



## Cornwall Alcohol Strategy 2016-19 and LAAA2 ACTION PLAN UPDATE 2017

## "TAKING RESPONSIBILITY FOR ALCOHOL"

#### 3 overall objectives targeting People, Services, and Communities:

#### 1: ENABLE PEOPLE TO MAKE INFORMED CHOICES ABOUT ALCOHOL

We aim to help people in Cornwall to become better informed about responsible drinking and safe alcohol intake levels, by giving relevant advice, information and support in order to reduce alcohol related harm.

#### 2: IMPROVE SERVICES TO REDUCE THE HARMS ASSOCIATED WITH ALCOHOL

We aim to reduce the risk of alcohol related harm to individuals and families by improving effective alcohol services in the community, in the NHS and hospitals, in the voluntary sector and in the Criminal Justice System, in order to reduce alcohol related hospital admissions and support recovery from problematic alcohol use.

### 3: PARTNERSHIPS THAT REDUCE ALCOHOL'S NEGATIVE IMPACT ON THE COMMUNITIES

We aim to work effectively in partnerships to promote best practice around safe alcohol retail, maintaining safe localities and communities, and to have well planned responses to alcohol related issues with the long term goal of reducing disruption to the community.

#### The Alcohol Strategy is arranged in 8 themes:

1. Advice and Information:

(Jez Bayes)

Helpful preventative and early intervention activities, including Identification and Brief Advice, population level messaging and targeted social marketing.

2. Children, Young People, Parents and Families:

(Viv Hughes)

Education, youth, family and household interventions, Including Together for Families.

3. Community Safety Schemes:

(Jez Bayes)

Reducing the harmful impact of alcohol on Cornish streets, including Anti-Social Behaviour (ASB), and Fire and Rescue.

4. Criminal Justice Interventions:

(Miles Topham)

Appropriate interventions to reduce alcohol related offences, including diversionary and sentencing pathways.

**5**. <u>Domestic Abuse and Sexual Violence:</u>

(Laura Ball)

Good pathways between alcohol, domestic abuse and sexual violence services, including MARAC referrals and sentencing pathways.

**6**. Employment, Deprivation and Inclusion:

(Marion Barton)

Interventions to reduce alcohol related employment problems, including Social Care, Homelessness and Housing.

7. Health, Treatment, Aftercare and Recovery:

(Kim Hager / Angela Andrews / Jez Bayes)

Easy access to treatment, and effective care throughout, including hospital admissions, mental health and the treatment system.

8. Licensing, Alcohol Retail and the Night Time Economy: (Jez Bayes)

Promoting and supporting a safe, responsible, successful alcohol trade, including Best Bar None and bar staff training.

Equity and diversity are key aspects of all 10 of these areas, with implications for equitable service delivery and access, encompassing such issues as gender, sexual orientation, disability, age, isolation, vulnerability, ethnicity, religion and beliefs.

## **GLOSSARY OF ACRONYMS**

A&E	Accident & Emergency (in Cornwall at Treliske).	LAAA	Local Alcohol Action Area (Home Office Scheme).
ADDAC	Addaction: Drug/Alcohol treatment provider.	LNL	Late Night Levy.
ANA	Alcohol Needs Assessment.	LSHTM	London School of Hygiene and Tropical Medicine.
ARID	Assault Related Injuries Database.	MARAC	Multi-Agency Risk Assessment Conference.
ASB	Anti-Social Behaviour.	MIU	Minor Injury Units.
AUDIT-C/AUDIT	"Alcohol Use Disorders Identification Test" (Consumption): World Health Org accredited tool.	NPS	National Probation Service.
BBN / BII	Best Bar None / British Institute of Innkeepers.	NTE	Night Time Economy.
CAP	Community Alcohol Partnership.	PCC	Police and Crime Commissioner.
CC	Cornwall Council.	PH	Public Health.
CIP / CIZ	Cumulative Impact Policies/Zones.	PHAP	Public Health and Protection (e.g:Trading Standards, etc).
CJS	Criminal Justice System.	PHIL	Public Health Information Line.
CMO	Chief Medical Officer.	PHRA	Public Health Responsible Authority.
CRC	Community Rehabilitation Companies/Probation.	RCHT	Royal Cornwall Hospitals Trust (Treliske).
CSO	Community Safety Officers.	RCS	Royal Cornwall Show.
CST	Community Safety Team.	RJ	Restorative Justice.
DAAT	Drug and Alcohol Action Team.	ROC	Redeeming Our Communities.
DASH	Domestic Abuse/Stalking/Honour Risk Training.	RTS	Reducing The Strength.
DASV	Domestic Abuse and Sexual Violence.	SIMP	System Improvement process.
DCH	Devon and Cornwall Housing.	SLA	Service Level Agreements.
DNA	Drugs Needs Assessment.	SMART	Substance Misuse and Alcohol Retail Training.
ED	Emergency Department (A&E).	SP	Street Pastor.
EMRO	Early Morning Restriction Orders.	SPHR	School for Public Health Research (Sheffield University).
FRS	Fire and Rescue Service.	STP	Sustainability and Transformation Partnerships.
GRIP	Group Review Intervention Powers.	SWASFT	South Western Ambulance Service NHS Foundation Trust.
HaLO	Health as a Licensing Objective.	T4F	Together For Families.
HFSC	Home Fire Safety Check.	UKCTAS	UK Centre for Tobacco and Alcohol Studies.
HPS	The Health Promotion Service.	WWYDC	"What Will Your Drink Cost" campaign.
IBA	Identification and Brief Advice (Early Intervention).		







