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Tab	Table of Contents		
Content		Page	
1. Purpose of this Objection Report		3	
2.	The Statutory Notice	3	
3.	Details of Objections Received	4	
4.	Objections and Responses	4	

1. Purpose of this Objection Report

This Objection Report is prepared in accordance with the Welsh Government's (WG's) <u>School Organisation Code (2nd Edition) (011/2018)</u>. Its purpose is to:

- Inform the outcome of the publication of the Statutory Notice published for this proposal, which was published on 4th March 2025 for a period of a minimum of 28 days.
- Include a summary of the statutory objections received and Rhondda Cynon Taf County Borough Council's (RCTCBC's) response to them.

2. The Statutory Notice

The Statutory Notice to progress this proposal, which was published 4th March 2025, is reproduced below:

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

Education and Inclusion Services, 21st Century Schools, Valleys Innovation Centre, Navigation Park, Abercynon, CF45 4SN.

Notice is given in accordance with Section 42 of the School Standards and Organisation (Wales) Act 2013, and the Welsh Government School Organisation Code 2018 (011/2018), that Rhondda Cynon Taf County Borough Council (RCTCBC), having consulted such persons as required, proposes to:

- 1. Make a regulated alteration to below English medium school listed as 1.1, so that the age range of the pupils it can admit is amended from 11 to 19 years to 11 to 16 years and that the sixth form provision be removed.
 - 1.1 Mountain Ash Comprehensive School, New Road, Mountain Ash, CF45 4DG.

Post-16 pupils from Mountain Ash Comprehensive School will have the option of attending sixth form at Aberdare Community School, Ynys Road, Aberdare, CF44 7RP, or the local college, Coleg y Cymoedd, Aberdare, Wellington Street, Aberdare, CF44 8EN and Nantgarw, Heol y Coleg, Nantgarw CF15 7QY for their post-16 education.

RCTCBC undertook a period of consultation before deciding to publish this proposal. A Consultation Report containing a summary of the issues raised by consultees, the proposer's responses and the view of Estyn is available on RCTCBC's website at: <u>Consultation Report Mountain Ash Comprehensive School Proposal</u>

It is proposed to close the sixth form at Mountain Ash Comprehensive School and amend the catchment area for post-16 provision to place Mountain Ash Comprehensive School in the catchment area of Aberdare Community School.

The capacity of Mountain Ash Comprehensive School after this proposal is implemented will be 1,394 pupil places. From September 2025 the proposed admission number for the school will be 255.

It is proposed that the sixth form at Mountain Ash Comprehensive School closes by no later than September 2026. To enable the closure of the sixth form at Mountain Ash Comprehensive School by this date, no new year 12 sixth form pupils would be admitted in September 2025.

Pupils will be provided with transport in accordance with RCTCBC's Transport Policy which is available here:

School and College Transport | Rhondda Cynon Taf County Borough Council

Within a period of 28 days of the date on which these proposals were published, that is to say by 17:00 on 3rd April 2025, any person may object to the proposals. Objections should be sent to the Director of Education and Inclusion Services, 21st Century Schools, Valleys Innovation Centre, Navigation Park, Abercynon CF45 4SN, or e-mail <u>schoolplanning@rctcbc.gov.uk.</u>

Where objections have been received, RCTCBC will publish a summary of any such objections made (and not withdrawn in writing) within the objection period, together with their observations thereon, within 7 days of the determination of the proposal.

Signed:	anynor Drives	
Director of Education and Inclusion Services for Rhondda Cynon Taf County Borough Council		
Date:	4 th March 2025	

3. Details of Objections Received

The Statutory Notice was published on 4th March 2025 which triggered the commencement of the objection period. This ran until 17:00 on 3rd April 2025. During the objection period, a total of two objections were received.

This Objection Report summarises the objections, along with RCTCBC's response to them. This is in accordance with the WG's <u>School Organisation Code (2nd Edition)</u> (011/2018).

To confirm both of the objections received during the objection period will be sent to the Welsh Ministers who make the final decision on proposals that affect sixth form education.

