

Arolygiaeth Ei Fawrhydi dros Addysg a Hyfforddiant yng Nghymru His Majesty's Inspectorate for Education and Training in Wales

A report on Ysgol John Bright

Maesdu Road Llandudno Conwy LL30 1LF

Date of inspection: November 2023

by

Estyn, His Majesty's Inspectorate for Education and Training in Wales

About Ysgol John Bright

Name of provider	Ysgol John Bright
Local authority	Conwy County Borough Council
Language of the provider	English
Religious character	
Number of pupils on roll	1147
Pupils of statutory school age	934
Number in sixth form	213
Percentage of pupils eligible for free school meals over a three-year average (The national percentage of pupils eligible for free school meals over a three-year average in Secondary is 20.2%)	18.1%
Percentage of pupils identified as having additional learning needs (a) (The national percentage of pupils identified as having an additional learning need in Secondary is 17.8%)	17.9%
Percentage of pupils who speak Welsh at home	7.9%
Percentage of pupils with English as an additional language	12.2%
Date of headteacher appointment	01/09/2022
Date of previous Estyn inspection (if applicable)	01/10/2015
Start date of inspection	13/11/2023

Data reported is sourced from the latest available Pupil Level Annual School Census. These figures may be slightly different to those observed during the inspection.

Further information is available from the Welsh Government My Local School website: mylocalschool.gov.wales

a. The term 'additional learning needs' is being used to describe those pupils on the SEN/ALN register of the school.

Overview

Ysgol John Bright is a supportive community of learning where leaders and staff encourage all learners to reach both their academic potential and personal goals. The school provides a safe, nurturing and encouraging environment alongside high levels of care that enables pupils to learn, grow and develop into mature and responsible individuals.

A notable strength of the school is the extensive range of curricular choices for pupils. These include relevant vocational, practical and academic subjects, which reflect pupils' aspirations and the employment needs of the local area. In addition, the school provides a wide variety of extra-curricular activities and sporting clubs for all its pupils including an annual musical production, which is staged in the town's theatre. Overall, many pupils seize the valuable learning and social opportunities offered to them and make considerable progress in their personal development by the time they leave school.

In many lessons, teachers plan a broad range of learning activities to enable pupils to develop their subject knowledge and understanding. In a few lessons, teachers' planning is particularly successful in securing strong, sustained pupil progress. In these cases, teachers have high expectations and ask challenging and probing questions to stimulate pupils' thinking and ideas. However, teachers do not maximise opportunities to develop pupils' literacy skills within their subject area. In addition, in relevant subjects, teachers do not plan numeracy tasks carefully enough to ensure pupils make consistent progress. Overall, planning for the progressive development of pupils' literacy and numeracy skills is underdeveloped.

The headteacher is a thoughtful and considerate leader who provides support and robust challenge to his staff. He has high aspirations for the school as a community of learning. Together with the senior leadership team and staff, he has forged a productive partnership with other education providers, external organisations and local charities such as Tŷ Hapus to ensure that pupils, including those from low-income households, obtain valuable academic and social learning opportunities.

Leaders at all levels use a broad range of evidence to consider the quality and effectiveness of their work. They are developing well their ability to identify strengths and weaknesses in their practice. However, overall, evaluations are not precise enough to enable leaders to pinpoint specific areas to improve.

Whole-school attendance has not improved as well as that in similar schools since the time of the pandemic. The attendance of pupils eligible for free school meals is notably lower than the national rate.

Recommendations

We have made three recommendations to help the school continue to improve:

- R1 Strengthen the provision for the progressive development of pupils' literacy and numeracy skills so that pupils have meaningful and challenging opportunities to develop these skills and make sufficient progress across the curriculum
- R2 Improve attendance and strengthen processes for monitoring whole-school attendance, including that of specific groups of learners
- R3 Refine self-evaluation and improvement planning processes so that they focus more precisely on securing improvements in specific areas

What happens next

The school will draw up an action plan to address the recommendations from the inspection.

Estyn will invite the school to prepare a case study on its work in relation to the broad and purposeful curriculum which meets the needs of all learners for dissemination on Estyn's website.

