



Vocational Qualifications Strategy





Introduction

1. Vocational qualifications make up the majority of the qualifications that are regulated and awarded to learners in Wales. At the time of drafting we regulate 121 awarding bodies that award vocational qualifications in Wales. Historically, regulators have focused less on vocational qualifications than GCSEs and A levels, but Qualifications Wales intends to remedy that imbalance.
2. In this Vocational Qualifications Strategy we set out how we will undertake a range of activities to address our Principal Aims in respect of vocational qualifications. We set out:
 - the background to, and context for, the regulation of vocational qualifications;
 - how we propose to continue with a programme of sector reviews as our core approach to the strategic review of vocational qualifications – and the sequence of reviews that we intend to follow;
 - the other ways in which we propose to regulate vocational qualifications, including:
 - designation
 - grant funding
 - monitoring
 - regulatory intervention
 - commissioning and development
 - research
 - how we will evaluate the implementation of the strategy.



Background and context

Definitions and scope

3. We consider vocational qualifications to be those qualifications that are awarded and certificated by an ‘awarding body’, taken by learners from the age of 14 upwards, and which **assess knowledge, understanding and/or skills that relate explicitly to the world of work.**
4. There are some ‘grey areas’. One example of these is the Welsh Baccalaureate, but we manage this qualification as a ‘general’ qualification, so it is outside the scope of this strategy. Another example is the Essential Skills suite of qualifications – and we manage these as vocational qualifications. There are ‘general’ qualifications that may also be considered as vocational qualifications – for example, GCSEs and A levels in Health and Social Care – and we consider these to be within the scope of our sector reviews.
5. While many degree qualifications are vocational in nature, degrees are explicitly excluded from the scope of our regulatory functions.
6. Qualifications Wales was established under the Qualifications Wales Act 2015 (‘the Act’) with two Principal Aims:
 - *ensuring that qualifications and the Welsh qualification system are effective for meeting the reasonable needs of learners in Wales; and*
 - *promoting public confidence in qualifications and in the Welsh qualification system.*
7. In addressing these Principal Aims the Act requires us to have regard, amongst other things, to eight key ‘matters’ relating to:
 - sustainable growth in the Welsh economy;
 - the use of the Welsh language;
 - the range, nature and assessment arrangements of qualifications;
 - the requirements of employers, higher education institutions and the professions;
 - the currency of knowledge, skills and understanding requirements;
 - comparable qualifications in other nations;
 - efficiency and value for money;
 - the relative roles and responsibilities of awarding bodies, learning providers, Qualifications Wales, Welsh Government and other interested parties.
8. In developing our Vocational Qualification Strategy we have considered how best we may pay regard to these eight ‘matters’. We want to give particular prominence to the needs of employers and, in the context of the Well-being of Future Generations (Wales) Act 2015 to the role vocational qualifications play in the future sustainability of the economy.

Benefits and challenges of three-country qualifications

9. Young learners in Wales, preparing for work, do not always envisage working only in Wales: many of them consider the employment market in England (which is just across the border for many), or even further afield. So there is a benefit to both learners and employers when the same qualifications are taken in Wales and England. The vast majority of vocational qualifications that are presently available in Wales are also available in England and Northern Ireland. We need to be mindful that any steps we take to improve the effectiveness of qualifications in Wales do not reduce their portability – but this need not limit the opportunities to improve or reform where this is necessary.
10. One challenge with three-country qualifications relates to the availability of opportunities for learners to be assessed through the medium of Welsh. Some awarding bodies have provided Welsh-medium assessment and other services, but others have found it challenging to respond to needs in a way that is financially viable. In some cases, Qualifications Wales offers assistance to awarding bodies to promote and support the extension of their Welsh-medium offers.
11. There are a number of significant policy developments in England that will have an impact on the vocational qualifications market in both England and Wales. For example, changes are being implemented in relation to apprenticeships in England, and in some cases external qualifications will no longer be used in these. This could reduce the demand for, and supply of, qualifications in those industries. The Welsh Government's policies in relation to apprenticeships in Wales continue to evolve and there is a strong emphasis on the importance of apprenticeships in underpinning growth in the economy. We therefore engage regularly with Welsh Government to understand the implications of these changes in respect of apprenticeships in Wales.
12. The UK Government's Skills Plan, published in 2016, announced considerable rationalisation of the qualifications market for learners aged 16 to 19 in England. This is likely, over time, to reduce significantly the number of vocational qualifications available across the UK, as well as in England. If some vocational qualifications become ineligible for use on publicly funded courses in England, awarding bodies may be unwilling to continue to offer those qualifications solely in Wales: the market is relatively small. The overall impact, of these combined changes, on awarding bodies and on their business models, are not yet known – but it could be significant.
13. In Wales, there is a programme of major curriculum reform underway in response to the 'Donaldson report' – 'Successful Futures'. We are keen to understand the role that vocational learning will play within that new curriculum.
14. In the light of these wider changes it is clear that any work that we conduct or propose, in relation to vocational qualifications at 14-16, must be joined-up with these developments.