4. Objections and Responses

The table that follows summarises the themes included in both objections received, along with the Council's responses.

Number	Objection Theme	Response
1.	The proposal would be detrimental to	We do not agree, small sixth forms are
	the overall offering of Mountain Ash	financially unviable and, where they
	Comprehensive School.	exist, resources intended for the benefit
		of 11 to 16 year old pupils accessing
	• The loss of the sixth form at Mountain	statutory education are redirected to
	Ash Comprehensive School would be	subsidise the post-16 provision. This is
	detrimental to the overall offering of	unsustainable and impacts upon the
	the school and unfairly penalise	educational offer for younger pupils and

young people from the lower area of the Cynon Valley by impacting on their educational prospects.	presents schools with significant budgetary challenges. This proposal will improve the 11 to 16 provision at Mountain Ash Comprehensive School as the resources available for statutory aged pupils will be increased given the improvements to the financial viability of the school.
	Under current Cynon Valley Post-16 Consortium arrangements, 75.0% of post-16 pupils already access their education across at least two school sites (Aberdare Community School, Mountain Ash Comprehensive School and St John Baptist Church in Wales High School) which impacts upon valuable study time. The extensive travel involved in accessing post-16 courses across multiple school sites could be a potential barrier to pupils progressing into post-16 education within the school setting, adversely impacting upon retention and progression into Further and Higher Education.
	Should the proposal proceed, transferring sixth form pupils from Mountain Ash Comprehensive School to Aberdare Community School would create a larger sixth form which would have more potential for economies of scale and financial efficiencies which can accrue and be reinvested for the benefit of all pupils. Larger sixth forms also enable a broad and balanced post-16 education to pupils that better meets the needs of individual pupils and, as such, could improve pupil outcomes.

2.	RCTCBC is clearly set on closing the sixth form at Mountain Ash Comprehensive School.	This is not true. All correspondence received during the consultation stage was shared with Cabinet and was consciously considered.
	 Noting the comments that are contained within the Consultation [Report] and its appendices, [RCTCBC] is clearly set on closing the [sixth form at Mountain Ash Comprehensive School] as they have obviously not considered the simple fact that 88.0% of respondents disagree with the proposal. This makes it clear that [RCTCBC], whilst obviously following procedure, are not considering the views of the people and communities which they are supposed to serve and are pressing on with their own agenda. 	Cabinet made a decision to progress with the statutory consultation process and publish a Decision Notice triggering the 28-day Objection Period in line with the requirements of the WG's School Organisation Code (2nd Edition) (011/2018). It is the Welsh Ministers who make the final decision on this proposal and not the Council's Cabinet. This consultation has been developed following discussions between RCTCBC
	pressing on with their own agenda.	and the Mountain Ash Comprehensive School. In addition, correspondence was received by RCTCBC's Director of Education and Inclusion Services from the Governing Body of Mountain Ash Comprehensive School expressing shared concerns regarding the viability and sustainability of the sixth form provision at the school, and a request for RCTCBC to undertake a review was made.
3.	Welsh Ministers should, in their considerations, ensure parity of the education of post-16 year old pupils is maintained within the lower area of the Cynon Valley.	Noted. Under Section 50 of the <u>School</u> <u>Standards and Organisation (Wales) Act</u> <u>2013</u> , proposals that affect sixth form
	• [Welsh Ministers] should, in their considerations, ensure that parity of the education of post-16 year old [pupils] is maintained within the [lower area of the] Cynon Valley and that [pupils]are not unfairly excluded for the opportunity to a [post-16 provision] because of [the] options for furthering themselves becoming more limited due to geography and circumstances beyond their control.	If Welsh Ministers approve the proposal, it will be implemented in accordance with the date stated in the Statutory Notice or any subsequently modified date. If the Welsh Ministers decide not to proceed, that will be the end of the proposal.
4.	Effective transition.	Understandably, some pupils may initially be daunted at the prospect of transferring to a new school. However, it

