medium provision could be invested in a brand new attractive and modern hub in the new build in Brecon, utilising the expertise of Ysgol y Bannau staff to support provision within KS3 to ensure consistency in the standard of Welsh being delivered	The delivery of education in Powys is through primary or secondary schools, with one all-through school in Machynlleth. The creation of a middle school up to the end of year 9 is not a model that the authority would currently support.
24.3.8	Inclusion of Welsh-medium education would strengthen the authority's chance of securing	The authority's strategic outline case, which is based on English-medium provision in Brecon, has already received approval from Welsh Government and we are currently developing the outline business case.



	funding required to develop a new state of the art school	
<b>24.4</b>	<b>ESTABLISH A WELSH-MEDIUM ALL-THROUGH SCHOOL IN BRECON</b>	
24.4.1	Turn Ysgol y Bannau into an all-through school	Due to the small number of pupils involved, it would not be cost effective. In addition, pupils would miss out on social opportunities to mix with a greater number of pupils on transfer to secondary school.
<b>24.5</b>	<b>ESTABLISH A FEDERATED / MULTI-SITED SCHOOL</b>	
24.5.1	Establish a federated secondary school with classrooms in Brecon and Builth Wells. The school would have its own headteacher, governors, budget, aims and objectives	This consultation document relates to the Welsh-medium stream alone, however the Welsh Government's Federation Regulations (2014) relate to Federation of whole schools, therefore Federation is not possible in this case. It is the authority's view that the Welsh-medium learner cohorts in Builth Wells and Brecon are not large enough to allow a multi-sited secondary provision.
24.5.2	Federation of the current secondary Welsh streams with the primary Welsh-medium provision at Brecon and Builth Wells	This consultation document relates to the Welsh-medium stream alone, however the Welsh Government's Federation Regulations (2014) relate to Federation of whole schools, therefore Federation is not possible in this case. It is the authority's view that the Welsh-medium learner cohorts in Builth Wells and Brecon are not large enough to allow a multi-sited secondary provision.
24.5.3	Create one school on two sites with one set of teachers and a supportive management team	It is the authority's view that the Welsh-medium learner cohorts in Builth Wells and Brecon High Schools are not large enough to allow a multi-sited secondary school.
24.5.4	Ysgol y Bannau couldn't agree to being federated with Brecon High School, but could agree to being part of a Welsh-medium split sited school	The authority accepts this point, however the Welsh Government's Federation Regulations (2014) relate to Federation of whole schools, therefore Federation is not possible in this case. It is the authority's view is that the Welsh-medium learner cohorts in Builth Wells and Brecon High Schools are not large enough to allow a multi-sited secondary provision.

24.5.5	Federated approach is the most sensible option – would enable Welsh-medium pupils to remain on their respective campuses, teachers would be available to teach pupils on both campuses, would allow Brecon children to benefit from the new building, children would be able to take part in after school activities	This consultation document relates to the Welsh-medium stream alone, however the Welsh Government's Federation Regulations (2014) relate to Federation of whole schools, therefore Federation is not possible in this case. It is the authority's view that the Welsh-medium learner cohorts in Builth Wells and Brecon are not large enough to allow a multi-sited secondary provision.
24.5.6	Using a federated approach, the school could have its own headteacher and governing body, or it could come under the remit of Builth Wells High School	This consultation document relates to the Welsh-medium stream alone, however the Welsh Government's Federation Regulations (2014) relate to Federation of whole schools, therefore Federation is not possible in this case. It is the authority's view that the Welsh-medium learner cohorts in Builth Wells and Brecon are not large enough to allow a multi-sited secondary provision.
<b>24.6</b>	<b>ESTABLISH A NEW WELSH-MEDIUM SECONDARY SCHOOL</b>	
24.6.1	South Powys needs a Welsh-medium school led by people with enthusiasm and drive	The authority's plans for Welsh-medium education are detailed in the Welsh in Education Strategic Plan. The proposal currently being made is the first step towards the possible creation of a category 2A school in the future. The progression towards this goal will largely be dependent on learner numbers and the future demand for Welsh-medium education.
24.6.2	A Welsh-medium secondary school is needed in south Powys	The authority's plans for Welsh-medium education are detailed in the Welsh in Education Strategic Plan. The proposal currently being made is the first step towards the possible creation of a category 2A school in the future. Progression towards this goal will largely be dependent on learner numbers and the future demand for Welsh-medium education.
24.6.3	A Welsh-medium secondary school should be established in Gwernyfed	The authority notes this comment.
24.6.4	In dual stream schools there is always a conflict between the needs of the two streams and difficulties with sharing limited resources	The authority notes this comment.