All vocational qualifications are not the same

15. Vocational qualifications measure whether learners have the right skills, and/or knowledge and understanding, to equip them for work in general, or their chosen career in particular. They also enable employers to recruit and develop staff with confidence. The right approach to vocational qualifications in one type of work may not be right for qualifications in another.
16. Vocational qualifications are taken by learners at a number of ages and stages and in a range of settings. Examples of these are:
- at ages 14 to 16, in schools, where learners take **initial vocational qualifications** alongside more traditional GCSEs. Sometimes these vocational options are also GCSEs; sometimes they are other qualifications such as BTECs. The courses leading to these qualifications provide an introduction to areas of work, but they do not require the assessment of competence. These qualifications are mostly at Levels 1 and/or 2 and are often taken in conjunction with the Key Stage 4 Welsh Baccaalaureate at National and Foundation level;
 - at age 16-19, in further education colleges, where learners take **full time programmes of learning** leading to one or more vocational qualifications at Levels 1, 2 or 3. These learners may either be seeking to progress to higher education or directly into employment – although they may not be sure at the outset of their programme. These learners will often also take the post-16 or Advanced Welsh Baccaalaureate;
 - at age 16-18, in **traineeships** that are delivered through work-based learning providers, where learners take vocational and other qualifications on programmes that combine learning with work experience, normally at Level 1¹, to prepare learners for progression into an apprenticeship or work;



- at age 16+, in **apprenticeships** that are delivered through work-based learning, where learners are employed as apprentices but also complete a programme of learning and assessment, at Level 2 or Level 3. There are also higher level apprenticeships for older learners;
- at age 18+, in **employment**, where learners undertake learning leading to qualifications, in order to improve their knowledge and skills to support their progression within, or beyond, their current job role. Learners in this group will often be working toward some kind of professional recognition or status within their current or future job roles. The learning might be developed 'on the job' and/or at a learning provider of any description;

Qualifications are also taken by adults, not in employment, to improve their employability.

¹as set out in the Credit and Qualifications Framework for Wales.

Our Strategy – core approach: Sector Reviews

Rationale and pilot

17. Vocational qualifications need to reflect the needs of employers at all ages and stages – even when they are a preliminary step that does not lead directly into employment. Rather than looking generically at one age, or stage, at a time, we are taking a sectoral approach to qualification review – focusing on the qualifications within particular employment sectors.
18. In our first year, we piloted a sectoral approach to qualification review in Health and Social Care (including childcare and playwork). We developed a model for review which included extensive engagement with stakeholders, learner engagement, technical reviews of sample qualifications, data analysis and a small international comparative study. The information that we gained from this process enabled us to identify actions that needed to be taken to improve qualifications in this sector. We published our findings in July 2016. The Review was well received by stakeholders, including employers, who told us how much they valued such an approach. We have refined our approach, including taking into account an independent analysis, and will now be conducting similar reviews in other sectors.
19. Sector Reviews will form the backbone of our work with vocational qualifications over the next five years, supplemented by a range of cross-cutting and ongoing work that we undertake in our day-to-day work as a regulator.