CIOS Alcohol Strategy 2016-19 ACTION PLAN  Thematic Area:	Delegated Lead and other involved staff and agencies:	Summary:	Next Action:
1. Advice and Information: Helpful preventative and early intervention activities; including Identification and Brief Advice, population level messaging and targeted social marketing.	Jez Bayes Shevaughan Tolputt (CC Comms / PH)		
1.01: Continue to promote and train early intervention, with consistent use of proven screening tools in all relevant settings and services, including Health Checks.	Jez Bayes Angela Andrews (DAAT)	<ul> <li>2016 trained:</li> <li>Fire and Rescue / Home Fire Safety Checks IBA Follow Up Visitors;</li> <li>Treliske Hospital (AUDIT-C) via Video modules and</li> </ul>	To be trained: • CRC; • NPS; • Volunteers;
<ul> <li>1.02: Target services not yet reached for more IBA training:</li> <li>Within front line community and criminal justice settings outside healthcare;</li> <li>Within targeted health care settings and services for specified health conditions, as guided by the alcohol related hospital admissions evidence;</li> <li>Within any healthcare commissioning, in line with the 2014 framework for all nurses and allied health professionals.</li> </ul>		Volunteer reps; • Stonham and other Housing services; • DASV services.  Fire and Rescue / Home Fire Safety Checks IBA Follow Up Visitors; Service to be established.  Priorities	<ul> <li>Social Care Services;</li> <li>Health Visitors;</li> <li>Midwives;</li> <li>Mental Health / OutlookSW / Beme;</li> <li>Pharmacy / Primary Care;</li> <li>Trading Standards / PHAP;</li> </ul>
<ul> <li>1.03: Deliver ongoing support to remove any barriers to IBA delivery.</li> <li>1.04: Evaluate findings from IBA delivery monitoring to target service commissioning, training and delivery, and to focus further intervention training, e.g. Motivational Interviewing.</li> <li>1.05: Reassess agencies and services trained to ensure training is being used and screening is occurring.</li> </ul>		<ul> <li>Target services not yet reached for more IBA training:</li> <li>Within front line community settings outside healthcare;</li> <li>Within targeted health care settings and services for specified health conditions, as guided by the alcohol related hospital admissions evidence;</li> <li>Within any healthcare commissioning, in line with the 2014 framework for all nurses and allied health professionals.</li> <li>Deliver ongoing support to remove any barriers to IBA delivery;</li> <li>Establish IBA delivery monitoring in SLAs and</li> </ul>	Other requests received and banked for follow up.  Monitoring System tba: Meet with management of trained agencies.  STP process could fund delivery / monitoring / evaluation / targeting?
		<ul> <li>recording tools if possible:</li> <li>Evaluate findings from IBA delivery monitoring to target service commissioning, training and delivery, and to focus further intervention training, e.g. Motivational Interviewing;</li> <li>Reassess agencies and services trained to ensure training is being used and screening is occurring.</li> </ul>	





1.06: In partnership with Public Health, the Health and Wellbeing	Jez Bayes	WWYDC research		
Board, and the Safer Cornwall Partnership, create targeted and	Shevaughan	10 Action Points for consideration in updated campaign	gn material:	
population level alcohol social marketing campaigns, such as 'What	Tolputt			
Will Your Drink Cost?', pedestrian road safety information, and	(CC Comms / PH)	1. Positive framed posters produce a short term improvement in responsible		
evaluate how to improve the effectiveness of such messaging.	Amethyst	drinking attitudes, which could reduce an amount of		
		binge drinking during a Pub or Club visit, although thi		
		several participants had a greater willingness to cons	ume alcohol after seeing	
		the posters.		
		2. This campaign will reduce violent tendencies in a j	ust over a third of the	
		participants who actually commit such acts.	high was do thous think	
		3. Participants liked the visual separation of the tear, about the consequences of alcohol related violence, I		
		photos used, which seemed staged and unrealistic.	out some distinct the	
		4. Images should feature people of the same age as the	ne target audience	
		5. Images need to avoid confusion over the transition		
		positive top image to the negative image consequence		
		unintended sexist implications about relationships.	, , ,	
		6. Images in this campaign theme could cause distress	s, and so they need to be	
		accompanied by information about how to change, or		
		advice. The campaign will be relatively ineffective wi		
		to live a healthy lifestyle, rather than just a warning		
		7. The death of a victim was highlighted as the most of	effective deterrent of	
		being involved in alcohol related violence.		
		8. The financial cost on emergency services lowest proportion of people		
		agreeing this would affect their levels of drinking.		
		9. Effects on others was highlighted as being the most effect deterrent of alcohol use, followed by impact on self with the breakdown of a relationship		
		being the most deterring as a consequence.		
		10. Repetition and presentation of material over long periods of time using a		
		combination of sources and methods, during different periods of exposure, as		
		well as describing the motives of the appeal.		
		WWYDC action tba.	Update WWYDC	
			Autumn/Winter 2016	
		Successful Festive messaging campaign delivered on	Christmas Drink Driving	
4.07. Compare aggregation and least the state of Dollar Hall	Low Davis :	social media and local media.	Campaign / FRS	
1.07: Support, engage with, and locally deliver national Public Health	Jez Bayes	One You launched. Cornwall Website.	National CMO messaging?	
messaging and campaigns, such as new alcohol messaging after the consultation period ends in April 2016, and the new 'One You' health	Shevaughan Tolputt	Use of PHIL/HPS.	PHE update: No CMO national message	
messaging theme.		RCS public event/media.	funding outside 'One You'	
messaging memer	(33 33/1/1)	nes pastic crefts friedla.	UKCTAS / SPHR / Sheffield?	
			LSHTM?	
			Winchester Uni?	
1.08: Improved alcohol advice and information for vulnerable and	Jez Bayes	Advice for elderly updated.	Promoted via CC PH	
hard to reach groups, such as the disabled, hearing impaired and				
those with learning difficulties.				







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2. Children, Young People, Parents and Families: Education, youth, family and household interventions; Including Together for Families.	and agencies: Viv Hughes (Addac / YZUP) T4F		
2.01: Develop effective identification and referral pathways and ensure joint working arrangements are in place between children and family services and specialist alcohol treatment where there are safeguarding issues and with local Together for Families provision where alcohol or drug misuse is a factor.	Kim Hager  Viv Hughes Sue Clarke (Addaction)	ANA / SIMP processes.	Treatment commissioning and SIMP processes.
2.02: Improve referral rates and early identification of drug and alcohol use in the Together for Families programme, via an agreed defined pathway and workforce development. A protocol for this was developed three years ago but was never fully implemented with children and family services and requires revision in line with developing early help and social work offers.		T4F / ANA / SIMP processes.	Treatment commissioning and SIMP processes.
2.03: Address the fears of parents with drug and alcohol problems in approaching services for help at the earliest opportunity.		T4F / ANA / SIMP processes.	Treatment commissioning and SIMP processes.
2.04: Support YZUP in redeveloping the alcohol themed educational messaging and interventions in schools and colleges, continue to partner with Brook to deliver training about risky behaviours, and the Health Promotion Service Healthy Schools work.		In progress.  (Including YP outreach at Festivals / Events)	Boardmasters Welfare and Safeguarding policies and delivery.
2.05: Continue to improve the responses to young people's alcohol presentations in A&E and alcohol related hospital admissions, in order to continue to reduce the rate of under 18 alcohol related hospital admissions and A&E presentations, and reduce the number of under 18 victims of alcohol related violence, in all A&Es serving Cornwall.		In progress, but lack of A&E referrals to treatment.  Analysis within Frequent Attenders process.	Treatment commissioning and SIMP processes.
2.06: Continued development of the alcohol intervention and treatment system for young people through the Addaction Cornwall YZUP service, with coherent assessment and referral processes between substance misuse and sexual health and screening services.		ANA / SIMP processes.	Treatment commissioning and SIMP processes.
7.01: Improve the complex needs pathways between alcohol and drug services, DASV, Together for Families, Social Care, Housing, Mental Health, Hospitals, CJS, including referrals via the DV Multi Agency Risk Assessment Conference (MARAC) mechanism between drug/alcohol and DASV services.		DASV / Housing / CJS / T4F / ANA / SIMP processes.	Treatment commissioning and SIMP processes.