24.6.5	Areas like Newport and Rhondda Cynon Taf have shown how successful Welsh-medium secondary schools can be	The authority notes this comment.
24.6.6	South Powys Welsh-medium pupils predominantly come from English speaking homes and need as many opportunities as possible to be immersed in the Welsh language – a Welsh-medium secondary school is the best way to provide this	The authority notes this comment.
24.6.7	Parents would be more likely to be willing for their children to travel to a designated Welsh-medium school than a stream	The authority notes this comment.
24.6.8	If the Council established a new Welsh-medium secondary school, Welsh-medium pupil numbers would grow as has been seen in other areas of Wales	The authority notes this comment.
24.6.9	If you open a Welsh-medium school, provision will go from strength to strength. If you open another stream, things will weaken and money will be wasted instead of saved	The authority notes this comment.
24.6.10	A Welsh-medium school is the only way to ensure continued provision, as can be seen by Welsh-medium	The authority notes this comment.

	comprehensives in authorities across Wales.	
24.6.11	Ysgol y Bannau attend a Welsh-medium primary school, there should be a Welsh-medium secondary school available for them too.	The authority notes this comment.
24.6.12	A Welsh-medium school would attract different staff – staff who want to teach in Welsh want a Welsh-medium school for their own children.	The authority notes this comment.
24.6.13	Welsh-medium education hasn't developed in the area because there is no Welsh medium secondary school	The authority notes this comment.
<b>24.7</b>	<b>WELSH-MEDIUM STREAM TO BE ESTABLISHED AT GWERNYFED HIGH SCHOOL</b>	
24.7.1	Welsh-medium provision to be removed from both Brecon High School and Builth Wells High School and developed at the Gwernyfed High School site	The provision of a Welsh-medium stream on the Gwernyfed site would mean that all learners from both Brecon and Builth Wells High Schools would need to be transported to Gwernyfed, therefore increasing the cost of transport. Currently, there are very few learners from the Gwernyfed catchment area accessing primary and secondary education at Ysgol y Bannau and Brecon High School.
<b>24.8</b>	<b>PROVIDE ADDITIONAL FUNDING</b>	
24.8.1	Extra money is available from the government to enhance Welsh-medium provision in secondary schools	The funding of the Welsh-medium streams at both schools is currently provided by the County Council through its Fair Funding Formula. The basis of the allocation of monies to the authority does not currently take account of the language of education. The authority's Fair Funding Scheme does provide additional support based on the number of subjects delivered through both languages, and currently amounts to approximately £175,000

		across the two schools in the current financial year, in addition to the usual age weighted factors.
24.8.2	Provide sufficient money to provide bilingual education at both sites	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. However, the authority recognises that in the current times of austerity, schools are under significant financial pressures.
24.8.3	Additional funding was promised to Brecon High School in order to increase the Welsh-medium subjects that could be provided, however this never materialised	In the Cabinet minutes of a meeting held on the 22 <sup>nd</sup> November 2011, following an informal consultation on secondary school modernisation, it notes that additional investment and support would be provided to dual stream schools to achieve the target of a Category 2B school. Early discussions took place with Brecon High School about providing additional support, however due to the challenging financial situation at both Powys County Council level and at Brecon High School, it was not possible to fulfil this. The Fair Funding Formula arrangements were reviewed for the 2013-14 financial year, and are very similar in respect of dual stream schools to the model used in Ceredigion. Additional support is provided to schools based on the number of subjects delivered through both languages, and the same level of support is provided to all dual stream secondary schools.
<b>24.9</b>	<b>PUBLICITY</b>	
24.9.1	The Council should do more to publicise what's available	The authority does work with organisations such as Twf and Menter Brycheiniog / Maldwyn to promote the advantages of bilingualism and Welsh-medium education, and has seen success in some of the Welsh-medium provisions across Powys, however it has experienced difficulty in successfully promoting Welsh-medium provision at Brecon due to the lack of continuity from KS3 into KS4 and 5.
24.9.2	Promote the language at every juncture	The authority does work with organisations such as Twf and Menter Brycheiniog / Maldwyn to promote the advantages of bilingualism and Welsh-medium education, and has seen success in some of the Welsh-medium provisions across Powys, however it has experienced difficulty in successfully promoting Welsh-medium provision at Brecon due to the lack of continuity from KS3 into KS4 and 5.
24.9.3	Ensure that parents are aware of the importance of Welsh language	The authority does work with organisations such as Twf and Menter Brycheiniog / Maldwyn to promote the advantages of bilingualism and Welsh-medium education, and has seen

	skills for children's future career choices	success in some of the Welsh-medium provisions across Powys, however it has experienced difficulty in successfully promoting Welsh-medium provision at Brecon due to the lack of continuity from KS3 into KS4 and 5.
<b>24.10</b>	<b>OTHER</b>	
24.10.1	Close the Welsh-stream at Builth Wells	As stated in the consultation document, this option was discounted as Builth Wells High School is closer for a larger proportion of south Powys Welsh-medium pupils.
24.10.2	Powys needs to think differently about transporting pupils around the county	With the home to school transport budget being around £9 million per annum, the authority gives serious consideration to the impact of the additional transport requirements when making any school transformation proposals. It is the authority's view that the proposal to close the Welsh-medium stream at Brecon High School would result in better educational provision for the learners in Builth, although it recognises that there will be additional transport costs.
24.10.3	Invest in the Welsh language, encourage and support its teaching and spoken use	The Authority's strategy in relation to the Welsh language in education is set out in its Welsh in Education Strategic Plan. The Authority's view is that this proposal will improve the Welsh-medium education provision available to pupils in south Powys, and that in the long term, the improved clarity may lead to an increase in Welsh-medium pupil numbers.
24.10.4	Encourage the Welsh language in the area	The Authority works with other organisations such as TWF and Menter Brycheiniog to promote Welsh-medium education and the benefits of bilingualism, however there has been some difficulty with this in the Brecon area due to the lack of clarity with regard to secondary provision in the area.
24.10.5	There should be a compromise where Welsh 1 <sup>st</sup> Language can continue in Brecon High School	There are examples of English-medium schools in Powys where Welsh 1 <sup>st</sup> Language is taught to pupils who have studied through the medium of Welsh in the primary sector. Whether or not to continue to provide Welsh 1 <sup>st</sup> Language would be a decision for Brecon High School to make.
24.10.6	Teachers to travel instead of the pupils	The authority has considered this type of arrangement in areas such as post-16 education, however in this case, it wouldn't address the small cohort numbers on both sites.

