

Worcestershire
Regulatory Services

Supporting and protecting you

Service Plan

2015/16

Worcestershire Regulatory Services Vision

"That Worcestershire is a healthy, safe and fair place to live, where businesses can thrive"

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EXECUTIVE SUMMARY

The plan broadly follows previous years and outlines:

- How the service will operate over the following 12 months to deliver on both national and local priorities, some of which are highlighted in the plan,
- What activities the service will carry out to achieve or address those priorities and how success will be measured.

The Service will enter 2015/6 with a total agreed budget of £4,081,000. This fully delivers the savings required by partners in 2014/15 (last year some partners had to take slightly reduced in-year savings due to budget timings,) and also the reductions in contribution from Worcestershire County (£250,000) Wyre Forest (£38,000) and Worcester City (£30,000,) requested for the 2015/16 financial year. This is being delivered using a mixture of transformational efficiencies and changes in the level of service. Much of the County Council's reduction in budget contribution is being delivered by the change in accommodation, which is facilitating a cost neutral change in partner contributions. The other 4 partners (Malvern Hills, Wychavon, Redditch and Bromsgrove,) are asking for efficiencies totalling £177,000 over 2015/16 and 2016/17, but they will only accept savings if they can be delivered without reducing/changing levels of service. Further reductions in budget contribution for Wyre forest (£37000,) Worcester City (£30000,) and Worcestershire County (£350,000 to be formally agreed) are required for 2016/17. The lack of financial stability and stable cost base makes service planning and development very challenging.

A 3-year business plan, as distinct from this service plan, which has a number of strands for continuing the Service's development has been prepared. The Strategic Partnering process has confirmed that there is no current market solution to the current regulatory service offering and that the service is already highly efficient and offers excellent value for money to partners. There is some room for pursuing marginal efficiencies in the future. However, with the different positions partners find themselves in, there is a need to review the business model, moving away from the common delivery platform to one where partners can buy a more bespoke level of service to match their financial envelopes.

The service will continue to examine opportunities for commercial activities to bring in additional income, however such income streams are certain to be small compared with the reduction in budget contributions required. It has become clear over the past 12 months that the opportunities for income generation are limited in most areas and that there is a general reluctance from business to pay for advice from the local regulator. Work done on behalf of WRS by the County Council's Research and Intelligence Unit showed that many businesses pay for professional advice but are reluctant to pay for this advice from a public body. The service has been more successful in obtaining income by doing work for other local authorities. This will continue to be pursued going forward.

In making decisions regarding service delivery the service will continue to risk assess what it does taking into account the following criteria:

- a) Is there a positive/ negative impact on the local economy?
- b) Are vulnerable people impacted?
- c) Are health and wellbeing issues involved? And should we look to work with Public health?

The work on our risk matrix of services, which has the approval of both Management Board and the Joint Committee, will continue to inform this approach where possible. New matrices have been developed for 2015/16 and 2016/17.

1. INTRODUCTION

This is the fifth formal annual service plan to be produced by Worcestershire Regulatory Services and the fourth since the co-location of all staff at Wyatt House in Worcester. It will be the first plan delivered from the service's new operating base, Wyre Forest House, Kidderminster. It follows a similar format to the previous plans with an Executive Summary and much of the detail in appendices that follow on from the commentary. The financial information covers the three year accounting period 2015/16, 2016/17 and 2017/18 however the operational detail reflects the planned activities that the service will undertake in 2015/16 only. The latter is in recognition of the on-going discussions with partners as to the shape and composition of service delivery in future years.

2014/15 was again very busy and successful for WRS, dominated the Strategic Partnering process and by the continuing implementation of a single IT platform. In these financially challenging times, officers have continued to deliver excellent work, with some excellent results in recent Court cases involving WRS. Details of this will be reported in the Annual Report to be produced at the end of May 2015.

The coming year promises to be very challenging and is likely to be dominated by delivering agreed reductions in budget contributions for some partners which will result in further changes to staffing levels. With the scale of budget review currently proposed, noticeable changes in how the service is delivered are likely, particularly in relation to Trading Standards and Animal Health provision. The budget for 2015/16 has been agreed at £4,081M, which fully reflects the savings required for 2014/15 and a further reduction in contribution from three of the seven partners for 2015/16.