CIOS Alcohol Strategy 2016-19 ACTION PLAN  Thematic Area:	Delegated Lead and other involved staff and agencies:	Summary:	Next Action:
3. <u>Community Safety Schemes:</u> Reducing the harmful impact of alcohol on Cornish streets; including Anti-Social Behaviour (ASB), and Fire and Rescue.	Jez Bayes Marion barton Sarah Necke Natasha Matthews (ASB) Paula Wellings (Road Safety)	Co-ordinated approach in localities, including DAAT, ASB, Localism, CSOs, Police.  Truro, St Austell, and wherever needs arise. Flexible, targeted, swift responses based on local evidence.	St A Action Plan St A CIZ evidence Truro Action Plan
<b>3.01: Continued focus on early intervention and prevention</b> as well as increasing activity related to the Night Time Economy.		IBA section 2. ASB / HFSC  Licensing Section 8. SMART Training.	HaLO LAAA Public Health / Licensing Priority cases.
<b>3.02:</b> Closely monitor violence trends to ensure that there is no escalation of risk. In particular, ensure that the Night Time Economy continues to be managed effectively and best practice prevails.		ANA Locality monitoring.  'Reducing The Strength' - danger of moving the problem?	RTS consideration in targeted areas and hotspots.  LAAA/CIZ processes (below).
3.03: Continue to support the move to a <b>coherent regional commissioning and delivery approach for the Assault Related Injuries Database (ARID)</b> , supporting a best practice evaluation, leading to improved opportunities for analysis and application of intelligence in improving safety in licensed premises, and reducing the risk of violence.		SV evaluation. PCC funding proposal - rejected. Local funding tba.	ARID used within LAAA Public Health Licensing cases and Cumulative Impact Zones.
3.04: Continue to improve the design and implementation of evaluation techniques for community safety interventions. This should build on the initiative group adopted by the Community Safety Service which aims to ensure initiatives are evidence based and robustly evaluated and creates an interventions library of effective initiatives.		Cf. WWYDC evaluation by Plymouth Uni.	Evaluation to be implemented in updated WWYDC 2017.
3.05: Address pedestrian safety when drinking alcohol, including preventative communication.		FRS Christmas Drink Driving campaign.  'Last Walk Home' Drinkaware approached.	Road Casualty reduction processes. Hotspots being identified. Evaluate the effectiveness of Court mandated courses
<b>3.06:</b> Support local community schemes such as the Street Pastors and Streetsafe, in order to make best use of the limited resources available, provide consistent good quality training, help different		SP co-ordinated publicity and recruitment campaign tbc?	ROC. SP reorganisation in Newquay.





teams to learn best practice from each other, and continue to make visitors, residents and communities safer while reducing the load on Cornwall's emergency and enforcement services.	SP Training.	Slack Communications system. Boardmasters Festival Angels approach.
3.07: Monitor and apply any changes to legislation addressing alcohol related disorder.	Modern Crime Prevention Strategy.  Police and Crime Bill.	Police and Crime Bill passed.
	CIPs. LNLs. EMROs. GRIPs.	Awaiting Governmental policy lead.
3.08: Continue to develop <b>referral pathways from ASB</b> into YZUP for young people, and Criminal justice diversionary interventions and Addaction for adults.		SIMP Positive Requirements CJS Diversion Ladder
3.09: Continue to address alcohol related anti-social behaviour offences committed by visitors to Cornwall through the 'Follow You Home' approach, so that parents and enforcement services in other areas of the country address disorder in Cornwall as seriously as offences committed in their home area.		Ongoing.
3.10: Develop a two stage approach for alcohol intervention in <b>Home Fire Safety Checks</b> , based on the evidenced alcohol correlated domestic fire risk. This will involve observational conversations in the HFSC, and follow up visits for IBA using the AUDIT toolkit.	All trained and in place.  HFSC revamp delayed within CST?	Awaiting 'Living Well' initiative, to include HFSC.
5.02: Align the new Alcohol Strategy with the new <b>Domestic Abuse</b> and Sexual Violence Strategy (the top two Community Safety Partnership priorities), particularly in terms of attendance at Multi-Agency Risk Assessment Conferences (MARAC) by treatment providers and IBA training for Domestic Abuse services.		