24.10.7	Provide more Welsh streams in the primary sector	As there has been no significant growth in pupil numbers at Ysgol y Bannau in recent years, there is no evidence that there is demand for any additional Welsh-medium streams in the Brecon area at the current time. However in accordance with the WESP and the authority's School Transformation Policy, the authority is keen to improve access to Welsh-medium education, and will take this into consideration in the future. However, any increase in Welsh streams in the primary sector would take many years to feed through to the secondary sector, and the authority is keen to improve equality of opportunity for Welsh-medium pupils by strengthening secondary provision now.
24.10.8	Ensure that Welsh is taught to a high standard in all primary schools that feed Brecon High School	Second Language Welsh is taught to all pupils in all English-medium primary schools and streams, and there examples of very good practice in the catchment. However, very few of the pupils from these schools would transfer to the Welsh-medium stream in Brecon High School or any other school.
24.10.9	Provide better Welsh resources and ALN support for children whose first language is Welsh	The authority does provide additional funding through the Fair Funding Formula for resources in the primary sector. The authority has had difficulties in appointing Welsh speaking staff within the central ALN structure, however it has successfully appointed a Welsh speaking member of the Learning Inclusion Support Team, which is the advisory teacher service for ALN.
24.10.10	Secondary reorganisation should include plans to establish Welsh-medium secondary schools in north Powys and to ensure full Welsh-medium provision in Builth Wells	The authority is considering the establishment of Welsh-medium secondary schools in north Powys, and believes that this proposal will strengthen the provision available in Builth Wells, with the aim of providing full Welsh-medium provision, as a first step towards the possible establishment of a category 2A school in the south in the future.
24.10.11	A Welsh speaking headteacher is needed who understands Welsh-medium education	The authority notes this point. The appointment of a headteacher is the responsibility of the school's governing body.
24.10.12	Create Welsh language after school clubs	Schools are supported to establish extra-curricular activities, however due to the current financial position of the authority, funding from the schools service is not provided to fund after school clubs.

24.10.13	You need to consider Welsh-medium educational life, not just the number of subjects	The authority has considered opportunities for pupils to use Welsh outside the classroom as well as the number of Welsh-medium subjects available, and believes that there is a greater Welsh language ethos at Builth Wells High School. A greater number of Welsh-medium pupils would enable the school to further develop this ethos.
24.10.14	The authority has been providing good support for Welsh-medium provision at Builth Wells High School but hasn't been providing the same support to Brecon High School.	The authority does not support this statement as the provision under the fair funding formula provides an equal level of funding to all schools delivering Welsh-medium education.
24.10.15	The authority should introduce a trochi programme in the Brecon area to provide additional opportunities for pupils to become fully bilingual and to increase the number of Welsh-medium pupils in the secondary sector.	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 individual schools could use their Education Improvement Grant allocation to support the introduction of such a programme.
24.10.16	If pupils were offered a higher level of WM education in Brecon High School, the Welsh-medium stream would not only be viable but sustainable.	The current number of Welsh-medium learners in the primary sector in the Brecon catchment are considered by the authority to be too low to make the secondary stream in Brecon High School viable and sustainable. A significant increase would be needed in pupil numbers in the primary sector to make the stream viable.
24.10.17	Would prefer them to be 'some' level of provision in Brecon even if not full Welsh-medium provision, rather than having no provision	The authority notes this point.
24.10.18	Establish Welsh-medium streams in primary schools in the Gwernyfed and Crickhowell areas to act as feeders to Brecon High School	The authority notes this point. Under the recent review of primary schools in the Gwernyfed area, a Welsh-medium sub-group was established, whose recommendation was to maintain the status quo, with learners from the Gwernyfed area accessing Welsh-medium provision in Ysgol y Bannau.



#### 4.4 OTHER ISSUES RAISED

<b>ISSUE</b>		<b>LOCAL AUTHORITY RESPONSE</b>
<b>25</b>	<b>MID POWYS REVIEW</b>	
25.1	The proposal cannot be considered in isolation from the work that is ongoing in mid Powys – there is concern that Welsh-medium provision will end up in Llandrindod Wells	The Mid Powys Review is ongoing, and a number of possible options are being considered. Recommendations will be considered by Cabinet in due course.
25.2	Provision in Mid Powys is more likely to be centred in Llandrindod Wells because it is not possible to develop the Builth Wells site as it is on a flood plain	The Mid Powys Review is ongoing, and a number of possible options are being considered. Recommendations will be considered by Cabinet in due course.
25.3	Suspect the English-medium provision in Builth Wells will eventually be sent to Llandrindod Wells and a Welsh language school will be created in Builth Wells – this would be unfair to English-medium pupils at Builth Wells	The Mid Powys Review is ongoing, and a number of possible options are being considered. Recommendations will be considered by Cabinet in due course.
25.4	Difficult to understand how the proposal fits in with the mid Powys review and the suggestion that Builth Wells High School will be merging with an English-medium school	The Mid Powys Review is ongoing, and a number of possible options are being considered. Recommendations will be considered by Cabinet in due course.