A significant proportion of this saving has been delivered by the move to Wyre Forest House, Kidderminster, which has facilitated a cost neutral change to the partner contributions, allowing the County Council's contribution to better reflect the staffing compliment committed to the delivery of its functions within the service. All partners have provided a profile of their savings requirements for 2015/16 and 2016/17 going forward. The service budget for 2016/17 is currently predicted to be around £3.475M. This will represent a reduction of approximately 50.5% compared with the £7.15M spend on relevant functions when the service came together in 2010. The service faces the same challenges that beset all of local government over the next few years.

Whilst last year's search for a Strategic Partner failed to deliver the hoped for outcome, a number of positive lessons were learned and the service received a great deal of praise from 3 of the main providers of professionalised local government services in the private sector. It is now clear that WRS delivers excellent value for money to its partners as none of the potential Strategic Partners could make the budgets add up in a way that allowed a high standard of service delivery within the current financial envelope. There was no margin for them to achieve,, nor was there the opportunity to make significant efficiency savings, these having already been made as part of the previous work done within the service. Indeed, both of the private suppliers who went into the dialogue sessions made it clear that they would have done nothing different in their pursuit of efficiency from that which the WRS Management Team has pursued. In terms of other lessons, tendering has forced us to develop a much better understanding of our own cost base, which has allowed us to push our own efficiency agenda and will allow us to bid for work in a cost effective manner going forward. A volume of short term work for the District Council's in north Gloucestershire was been secured and a successful bid made to provide Dog Warden services for three of them. Other neighbours have asked for support with situations like maternity leave. The focus of much of this work is in highly technical areas where the economies of scale created by bringing the six district service together have put us in an excellent position to deliver these service elements for other local authorities.

It has become clear over the past 12 months that other opportunities for income generation are available but there is a general reluctance from business to pay for advice from the local regulator. Work done on behalf of WRS by the County Council's Research and Intelligence Unit showed that many businesses pay for professional advice but are reluctant to pay for this advice from their local regulator. The Primary Authority concept has delivered little in terms of meaningful financial support for business advice but we will continue to offer it as it allows us to offer assured advice to local businesses and recover the cost of this service. We have begun to develop a relationship with a locally based environmental business that is going to use some of our officers on a consultancy basis outside of the County to support their work. It is hoped that this will develop over time into a reasonable income stream.

Moving customers onto the most efficient operating channel will also be a focus of 2014/15. The first contact point for telephone calls was moved in-house from May last year and this has been successful, with resolution of issues at first point increasing beyond 20%. Having calls coming to our own staff has enabled us to train them up to answer many of the basic questions that would otherwise have to go into our system to be dealt with by more expensive professionally qualified staff. Improvements in the website will continue with the development of public service. We are already publishing a range of public registers on-line, and we hope to further enable our website going forward to allow electronic application for licenses, including payment, the reporting of issues and allow the public to monitor progress of these without needing to speak to someone.

2. OPERATING ENVIRONMENT

A PESTEL analysis appears as Appendix D, which outlines the nature of the environment within which the service operates. It has to focus on both national and local drivers as the majority of services delivered by WRS form part of the jigsaw puzzle that is part of the UK's national regulatory framework. At the national level the external environment in which the Service operates continues to face unprecedented challenges. National government continues to set challenging financial targets for local government and challenges regulators to demonstrate how regulation supports businesses and economic growth, whilst supporting and protecting local residents.

There is still a perception from some sectors of business that local authority regulators are not here to help. We know this is not the case, and along with colleagues in the professional institutes, the Local Government Association and the Local Enterprise Partnerships, we have sought to challenge this perception.

The service is sharing significant financial challenges with partners as their own allocations of central funding fall. The Strategic Partnering exercise highlighted that WRS is already a highly efficient and effective service, delivering value for money for the partners, the public and local business. There are no profit margins available and no easy wins for the delivery of cost saving efficiencies left. These have already been taken and, again the potential private partners praised the service indicating that would have taken the same steps had they been in our shoes. Therefore, the level of reduction requested by some partners cannot be delivered through efficiencies alone. There will have to be associated reductions/changes in the level of service delivery.

The service will continue to look for efficiencies where possible, and look to generate income to assist with the offsetting of budget shortfalls. There seems to be unwillingness on the part of businesses to pay local regulators for the advice that they have received previously without charge. This is likely to limit our ability to generate income from such sources. We will continue to work with bodies like the Worcestershire LEP and the Greater Birmingham and Solihull LEP to engage with businesses and where possible support business growth.