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4. <u>Criminal Justice Interventions:</u> Appropriate interventions to reduce alcohol related offences; including diversionary and sentencing pathways.	Miles Topham (Police) Lynda Edward (Addac)		
4.01: Update and redevelop the ladder of Criminal Justice System Alcohol Diversionary interventions, to ensure that there is no enforcement with a diversionary intervention pathway.	Miles Topham	MT: Working Group met to edit old interventions list.	Meet to compile updated index.
		CJS Diversion Ladder and referral pathways.	GPS due to start 01/04/17. Currently recruiting. Training tba. Covering all PCC area custodies, to include alcohol assessment and diversion, and RJ.
4.02: Offender manager workforce development based on specific	Carol Baines		IBA training tbc
identified training needs, whilst reviewing the interventions available to	Kerry Nasen		
target problem drinking in offenders.			Targeting NHS, Pharmacy,
4.03: Improve identification, referral and engagement into specialist	Carol Baines		CJS, DASV, Housing,
services and to identify if there are any barriers (staff or offenders) that	Kerry Nasen		Community Safety, with a
we need to address. This is a priority for the new offender management			Motivational Interviewing
structure under Dorset, Devon and Cornwall Community Rehabilitation			perspective: IBA-MI.
Company (CRC) but also applies to the National Probation Service (NPS).			
4.04: Gather good quality local data (CRC and NPS) to inform our local	Carol Baines	Amethyst and PCAN to address with	No current
reoffending needs assessment and inform the development of the packages	Kerry Nasen	NPS/CRC.	progress/capacity.
required to reduce reoffending locally. Management in these services			
should monitor and share information about performance and outcomes.	I/II / AAD / LD	CIMP / Commissioning	CE Diversión de la contraction
4.05: Address the needs of offenders with complex needs in an integrated	KH / MD / LB	SIMP / Commissioning	Cf. Blue Light training
way in the community, including family-based interventions, to address the "toxic trio" of domestic abuse, mental health and problem substance use.	Sue Clarke / LE Carol Baines		development
toxic tho of domestic abuse, mental nealth and problem substance use.	Kerry Nasen		
4.06: Improve successful completion rates for criminal justice clients.	Lynda Edward	Improved / ongoing.	
4.00. Improve successful completion rates for criminal justice clients.	Lyllua Luwalu	improved / ongoing.	
4.07: Monitor and apply any changes to legislation addressing alcohol related disorder.	Jez Bayes	See 3.07.	
7.01: Improve the complex needs pathways between alcohol and drug			
services, DASV, Together for Families, Social Care, Housing, Mental			
Health, Hospitals, CJS, including referrals via the MARAC between			
drug/alcohol and DASV services.			







CIOS Alcohol Strategy 2016-19 ACTION PLAN  Thematic Area:	Delegated Lead and other involved staff and agencies:	Summary:	Next Action:
5. <u>Domestic Abuse and Sexual Violence:</u> Good pathways between alcohol, domestic abuse and sexual violence services; including MARAC referrals and sentencing pathways.	(CC / DASV) (Twelves)		
5.01: Implement the new joint Domestic Abuse and Sexual Violence (DASV) DAAT protocol and greater joint working would be beneficial to identify the nature of the drug and/or alcohol use and whether treatment would aid the 50% of those identified in domestic abuse services who were not known to drug and alcohol treatment services, whilst also identifying historic DASV as a barrier to alcohol treatment.	MD / LB	Joint DAAT DASV protocol in development. DASH training. MARAC engagement.	Ongoing via SIMP.
5.02: Align the new Alcohol Strategy with the new <b>Domestic Abuse</b> and <b>Sexual Violence Strategy</b> (the top two Community Safety Partnership priorities), particularly in terms of attendance at Multi-Agency Risk Assessment Conferences (MARAC) by treatment providers and IBA training for Domestic Abuse services.	JB LB		
5.03: Improve screening and recording in drug and alcohol and domestic abuse services to identify complex needs and enable joint working to occur.	SIMP MARAC		
5.04: Learn lessons from the national treatment resistant drinkers domestic abuse project, and implement locally.	ANA Blue Light Project Manual	Multi-agency training due April onwards.	Blue Light Delivery to begin as training delivered.
7.01: Improve the complex needs pathways between alcohol and drug services, DASV, Together for Families, Social Care, Housing, Mental Health, Hospitals, CJS, including referrals via the MARAC between drug/alcohol and DASV services.			







CIOS Alcohol Strategy 2016-19 ACTION PLAN	Delegated Lead and other involved staff and agencies:	Summary: Next Action:
Thematic Area:		NEXT ACTION.
6. <u>Employment, Deprivation and Inclusion:</u> Interventions to reduce alcohol related employment problems; including Social Care, Homelessness and Housing.	Marion Barton (DAAT)  JC+  Mark Vinson  DCH	
6.01: Continue to promote IBA in Job Centres and employment services, housing and homelessness services and debt advice services.	Jez Bayes	IBA Training Next phase March 2017
6.02: Ensure the <b>new housing pathway for clients leaving residential services</b> is effective in securing accommodation on completion of a rehabilitation programme.	Marion Barton MB: Latest Needs Assessment shows continuing progress.	
<ul> <li>6.03: Continue to work with our complex needs housing providers to ensure they are supported in their provision of accommodation to clients at all stages in their recovery journey, with a priority focus on homelessness prevention.</li> <li>6.04: Ensure the housing pathway for Prolific and other Priority Offenders is effective in securing accommodation for those released from prison, who would otherwise be homeless.</li> </ul>	Positive housing outcomes on exit for alcohol clients are consistently very close to 100%; meaning that nearly every person completing alcohol treatment successfully leaves with no housing problems. The national rate in 2015/16 was 84%.  Housing problems are less prevalent amongst people starting alcohol treatment the amongst those starting any kind of drug treatment.  Around 1 in 10 alcohol clients present to treatment with a housing problem (3% NFA/homeless and 6% with a less acute housing problem, such as being in tempora accommodation), compared with 1 in 5 for drug clients.  Employment outcomes:  Levels of paid work being undertaken by alcohol clients in the month prior to leaving treatment successfully, are in line with the national average - with 7% in part-time work and 26% in full time work (compared with 5% and 25% respectively nationally constraints).	
6.05: Create more effective links and referral pathways between alcohol intervention and treatment services, and employment agencies such as Job Centres and their service providers.		
<ul> <li>6.06: Continue to develop the Health Promotion team's Healthy Workplace support to local employers, in training their management and staff in identifying and responding to alcohol issues in their workforce, and putting good policies in place to address these issues without endangering employees' careers.</li> <li>6.07: Improve pathways to alcohol services for Migrant Workers in Cornwall by addressing GP registrations, interpreter services, agency links to employers, and access</li> </ul>		
to specialist agencies.  7.01: Improve the complex needs pathways between alcohol and drug services, DASV, Together for Families, Social Care, Housing, Mental Health, Hospitals, CJS, including referrals via the MARAC between drug/alcohol and DASV services.	Employment is one of the most strongly positive factors in then sustaining recovery  SIMP HPS / LQ Pentreath	successful completion and