Aims and objectives of future reviews

20. Building on the experience of the first review, each subsequent review will aim to identify the extent to which qualifications and the qualification system in that sector, are effective for meeting the reasonable needs of learners (from age 14 upwards), employers and higher education institutions.



21. The objectives of each review will be to:
- develop an understanding of the qualification landscape in the sector;
 - identify the views of key stakeholders in relation to the effectiveness of existing qualifications, and the qualification system, in meeting the needs of learners, employers in the sector and higher education institutions;
 - consider the extent to which the most commonly taken non-degree qualifications in the sector are technically effective and fit for purpose;
 - identify whether there are any lessons to be learned from qualifications and the qualification system in the sector in other comparable nations;
 - identify whether there are any actions that Qualifications Wales should take or recommend others to take, to improve the effectiveness of qualifications and the qualification system in the sector – and to promote public confidence in these.

Core lines of enquiry

22. In conducting each review, we will focus on the following core lines of enquiry, based closely on our statutory matters:
- is the **range and nature** of qualifications available in the sector sufficient?
 - are the **assessment arrangements** of those qualifications effective, and are they reliable and valid?
 - is the provision of **Welsh-medium assessment** sufficient?
 - are the requirements of **employers, higher education and the professions** being met?
 - do the knowledge, skills and understanding requirements reflect **current knowledge and best practice**?
 - are the qualifications **comparable** with similar qualifications elsewhere?
 - are qualifications in the sector provided **efficiently** and do they represent **value for money**?

Methodology

23. The review will focus on those qualifications that are used on publicly funded programmes of learning – but the review team will also listen to evidence about gaps in the market or about non-funded but critical qualifications. The review activities will be guided by a research-based approach to identifying the scope of each review and to gathering evidence. This will be supported by the involvement of one or more sector specialists to provide expert advice to the review team on the landscape and issues within each sector.

24. Each review will consist of a strong element of stakeholder engagement, including:
- research-led interviews with employers, learning providers, higher education institutions and other interested parties;
 - review and statistical analysis of available data;
 - focused research activities with current and recent learners;
 - an online consultation on emerging issues and options for action.
25. We will use a combination of external expert reviewers and our own qualifications specialists to review a sample of qualifications in more depth. This work will consider both the materials produced by awarding bodies and examples of learners' work. This technical analysis element of each review will focus in particular on the effectiveness of a sample of current assessment instruments in producing valid qualification outcomes.
26. We will conduct and/or commission some desk-based research to consider comparable qualifications in other nations.
27. Upon the completion of each review, we will consider our findings and evaluate the likely impact and viability of options for action. We will conduct an options evaluation and regulatory impact assessment. Once we have identified our preferred course of action we will publish our findings and indicate the actions that we propose to take and/or to require awarding bodies to make. We will normally consult further on proposals for action, identifying the options we have considered. However, in some cases, where we deem it necessary, we will take immediate action. In line with our wider interest in the qualification system, our actions may include providing advice to other parties in relation to their role(s) in the system.



Each review is different – the outcomes of one are not necessarily the outcomes of the next

28. While one of the outcomes of the Health and Social Care Sector Review was a proposal for a new suite of qualifications to meet the needs of learners in Wales, it is unlikely that this will be the outcome of every sector review. Each sector is different and we anticipate that some of the solutions to issues are also likely to be different. The range of actions that we may take are set out later in this document at paragraph 53.
29. While many of the issues that we identify through a sector review will be particular to that sector, others may be more cross-cutting. We will identify cross-cutting themes and consider the potential for generic actions to address them. Our sector reviews may also prompt learning providers, awarding bodies and other stakeholders to reflect on their own practices in relation to wider vocational qualifications and to take action where appropriate.