•	This year 11 group is absolutely fantastic but have sadly had extra disadvantages due to Covid-19; they were in their final year in primary school when Covid-19 hit, and missed lots of special moments, and also on a proper transition programme to Mountain Ash Comprehensive School. Their first year at Mountain Ash Comprehensive School was also heavily affected, but still the vast majority of them have always tried to do their best to be successful.	is worth noting that 75.0% of pupils are already accessing provision across at least two school sites. Should the proposal proceed, there will be targeted support for all sixth form pupils from Mountain Ash Comprehensive School. A new package of support aimed at year 12 pupils, known as EVALUATE, will be focused initially on pupils transferring from Mountain Ash Comprehensive School to Aberdare Community School. This will include enhanced careers advice and guidance, mentoring and carefully monitored pastoral care.
•	Building new relationships with peers and staff takes timeproposal will create an 'us and them' culture.	Meaningful and positive transition is an integral part of ensuring that pupils settle into their new school setting with little disruption to their wellbeing and education. This is supported by providing effective pastoral and academic support and structured opportunities for pupils to become familiar with the new school environment and staff. Should the proposal proceed, an enhanced collaboration across all areas of the curriculum between both schools can begin to develop from year 7 onwards, allowing both schools to foster a collegiate approach and a feeling of belonging across both school communities.
		A plan is already in place for transition activities to take place which will be beneficial to strengthen the consortia arrangements should the proposal not be implemented. Assemblies have already taken place at Mountain Ash led by Aberdare Community staff and a teambuilding day with the army has been planned for June. In addition, transition plans from other schools in the Local Authority that have been through successful school organisation changes have been shared to support further planning.
5. I r	npact on pupils/pupils' wellbeing.	The wellbeing of all pupils has been considered and is paramount to RCTCBC. We acknowledge that some

•	There are extensive concerns raised by parents[/carers], pupils (of both schools), governors and staff over	pupils may find the changes more difficult than others.
	pupil wellbeing, mental health and support for the transfer of pupils to Aberdare Community School from	Life transitions are significant features in all young people's lives. All pupils receiving education will experience
	Mountain Ash Comprehensive School, both immediately and ongoing.	periods of change and adaptation and many pupils are already accessing their education across more than one school site and have adjusted well to this. It
•	While in the process of choosing their next steps after year 11, this announcement was made and has affected many [pupils]. The timing of this is so quick that pupils who had planned to return to sixth form at Mountain Ash Comprehensive	could be argued that receiving post-16 education on a reduced number of school sites will bring greater stability to pupils and continuity in teaching and learning, and social relationships with staff and peers during their post-16 studies.
	School in less than a year's time have been left confused and unsure what to do next. Pupils who were planning to apply have now not filled in the initial options trawl for sixth form subjects as they are disillusioned and feeling very let down.	It is acknowledged that some pupils will need additional support emotionally to adapt to a new school environment and encouragement to make new friends and relationships and to be part of a new social network. Transition arrangements that have already been actioned are detailed above.
•	Joining a [the] sixth form at Aberdare Community School, the Mountain Ash Comprehensive School pupils will be viewed as and treated as outsiders by the established pupil cohorts.	Should the proposal proceed, RCTCBC will work with both schools to support the meaningful delivery of effective transition. Further information on this is detailed above. The transition
•	In 2014, Aberdare Community School was formed by the merger of three local schools. For the first few years there was an ongoing 'legacy' of which school the pupils and staff had originated from. This took about five	arrangements that will be delivered, will ensure there will be lots of opportunities to help pupils navigate the change and happily settle into their new school as quickly as possible.
	years, or maybe even longer, to be lost as new pupils came though the school, as well as some new staff. For [sixth form] pupils [from Mountain Ash Comprehensive School], when they	An Equality Impact Assessment for the proposal is still available to view on the Council's website and this has been prepared in line with the requirements of the WG's <u>School Organisation Code (2nd Edition) (011/2018)</u> . In addition,
	attend the sixth form at Aberdare Community School, their peers will have had five years teaching in the school, so Aberdare Community	RCTCBC considers that the proposal benefits the children and young people in accordance with the seven core aims set
	School pupils will have an advantage over Mountain Ash Comprehensive School pupils as they will be familiar with the staff, and the school.	out within the United Nations Convention on the Rights of the Child.