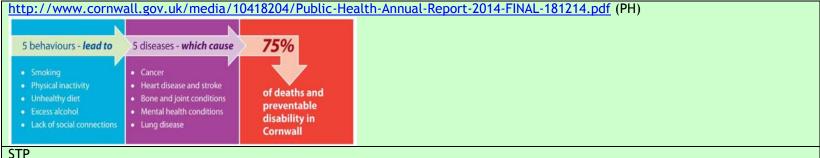


CIOS Alcohol Strategy 2016-19 ACTION PLAN	Delegated Lead and other	Summary: Next Action:
Thematic Area:	involved staff	Next Action.
	and agencies:	
7. Health, Treatment, Aftercare and Recovery:	Kim Hager	
Easy access to treatment, and effective care throughout;	Sue Clarke	
including hospital admissions, mental health and the treatment system.	(Addac)	
7.01: Improve the complex needs pathways between alcohol and drug services, DASV, Together for Families, Social Care, Housing,	SIMP	Theme 7 Covered in
Mental Health, Hospitals, CJS, including referrals via the MARAC between drug/alcohol and DASV services.	ANA / DNA	Commissioning
7.02: Continue the development of thorough pathways from hospitals to alcohol treatment services, train IBA in Hospital	KH	Priorities document,
departments, monitor and support RCHT to ensure that it is fully embedded, and continue developing the RCHT alcohol multi-	ALT	along with
disciplinary monthly meetings to analyse and care plan frequent attenders on a monthly basis.	Stakeholders	procurement/contract
7.03: Projects aimed at public messages about alcohol, treatment interventions, or IBA/preventative schemes need to address the	ST	monitoring processes.
population as a whole, but should consider catering for specific audiences, such as women and under-18s.	JB	
7.04: Monitor the balance of people in treatment for alcohol issues in Tiers 2 and 3, such that numbers don't fall below 1,400,	SIMP	
with a maximum of 1,000 in Tier 3.	ANA	
7.05: Work towards developing a consistent and effective method of investigating alcohol related deaths to inform lessons learnt	SW	
and future practice, review drug related deaths where clients have been in treatment for alcohol problems only, and promote		
awareness and education around the risks of poly drug use.		
7.06: Examine the unmet need for alcohol treatment for those with mental health issues and the potential barriers to	Dual Diagnosis	
treatment, and continue to develop and implement the Dual Diagnosis strategy and action plan to aid development of joint	Pathway	
working to improve outcomes for people affected by more than one condition.		
Work with other specialist providers would help to identify if those with mental health issues in domestic abuse and drug and alcohol		
services are accessing treatment for their mental health condition and what joint working could occur for those with complex needs.		
There will be a primary focus on increasing successful completions by:		
• Examining and developing the treatment offer for the most complex service users, particularly those who are representations		
to treatment, to reduce these service users dropping out of treatment again;		
<ul> <li>Increasing engagement of those not in contact through outreach and targeted activities, particularly people with children;</li> </ul>		
<ul> <li>Providing more information for service users about what is available. A comprehensive directory of recovery pathways</li> </ul>		
published and regularly updated;		
Reviewing the treatment offer for people who have been in treatment for 4 years and over to assess the recovery potential		
and service design for this group;		
<ul> <li>Reviewing the options for getting treatment to people who have difficulty with transport costs;</li> </ul>		
<ul> <li>Including stages of constructive activity and volunteering from the outset of treatment;</li> </ul>		
Clarifying the mental health offer within treatment services;		
<ul> <li>Increasing the solid network of volunteer drivers and peer mentors.</li> </ul>		
7.07: Support the Health and Wellbeing Board, Public Health and NHS partners in delivering the 'Live Well' initiative:	One You etc.	
Alcohol is one of the 5 behaviours, that lead to the 5 diseases, that cause 75% of deaths and preventable disability in Cornwall. As		
such, this will need the delivery of preventative and social marketing messages, and treatment and support interventions involving		
Addaction Cornwall:		









STP process in progress:

IBA Outreach **Frequent Attenders** Blue Light

**HFSC** 

#### Three aims:

- Improve the health and wellbeing of the local population.
- Improve the quality of local health and care services. 2.
- 3. Deliver financial stability in the local health and care system.

5 lifestyle behaviours contribute to 5 diseases which cause 75% of premature death and disability.

- Smoking Higher rate of smoking attributable admissions than national average
- Diet Over a quarter of children are overweight or obese
- Alcohol Estimated 25,000 people drink at harmful levels costing £75m a year to the health and social care system
- Physical inactivity People in the most deprived areas are twice as likely to be physically inactive than the least deprived.
- Social isolation 15% of all households in Cornwall have a person over 65 living alone.

#### Measures of success will be:

- Healthy life expectancy at birth.
- Fewer pregnant women smoking.
- Fewer households in fuel poverty.
- Fewer overweight children aged 10 or 11.
- Fewer people admitted to hospital for smoking or alcohol related conditions.

The Plan recognises that major social factors are a big influence on demand - 20% of NHS costs are associated with avoidable risk factors to do with diet, physical activity, smoking and alcohol consumption, while alcohol related harm accounts for 4,060 hospital stays per year.

The key health outcomes and benefit expected to be achieved from changes in this area include "Alcohol consumption is reduced and related hospital admissions are lowered."

Under a different intervention, "Prevention and self-care", seeking to achieve "Admission avoidance for high risk groups", it states that:

"In order to reduce harm from alcohol, we could also implement an Alcohol Assertive Outreach Team as an extension to our drug and alcohol services (DAAT) to offer more intensive support."

LAPE: Out of 20 conclusions from the Local Alcohol Profiles for England (LAPE), these are the most important specifics to be addressed:

8: Overall alcohol related episodes for under-40s are rising above the national trend, with female admissions rising more sharply

Findings to be addressed within SIMP/Commissioning and in Safer Cornwall operations and delivery.