25.5	Concern that merging Builth Wells High School with Llandrindod High School will drown the Welsh-medium stream	The Mid Powys Review is ongoing, and a number of possible options are being considered. Recommendations will be considered by Cabinet in due course.
25.6	The authority will need to consider the additional travel time to Llandrindod Wells for Brecon pupils as part of the Mid Powys Review	The Mid Powys Review is ongoing, and a number of possible options are being considered. Recommendations will be considered by Cabinet in due course.
<b>26</b>	<b>ISSUES WITH THE CONSULTATION PROCESS</b>	
26.1	Has the Council consulted with Huw Lewis AM, Minister for Education and Skills	Yes, the Council has consulted with Huw Lewis AM, Minister for Education and Skills through the Welsh Government's Schools Management Division.
26.2	Has the Council consulted with the Welsh Language Commissioner	No, the Council has not consulted with the Welsh Language Commissioner directly. There is no requirement in the School Organisation Code for authorities to consult with the Welsh Language Commissioner in respect of individual proposals. However, the document was available on the Council's website throughout the consultation period, therefore the Welsh Language Commissioner could have responded if she wanted to.
26.3	The Council announced the closure as if it was fact and created panic as parents hurried to move their children	The Council did not announce the closure as if it was fact, however it may have been reported in this way in the press. The Council cannot control what is published by the press or by anyone else.
26.4	A more thorough consultation process is needed for decisions such as this	The consultation process carried out by the authority exceeds the requirements of the School Organisation Code.
26.5	In accordance with the School Organisation Code, the Council should have consulted with stakeholders when matters were at a	It is the authority's belief that it has consulted with stakeholders when matters were at a formative stage.

	formative stage – this hasn't been the case	
26.6	Decisions need to be made quickly so that parents can make the best choice for their children	The authority is keen to conclude this process as soon as possible in order to provide equality of opportunity for Welsh-medium pupils.
26.7	Staggering of consultations into Welsh-medium education in Brecon High School and those concerning the proposed merger of Brecon and Gwernyfed High Schools, Sixth Form provision and the review of Builth Wells and Llandrindod Wells High Schools has led to confusion and uncertainty.	The authority notes this point.
26.8	The outcome of other consultations will impact on this consultation, therefore this consultation process is flawed and should be stopped	The authority is fully aware that any proposals on secondary configuration in mid Powys may impact on Welsh-medium learners from both the Brecon and Builth Wells catchment areas, and this will be taken into consideration when reviewing the options for mid Powys provision.
26.9	Concern and disappointment at lack of consultation, and poor timing of consultation. Parents have not had adequate time to consider the options without feeling pressured to decide before the end of the school term	The authority's proposal is to close the Welsh-medium stream from the end of the 2015-16 academic year, and therefore parents did not have to move their children for the start of the 2015-16 school year, however the authority recognises the reasons why some parents have chosen to do so. The consultation periods undertaken are in line with the requirements of the School Organisation Code.
26.10	Given the recent developments overturning the closure of Gwernyfed High School due to not having followed all guidance, would expect the same applies to this process	The authority is content with the processes that have been followed around this proposal, and does not intend to restart the consultation process.

	involving Welsh-medium education at Brecon High School and challenge you to restart the consultation process	
26.11	What is the critical number of responses you would need to receive to support continuing to provide Welsh-medium education in Brecon?	The Cabinet will take note of the volume of responses and all of the issues raised, however they will need to balance a range of issues and will need to ensure that equality of provision is provided for Welsh-medium pupils from the Brecon area.
26.12	Why were parents advised not to go to the consultation meetings?	The authority did not advise parents not to go to the consultation meetings. Information about the consultation events at Brecon and Builth Wells was distributed to parents with the copies of the consultation documentation.
26.13	Parents have been fed stories in the national and local press of 'done deals' and 'going through the motions as the decision was secretly taken long ago'.	The authority strongly objects to this statement. There is no 'done deal', and no decisions in respect of the outcome of this proposal have been made. The council cannot control what is published by the press.
<b>27</b>	<b>ISSUES WITH THE CONSULTATION DOCUMENTATION</b>	
27.1	The numbers in the consultation document are incorrect	The numbers in the consultation document have either been taken from the authority's central data records or have been provided by the schools in question.
27.2	The Council's Community Impact Assessment and Welsh Language Impact Assessment understate the impact of the proposals	The authority notes this comment.
27.3	The mileage from Brecon to Builth Wells is not correct	The mileage was provided by the Admissions and Transport Section of the Schools Service, which is based on the nearest suitable road, and measured via a GIS system.