Main evaluation

Teaching and learning

Nearly all teachers at Ysgol John Bright know their pupils well and are caring and respectful towards them. Most teachers build and maintain positive, supportive working relationships with the pupils they teach. They manage pupil behaviour effectively, which ensures a positive working environment in their classrooms. As a result of the strong care and support by teachers, the behaviour of most pupils is very good and they have a positive and healthy attitude towards their learning. Most pupils arrive promptly to lessons and are respectful to their teachers. Many sustain concentration well and listen carefully to presentations and instructions. When given the opportunity, they generally collaborate well with their peers in pairs or in small groups.

Many teachers have secure subject knowledge and make regular use of subject specific terminology when explaining concepts. In many cases, they make use of a suitable range of resources to support learning. This includes helpful starter activities to check pupils' prior learning before introducing new work. Overall, most teachers give due consideration to pupils' additional learning needs (ALN) when they plan lessons. They make appropriate amendments to tasks or provide helpful additional resources to support these pupils. As a result, many pupils with additional learning needs make good progress from their starting points.

In many lessons, common strengths in teaching lead to suitable progress in pupils' subject understanding, literacy, numeracy and digital skills. In these lessons, teachers:

- plan a broad and relevant range of activities that allow pupils to develop subject specific knowledge and skills
- ensure that activities and tasks build on each other cumulatively
- highlight requirements of tasks clearly and model what a good quality response should look like
- question pupils appropriately to check their understanding and ensure they are engaged in learning
- provide appropriate whole-class and individual verbal feedback at suitable points in lessons
- give pupils time to reflect on achievements and what they need to improve following assessments

In a few lessons that are particularly effective, teachers meticulously plan a wide variety of interesting learning experiences and activities which engage pupils well. This means that pupils participate with fervour in tasks and make strong and sustained progress in their subject knowledge and skills. In these lessons, teachers' expectations of what pupils can achieve are high and the pace of teaching is closely matched to the pace of learning. Teachers use questioning well to probe and deepen pupils' thinking skills and develop their ability to solve problems. They assess pupils' progress as they work to gauge how well they are doing and pause activities accordingly in order to further explain or consolidate the learning or increase the level

of challenge. These teachers often use pupils' verbal and written answers productively to help the class understand qualities and shortcomings.

In a minority of lessons, shortcomings in teachers' planning and delivery sometimes lead to pupils being passive in lessons, having poor concentration, not engaging well enough in class discussions or making slower progress than expected. These shortcomings include:

- setting a low level of challenge and having low expectations of what pupils can
- planning a narrow range of tasks with little variety
- teachers over-directing the learning and not giving pupils enough independence to work out problems themselves
- missed opportunities to probe pupils' thinking and reasoning through questioning
- insufficient use of the target language in Welsh and international languages lessons

The school plans and adapts its curriculum well to meet pupils' needs and this is a strong feature. In the sixth form, it offers an extensive range of academic and vocational courses to support pupils' aspirations and career path. Pupils can study subjects such as further mathematics, medical science, fashion and textiles and photography. In addition, well-established links with local schools are used beneficially to extend the curriculum offer for these pupils. There is a similarly broad range of options at Key Stage 4, where pupils can follow courses such as outdoor education, engineering and construction. They also have the choice of three modern foreign languages. Currently, the three-year Key Stage 4 means that pupils in Year 9 do not have the opportunity to study a full range of subjects, although the school has well-considered plans in place to address this from next year.

The school has robust systems to identify and support pupils at risk of disengagement. It uses beneficial links with a local college, pupil referral unit and special school to provide these pupils with helpful alternative provision, for example courses in hair and beauty, bushcraft, boat building and motor vehicle studies.

Supporting all pupils' interests and aspirations

All pupils can take part in the school's Duke of Edinburgh programme, with free places offered to families in need. In addition, the school identifies pupils who have a talent for acting and performing and who are interested in pursuing a career in this area but whose families cannot afford private lessons. These pupils are given free acting lessons to help prepare them for taking external examinations and gaining recognised acting and public speaking qualifications. The provision of support for vulnerable learners and those disadvantaged by poverty, equally for their learning and their personal development, is a strength of the school.

Leaders have a clear vision for developing their Curriculum for Wales. Supported by helpful collaboration with local primary schools, they are making sound progress in developing a range of authentic learning experiences that make suitable use of the local area.