	than male, although males account for more admissions overall.	
		Cornwall LAPE target Groups:
	9: Alcohol related episodes for 40-64s overall, for men and for women are rising above the national rate which is on a level	Male drinking, especially the amount
	trajectory. Males account for nearly two thirds of the admissions.	drunk by a proportion of men with
	,,	excessively risky drinking patterns;
	12: The broad rate for Alcohol related episodes for mental and behavioural disorders among women is slightly rising, higher than	excessively riskly drinking pacterns,
	the national rate, which is on a level trajectory.	The male drinking pattern being
	NB: The rate for men is in line with national rates, but is roughly double that of women.	damagingly assumed by women;
	Nb. The rate for men is in the with national rates, but is roughly double that of women.	Alcohol related RTAs in Cornwall;
	42. Alaskalia liwan dianana animalan ayanali, and fan man and yyaman ana nisian, kinkan tha national meta, yykisk is an a slavyan	Alcohol related KTAS III Cornwall,
	13: Alcoholic liver disease episodes overall, and for men and women are rising, higher than the national rate, which is on a slower	Hadan 40a yukasa sislay dainkina anasasa
	rising trajectory. NB: The rate for men is roughly double that of women.	Under-18s, whose risky drinking appears
		to be reducing in Cornwall, but at a
	14: Alcohol related unintentional injury episodes overall, and for men and women are rising, higher than the national rate, which	slower rate than nationally;
	is on a slightly falling trajectory. NB: The rate for men is roughly three times that of women.	
		Rising rates of Alcohol related
	16: Alcohol related episodes for intentional self-poisoning overall and for men and women are falling, but are much higher than	cardiovascular conditions, with especially
	the national rate, which is also on a falling trajectory. NB: Female rates of alcohol intentional self-poisoning are higher than men.	high rates among men;
	18: In the vast majority of the alcohol related and specific hospital admission conditions, the rate for men is at least double the	Alcohol related mental and behavioural
	rate for women, even when the rate for women is rising at a worse rate than national trends.	disorders, with especially high rates
	This suggests gradually increasing impact from a gradual change in female drinking patterns, but it also suggests than men are twice	among men;
	as likely to drink in such a way that it will cause health problems that require hospital treatment.	
		Alcoholic liver disease, with especially
	19: Cornwall's workforce, social cohesion, economy and welfare budget are detrimentally impacted by high benefit claimants due	high rates among men;
	to alcohol.	, , , , , , , , , , , , , , , , , , ,
		Alcohol related unintentional injuries,
	20: Our alcohol related RTAs are exceptionally poor, worse than the SW, which is also performing worse than national rates.	with excessively high rates among men,
		probably caused by risky drinking,
		vulnerable disinhibited behaviour, and
		disorder.
ŀ	Blue Light	Multi-agency approach to target
		complex 'Treatment Resistant
		Drinkers'.
ŀ	RCHT Alcohol Liaison Team	Data to be analysed to help focus
	NCTT ACOHOL Eldison Team	Hospital and Community services and
		pathways on the most frequent
		attenders.
ŀ	Alcohol and Suicido in Cornwalls	
	Alcohol and Suicide in Cornwall:	Contribution to 'Towards Zero'
	Males: higher rate than the national average.  Pate has been increasing since 2007.	processes and awareness raising.
	• Rate has been increasing since 2007.	
	2013: 65 deaths by suicide    Highest graphities in the 4F FO and graphs	
	Highest quantities in the 45-59 age group.	
	Most common methods:	
	'hanging, strangulation and suffocation' by males;	
	'poisoning by drugs/alcohol' by females	
	• 24% of all suicide cases were reported to have taken alcohol at the time of death.	
	DRUC 8 ALCOHOL together for a 8	







CIOS Alcohol Strategy 2016-19 ACTION PLAN	Delegated Lead and other	Summary:	Next Action:
Thematic Area:	involved staff and agencies:		
8. Licensing, Alcohol Retail and the Night Time Economy:	Jez Bayes		
Promoting and supporting a safe, responsible, successful alcohol trade;	Bob Mears		
including Best Bar None and bar staff training.	Angie McGuinn		
	(CC Licensing)		
8.01: Continue to communicate and lobby strongly for the evidence	JB	MUP not on current national agenda.	
based policy of connecting the price of alcohol to strength (either by MUP or by through targeted taxation) in any policy debates and	CC PH	Legislation doesn't support local schemes.	
consultations.	Rachel Wigglesworth	Some interest in voluntary 'Reducing The Strength'	type initiatives.
		Be aware of progress in Scotland, Ireland, Wales, EU	. to see when Westminster
	Sarah Wollaston MP	might pick up this issue again.	,
		MPs Alcohol Briefing?	
	Sarah Newton MP	(inc. Sarah Newton)	
		https://www.gov.uk/government/people/sarah-newt	on
		Parliamentary Under Secretary of State for Vulnerab Countering Extremism	ility, Safeguarding and
		Minister responsible for:	
		Disclosure and Barring Service	
		drugs	
		alcohol	
8.02: Review and continue to <b>deliver the SMART training</b> for bar staff,	SC	vulnerability	To be reconfigured and
in order to promote best practice and responsibility in alcohol sales.	JB	Content needs reviewing. Incorporate HaLO.	probably kept in house.
in order to promote best practice and responsibility in alcohol sales.	ال ا	incorporate naco.	probably kept in nouse.
		Delivery and funding needs reviewing, may be taken 'in-house' by Alc Strat Lead.	Larger regional events rather than small local
		Evaluation process to be instigated.	and premises events.
8.03: Continue to develop <b>Cornwall Licensing Forum</b> as a series of	JB	tba	Possibly replaced by
events for dialogue and discussion about best practice, involving both			LAAA steering group.
trade and enforcement representatives.			RA Meeting.
8.04: Support the evolution of <b>Cornwall Best Bar None</b> to fit in with	Mick McDonnell	BII progress in Pz.	No longer a CC priority.
the national BII model and timetable, making changes designed to	cit medoniicit	Update needed.	BBNUK/BII not making
create sustainability by increasing trade commitment to the scheme			headway.
through sponsorship, and by making the assessment process more			
efficient.			HaLO and LAAA processes







			more likely to help improve towns and NTEs.					
8.05: Improve support to local schemes such as the Street Pastors and Streetsafe, in order to make best use of the limited resources available, provide consistent good quality training, helping different teams to learn best practice from each other, and continue to make visitors, residents and communities more safe while reducing the load on Cornwall's emergency and enforcement services.	JB Asc Trust Jon Creber	SP recruitment campaign tba.	ROC Newquay reorganisation. Boeardmasters / Festival Angels.					
8.06: Increase Public Health engagement with licensing applications and review processes using current legislation as possible, or if relevant legislation or Licensing Objectives are updated.	JB	HaLO process.  LAAA2 process. (below)  CUMULATIVE IMPACT APPROACH.  Inc. Festival / Events???	Begin to present evidence with other partner RAs to learn how to use HaLO evidence to support Conditions.					
8.07: Work with the Office of the Police and Crime Commissioner to engage with supermarket alcohol retailers, and to encourage a national dialogue about improving alcohol legislation and enforcement.	Lisa Vango JB	PCC Crime Plan launched.  No PCC/ARID regional funding.	ARID data to be used in LAAA premises/cases approach.					
8.09: Work with the Police and Office of the Police and Crime Commissioner on local Night Time Economy schemes and messages, for example #RU2drunk and the nightclub breathalyzer schemes.	Lisa Vango JB	HaLO process.  LAAA2 process. (below)  CUMULATIVE IMPACT APPROACH.  Inc. Festival / Events???						
8.10: Continue to work with Community Safety colleagues as they evaluate and refresh the "What Will Your Drink Cost" campaign, impacts the Night Time Economy and the wider community.	JB / ST	See Section 1.06 above.						
		Plymouth Uni review received (above).  Update WWYDC Autumn/Winter 2016						
8.11: Improve operational usability and impact of data gathered through the Assault Related Injuries Database in Emergency Departments and Minor Injuries Units, in order to improve practice in licensed premises, making customers less vulnerable to violence and health harms.		SV compiled review and recommendations (Sept 2016) submitted top PCC Crime Plan Consultation process.  HaLO process.  LAAA2 process. (below)  CUMULATIVE IMPACT APPROACH.  Consideration of including St Austell as a 5 <sup>th</sup> CIZ???						
4.01: Redevelop the ladder of Criminal Justice System Alcohol Diversionary interventions that address alcohol related offences and violence in Cornwall.	MT							