	• Will there be ongoing pastoral support throughout sixth form for Mountain Ash Comprehensive School pupils from Mountain Ash Comprehensive School staff after they move?	
6.	Impact on pupils' attainment.	Should the proposal proceed, it is anticipated that there will be no long
	• The [proposal] significantly underestimates how the change will impact on long term A Level results and educational out turn of young people from the lower [area] of the Cynon Valley who spend their pre-16	term, adverse impact and it should be noted at this point in the consultation process that RCTCBC considers the overall impact of the proposal to be positive.
	education at Mountain Ash Comprehensive School and ultimately move to Aberdare Community School.	As noted within the Consultation Report, Estyn considered that the proposal is likely to improve the standard of post-16 provision within the area. As has already been included within the data and
	• The overarching feeling of "belonging" and community that pupils have at Mountain Ash Comprehensive School will be lost and will no doubt affect their performance.	mentioned above, 75.0% of pupils in Mountain Ash are already accessing provision across at least two school sites, so the attainment success of the pupils will be attributable to the quality of the teaching and learning across the consortia. There is no evidence to
	• What steps will be taken to ensure the success of the results achieved at MACS will continue?	suggest that this change will have a detrimental impact on academic outcomes. Indeed, access to education on one school site, should provide greater continuity in teaching, learning and pastoral support.
7.	Is there capacity at Aberdare	As outlined within the Consultation
	Community School to accommodate all sixth form pupils from Mountain Ash Comprehensive School?	Document, there is sufficient capacity at Aberdare Community School to accommodate all prospective sixth form pupils of Mountain Ash Comprehensive
	• It has been highlighted by the existing pupils of Aberdare Community School, during this process, that there are capacity issues regarding equipment, facilities and course offerings. In relation to certain	School. The current capacity of Aberdare Community School is 1,574 and there are currently 1,238 pupils on roll. Therefore, there is ample space to accommodate growth in numbers.
	offerings. In relation to certain courses the capacity is reliant upon Mountain Ash Comprehensive School to meet demand. Introducing additional pupil numbers will undoubtedly compound this situation.	Schools receive post-16 funding based on the number of post-16 pupils they have on roll. If Aberdare Community School has more sixth form pupils, their funding will increase, and they will have more money to spend on post-16

	• I am concerned about the practicalities of pupils being absorbed by Aberdare Community School with	provision and to make any necessary changes to accommodate all pupils.
	sixth form numbers forecast to be increasing this year, at both schools. How will you ensure adequate provision across the curriculum for all sixth form pupils with a big increase in the number of A Level classes at Aberdare Community School needed?	In addition, as stated in the data included within the Consultation Document, numbers on roll in the sixth forms at both schools have been much larger over previous years. This historic data demonstrates that Aberdare Community School has the capacity to cater for a much larger sixth form, as it has done so successfully, within the last 5 years.
8.	The catchment area for Mountain Ash Comprehensive School is deprived, this could have a detrimental impact	All comments in relation to deprivation are noted.
	 on pupils who are already disadvantaged. Mountain Ash is a disadvantaged area; parts of Mountain Ash are listed 	An Equality Impact Assessment for the proposal has been prepared in line with the requirements of the WG's <u>School</u> <u>Organisation Code (2nd Edition)</u> (011/2018).
	as some of the most deprived areas in Wales. Mountain Ash Comprehensive School pupils are already striving to overcome disadvantage, without adding in an extra source at sixth form. How will this be overcome?	Section three of the Equality Impact Assessment sets out RCTCBC's Socio- economic Duty in relation to this proposal. The socio-economic disadvantages relevant for the area are listed using data from the Welsh Index of Multiple Deprivation (WIMD). Each disadvantage is considered within the context of this proposal, and the given impact of this proposal upon each disadvantage is listed, detailed and evidenced. This information is still available on the Council's website.
		It is important to note that should the proposal proceed, it is highly likely that all sixth form pupils living in the catchment area of Mountain Ash Comprehensive School will be entitled to free home to school transport to attend post-16 education at Aberdare Community School.
9.	The sixth form at Mountain Ash	This is not disputed.
	Comprehensive School may be small	
	but it is successful.	As noted within the Consultation Report,
	The sixth form at Mountain Ash	Estyn considered that the proposal is likely to improve the standard of post-16
	Comprehensive School may be small	provision within the area. As has already
	but it is successful. At Mountain Ash	been included within the data, and