The budget for 2015/16 is agreed at £4.081M. This reflects the full savings asked for by three of the partners in 2014/15 (their actual contributions were above the level intended as the budget was not agreed in time so they had to accept in-year savings and delivers further savings to a number of partners requested for 2015/16:

- £30k from Worcester City
- £38k from Wyre Forest
- £250k from Worcestershire County

The methods of delivering the district savings were agreed last year and consist of:

- full implementation of self-help in relation to non-noise related nuisance complaints and
- the cessation of proactive Health and Safety at Work enforcement in the areas of these two partners.

The model of self-help will be deployed across the other district partners in 2015/16 to enable efficiencies to be delivered in this area.

The relocation of the service's operating base has delivered much of the rest of the savings for 2015/16, along with some reductions in service level for County Council functions. The falling headcount in the service meant that we were able to review alternative accommodation on offer from all partners and organise the relocation to Wyre Forest House. This has delivered significant savings which have allowed a cost neutral reorganisation of partner contributions.

Shifting demand to the use of more cost efficient digital channels remains a major focus of efficiency proposals, with self-help in relation to service requests being a major area for action. Increasing the volume of helpful information on the service's website and giving public access to some of the data from our database (e.g. public registers being available on-line, effectively published directly from the database,) does help. Giving customers the ability to monitor the progress of their service requests on-line will also deliver some improvements in efficiency at the margins. Some care will need to be taken with this as some customers may find this difficult and it may be that face to face interaction is the most efficient channel for their demand.

Staff are now using the new IT system and this has significantly improved our ability to provide performance and activity data to members. Officers are already working flexibly, only attending Wyatt House 2 or 3 days per week, the rest of the time using either home or a touchdown site in another local authority building as their start and finish point for work. This helps to control the mileage bill and allows staff to have a better work/ life balance. These work patterns have allowed us to reduce from the current 102 desks at Wyatt House to 50 at Wyre Forest House.

The national elections in May leave significant uncertainty for local government over what will happen to funding going forward. Both of the main parties are indicating on-going austerity for some time so it is probably safest to assume that the challenging financial climate will remain for the foreseeable future.

3. STRATEGIC PRIORITIES

The Government tasked the BDRO (Better Regulation Delivery Office) with developing Priority Regulatory Outcomes for England for local authorities to consider when undertaking their service planning processes. Published in May 2011, the list is as follows:

1. Support economic growth, especially in small businesses, by ensuring a fair, responsible and competitive trading environment
2. Protect the environment for future generations including tackling the threats and impacts of climate change
3. Improve quality of life and wellbeing by ensuring clean and safe neighbourhoods
4. Help people to live healthier lives by preventing ill health and harm and promoting public health
5. Ensure a safe, healthy and sustainable food chain for the benefits of consumers and the rural economy

The aim of these priorities was to help local authority regulators demonstrate their links to the main corporate priorities of their parent councils, and public health, and to give those authorities the opportunity to shape what is delivered to local need. They have been used previously by the service for this purpose and still dovetail well with the priorities of the seven partners across Worcestershire. Whilst the wording is slightly different for each partner, the commonalities and similarities across their high-level priorities are such that the BRDO strategic priorities will enable us to engage with issues that matter across the districts and at county level. The service will also have the flexibility to engage with members and other stakeholders to identify any truly local priorities which may not easily fit into any of the above and this may, for example, cover issues around licensing and levels of enforcement of certain provisions.

In taking into account the effect of the potentially challenging budget situation moving forward and how the service can deliver against national and local priorities, there is no question that changes in service delivery and scope will be an inevitable consequence of further funding changes. We will need to prioritise what is delivered, to whom and how. To assist in this decision making, a risk matrix was developed in 2013/14 and approved by Management Board and Joint Committee, which identifies 3 key criteria to consider when making decision on service provision:

- a) Are vulnerable people impacted
- b) Are there Health and Well Being issues involved
- c) Is there a positive/negative impact on economic activity

This piece of work will continue to inform any process of service contraction that may be required. The financial elements of the matrix have been updated for 2015/16 and for 2016/17 so we can see how the changes requested by partners are impacting on our own cost base. There remains a risk that demand which can no longer be met by WRS is simply re-directed to partners in other ways e.g. via complaints. Where reductions have been largest, partners may face challenges relating to whether or not they are meeting their statutory obligations.

4. PURPOSES

Following its Systems Thinking work, WRS adopted 3 purposes to underpin service delivery and provide a common thread to run through all of its functions.

1. Help me resolve my problem and stop it from happening to anyone else,
2. I want to assume everything is ok
3. Help me trade well and ensure my competitors do the same.