# <u>Cornwall Local Alcohol Action Area (Phase 2) 2017-2018 2 Year Plan:</u> Accepted into this Home Office scheme January 2017.

	<i>9</i>		ACTIONS: 2017 – 2018									
Cornwall LAAA2 Activity: Page 1 of 4	NAA Aim and nallenge rage 7)	Lead Role or Agency	Funding Needed?	Q1 2017 (Jan-Mar)	Q2 2017 (Apr-Jun)	Q3 2017 (Jul-Sep)	Q4 2017 (Oct-Dec)	Q1 2018 (Jan-Mar)	Q2 2018 (Apr-Jun)	Q3 2018 (Jul-Sep)	Q4 2018 (Oct-Dec)	Initial SMART targets:
Main Activities:	1:i			Use Healt	n based evid	lence to pre	sent	Use Heal	th based evi	dence to pro	esent	Present

Mai a)	n Activities: Supporting LA and Police Licensing cases	1:i	Jez Bayes (DAAT / PHRA)	N	supporting evidence in 1 case per month.			Use Health based evidence to present supporting evidence in at least 1 case per month.	Present supporting evidence in at least 1 case per month.
b)	Developing Public Health as an active <b>Responsible Authority</b>	1:i	Jez Bayes (DAAT / PHRA)	N			Use Health based evidence to propose Conditions or Objections in 1 case per Quarter.	Use Health based evidence to propose Conditions or Objections in at least 1 case per Quarter.  (Link to CIZ processes)	Propose Conditions or Objections in at least 1 case per Quarter.
c)	Improving operational use of ARID to address violence hotspots and improve Licensing practice (cf. PCC Crime Plan Funding proposal made.)	1:i	Simon Viles (Amethyst) Bob Mears (CC Licensing) Dave Vickery (Police Licensing)	£6,900 pa PCC / Community Safety funding	Secure Funding for 2017- 18.	Meet ED and MIU teams to update.	Evidence from CC and Police staff in the form of ARID case studies.  1 case per Quarter.	Evidence from CC and Police staff in the form of ARID case studies.  At least 1 case per Quarter.	Evidence from CC and Police staff in the form of ARID case studies.  At least 1 case per Quarter.
d)	Incorporation of <b>SWAST data</b> into HaLO dataset	1:i	James Butler (Amethyst)	N	Identify SWAST data contact.	Agree data sharing protocol and systems.	Include Ambulance Intoxication Callout and ED data in HaLO dataset.	Include Ambulance Intoxication Callout and ED data in HaLO dataset.  Identify whether supporting data, or Key Indicator for Priority Matrix.	Include Ambulance Intoxication Callout and ED data in HaLO dataset.  Identify whether supporting data, or Key Indicator for Priority Matrix.







		( <i>b</i> 5 ک			<u>ACTIONS:</u> 2017 – 2018								
Activ		LAAA Aim and Challenge (page 7)	Lead Role or Agency	Funding Needed?	Q1 2017 (Jan-Mar)	Q2 2017 (Apr-Jun)	Q3 2017 (Jul-Sep)	Q4 2017 (Oct-Dec)	Q1 2018 (Jan-Mar)	Q2 2018 (Apr-Jun)	Q3 2018 (Jul-Sep)	Q4 2018 (Oct-Dec)	Initial SMART targets:
e) Better use of drink driving and pedestrian casualty data in Licensing and Road Safety processes		1:i	Jez Bayes (DAAT / PHRA) James Butler (Amethyst) Tamsin Ferris			discuss ho monitor ir	n Court Servi w to identifi npact of red drink driving	y data to uced	Set up project.	Court outo	ta sources, i comes, num o reduced se eoffending r	bers entence	Assess whether reduced sentence drink driving courses reduce reoffending.
			/ Paula Wellings (CC FRS)	N		Identify alcohol related road casualty hotspot locations data source, with FRS.			Set up project.	Identify alcohol related road casualty hotspot locations.  Identify whether sufficient numbers to be mapped into HaLO.			Identify whether this can be mapped into HaLO.  Identify whether this can guide Road Casualty Reduction Team targets.
f)	Contributing alcohol related data to <b>Trading Standards</b> and other 'Public Health and Protection' processes	1:i	Jez Bayes (DAAT / PHRA) James Butler (Amethyst) Nigel Strick (PHAP)	N	HaLO dataset used as supporting evidence in 2 cases per Quarter.				I set used as per Quarter	HaLO dataset used as supporting evidence in 2 cases per Q.			
g)	3 Health Actions: Use of alcohol data to guide the development of Complex Needs Pathways for people experiencing multiple problems (mental health, domestic abuse, homelessness).	1 : i <mark>2 ; i</mark>	Kim Hager (DAAT) Kim Dowsing (CC/EHSC) Mairead Munro (Amethyst)	N	Measures and metrics agreed.	Implemen workforce developm programm commence (numbers from whice agencies).	ent ne e of staff h	Group starts (to trouble shoot system problems arising from  Needs Assessment process. NA completed in Q4 (Jan-Mar 2017), then this will involve ongoing monitoring processes.		Jan-Mar (Jan-Mar nvolve processes:	448 people with three or more problems have a single joint care plan.		







