



Mrs Katharine Evan-Hughes  
Director for Children and Schools  
Pembrokeshire County Council  
County Hall  
Haverfordwest  
SA61 1TP

Our Ref: qA1197852

1 September 2016

Dear *Kate*

**SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013 – PROPOSAL TO MAKE REGULATED ALTERATIONS TO YSGOL BRO GWAUN BY ENDING SIXTH FORM PROVISION REDUCE THE CAPACITY AND ESTABLISH SPECIAL EDUCATIONAL NEEDS PROVISION**

1. Kirsty Williams AM, Cabinet Secretary for Education, one of the Welsh Ministers, has considered Pembrokeshire County Council's (the Local Authority) proposal to end sixth form provision, reduce the capacity and establish special educational needs provision at Ysgol Bro Gwaun. Proposal to end sixth form provision at maintained schools require the approval of the Welsh Ministers under section 50 of the School Standards and Organisation Act 2013 ("the 2013 Act"). The Welsh Ministers exercise their school reorganisation functions in accordance with the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code ("the Code") made under it. Where proposals require their consideration the Welsh Ministers must decide to approve, reject or approve the proposals with modifications. The former Minister decided that the proposal to discontinue Ysgol Dewi Sant, Ysgol Bro Dewi Church in Wales Voluntary Aided School and Solva Community School and establish a new 3-16 Church in Wales voluntary aided school was related to this proposal. The proposals have therefore been considered together.
2. I am directed by the Cabinet Secretary to say that she has considered the consultation document, the consultation report, advice from Estyn, and additional information provided by the local authority for the purposes of consideration of the relevant factors set out in the School Organisation Code.
3. In exercise of her powers under Section 50 of the 2013 Act the Minister has decided to approve the proposal.
4. Paragraphs 1.3 to 1.14 of the Code set out the factors which should be taken into account by the Welsh Ministers when exercising their functions of determining

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

school organisation proposals. The relevant factors are set out below and are followed by an analysis of how far the Cabinet Secretary believes the factors have been "satisfied".

## **QUALITY AND STANDARDS IN EDUCATION**

### **Outcomes (standards and wellbeing)**

5. The Cabinet Secretary considers that it is reasonable to assume that the greater range of courses and the larger viable and more stimulating classes, which will be available at the proposed sixth form centre at Pembrokeshire College, will be beneficial to post 16 learners and would support good outcomes at key stage 5. She notes that comments provided by Estyn during the consultation show that they consider that the local authority has set out a strong case for reorganising sixth form provision.
6. The Cabinet Secretary considers that there is no evidence to suggest that the quality and standard of 11-16 education at Ysgol Bro Gwaun will be adversely affected by the removal of the sixth form. She agrees with the local authority that with the removal of key stage 5 the school will be able to concentrate on raising standards in key stages 3 and 4.
7. The Cabinet Secretary notes that as part of the proposal a satellite of the Portfield Special School and a Learning Resource Centre for pupils with complex learning needs would be established at Ysgol Bro Gwaun. She welcomes the fact that the availability of these facilities will ensure easier access and reduce travel times for pupils in the Fishguard area with additional learning needs. The co location of these facilities is likely to enhance the exchange of good practice amongst specialist professionals, which could promote better outcomes.
8. The Cabinet Secretary agrees with Estyn who expressed the view that the proposal is likely to improve standards and outcomes for pupils with complex additional learning needs, and that it is likely to at least maintain standards and outcomes for both pre and post 16 pupils.

### **Provision (learning experiences, teaching, care, support and guidance, and the learning environment)**

9. The Cabinet Secretary considers that the proposal should not affect the ability of Ysgol Bro Gwaun to continue to provide a broad and balanced curriculum in key stages 3 and 4, although it seems probable that there will be some staffing reduction.
10. The Cabinet Secretary believes that it is reasonable to assume that learning experiences will be improved for post 16 pupils by the creation of the sixth form centre which will provide an increased number of viable options at one location.
11. The Cabinet Secretary notes that some concerns were raised during consultation about the potential lack of pastoral care at the sixth form centre in comparison with that currently provided by Ysgol Bro Gwaun. However, she was reassured that when Estyn inspected Pembrokeshire College it had a comprehensive health and well being strategy and a wide range of support and services and multi agency partnerships to support the strategy. She believes that it is reasonable to assume

that care and support will be extended to the sixth form centre, and she is satisfied that the responses to this issue provided by the local authority during the consultation period indicate that they have considered this matter.