There are appropriate opportunities across the curriculum for pupils to learn about Welsh culture and heritage and the experiences of black, Asian and minority ethnic people. For example, they learn about the lives of Vivienne White and Betty Campbell, and study the Aurelian Moors, the first recorded African community in Britain. In Years 7, 8 and 9, the personal and social education (PSE) programme helps pupils to understand important topics such as healthy relationships and the dangers of substance abuse. However, PSE provision for older pupils is not sufficiently developed.

The school has a robust and effective system to monitor pupils' progress. Leaders identify pupil underachievement and act upon this swiftly. There are worthwhile arrangements to review the suitability of assessments through a purposeful assessment working group for middle and senior leaders.

Overall, the school does not have a sufficiently strategic approach to developing pupils' literacy skills across the curriculum. Moreover, opportunities to develop pupils' numeracy skills across the curriculum are not consistently meaningful or challenging enough. In general, pupils develop their digital skills suitably across the curriculum. For example, they compose and edit musical compositions using a variety of software, manipulate digital images creatively in photography, and create videos to promote a homelessness charity in English.

A summary of pupils' development in literacy, numeracy, Welsh and other skills:

Literacy

Many pupils read aloud competently and a few pupils do so with impressive fluency and expression. Most pupils use an appropriate range of reading strategies to extract information from a relevant range of texts. Where there are beneficial opportunities to do so, the majority of pupils analyse a range of texts well, for example when they consider the impact of specific language on the reader in literary texts. However, they generally do not develop advanced reading skills, such as making inferences and deducing meaning in more challenging texts, well enough.

Many pupils listen attentively to their teachers' explanations and to the contributions of their peers. A few pupils give detailed responses to teacher enquiry using a good range of subject-specific vocabulary and complex or sophisticated language. For example, they speak articulately when discussing stereotypes in male and female careers in PSE. However, in general, the majority of pupils offer brief responses to teachers' questions or lack confidence when participating in group discussions.

The majority of pupils write clearly and accurately in most subjects across the curriculum, such as when they consider the nature and impact of the Ebola virus in geography. A minority of pupils produce suitably crafted analytical writing, making appropriate use of subject-specific vocabulary. A few write at length with fluency, detail and sophisticated vocabulary. For example, in English they discuss the advantages and disadvantages of taking risks and, in drama, pupils produce high quality evaluations of their performances. In international languages, many pupils acquire strong writing skills over time. A few subject areas provide pupils with suitable opportunities to develop their extended writing skills. For example, in

religious education pupils produce thoughtful discursive pieces examining whether cohabitation is always wrong or if worship has relevance in 2023.

Numeracy

The majority of pupils have a secure grasp of basic number skills. They use the four operations to carry out mental and written calculations quickly and accurately, and confidently convert between fractions, percentages and decimals. For example, they apply their number skills in science to calculate the relative mass of different compounds or the percentage mass of an element in a compound.

The majority of pupils have a good understanding of shapes and measures. They convert between different metric measures and use scale factor to calculate missing sides in similar shapes. They also analyse data appropriately. They calculate averages and construct graphs accurately, with suitable scales. In a minority of instances, pupils analyse graphs to draw conclusions, for example when predicting future population levels in geography or when predicting the effect of changing one variable on another in science.

A few pupils have strong numeracy skills. For example, they apply their understanding of concepts such as the Sine and Cosine rules to solve complex problems. However, a few pupils have weak numeracy skills. They struggle with basic number skills such as mental arithmetic, calculating with fractions and negative numbers.

Welsh language skills

Many pupils make secure progress in Welsh over time. They have strong recall of previously learnt vocabulary and grammar rules and use this well to gather information from a suitable range of texts in Welsh, such as letters, advertisements and diary entries. Nearly all pupils write basic Welsh paragraphs coherently using the present tense. Many, particularly as they get older, write accurately in the perfect, imperfect and future tenses. The majority of pupils learn and use Welsh idioms and sophisticated language patterns well in their writing and apply varied vocabulary, phrases and mature syntax successfully. Overall, many pupils include a broad range of adjectives and connectives to help express their opinions coherently. When given the opportunity, many pupils speak Welsh competently although their responses are usually brief.

Other skills

In relevant subjects, most pupils develop their physical and creative skills very well. Many demonstrate control and dexterity in physical education lessons and are keen participants in physical activities. For example, they persevere in team games and practise and refine skills such as passing, kicking, stretching, ball possession and scoring. They also develop beneficial skills in their dance lessons when they plan a group dance on the theme of circles, successfully incorporating the elements of unison, canon and formation into their dances.