The sequence of future reviews

30. Having begun with Health and Social Care, we have based our proposed sequencing of future reviews on information received from Regional Skills Partnerships on the priority areas for growth and skills development in Wales. This is relevant in respect of our duty to have regard to the need to promote sustainable growth in the economy. Our proposed sequence of sector reviews is as follows:

Construction and the built environment
Information and communication technology
Engineering, advanced manufacturing and energy
Financial services
Customer services and retail
Travel and tourism
Hospitality and catering.

31. At any point, we may pause and reflect on the remaining sequence, having conducted reviews on engineering, advanced manufacturing and energy, because of the significant size and impact on resourcing of these programmes of work. Depending on the scale of actions that are required, it may be necessary to build a gap between any of the planned reviews in order that the work is manageable within our finite resources.

Qualifications not covered by sector reviews

32. The omission of other sectors should not be taken to indicate that vocational qualifications in other sectors are unimportant – or that they are not needed in Wales. They are important, and they are needed. As a regulator, we need to focus our efforts on areas where our impact can be maximised and we have chosen to target our reviews based on areas of identified economic growth. The absence of a sector review does not preclude employers in a sector and awarding bodies working together in the normal way to review and revise qualifications – or to develop new qualifications to meet learners’ needs. We would expect this work to continue, and we will continue to regulate qualifications in all sectors as part of our ‘business as usual’.

33. When we are further through the reviews that are identified above, we will take stock and consider whether we should proceed with further sector reviews. In the meantime, the following section of this strategy outlines the other ways in which we propose to have oversight of vocational qualifications.

Our Strategy: other ways in which Qualifications Wales regulates Vocational Qualifications

34. While sector reviews will form the backbone of our vocational qualification strategy, vocational qualifications are integral to all of our other areas of work. There are a number of other ways in which we engage with vocational qualifications, including:
- **designating** qualifications as eligible for use on certain publicly-funded programmes of learning;
 - **grant funding** some Welsh-medium assessment for vocational qualifications;
 - **monitoring** vocational qualifications (including Essential Skills qualifications);
 - **monitoring** awarding bodies;
 - addressing identified issues through **regulatory intervention**;
 - **commissioning** new qualifications and overseeing their **development** in cases where we should determine that a restriction is appropriate;
 - conducting **research** into matters related to vocational qualifications.

The Designation of qualifications as eligible for use on certain publicly-funded programmes of learning

35. Where an awarding body wants one of its qualifications to be eligible for use on certain publicly-funded courses, the awarding body will normally apply to Qualifications Wales for the qualification to be 'Designated'. The exception to this is where we have published specific approval criteria for qualifications listed on the Priority Qualification List – in which case, a more detailed application for the qualification to be 'Approved' will be required. The Qualifications Wales Act 2015 requires maintained schools or other learning providers funded directly by Welsh Government to use only qualifications that have been Designated or Approved by Qualifications Wales on courses for learners under the age of 19. However, in addition, some other funding arrangements for learners over the age of 19 also specify the use of Designated or Approved qualifications.



36. In considering whether to Designate a qualification, we currently use a standard list of criteria to determine:
- whether there is evidence of substantiated demand for the qualification from an identified cohort of candidates in Wales;
 - whether there is evidence that the qualification is relevant, where applicable, in a Welsh context (for example, references to Welsh legislation and policies);
 - whether there is evidence that the qualification is appropriate for the age ranges selected. In particular, if a qualification is primarily awarded to a course of education or training normally undertaken by pre-16 learners, the qualification should not attest to occupational competence or be focused on specific occupations – rather, it should offer a general introduction to an industry sector;
 - whether there is evidence of support from relevant professional bodies, subject representatives or industry representatives for the qualification to be designated in Wales.
37. In 2016/17, we will review our policy in relation to the designation of qualifications and this may result in amendments to the process and, potentially, the criteria. We will consult on any proposals for change.