27.4	It's unclear from the consultation documentation what the implications will be for pupils from Sennybridge – will they be expected to attend Ysgol Gyfun Ystalyfera or Builth Wells High School?	In accordance with the Learner (Wales) Travel Measure, the authority would be required to provide free home to school transport for pupils to the nearest school providing education in the language of their choice. For pupils from Sennybridge, this is most likely to be Ysgol Gyfun Ystalyfera. In accordance with the authority's admissions policy, parents can apply for a place at any school in Powys, therefore parents from the Sennybridge area could apply for a place for their child at Builth Wells High School, however there would be no obligation on the authority to provide free transport.
27.5	Children living outside the town of Brecon have been forgotten	The authority is fully aware that the proposal will impact differently on pupils depending on where they live.
27.6	The proposal is rushed and is based on the wrong information	The proposal is based on factual information held centrally by the authority and provided by Brecon High School and Builth Wells High School. The authority does not believe the process has been rushed. The authority is keen to conclude the process as soon as possible in order to provide equal opportunity for Welsh-medium pupils from the Brecon area.
27.7	From the consultation document it looks like a 'fait accompli'	It is not a 'fait accompli', all issues raised during the consultation have been considered and responded to by the authority and the Council's Cabinet will decide whether or not to proceed with the proposal. If it is decided to proceed, there will be a further opportunity for interested parties to submit an objection.
27.8	The consultation document is very negative about Brecon and very positive about Builth Wells	The document includes factual information. The information about the provision in the two schools was agreed with both schools before the document was published.
27.9	The document doesn't look at children's feelings	The document is a factual document and includes information required by the School Organisation Code. The authority has spoken to pupils at all of the affected schools in order to understand their views and concerns.
27.10	Brecon High School offers more Welsh-medium provision than what is listed in the document	The information included in the document was provided by, and agreed with Brecon High School before it was published.

27.11	The Council hasn't considered how many pupils could be coming to the Welsh stream at Brecon High School but aren't	The authority accepts that some pupils are currently lost to the Welsh-medium stream at Brecon High School as their parents choose for them to transfer to alternative provision. However, the authority does not believe that the number of pupils lost in each year group would make a significant difference to pupil numbers in each year group at Brecon High School. The document also considers the total number of Welsh-medium pupils currently attending primary provision in both areas, and this is the basis for the authority's view that centralising provision in Builth Wells High School is the best way to provide equality of opportunity for Welsh-medium learners.
27.12	The document doesn't add up in respect of school transport – it says that transport will be provided to Builth Wells High School, but also that transport will be provided to the nearest school	Under the School Organisation Code, the authority is required to have a named receiving school, and the authority has always transported existing pupils to the named receiving school if that is their parental wishes. Under the Learner Wales Travel Measure, the authority has a duty to provide transport to the nearest suitable school if that is the parental wish.
27.13	The document mentions the condition of Brecon High School's building, but doesn't mention the proposed building project in Brecon	The document is based on the current provision, and the condition of the current accommodation at both schools.
27.14	The information about extra-curricular activities is conflicting – you say that Builth Wells High School can offer more activities, but that pupils won't be able to access them	Builth Wells High School currently provides Welsh-medium education for learners across the Builth and Llandrindod catchments, and has a significant percentage of learners who are transported to the school. Like all secondary schools, they rely on parental support in respect of pupils accessing extra-curricular activities outside the school day.
27.15	Concern about the inclusion of the post-16 element as a positive for Builth Wells High School. Post-16 provision is part of the south Powys consortium, the school doesn't have a choice in what it provides	The south Powys consortium for post-16 education is a collaborative model that has been developed jointly by the authority and schools. Historically, Builth Wells High School has provided a number of Welsh-medium post-16 courses, and the authority would expect this provision to increase with the increasing number of learners.

27.16	Do the indicative transport costs only include transport from Brecon to Builth Wells?	No, the estimated costs include transportation costs from the Brecon catchment area to Builth, together with an increase in numbers travelling to Ysgol Gyfun Ystalyfera.
27.17	The list of Welsh-medium subjects in Brecon High School is incorrect	The list of Welsh-medium subjects was provided by the school in the Welsh-medium and bilingual provision questionnaire which was submitted to the authority in the autumn term 2014, and was verified by the school before publication of the consultation document
27.18	The fact that Brecon High School is currently in Special Measures shouldn't be a consideration – Builth Wells High School is potentially only one inspection away from being in the same position	The authority acknowledges this point. As stated in the document, the main aim of the proposal is to ensure equality of opportunity for Welsh-medium pupils, however Welsh Government guidance requires the authority to include information about standards in affected schools in all consultation documents.
27.19	The consultation does not examine the improvement of provision at Brecon High School, and the increased impact of higher student cohorts in Brecon High School due to returning out of county students	Whilst some students attend alternative Welsh-medium provision out of county, the numbers per year group are small, and the authority does not believe that these additional pupils would enable the Welsh-medium stream at Brecon High School to become viable.
27.20	Documentation glosses over the point about fear for the decline of the Welsh language	It is the authority's view that the concentration of provision on a single secondary school site will enhance the delivery and continuity of Welsh language provision, and over time, should support the continued growth of Welsh-medium education in the area.
27.21	Document does not consider the impact on those who, whilst on very low incomes, may not be in receipt of Free School Meals	Free home to school transport would be provided to all pupils who live 3 miles or more from their nearest Welsh-medium provision, regardless of whether or not their parents receive Free School Meals. However, it is recognised that parents without their own transport may experience difficulties in attending parents evenings etc., and that there would be an additional cost implication for parents in terms of attending these events.
27.22	Current proposals are based on misleading, inaccurate and manipulative information	The consultation document provides factual information as required by the School Organisation Code. This information is either held centrally by the authority or was provided by the schools.