12. The Cabinet Secretary is satisfied that the proposal will improve overall provision for post 16 pupils and for pupils with special educational needs, taking into account the investment in school and college buildings.

### **Leadership and Management (leadership, improving quality, partnership working and resource management)**

13. The Cabinet Secretary notes that when Estyn inspected the school they reported that the acting headteacher provided strong leadership and clear vision for the school and was well supported by the senior management team who carried out their responsibilities effectively. However, while leadership and partnership working were judged to be good, improving quality and resource management were judged to be only adequate. This resulted in Estyn judging leadership and management overall as being adequate. In follow up monitoring the school was judged to have made insufficient progress and Estyn increased the level of follow up activity. Since the inspection the school has appointed a permanent headteacher.
14. The Cabinet Secretary considers that given the level of support the school is receiving in the form of challenge and intervention, and increased activity from Estyn it is reasonable to assume that leadership and management will improve. In addition without sixth form provision the proposal will enable the school to concentrate on planning for and improving standards for pupils aged 11-16.
15. The Cabinet Secretary is satisfied that the proposal will also lead to an improvement in leadership and management of post 16 provision as the provision will focus mainly on fewer establishments and also in special educational needs provision, as a new unit would be able to share and learn from the expertise available at Portfield school.

### **NEED FOR PLACES AND THE IMPACT ON ACCESSIBILITY OF SCHOOLS**

16. The Cabinet Secretary is satisfied that the proposal will result in improved provision that more effectively matches demand for secondary places in the Fishguard area. The condition of the school is poor and it has a significant number of surplus places. Remodelling and a new extension will improve the overall condition and reduce the capacity of the school. After the sixth form is removed the number of pupils on roll will initially fall. However, the number of pupils in the primary sector, in the area served by Ysgol Bro Gwaun, has increased in recent years and these pupils will eventually progress to Ysgol Bro Gwaun to increase the overall number of pupils. The local authority has confirmed that there will be scope to increase the size of the school should the need arise.
17. The post 16 students would have increased journey times if the proposal is approved because in future they would have to travel to the Pembrokeshire College. The distance between Fishguard and Haverforwest is approximately 16 miles. However, we note that it is intended that post 16 students would still be able to access the facilities at Ysgol Bro Gwaun including information and communication technology suites for distance learning and that it may be possible to deliver some of the A level curriculum from Ysgol Bro Gwaun.

## **RESOURCING OF EDUCATION AND OTHER FINANCIAL IMPLICATIONS**

### **Whether the proposals will ensure a fairer more equitable distribution of funding between mainstream schools within the local authority's area**

18. As sixth form funding will be redistributed to Pembrokeshire College sixth form centre there will not be any savings as a result of the proposal. The college should be able to provide courses more cost effectively than the schools individually.
19. As sixth form funding will be redistributed to Pembrokeshire College sixth form centre there will not be any savings as a result of the proposal. However, the Cabinet Secretary considers that this should not adversely affect the school's budget as the local authority believes funding intended for 11-16 provision is currently subsidising sixth form provision at the school. The college should be able to provide courses more cost effectively than the schools individually. The local authority does not anticipate that there will be any additional revenue costs associated with location of the Learning Resource Centre and the Portfield School Satellite at Ysgol Bro Gwaun.
20. The Cabinet Secretary notes that the proposal will remove approximately 250 surplus secondary school places and that the reduced capacity will better match the pupil projections.

### **Whether proposals form part of the local authority's 21<sup>st</sup> Century Schools Investment Programme and contributes to the delivery of sustainable schools for the 21<sup>st</sup> Century and to better strategic management of the school estate through the removal of maintenance backlogs and school buildings which are inefficient or in poor condition.**

21. The Cabinet Secretary considers the proposal will contribute to the delivery of sustainable schools for the 21<sup>st</sup> Century and to better strategic management of the school estate, as the local authority will remove an unviable sixth form, will significantly refurbish the remaining school, and will improve the facilities available for pupils through opening the sixth form centre in Haverfordwest.