Grant funding of some Welsh-medium assessment for vocational qualifications

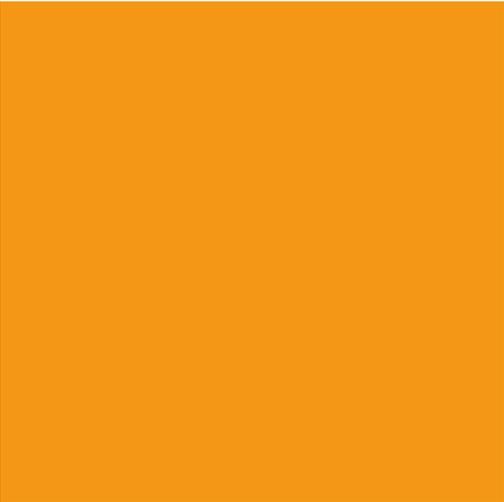
38. Wales is a bilingual nation, and learners taking vocational qualifications have a legitimate expectation that they should be able to be assessed for those qualifications through the medium of Welsh. There are, however, many thousands of vocational qualifications offered in the competitive qualifications market in Wales, and the costs to awarding bodies of providing appropriate resources to a small section of their market can appear prohibitively high. In order to encourage awarding bodies (which are mostly based in England), to provide and support Welsh-medium assessment, Qualifications Wales offers grants to cover some of the additional costs that the awarding bodies incur. In 2016, we have introduced a new bidding process for awarding bodies to apply for these grants and we will evaluate the effectiveness of this element of our vocational qualification strategy in 2017.

Regulatory oversight of Essential Skills qualifications

39. The current Essential Skills suite of qualifications was launched in 2015 following extensive revisions to the assessment strategy, which applied to the previous suite of Essential Skills Wales qualifications. The revisions were led by Welsh Government following the Review of Qualifications in 2012 and were designed to address considerable weaknesses that had been identified in the existing assessment regime. The Essential Skills qualifications are designed to assess the skills that learners need for successful learning, employment and life – and to provide a clear ladder of progression in Communication, Application of Number, Digital Literacy and Employability.
40. Essential Skills qualifications assess skills that are relevant to – and important for – virtually all areas of work. They are also a mandatory requirement of other publicly-funded programmes of learning such as apprenticeships. This means that it is likely that many learners taking a publicly-funded vocational qualification will also be taking one or more Essential Skills qualifications – so for these reasons, amongst others, we will maintain our oversight of these qualifications as part of our vocational qualification strategy.
41. The introduction of the revised Essential Skills qualifications in 2015 brought a number of challenges: to awarding bodies, learning providers, employers and learners. We have been monitoring, and supporting (through grant funding) the development and delivery of the assessment instruments for the qualifications by the four awarding bodies who are collaborating in the award of these qualifications. We have also been engaging with learning providers in an attempt to understand the challenges that they have been facing and to identify good practice in overcoming these challenges.
42. In early 2017, we will conduct an evaluative review of the introduction of the Essential Skills qualifications to identify the extent to which the qualifications are effective in meeting learners' needs – and will also consider the extent to which the qualification system is effective in delivering these qualifications. We will publish our findings by the summer of 2017, together with our proposals for any action, which may include future monitoring activities.

Monitoring of vocational qualifications

43. We are introducing a programme of vocational qualification monitoring to sit alongside the programme of sector reviews and to focus on qualifications and qualification groups that are not being targeted by the sectoral reviews. This will enable us to broaden the spread of our scrutiny work to ensure that vocational qualifications are monitored effectively. Increasing our monitoring activity in this way will, we hope, signal to awarding bodies that we have a keen interest in the quality of assessment of vocational qualifications.
44. We will determine our monitoring plans regularly so that we can be sufficiently responsive to issues that may arise – while also taking a strategic approach to the selection of qualifications for monitoring. We will take a number of factors into account when deciding which qualifications to monitor. We are likely to focus, in particular, on qualifications that meet one or more of the following descriptions:
- eligible for public funding;
 - relatively high entries and certifications;
 - either not targeted by sector reviews or recently reformed following a sector review or other activity;
 - assess areas of work where safety is critical;
 - meet a requirement for, or licence to, practise;
 - provide entry to Higher Education; and
 - those that demonstrate trends and patterns linked to complaints, incidents or intelligence received about qualifications.
45. Having considered all these factors, the qualification groups selected for vocational qualification monitoring for 2017/18 are:
- First Aid**
 - Food Safety**
 - Health and Safety.**

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46. We will compare and contrast information and evidence from different awarding bodies and will focus on the assessment standards that awarding bodies set; their external quality-assurance processes; the guidance that they provide to learning providers – and the extent to which this is sufficient to meet needs. We are likely to conduct some face-to-face and/or focus group discussions with learning providers and/or learners to get feedback from these stakeholders – and we may involve subject experts in conducting some of the work.