27.23	Concern that as key stakeholders, parents weren't consulted to inform the community impact assessment	The Community Impact Assessment was carried out with input from the headteachers of both of the affected secondary schools. There is no requirement in the School Organisation Code for authorities to consult with stakeholders when carrying out this assessment. A great deal of information on the potential impact of this proposal on the community was received during the consultation period, and these issues are raised and responded to in this report.
27.24	The community of Brecon has not been involved in a Community Impact Assessment	The Community Impact Assessment was carried out with input from the headteachers of both of the affected secondary schools. There is no requirement in the School Organisation Code for authorities to consult with the community when carrying out this assessment. A great deal of information on the potential impact of this proposal on the community was received during the consultation period, and these issues are raised and responded to in this report.
27.25	Appendix B does not accurately reflect the subject provision at Brecon High School as opposed to Builth High School. Information relating to bilingual subjects was not requested from Brecon High School	All dual stream secondary schools are asked to provide information to the authority on subjects taught through the medium of Welsh or bilingually each year. Brecon High School did not provide information about any bilingual subjects during the 2014/15 academic year. The list of subjects provided in Appendix B is based on the information provided by both schools, however this was verified by each headteacher before the document was published.
27.26	Question the accuracy of the information in the consultation document as the document indicates that "in the event of closure of the Welsh-medium stream at Brecon High School parents of pupils currently attending Welsh-medium stream would be allocated places at Builth Wells High School".	The authority notes this point and has amended the document.
27.27	In the Consultation Document, the Council has severely underestimated	The authority recognises the risk to pupil numbers at Ysgol y Bannau, and would work closely with the school and organisations such as TWF and Menter Brycheiniog to promote the benefits of Welsh-medium education in the local area.



	the risk to pupil numbers at Ysgol y Bannau	
27.28	Reliance in the Consultation Document on fine marginal numbers of comparing students accessing Welsh medium provision in the two schools is alarming and demonstrates a lack of vision	The authority notes this comment.
27.29	Consultation document doesn't refer to one year 7 pupil from Sennybridge who transferred from Ystalyfera to Brecon High School this academic year and a shift in the demographic in Sennybridge from traditional Welsh first language families to incoming families interested in pursuing bilingual education and would prefer a successful Welsh stream at Brecon High School	The authority notes this comment. The authority does not differentiate between pupils from a Welsh speaking background and pupils not from a Welsh speaking background, however in other areas of Wales, the development of Welsh-medium education has mainly been through the establishment of category 2A schools, such as Ysgol Gyfun Ystalyfera, where the full immersion in the Welsh language has been seen as the best way to ensure the linguistic development of those pupils coming from non-Welsh speaking backgrounds. The population density within Powys makes the establishment of a category 2A school difficult at this time.
27.30	Table on page 5 refers to 'current' Welsh language provision at Brecon High School. In fact this reflects 'uptake'. Other subjects were available, but this cohort did not choose them. The figures are a snapshot of uptake of GCSE subjects and cannot be taken as a definitive ongoing total	The authority notes this comment.
27.31	Equality Impact Assessment does not address the fact that parents of pupils with ALN may not wish to	Each child is assessed on an individual basis regarding their needs, and this includes assessment of transport issues. Wherever possible, the local authority attempts to stay within the guidance with regard to time spent on school transport.

	send them to a school a considerable distance away	
27.32	Objection to statement in section 3.2.1, that it is not anticipated that the proposal would have a negative impact on outcomes at Brecon High School. Welsh language students have historically been the successful Oxbridge entrants, and they form the basis of the school orchestra and drama productions.	The authority notes this point.
27.33	The authority sometimes refers to Builth Wells as being in south Powys and sometimes refers to it as being in mid Powys – misleading the reader by making the implication that Builth Wells and Brecon are both in South Powys	The authority notes this point. Builth Wells is part of Brecknockshire, therefore the authority considers that it is part of south Powys. However, at the current time, secondary provision in the Builth Wells and Llandrindod Wells area is being reviewed as part of the Mid Powys Review, therefore it is likely that this is the cause of the confusion.
27.34	The assertion in the document that Welsh-medium isn't viable at Brecon High School is incorrect – there are a number of reasons why all of the children that could be attending Brecon High School Welsh stream aren't doing so and as a result the Welsh medium stream is not fulfilling its potential.	The authority notes this point, however considering the number of pupils attending Welsh-medium primary provision in mid and south Powys, the authority's view is that centralising provision is the only way to provide equality of opportunity for Welsh-medium pupils.
27.35	Disagree with PCC's interpretation of figures showing the current number of Welsh-medium primary pupils in the catchment – don't agree with the	The authority notes this point, however the authority's view based on the current number of Welsh-medium pupils in the catchment area is that there will not be a significant change in Welsh-medium pupil numbers in Brecon High School.