### **The recurrent costs of the proposals over a period of at least 3 years and whether the necessary recurrent funding is available**

22. The Cabinet Secretary notes that as sixth form funding will be redistributed to Pembrokeshire College sixth form centre there will not be any savings as a result of the proposal. However, she notes that the local authority considers that this will not adversely affect the school's budget because it believes funding intended for 11-16 provision is currently subsidising sixth form provision at the school. The college should be able to provide courses more cost effectively than the schools individually. The local authority does not anticipate that there will be any additional revenue costs associated with location of the Learning Resource Centre and the Portfield School Satellite at Ysgol Bro Gwaun.

### **Additional transport costs incurred as a result of proposals**

23. The Cabinet Secretary notes that the local authority considers the proposal will not affect the cost of transport for pupils aged 11-16. However, post 16 pupils currently attending Ysgol Bro Gwaun would in future have to travel to the Pembrokeshire College sixth form centre. Currently Pembrokeshire College provides transport free of

charge to full time students. Students who require transport to the Sixth Form Centre will be able to access Pembrokeshire Colleges' dedicated bus service.

### **The capital costs of the proposals and whether the necessary capital funding is available**

24. The total cost of work to Ysgol Bro Gwaun has been estimated as £12.9 million. Pembrokeshire County Council will provide £6.45 million and has submitted a request to the 21<sup>st</sup> Century Schools Programme for the remaining £6.45 million.
25. The total cost of work to Pembrokeshire College to provide the Sixth Form Centre has been estimated as £6.6 million and has submitted a request to 21<sup>st</sup> Century School Programme for the remaining £3.3 million.

### **The scale of any projected net savings (taking account school revenue, transport and capital costs)**

26. As sixth form funding will be redistributed to Pembrokeshire College sixth form centre there will not be any savings as a result of the proposal.

### **Whether, without the proposals, the school affected would face budget deficits**

27. The Cabinet Secretary notes that the school has managed to reduce the deficit of the previous two years and comfortably balanced its budget in 2014/15. In future as the school will no longer have to support the sixth form, it will be able to focus resources on key stages 3 and 4, and it is more likely that the school will maintain a balanced budget.

### **Whether any savings in recurrent costs will be retained in the local authority's local schools' budget**

28. The local authority will use savings for the educational service.

### **Whether the proceeds of sales (capital receipts) of redundant sites are to be made available to meet the costs of the proposal or contribute to the costs of future proposals which will promote effective management of school places.**

29. The school will be extended and remodelled but will remain on the existing site so there will be no capital receipts from the sale of land or building.

## **OTHER GENERAL FACTORS**

### **What impact proposals will have on educational attainment among children from economically deprived backgrounds**

30. The Cabinet Secretary agrees with the local authority that the extra choice, availability and appropriateness of courses at post 16 could attract more learners to engage in post 16 learning. This may have a positive effect on children from economically deprived backgrounds. As Pembrokeshire college provides free school transport, the Cabinet Secretary would not expect such pupils to be dissuaded from participating.

## **Equality impact assessment**

31. The Cabinet Secretary is satisfied that the local authority has carried out an equality impact assessment and that there will be no adverse impact on any of the protected groups.

## **Community impact assessment**

32. The Cabinet Secretary agrees with the local authority's conclusions that the proposal will have little impact on the community.

## **SPECIFIC FACTORS TO BE TAKEN INTO ACCOUNT FOR PROPOSALS TO REORGANISE SECONDARY SCHOOLS OR TO ADD OR REMOVE SIXTH FORMS**

### **Whether proposals will lead to an improvement in the educational or training achievements of persons who are above compulsory school age but below the age of 19**

33. The Cabinet Secretary agrees with the local authority which believes that the proposal will lead to an improvement in the educational or training achievements of post 16 pupils as larger sixth forms provide more course options and in their view are characterised by higher attainment levels.

### **Whether proposals will contribute to an appropriate range of relevant courses and qualifications and high quality, employer informed, vocational learning routes targeted at pupils of all abilities, whilst maintaining GCSE, AS/A level and other established courses, as required under the Learning and Skills (Wales) Measures 2009 for 14-19 year old learners**

34. The Cabinet Secretary agrees with the local authority that Ysgol Bro Gwaun is unlikely to sustain the variety and quality of post 16 courses needed to satisfy the Learning and Skills (Wales) Measure 2009 because of the low number of pupils on roll. While Estyn found that as a partner of the North Pembrokeshire Federation schools were able to provide a suitable number of and range of post 16 options to meet statutory requirements, few pupils took up courses offered at other establishments.
35. The Cabinet Secretary is satisfied that the Pembrokeshire College will provide the variety and quality of courses required to satisfy the Learning and Skills (Wales) Measure 2009.