	Comprehensive School pupils are encouraged in all ways possible to aim high and believe in themselves by all staff. What steps will be taken to ensure this continues?	mentioned above, 75.0% of pupils in Mountain Ash are already accessing provision across at least two school sites, so the attainment success of the pupils will be attributable to the quality of the teaching and learning across the consortia. Similarly high expectations will be in place in Aberdare Community School and all pupils will access the support required to enable them to achieve the best outcomes that they are
10.	 Could result in home to school transport implications. The [Consultation] Report points to the A Level offerings at Coleg Y Cymoedd the primary Coleg Y Cymoedd campus for A Levels is Nantgarw with an extremely limited offering at Aberdare. This means travel to the appropriate campus for A Level pupils from Mountain Ash Comprehensive School becomes far more difficult andit places more limitations on pupil choice. 	capable of.Information in relation to RCTCBC'sHome to School Transport provision isavailable on the RCTCBC website. Thisalso includes information in relation topost-16 provision.Should the proposal proceed, it is highlylikely that all sixth form pupils living in thecatchment area of Mountain AshComprehensive School will be entitledto free home to school transport to attendpost-16 education at AberdareCommunity School.
	 At the moment pupils only qualify for free [home to school] transport to the closest provision that runs the course or subjects that the pupil chooses. Lots of pupils feel uncomfortable with the idea of joining an already established year group at another school and are choosing to go to Coleg Y Cymoedd instead. This will mean [that lots of pupils] will not qualify for free [home to school] transport. Lots of families will struggle with this due to financial constraints. 	
11.	 The presence of sixth form pupils provides pre-16 pupils with good role models. Younger pupils at [Mountain Ash Comprehensive] School will no longer have the opportunity to interact with sixth form pupils. Sixth form pupils have roles of responsibilities in school. At present younger pupils 	RCTCBC recognises this point, however, more opportunities could be made for year 11 pupils to take on this role which would be beneficial for both younger and the older pupils.

10	view sixth form pupils in a positive way and see this as something to aspire to in their future. Lots of our pupils do not have positive role models and losing this will be detrimental to them.	The qualifications to teach post 10
12.	 Closing the sixth form could have a detrimental impact on staffing levels. Closing the sixth form could have a detrimental impact on staffing levelsno teacher with ambition will want to teach in a school without a [sixth form]. 	The qualifications to teach post-16 education are no different from those of pre-16 education, and staff deployed to teach sixth form can also be utilised to teach years 7 to 11. It is recognised that some staff have a passion for teaching at sixth form level and may decide to seek opportunities elsewhere.
		RCTCBC has well established Human Resource (HR) policies and procedures that give reassurance to staff and employers about the management of organisational change.
13.	How will pupils with additional learning needs (ALN) be supported.	All pupils with ALN will continue to be supported. <u>The Additional Learning</u> <u>Needs Education Tribunal (ALNET) Act</u>
	• [Pupils] have spent five years in a school, where they are used to the staff, the routine, the building and surrounding area and now you want to completely change the sixth form.	<u>2018</u> provides detailed guidance on the duties and responsibilities of Councils in meeting the ALN of children and young people.
		<u>The ALN Code for Wales (2021)</u> recommends that early years and school settings adopt a graduated response to meeting the ALN of children and young people. A graduated response means that progressively greater expertise and support can be brought in to address the difficulties a child or young person may be experiencing. Additional or different provision should be made depending on the severity of the child/young person's level of need.
		This duty and responsibility in this regard will be met regardless of which school a child/young person attends.
14.	Mountain Ash Comprehensive School offers some subjects at post-16 that Aberdare Community School doesn't, will these subjects transfer?	There is only one course currently offered in Mountain Ash Comprehensive School that is not currently offered by the other schools in the Cynon Valley Post- 16 Consortium. Should this proposal proceed, and should there be future