Many younger pupils develop considerable creative skills in relevant subjects. In drama, they devise a series of still images to represent Christopher's journey to

London in 'The Curious Incident of the Dog in the Night-Time'. In art lessons, older pupils develop their creativity well when investigating the potential of different tonal and textural effects to produce a self-portrait, using Frida Kalho's self-portraiture as a stimulus.

Sixth form pupils are excellent ambassadors of the school. They are generally mature, sensible and well-spoken young people who take substantial responsibility for their academic and personal development. Most communicate coherently and respectfully with visitors to the school and they convey their thoughts and opinions very well. Many are clear on their chosen career pathway and value highly the academic and personal support they receive from relevant leaders and staff.

Teachers value the support they receive from sixth form pupils to help younger pupils in lessons and when they sit and listen to them reading during literacy intervention sessions. In some cases, sixth form pupils prepare well-crafted resources to support teaching and learning. For example, A level biology pupils have produced helpful posters to model complex concepts of photosynthesis for those studying the subject for GCSE.

Care, support and well-being

Staff in Ysgol John Bright ensure that supporting and nurturing pupils is at the heart of all their work. Leaders have created an inclusive and caring environment where most pupils are proud to be part of a community that celebrates diversity, encourages individuality and welcomes all.

Pupils thrive in a strong culture of safeguarding where leaders ensure that arrangements to keep pupils safe are robust. Staff and governors receive relevant training and this ensures that they are clear about the school's processes and their responsibility for keeping pupils safe. As a result, nearly all pupils feel safe and most feel free from any bullying or harassment.

Directors of learning know the pupils in their year groups very well. Together with support staff, they ensure that pupils are provided with helpful emotional support and guidance to overcome any barriers that might prevent them in engaging in learning. Staff support pupils' spiritual, moral, social and cultural development well through purposefully planned assemblies and presentations from external providers and charities. There are helpful processes to monitor pupils' emotional and physical well-being through daily check-ins, focussed tutor sessions and regular contact with well-being officers. This enables the school to plan tailored support that helps pupils and their families to overcome barriers to their learning and enjoyment in school. This approach includes working effectively with a broad range of relevant external agencies, including the police, the local 'Family Centre' and health professionals.

Pastoral leaders monitor the behaviour and engagement of individual pupils well and generally provide timely and helpful support. Leaders ensure that pupils' views are regularly sought. This has led to a number of important changes, such as the recent improvements in the PSE provision during tutor time and the school's new and well-received behaviour policy. Due to a considerable effort to improve well-being through these recent amendments, most pupils behave well in lessons and around the

school, are welcoming to visitors and show high levels of respect for staff and their peers.

Pupils value and participate enthusiastically in the wide range of extra-curricular activities, such as sporting activities, the creative arts and chess club. There is a broad range of purposeful trips, including visits to local beaches and meadows and a cost-free visit to see a performance of La Traviata in Venue Cymru. This, along with the annual musical production, has enhanced and broadened the learning experiences of all groups of pupils and has a positive impact on their physical and emotional well-being.

The school has a range of beneficial provisions to support learners with specific social, emotional and behavioural needs. The recently introduced internal exclusion area provides a calm and welcoming environment where pupils are encouraged to reflect on any poor behaviour. This provision has helped the school to avoid fixed term exclusions for a number of specific pupils. In addition, 'Engage', the school's onsite provision for pupils at risk of permanent exclusion provides a purposeful learning environment where pupils can continue with their education with specialist support. Pupils who attend this provision generally make strong progress from their starting points and engage positively with visitors and staff.

Leaders have recently strengthened their focus on improving pupils' attendance and are beginning to make suitable use of data to help them to plan and provide support for pupils with low attendance. As a result, attendance has improved slightly over the past year. However, pupils still do not attend as well as they did before the pandemic and the attendance of pupils entitled to free school meals is notably below that of their peers. Whilst leaders consider individual pupils' attendance suitably, they do not always use the available data regularly or robustly enough to monitor the attendance of groups of pupils or to identify strategies that are having the most and least impact.