47. We will identify our core lines of inquiry for each monitoring activity, and these are likely to differ depending on the qualifications being monitored, the awarding bodies awarding the qualifications and the intelligence we already hold about each qualification.

48. We will report on our findings and, if we identify shortcomings with individual awarding bodies, we will write to them individually to highlight our concerns and ask them to take action accordingly.

The monitoring and compliance activity that we conduct in relation to awarding bodies

49. Most regulated awarding bodies offer vocational qualifications, so most of our business-as-usual work also underpins our work in relation to vocational qualifications. Awarding body audits are an example of this, where we consider the extent to which selected awarding bodies are compliant with the Standard Conditions of Recognition.

50. We will focus initially on auditing the awarding bodies that award the highest number of certificates in Wales. Our lines of inquiry for each audit will vary depending on the intelligence that we hold about the awarding body and the factors that we consider to be risks of that awarding body.

51. The audit process is likely to consist of a desktop analysis of information and evidence received from the awarding body, a detailed analysis of information and evidence that we hold, and an on-site audit of an appropriate duration with a focus on key lines of enquiry. The findings of each audit will be presented in a report that will be made available to the awarding body. This report will outline any concerns or recommendations that we make.



Addressing identified issues through regulatory intervention

52. Through our work on sector reviews, monitoring and audit activities issues, we are likely to identify issues where improvements or more substantial changes are needed to make the qualifications, or the system, more effective. We have a range of regulatory tools at our disposal to bring about such change. Our ‘enforcement’ powers, which we may invoke in certain circumstances, are set out in our policy on *‘Taking action when things go wrong’* – but there are a number of options for initiating change before resorting to enforcement.

53. These options include, for example:

- writing to an awarding body to request that it sets out how it intends to address an issue;
- introducing a new standard condition of recognition for all relevant awarding bodies in respect of particular qualifications, descriptions of qualifications, circumstances and/or categories of learners;
- placing a special condition of recognition on one or more specific awarding bodies;
- adding additional considerations to the process for Designating qualifications;
- introducing a new condition of Approval in respect of Approved qualifications;
- listing qualifications, or descriptions of qualifications (with the agreement of Welsh Ministers) on the Priority Qualifications List and publishing approval criteria for these.



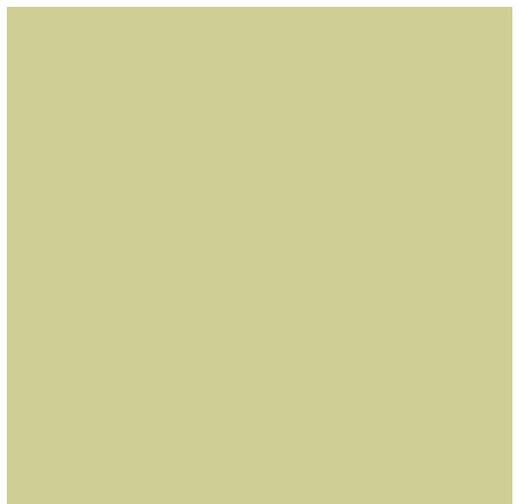
Commissioning and overseeing the development of new vocational qualifications to meet the needs of learners in Wales

54. There may be circumstances, however, where any combination of the above actions may not address the issues we have identified – and where we consider that there is a need for new vocational qualifications to meet the needs of learners in Wales. In this situation we can, using our powers to restrict priority qualifications, commission or select an awarding body through fair and open competition. This is a significant step to take, with ongoing cost implications for our own organisation, and it is not one that we would enter into lightly or without due consideration. However, if, as a consequence of a sector review or any other investigation, we determine that new Wales-specific qualifications are required, then it may be the most viable option to commission a single awarding body to develop them. This is not our default position in relation to vocational qualifications – it is a step that we might propose only after a detailed consideration of other options for action and having consulted widely on such proposals.