### **Whether the proposals are likely to lead to increased participation in learning by pupils beyond compulsory school age, taking into account transport issues and costs to the learner and others, the affordability of such costs, and the likelihood of learners being willing to travel**

36. The local authority believes that increasing the number of courses is likely to increase the level of participation in learning by pupils beyond compulsory school age. The Cabinet Secretary has no reason to disagree with the local authority as the proposal will provide more opportunities and choices. Pembrokeshire College's policy of providing transport free of charge to full-time students may reduce the reluctance of some post 16 pupils to take up A level and vocational courses at a distance from their school, and the intention to provide some courses remotely on

current school sites could further promote engagement. So long as this provision remains in place engagement should be promoted.

### **The extent to which proposals contribute to the 14-19 agenda taking account of the views of local 14-19 networks and learning partnerships**

37. The Cabinet Secretary considers it probable that the proposal will contribute to the 14-19 agenda by improving the educational experience of students at post 16. Although currently the schools in mid and north Pembrokeshire collaborate with each other and Pembrokeshire College to provide A level and vocational courses, few pupils take full advantage of this arrangement to study courses at other schools. The Cabinet Secretary agrees with the local authority that the small sixth forms at Ysgol Bro Gwaun and Ysgol Dewi Sant are not sustainable and, what is in effect, the amalgamation of these sixth forms at the Pembrokeshire College Sixth Form Centre will create more viable and sustainable post 16 provision.

### **The effect of proposals on 11-16 provision in schools**

38. The Cabinet Secretary agrees with the local authority that the proposal could have a positive effect on 11-16 provision in Ysgol Bro Gwaun as the budget for Key stages 3 and 4 will no longer be subsidising post 16 provision. The Cabinet Secretary notes that the total number of pupils attending Ysgol Bro Gwaun will fall initially the number of pupils in feeder primary schools is increasing and will transfer to the school in due course. Although Ysgol Bro Gwaun is and will continue to be a small school it is reasonable to assume that it is unlikely that it will become unviable in the foreseeable future.

### **How proposals would affect the viability of institutions already providing good quality post-16 provision, including school sixth forms, Further Education institutions and private training organisations**

39. The proposals to end sixth form provision at Ysgol Bro Gwaun and close Ysgol Dewi Sant, Ysgol Bro Dewi, Solva Community School and establish a 3-16 school have in common that it is proposed Pembrokeshire College would provide all A level and vocational courses in future. The Cabinet Secretary agrees with the local authority that the more students that attend the Sixth Form Centre the more viable and sustainable it will be and that for a viable Sixth Form Centre, alongside college provision, it would be necessary for at least the sixth forms at Fishguard and St Davids to unite.

### **How proposals might affect the sustainability or enhancement of Welsh medium provision in the local 14-19 network and wider area and promote access and availability of Welsh medium courses in post-16 education**

40. The language category of Ysgol Bro Gwaun would remain as "English medium with significant Welsh following implementation of the proposal. Therefore in terms of Welsh medium education pupils of compulsory school age will continue to receive equivalent provision.

41. Currently, Ysgol y Preseli is the only Welsh medium secondary school in Pembrokeshire and provides for pupils aged 11 - 16. The local authority has recently approved a proposal to establish a Welsh medium school for pupils aged 3 - 16 in Haverfordwest. The local authority has made a commitment to consider post

16 provision when there is evidence of sufficient demand. We have been advised by officers at the local authority that Ysgol Bro Gwaun pupils who would like to access Welsh medium post 16 provision would be able to attend Ysgol y Preseli.

42. Estyn identified the possible risk that pupils may choose to attend post 16 provision at Pembrokeshire College sixth form centre because of the breadth of courses available rather than Ysgol y Preseli. A second Welsh medium secondary school may in future increase demand for post 16 Welsh medium provision and the number of courses available could be increased as they are judged to become more viable to run.

43. There is no Welsh medium provision at Pembrokeshire College and the published proposal does not include an intention to change this. Pembrokeshire College and the proposed A level committee will have responsibility for the courses provided at the sixth form centre. The Cabinet Secretary considers it a reasonable expectation that Pembrokeshire College and the A level committee consider providing courses through the Welsh medium if there is evidence of demand.