Effective transition arrangements enable pupils to settle well when they join Ysgol John Bright and in their integration into sixth form or further study. Directors of learning and staff plan and facilitate a comprehensive range of activities that support pupils to maintain high levels of wellbeing and achievement as they move to their next steps. Most pupils are positive about the helpful range of advice and guidance which helps them to make informed choices about their next steps.

The school has strong transition arrangements. The Year 7 Director of Learning meets regularly with pupils from cluster primaries and their parents from Year 5 onwards to plan and support a smooth and positive transition to secondary phase learning. The ALN team provides further purposeful support and extra activities for pupils with additional needs. The Director of learning for the sixth form offers a broad range of relevant activities and talks for pupils in Year 11 who are considering their next steps. This helps them make well-informed choices.

Developing pupils leadership skills

There are ample opportunities for pupils to develop their communication and leadership skills and this is a notable strength of the school. Pupil representatives run the school Senedd independently and others participate in a wide variety of committees that focus on important aspects such as diversity, well-being, and

teaching and learning. These committees have successfully brought about positive change, such as introducing an accessible 'Kindness Locker' which provides any pupil with essential personal items and adapting learning environments carefully to support pupils with sensory needs.

The provision for pupils with additional learning needs (ALN) is a strength of the school. Support staff deliver a wide range of effective interventions tailored to individual pupils' needs, such as support for developing social communication. This valuable support enables many pupils to make strong progress. The school has an effective and interactive information system to share information about pupils with ALN. This system includes a helpful section with additional information about beneficial strategies to support and teach individual pupils. Teachers use this system well to collect information but also make productive use of it to share their own successful strategies with their colleagues.

Leading and improving

The headteacher provides thoughtful and reflective leadership. His well-considered vision of 'Ysgol John Bright – Our Community of Learning' is shared successfully and clearly with staff, pupils and parents and is well understood by all. He knows his staff very well and is supported ably by the rest of the senior leadership team.

Roles and responsibilities are distributed equitably amongst senior leaders and have been matched deftly to their particular strengths. Senior leaders consider the well-being of staff carefully in all decisions taken. For example, they have established an email curfew, so that staff are not contacted in the evenings, and reviewed the workload of middle leaders. The senior leadership team works well together to provide a clear strategic direction for the school. As a result, leadership has had a beneficial impact on important aspects of the school's work such as improving pupils' behaviour and the broad range of curricular choices available.

There are clear lines of accountability. Leaders meet regularly with middle leaders to discuss the quality of provision and standards of pupils' learning and well-being. There is a careful balance in these meetings between supporting staff and challenging them to take responsibility for the impact of their work. The manner in which senior leaders challenge and model their expectations in order to develop the leadership skills of middle leaders is a strength. Any instances of underperformance are tackled swiftly and robustly.

Leaders at all levels use a wide range of strategies to gather evidence about their areas of responsibility. They are beginning to establish a more appropriate balance between analysis of examination outcomes and consideration of first-hand evidence from lessons and books and information gained by talking to pupils and staff to evaluate the school's performance. As a result, senior leaders have a good understanding of the school's main strengths and areas for improvement. The headteacher is clear and open about these and is prioritising fittingly the aspects that require the most rapid improvement. However, self-evaluation at all levels is not always comprehensive or forensic enough to enable leaders to home in precisely on what needs most focus to bring about improvement, such as improving attendance and strengthening processes to monitor attendance of groups of pupils.

Middle leaders understand their roles well and in many instances they provide effective leadership in their areas of responsibility. Senior leaders are working closely with middle leaders to develop their evaluation and improvement planning skills. This is helping many of them to gain a good understanding of the main strengths and improvement priorities within their areas of responsibility.

School leaders pay due regard to national priorities. There are suitable opportunities within both the formal curriculum and extra-curricular activities for pupils to develop their Welsh language skills such as the Clwb Cymraeg. The school has made good progress in implementing ALN reform and Curriculum for Wales. However, leadership has not had sufficient impact on the cross-curricular provision to develop pupils' skills or on pupil attendance since the pandemic.

Helpful strategies to mitigate against the impact of poverty on pupils' progress

The school has implemented a wide range of valuable strategies to reduce the impact of poverty on educational attainment and well-being. These strategies include free tuition in music and drama, subsidising trips, supporting the well-being of pupils so that they are ready to learn, and focusing on improving the quality of teaching. The school works effectively in partnership with Oxford university on a project to raise the aspirations of pupils in the sixth form who are eligible for free school meals.