	( <i>ا</i> م			<u>ACTIONS:</u> 2017 – 2018										
Cornwall LAAA2 Activity: Page 3 of 4	LAAA Aim and Challenge (page 7)	Lead Role or Agency	Funding Needed?	Q1 2017 (Jan-Mar)	Q2 2017 (Apr-Jun)	Q3 2017 (Jul-Sep)	Q4 2017 (Oct-Dec)	Q1 2018 (Jan-Mar)	Q2 2018 (Apr-Jun)	Q3 2018 (Jul-Sep)	Q4 2018 (Oct-Dec)	Initial SMART targets:		
h) Use of data for Alcohol Related Hospital Frequent Attender identification and outreach	1:i <mark>2;i</mark>	Kim Hager (DAAT) James Butler (Amethyst)	N		FAs. Pathway and utilisation Min of 10 engaged per quarter; Palliative Care FA and i				Cost service utilisation FA and ide reduction	of each entify cost	Review top 50 FAs per Q; Min 10 engaged per Q; Nil hospital attendance by 70% of FAs.			
i) Developing a pathway for 'Treatment Resistant Drinkers' using the 'Blue Light Project' model and learning, for both enforcement and supportive interventions, as relevant.	1 : i <mark>2 ; i</mark>	Kim Hager Jez Bayes (DAAT) James Butler (Amethyst)	Within existing budget.		Multi agency sign up;  Joint Training prog.		Delivery programme started.		All dependent drinkers scoring 40 + AUDIT in ASB, criminal justice and social care settings and unwilling to engage in treatment will be subject to the Blue light multi agency approach.  Monitored and Evaluated by Needs Assessment Expert group			in ASB, criminal justice and social care settings and unwilling to engage in treatment will be subject to the Blue light multi agency approach.		Monitored and Evaluated by Needs Assessment Expert group.
Secondary impacts:  a) Improved targeting and co- ordination with Street Pastors and other local outreach services.	1 : ii	Jez Bayes (DAAT)	N	Use of HaLO data to help local NTE services identify correct patrol locations.				Use of HaLO data to help local NTE services identify correct patrol locations.				Reduction in ASB and Violence in identified locations.		
b) ASB / Enforcement and Positive Requirements	1 : ii 2 ; i	Natasha Matthews (ASB team)	N	Use of HaLO data to identify and understand ASB Hotspots, generating 6 cases per Quarter referred from ASB to Addaction.				Review use of HaLO data to identify and understand ASB Hotspots, generating 6 cases per Quarter referred from ASB to Addaction.				6 cases per Q referred from ASB to Addaction.		
c) Late Night Levy Processes tbc.	1 : ii	Jez Bayes (DAAT) *	Awaiting Legislation	flexibility of towns in Co areas.] * Th	[If new legislation due to be passed this Autumn in the Police and Crime Bill improves the flexibility of the 'Late Night Levy', we will work with partners to assess its application in towns in Cornwall, with the support of the PCC. This could apply to major towns and CIZ areas.] * Tbc: Process under auspices of Malcolm Brown (Licensing Act Committee) and Mark Andrews (CC Legal).						If legislation is applicable, LNL process addressed in 4 CIZs.			
CIZs currently with Safe Spaces:  1: Truro (Y)  2: Falmouth (Y)  3: Newquay (Streetsafe Centre)  4: Penzance (Y)  Other Hotspots:  Camborne (N), St Austell (N).	1 : iii	Jez Bayes (DAAT) Miles Topham (Police) CSOs (CC / CST)	N	Use of HaLO data to help local NTE capture activity and services identify correct patrol locations.  Assess staffing/training for existing Safe Spaces.  Use of HaLO data to help loc identify correct patrol location identifies identified ident				E services	Capture activity & intervention data. Reduction in ASB and Violence in identified locations.					





	<i>8</i>			<u>ACTIONS:</u> 2017 – 2018								
Cornwall LAAA2 Activity: Page 4 of 4	LAAA Aim and Challenge (page 7)	Lead Role or Agency	Funding Needed?	Q1 2017 (Jan-Mar)	Q2 2017 (Apr-Jun)	Q3 2017 (Jul-Sep)	Q4 2017 (Oct-Dec)	Q1 2018 (Jan-Mar)	Q2 2018 (Apr-Jun)	Q3 2018 (Jul-Sep)	Q4 2018 (Oct-Dec)	Initial SMART targets:
Responsible Licensed Trade Schemes:  a) SMART Training update, incorporating new CMO Alcohol Guidelines, HaLO dataset, and Addaction intervention training as developed with Penzance Pubwatch Scheme;	1 : i/ii/iv	Jez Bayes (DAAT) Lynda Edwards (Addaction)	£2,000 pa at present. Delivery reviewed & updated.	Redesign SMART training content into a Half Day Conf.	Deliver 1 S per Quarto (NB: SMAI Misuse an Training' f	er RT = 'Subs nd Alcohol	stance I Retail	Deliver 1 S	SMART Con	ference per	Quarter	Deliver 1 SMART Conference per Quarter Minimum 12 premises per Conference.
b) CAPs? c) 'Reducing The Strength' Off Trade Approaches?	1 : iv	<b>Jez Bayes</b> (DAAT)	N	Use of HaLO evidence to consider CAP and RTS in CIZs and Hotspot areas.				Use of HaLO evidence to review CAP and RTS in CIZs and Hotspot areas.				CAP and RTS considered in CIZs and Hotspot areas.
HaLO data will be used in the annual review of Cornwall's CIZs in early 2017:  a) Truro b) Falmouth c) Newquay d) Penzance	1/3 : i/ii	Jez Bayes (DAAT) Malcolm Brown (Licensing Act Committee) Mark Andrews (CC Legal)	N	HaLO data to be incor into annual Review pro all 4 CIZs, e	porated I CIZ cesses for			HaLO data to be inco into annua Review pr for all 4 CI 2017.	rporated al CIZ ocesses			Conditions based on Health evidence in all CIZs. Conditions used in Licensing cases (as above).
Assessing the current makeup of the NTE in the 4 CIZs, in order to guide Licensing decisions and priorities towards a balance that reduces the likelihood of disorder and injury.	3 : i/ii	Jez Bayes (DAAT) James Butler (Amethyst)	N	Survey/map the evening/NTE offer in the 4 CIZs, to assess types of businesses.  Map against crime types and ED attendance.  Analyse survey outcomes.		ne 4 : es and	Demonstrate results to Licensing Act Committee, and agree implications.	Apply survimplication reviews, surviyes of publicady over the control of the cont	ns to CIZ uggesting remises ver- ed, and	Apply survey implications within CIZ reviews to actual applications and reviews.		Crime/Health input into NTE balance in CIZs.  Conditions used in Licensing cases (as above).