#### **The extent to which proposals will provide additional learner benefits compared with the status quo and other tenable options for post-16 organisation**

44. There is little or no evidence that current collaboration is leading to pupils accessing a wide range of subject options, including vocational options. As part of the proposal Pembrokeshire College students would receive new and improved facilities and be able to choose from a wide range of A level and vocational courses. The Cabinet Secretary is satisfied that post 16 students would benefit from better facilities and have access to a wider range of courses.

45. The Cabinet Secretary notes that it is intended that post 16 students would still be able to access the facilities at Ysgol Bro Gwaun including information and communication technology suites for distance learning and that it may be possible to deliver some of the A level curriculum from Ysgol Bro Gwaun.

#### **How proposals might affect the discretionary transport provision a local authority may provide to learners above compulsory school age**

46. Post 16 pupils currently attending Ysgol Bro Gwaun would in future have to travel to the Pembrokeshire College sixth form centre. The Cabinet Secretary notes that Pembrokeshire College provides transport free of charge to full time students. Students who require transport to the Sixth Form Centre will be able to access Pembrokeshire Colleges' dedicated bus service.

#### **Specific factors to be taken into account for proposals to reorganise ALN provision**

47. The Cabinet Secretary is satisfied that the proposal will improve and extend provision for pupils aged 11-16 with ALN in the Fishguard area. Ysgol Bro Gwaun currently has a pilot learning resource centre for ALN pupils with complex learning needs. The proposal will provide improved facilities in new accommodation for pupils with ALN in learning resource centre and a satellite unit of the Portfield School based at Ysgol Bro Gwaun. The Cabinet Secretary agrees with the local authority that the satellite unit and learning resource centre are likely to provide a continuum of provision and increase opportunities for inclusion within the



mainstream environment, while meeting the individual learning, emotional and social needs of children and young people identified with particular complex needs.

## **ADDITIONAL FACTORS TO BE TAKEN INTO ACCOUNT IN APPROVING/ DETERMINING SCHOOL ORGANISATION PROPOSALS**

### **Whether there are any other related proposals**

48. The Cabinet Secretary considers that the proposals to end sixth form provision at Ysgol Bro Gwaun and close Ysgol Dewi Sant, Ysgol Bro Dewi, Solva Community School and establish a 3-16 school are related for the reasons set out in the paragraphs above. The Cabinet Secretary has therefore considered the proposals together.

### **Whether the consultation has been conducted in accordance with the Code**

49. The Cabinet Secretary is satisfied that the consultation has been conducted in accordance with the Code.

50. The Cabinet Secretary is satisfied that the necessary impact assessments were carried out and were publicly available. She agrees with the local authority that there should not be any adverse impacts on groups with protected characteristics.

### **Whether the proposal has been published in accordance with the Code and the notice contains all of the required information**

51. The Cabinet Secretary is satisfied that the publication requirements have been complied with.

### **Consideration of the objections and local authority's responses to the objections**

52. There were no statutory objections to this proposal.

53. The Cabinet Secretary has decided to approve the proposal on the grounds that it will:

- be likely to maintain or improve the standard of education provision at post-16;
- provide young people with a wider choice of post-16 provision located at one site;
- provide enhanced facilities for post-16 pupils;
- contribute to the aims of the Learning and Skills (Wales) Measure 2009 by strengthening sustainable provision;
- enable Ysgol Bro Gwaun to focus on maintaining and improving the standards for pupils aged 11-16;
- be likely to improve provision and outcomes for relevant pupils;
- be likely to promote further inclusion for relevant pupils and enable good practice to be shared between special schools, units for pupils with SEN and mainstream schools; and
- Provide sufficiency of school places and reduce the costs involved in maintaining overlarge school buildings.

54. The Cabinet Secretary notes that this proposal is due to be implemented with effect from 1 September 2018 and from that date pupils of Ysgol Bro Gwaun will cease to be admitted to the sixth form. When the proposal is implemented, the Cabinet Secretary looks to the local authority to ensure that appropriate arrangements are put in place and that the transfer of pupils is carried out with the minimum disruption possible. The local authority should inform Schools Effectiveness Division when the proposal has been implemented.

55. I am sending a copy of this letter to the Chief Executive of Pembrokeshire County Council.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steve Vincent', written in a cursive style.

**STEVE VINCENT**  
**DEPUTY DIRECTOR: SCHOOLS EFFECTIVENESS DIVISION**