	assertion that 'it is not expected that there will be a change in Welsh-medium pupil numbers in Brecon High School'	
27.36	Options considered section doesn't refer to a Federation Model – in PCC's Education Interim Scrutiny Report (May 2014), the Education Scrutiny Working Group specifically recommended School Federations as appropriate.	Federation is included as a possible model in the council's School Transformation Policy (2014). This consultation document relates to the Welsh-medium stream alone, however the Welsh Government's Federation Regulations (2014) relate to Federation of whole schools, therefore Federation is not possible in this case. It is the authority's view that the Welsh-medium learner cohorts in Builth Wells and Brecon are not large enough to allow a multi-sited secondary provision.
27.37	The authority has understated many of the risks identified in relation to the proposal, and in other cases the response strategy is inappropriate.	The authority notes this comment, however the authority is satisfied that the risks and response strategies identified in the consultation document are appropriate.
27.38	Disagree with statement that the proposal would not impact on standards at Brecon High School – various Estyn reports have singled out the Welsh stream as a positive impact on the school.	The authority notes this comment. Estyn's response to the consultation document is provided in this report.
27.39	Statement about impact on leadership and management at Brecon High School – why should Welsh-medium children suffer to make life easier for the school's leadership and management?	The proposal is not being made in order to make life easier for the school's leadership and management. The School Organisation Code requires authorities to comment on the impact of any proposal on a number of factors, including leadership and management at all affected schools. As stated in the document, the authority's view is that the proposal will have no impact on the general leadership and management of the whole school, however there may be a positive impact as the proposal would enable the school leadership to focus on the delivery of a single stream school.
27.40	Funding information is misleading – if the cost of additional transport is	The table in the consultation document also shows that there would be a reduction of £59,931 to the authority in terms of funding provided to Brecon High School. Therefore this

	£76,000, why is it showing as only an additional £16,069 cost to the authority?	would be a saving to the authority, meaning that the total additional cost of the proposal, taking into account the additional transport costs and the reduction in funding to Brecon High School would be £16,069.
27.41	The document doesn't refer to the cost of transport for pupils out of county to Ysgol Gyfun Ystalyfera – only tells half the story and is deliberately misleading the reader by not showing the true costs.	The document provided estimated additional costs. The cost of transport to Ysgol Gyfun Ystalyfera is already incurred, therefore these costs were not included. The current cost is £585 per qualifying pupil per year.
27.42	Concerning that more emphasis is placed on the number of staff that can speak Welsh and not the way staff deliver lessons in Welsh	The authority has to consider the number of staff with appropriate linguistic ability for the effective delivery of Welsh-medium provision. The quality of teaching is monitored and evaluated through lesson observations, and issues identified would be addressed by the school.
27.43	Travel distances stated in the document are incorrect	The mileage was provided by the Admissions and Transport Section of the Schools Service, which is based on the nearest suitable road, and measured via a GIS system.
27.44	The document doesn't include distances from Sennybridge Primary School to the various high schools	The authority notes this comment, however the document does not include distances from Ysgol y Bannau to the various high schools either. The distances stated in the document were from the current secondary provision to the alternative provision, to illustrate the additional travel that would be required.
27.45	The document doesn't include information about bus journey times to the relevant locations	The authority notes this comment. As stated previously, the authority is confident that for the majority of pupils, travel time to the nearest alternative provision would be within the 45 minutes maximum journey time stated in the authority's Home to School Transport Policy.
<b>28</b>	<b>OTHER</b>	
28.1	Powys is very far behind the rest of Wales with regard to Welsh-medium education, and it's time something was done about it	The authority acknowledges that it has been slow to make progress in order to strengthen Welsh-medium education in the county, particularly in the secondary sector, and is keen to conclude this process as soon as possible in order to begin to address this.

28.2	The uncertainty in relation to secondary provision has been a reason why parents in Brecon haven't chosen Welsh-medium education for their children	The authority accepts this and is aiming to conclude this process as soon as possible in order to strengthen provision, with the aim that the greater clarity in relation to secondary provision will lead to an increase in Welsh-medium pupil numbers in the primary sector in the long term.
28.3	A high number of Ysgol y Bannau pupils come from non-Welsh speaking families, which demonstrates the positive impact the school has had on the area and the Welsh language	The majority of Welsh-medium pupils across Powys come from non-Welsh speaking families. The authority would continue to provide local primary access to Welsh-medium education at Ysgol y Bannau, and would work with organisations such as Twf and Menter Brycheiniog to promote the benefits of bilingualism and Welsh-medium education with the aim that non-Welsh speaking families would continue to choose Welsh-medium education for their children
28.4	Clarity is needed on what Welsh-medium 6 <sup>th</sup> form provision will be available, given the recent outsourcing to Neath Port Talbot College	Welsh-medium 6 <sup>th</sup> form provision would continue to be provided at Builth Wells High School, and the intention is that a greater number of Welsh-medium pupils will enable the school to increase the number of Welsh-medium subjects offered in the 6 <sup>th</sup> form.
28.5	Education is always at the bottom of the financial pecking order	The authority has provided financial protection to the Schools Service and to schools during recent years, and would strongly disagree with this statement.
28.6	How will the Welsh language solution affect the rest of the education and physical education offer?	This proposal will be taken into account when considering other reorganisation options.
28.7	How will the Welsh language solution affect NPTC Group's willingness or ability to attract "academy-style" sponsorship?	Officers from NPTC Group have been working closely with officers from Powys County Council in the development of business cases for the learning campus at Brecon, and are fully supportive of the authority's proposal.
28.8	Builth Wells High School would need to work closely with Ysgol y Bannau to develop close links between the	As some parents have decided that their children will transfer to Builth Wells High School instead of Brecon High School in year 7 in September 2015, Ysgol y Bannau has already started to develop close links with Builth Wells High School, including attending the Builth