	• "Many popular subjects such as psychology are not available in [Aberdare Community School] while they are available at Mountain Ash [Comprehensive School]."	demand for this course, then support will be offered to the schools in the consortium to provide this course to ensure that there is no detrimental impact on the choices available to pupils. Schools routinely review and revise their
		post-16 offer to meet need and demand. If there is a need for a specific course, including Psychology as was mentioned in the response, then a potential arrangement to collaborate and share staff under a secondment arrangement could be an option that is explored. Discussions regarding this arrangement are already being held so that plans can be put in place quickly should the proposal be implemented.
		Creative solutions will be supported where appropriate but until we have final pupil numbers it is difficult to project the potential demand for certain subjects. It is for school leaders to decide on the curriculum offer in their schools based on the demand for certain subjects. However, pupil numbers will influence the capacity of a school to provide an extensive curriculum offer.
15.	 Sixth form classes at Aberdare Community School could be too large. "Aberdare Community Schoolwill also face larger class sizes at A level." 	Schools receive post-16 funding based on the number of post-16 pupils they have on roll. If Aberdare Community School has more sixth form pupils, their funding will increase, and they will have more money to spend on post-16 provision and make any necessary changes to accommodate all pupils. This could include exploring a wider variety of post-16 subjects and could potentially mean there would be more choice for pupils as well as the opportunity to develop more post-16 pastoral care.
		Estyn's thematic review on ' <u>A Levels and</u> <u>Sixth Forms in Further Education</u> <u>Colleges</u> ' in November 2018, outlines: "Class sizes vary dramatically across centres, from one to about 30 [pupils]. In very small classes, it is difficult to hold

		productive discussions and for [pupils] to learn from each other." Therefore, having larger sixth forms will
		benefit pupils, help build relationships, provide greater opportunities for student interaction, study groups and a wider experience of sharing knowledge and ideas. There will also be an opportunity for pupils to 'buddy up' providing each other with peer support with increased social interaction and well-being.
		As previously noted, and as stated in the data included within the Consultation Document, numbers on roll in the sixth forms at both schools have previously been much larger. This historic data demonstrates that Aberdare Community School has the capacity to cater for a much larger sixth form, as it has done so, successfully, within the last 5 years.
16.	 Parents/carers of pupils have developed a relationship with the staff at Mountain Ash Comprehensive School and these would have to be developed from scratch with staff at Aberdare Community School. I would like to question how the positive relationships would continue to be developed between the [sixth form] pupils at [Mountain Ash Comprehensive School] and the staff at Aberdare Community School. 	Throughout the consultation process, comments received from the pupils at Mountain Ash Comprehensive School have been very complimentary and extremely positive about the support and guidance offered by the staff at the school. However, should the proposal proceed, we would hope that those positive relationships would be forged and continue to be developed between the pupils and the staff at Aberdare Community School.
	at Aberdare Community School.	The transition arrangements that will be delivered to pupils will also be available to parents/carers, and there will be opportunities for both parents/carers and pupils to visit the school prior to any changes being implemented. This will help both the pupils and their families navigate the change and happily settle into their new school as quickly as possible.
		Good transition inevitably entails effective information sharing about pupils, their skills and any support needs.

17.	Financial implications of the decision	Given the timing of this decision the Local Authority has confirmed that both
	 How would this be possible to deliver with the decision coming far too late for staffing levels to be changed and funding not in place? 	schools' budget positions will be protected for the next academic year until a decision on the proposal is made.
		Both schools have received clarification on this issue and have received confirmation that there will be no financial impact should the proposal be implemented from September 2025.