55. Where we do commission the development of vocational qualifications, we will work closely with relevant sector bodies, occupational experts and the commissioned awarding body, as well as engaging with learning providers, to ensure that the finished products (new qualifications), are effective and fit for purpose.
56. One of the benefits of commissioning the development of qualifications to meet the needs of learners in Wales is that there is the opportunity to ensure that the qualifications are developed in both Welsh- and English-medium at the same time – so that learners will be able to be assessed in the language of their choice.
57. Where new qualifications are commissioned and introduced to meet the needs of learners in Wales, it will always be important to ensure that there is an effective period of transition to the new qualifications to the old and that learners are not unfairly disadvantaged by being amongst the first to take a new qualification. We will always consider what role we are best placed to take in order to promote or support the preparation of the teaching and assessing workforce where new qualifications are introduced. This is likely to include requiring awarding bodies to implement appropriate support mechanisms – or we may, in some instances, take a more active role in facilitating such support where it is desirable and possible for us to do so. We will also seek to engage with other bodies who have a role in this respect, including professional bodies.

Research in relation to vocational qualifications

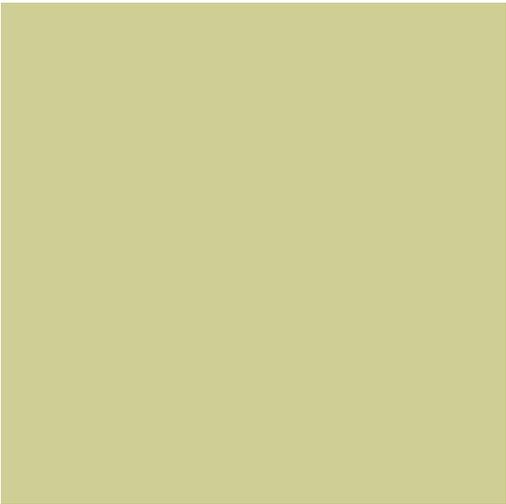
58. We have recently established a team of researchers and statisticians to enable us to ensure that our decision-making and policy development is underpinned by sound evidence. We will be developing a programme of research over the coming months, but we are already clear that the research we conduct must support the effective regulation of vocational qualifications. We are developing a research and analysis strategy that will give due consideration to research into vocational qualifications.
59. We will ensure that future sector reviews are well supported by informative and accurate research led data. In order to be able to work more effectively with data, we need to establish how best to obtain both regular flows of information on qualification take-up and achievement – but also how best to manage ad hoc requests for information. In developing and implementing a data management strategy, we will identify how we propose to address both of these types of requirements.



Evaluation of the Vocational Qualification Strategy

60. We intend, in implementing this Vocational Qualification Strategy, to direct our best efforts towards ensuring that vocational qualifications and the vocational qualification system in Wales are effective for meeting the needs of both learners and employers. We will evaluate each of the areas of work within the Strategy to identify the extent to which the activity has been successful in meeting its aims. For sector reviews this process will depend on the actions that are identified and taken – and may be long term. We will continually solicit feedback on our work and consider ways in which we can improve the way in which we do things. Our success in so doing will partly depend on the level of trust we build with the stakeholders with whom we engage, so that they feel comfortable and confident to raise concerns with us – and we will do our best to build that trust.
61. In this spirit, we would welcome feedback from any of our stakeholders on the proposals set out in this, our first Vocational Qualifications Strategy – together with any further suggestions for improving the work that we carry out. We look forward to working with you to give vocational qualifications the attention and focus that they deserve, so that we can build confidence that the qualifications taken in Wales are fit for purpose and truly world-class.







Q2 Building,
Pencarn Lane,
Imperial Park,
Newport NP10 8AR
☎ 0333 077 2701



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