	two schools, with parents and within the community	Wells cluster meeting. This would need to be further developed should the proposal be implemented.
28.9	Ystalyfera is a full Welsh-medium school and is within the same distance from Brecon as Builth Wells High School	Ysgol Gyfun Ystalyfera is further from Brecon than Builth Wells High School. The authority would provide free transport to pupils to their nearest school offering Welsh-medium provision.
28.10	Amalgamating the two streams to strengthen provision relies on the priorities set by the Governing Body of Builth Wells High School and the school's ability to employ suitably qualified staff	The authority has undertaken discussions with Builth Wells High School as part of this process and has received assurance of the full commitment of the governing body to the ongoing delivery of Welsh-medium education at the school.
28.11	The authority was going to support Brecon High School to become a category 2B school but no support was received, how can you now promise to support Builth Wells High School?	As stated above, the authority provides support through the fair funding formula to dual stream schools to increase and progress continuity of Welsh-medium provision in the schools. Over the recent period of time, Builth Wells High School has increased the level of progression available whilst Brecon High School hasn't. The support provided to Builth Wells High School in the future will be in accordance with the authority's Fair Funding Formula.
28.12	Why is there no Welsh-medium KS5 provision in Brecon High School?	The school has not delivered any KS5 Welsh-medium provision for a number of years, and when the south Powys consortia for post-16 education was established, the reducing budgets did not allow for the establishment of new provision at the school, nor was there any demand from the school representatives to establish such provision
28.13	Who will make the decision on this proposal?	The decision will be made by the Council's Cabinet.
28.14	Why is the Council already paying to transport pupils to Builth Wells?	The provision of transport to Builth Wells High School has only been provided following parents making a successful transport appeal and being awarded transport by the transport appeals committee or, more recently, by the portfolio holder with responsibility for schools.

28.15	What evidence is there that the level of Welsh-medium provision makes a difference in terms of pupils' ability to progress?	The authority's WESP has the objective of ensuring that learners who commence education through the medium of Welsh have the opportunity to complete their education through the Welsh language if they so wish. The literacy framework in Wales requires that Welsh-medium pupils' literacy skills are developed across the curriculum. A greater level of Welsh-medium provision enables pupils to progress effectively through rehearsing and developing their literacy skills in different contexts and subject areas. This is a statutory requirement.
28.16	When the proposal goes to Cabinet, will someone be able to speak on the governors' behalf?	The County Council's procedures allow for local members to speak on the proposals going forward. As the Chair of Governors and other members of the governing body are local members, then the voice of the governing body will be heard.
28.17	Is the authority's ultimate aspiration to have a fully Welsh-medium secondary school in south Powys?	The proposal currently being made is the first step towards the possible creation of a category 2A school in south Powys in the future. The progression towards this goal will largely be dependent on learner numbers and the future demand for Welsh-medium education.
28.18	A Welsh-medium primary school is needed in Builth Wells to further develop Welsh-medium education in the area	The authority notes this point.
28.19	It's a shame that Brecon could be losing its Welsh stream, would like to see Welsh-medium provision return to Brecon in the future as Welsh-medium education expands across the county	The authority notes this point.
28.20	Is any collaboration with Carmarthenshire possible to attract additional pupils to Builth Wells High School?	Carmarthenshire County Council are nearing the completion of the establishment of a new secondary school in Llandeilo to serve the areas surrounding Llandeilo and Llandovery. Once this provision has been established, officers from Powys County Council will initiate discussions with Carmarthenshire.
28.21	If the proposal was implemented would it be a short term or a long term arrangement? Would it be	If the proposal is implemented, it is being seen as a long term arrangement.

	reversed when the new campus is opened in Brecon?	
28.22	Local Welsh-medium learners are being penalized for the fact that standards within the local secondary have been gradually slipping – where has the county been to support and monitor standards?	The local authority has provided Brecon High School with a significant level of support to improve standards over the last 5 – 10 years.
28.23	The Council should look at slicing the salaries of senior staff before making any changes, and should also look at the cost of implementing any changes	The authority notes this comment.
28.24	Assurance is needed that full Welsh-medium provision will be available in the south of the county	The proposal currently being made is the first step towards the possible creation of a category 2A school in the future. Progression towards this goal will largely be dependent on learner numbers and the future demand for Welsh-medium education.
28.25	Would like to see centralising secondary Welsh-medium provision in south Powys in Builth Wells as the first step as part of a longer term plan to establish a Welsh-medium secondary school	The proposal currently being made is the first step towards the possible creation of a category 2A school in the future. Progression towards this goal will largely be dependent on learner numbers and the future demand for Welsh-medium education.
28.26	Assurance that free transport will continue to be provided is key to ensure the success of this proposal	The authority has a statutory duty to transport Key Stage 3 and Key Stage 4 learners who live more than 3 miles from their allocated school.
28.27	It is a concern that some parents still consider that the current arrangement in Powys provides sufficient provision to enable pupils	The authority notes this comment.



	to develop true fluency in both Welsh and English	
28.28	Brecknock is a forgotten county – where is the Brecknock representation on the council's Cabinet?	The authority notes this comment.
28.29	Sennybridge CP School has been forgotten – where is the investment in the school building?	Works have been undertaken at Sennybridge CP School in respect of parking and safeguarding issues. Further works are planned to address required improvements to toilet arrangements at the school.