Leaders use the pupil development grant carefully to fund a range of appropriate activities to support pupils from low-income households. However, the evaluation of the use of this grant does not focus well enough on the impact of this spending on the outcomes of these pupils.

There are sound performance management arrangements for staff. The process is carried out in a supportive manner with a particular emphasis on the development of leadership and teaching skills. Objectives align closely with whole-school and departmental priorities and inform the professional learning programme suitably.

Senior leaders are developing a culture of professional learning across the school for all staff. The central focus is on a few aspects of teaching and learning that have been identified as needing improvement. Professional learning is becoming more individualised rather than a one-size-fits-all approach. As a result, most staff feel that they benefit from worthwhile opportunities to develop their practice and knowledge. The school provides valuable opportunities for staff to develop leadership skills and experience, for example through links with other schools, associate senior leader roles and a coaching approach to line management. The 'A55 Alliance', a collaboration established by a few schools in 2019, provides productive opportunities for leaders to work with their peers outside the school on important aspects of their work, such as self-evaluation and curriculum development.

The school communicates effectively with parents and shares important information in a timely manner through, for example, the headteacher's tri-weekly newsletters to parents. In addition, leaders provide regular opportunities for parents to share their views on the school's provision. This information is used well to inform the school's improvement planning.

Governors are highly committed and proud members of the school community and provide strong support for the school. They are well informed through regular written reports and presentations by leaders and through talking regularly to pupils. There is a suitable range of sub-committees and focus groups that monitor different aspects of the school's work. Governors carry out their role as critical friends effectively and provide robust challenge to school leaders on matters such as outcomes, spending plans and the quality of provision. The headteacher, business manager, and governor finance sub-committee manage the school's budget effectively. Spending plans align well with the school's priorities for improvement and are monitored carefully.

Statutory compliance

The school's arrangements for safeguarding pupils do not give any cause for concern.

The school has appropriate arrangements for promoting healthy eating and drinking.

Leaders and governors manage the school's finances appropriately, including use of the pupil development grant.

The school's arrangements for site security do not give any cause for concem.

Evidence base of the report

Before an inspection, inspectors:

• analyse the outcomes from the parent and pupil questionnaires and consider the views of teachers and the governing body through their questionnaire responses

During an inspection, inspectors normally:

- hold a meeting with parents to hear their views on the school and its effectiveness
- meet the headteacher, governors, senior and middle leaders (where appropriate) and individual teachers to evaluate the impact of the school's work
- meet pupils to discuss their work and to gain their views about various aspects of their school
- meet groups of pupils in leadership roles, such as representatives from the school council and eco-committee, where appropriate
- visit a broad sample of lessons, including learning support groups and undertake
 a variety of learning walks to observe pupils learning and to see staff teaching in
 a range of settings, including classrooms, support groups and in outdoor areas
- where appropriate, visit the specialist resource base within the school to see pupils' learning
- observe and speak to pupils at lunch and break times and at a sample of afterschool clubs, where appropriate
- attend assemblies and daily acts of collective worship
- look closely at the school's self-evaluation processes
- consider the school's improvement plan and look at evidence to show how well the school has taken forward planned improvements
- scrutinise a range of school documents, including information on pupil
 assessment and progress, records of meetings of staff and the governing body,
 information on pupils' well-being, including the safeguarding of pupils, and
 records of staff training and professional development

After the on-site inspection and before the publication of the report, Estyn:

 review the findings of the inspection alongside the supporting evidence from the inspection team in order to validate, moderate and ensure the quality of the inspection

Appendix 1: Numbers – quantities and proportions

The report makes references to different quantities and proportions e.g. 'most pupils...' or 'very few pupils...'. We use these terms to describe quantities and proportions as outlined in the table below:

nearly all =	with very few exceptions
most =	90% or more
many =	70% or more
a majority =	over 60%
half =	50%
around half =	close to 50%
a minority =	below 40%
few =	below 20%
very few =	less than 10%

Copies of the report

Copies of this report are available from the school and from the Estyn website (http://www.estyn.gov.wales/)

The report was produced in accordance with Section 28 of the Education Act 2005.

Every possible care has been taken to ensure that the information in this document is accurate at the time of publication. Any enquiries or comments regarding this document/publication should be addressed to:

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