These purposes are expressed in terms a customer (member of the public or a business,) might use, provide a focus for staff and have been agreed by the Joint Committee. These purposes, combined with the priorities outlined by BRDO, encapsulate the Service's contribution to the wider community agenda, reflecting as they do the broad themes relevant to all partners.

5. FINANCE

A summary of the budget position for 2015/16 is shown at Appendix B, along with the proposed budgets for the following two years. This includes an indication of the levels of saving partners are considering at the time of writing. Obviously the financial position may change going forward. A more detailed breakdown will be available to the Joint Committee in its regular financial reports. Income levels are difficult to estimate but we have set ourselves income targets going forward in order to maintain a greater resilience than would otherwise be possible.

6. AUDIT ARRANGEMENTS

The Internal Audit Service will be provided under the current arrangement by Worcester City Council to the Host Authority. The participating authorities S151 Officers will consider the Audit Plan of the Host to ensure adequate arrangements are in place. An assurance statement and copies of relevant Audit reports will be made available to the S151 officers when audits are undertaken. External Auditors appointed by our hosts will provide an Audit opinion of the Joint Arrangement as a separate entity to the Host's financial reports.

The Financial Statement of Accounts will be presented to the Joint Committee in June for approval within the statutory deadline. Member Authorities will liaise about requests from their Overview and Scrutiny Committees and Audit Committees. They will use reasonable endeavours to agree joint scrutiny arrangements with a view to avoiding duplication of effort

7. ACTIVITIES & OUTCOME MEASURES

The implementation of the new IT system has allowed the service to report more accurately on activities. The service has continued to work with members to demonstrate the service's performance and the service's current core performance indicators are listed as Appendix C. These have been amended following the half-day session with Joint Committee members in January 2014.

The activities outlined below are examples of what is planned by the service. We believe that activity data combined with the core performance indicators will give Members the confidence that the Service is performing well, given the current financial constraints, and contributing to the wider local agenda. The approach is very much in line with Government thinking in terms of reducing burdens on and supporting local businesses whilst tackling rogues who would ignore their responsibilities and criminals who use business as a model for generating criminal assets. It also addresses the significant demand that comes into the service as complaints/ service requests, covering a wide range of issues and concerns from residents, visitors and businesses within Worcestershire.

	OUTCOME	WHAT WE WILL DO	PURPOSE	NATIONAL PRIORITY	MEASURES
1	<p>Businesses are supported to become compliant with the law and successful (Pollution, H&S, Food Safety, Licensing)</p> <p>NB: for the Trading Standards functions (Metrology, Food and Agriculture Standards, Product Safety, Fair Trading and Animal Health,) this work will be chargeable unless it relates to infringements identified either locally or by other authorities</p>	<p>Provide businesses with advice and assistance using a range of channels.</p> <p>Conduct risk based/ intelligence-led interventions with businesses; targeting resources towards potentially non-compliant businesses</p> <p>Undertake intelligence led projects including sampling of various consumer products including food.</p> <p>Develop Commercial Products that businesses would be willing to pay for that would enhance business performance</p>	<p>I want to assume everything is ok.</p> <p>Help me trade well and ensure my competitors do the same</p>	1, 2, 3 and 5	<p>% businesses meeting purpose at first assessment/ inspection</p> <p>% of service requests where resolution is achieved to business satisfaction</p> <p>% of food businesses scoring 0,1,2* at 1st April each year</p>
2	<p>Doorstep crime is tackled and older people are supported and feel safer in their homes</p>	<p>Respond to complaints and take appropriate action</p> <p>Promote alternative to doorstep interaction e.g. Trader Register</p> <p>Share intelligence with Police and other partners</p> <p>Participate in multi-agency events e.g. Rogue Trader Day</p>	<p>Help me to solve my problem and stop it from happening to anyone else</p> <p>I want to assume everything is ok.</p> <p>Help me trade well and ensure my competitors do the same</p>	1 and 3	<p>% of service requests where resolution is achieved to customers satisfaction</p>

3	Reduction in nuisance and other pollution related issues	<p>Respond to complaints and take appropriate action</p> <p>Provide relevant advice and information, available through a range of channels.</p>	<p>Help me to solve my problem and stop it from happening to anyone else</p> <p>Help me trade well and ensure my competitors do the same</p>	2 and 3	<p>% of service requests where resolution is achieved to customers satisfaction</p> <p>Rate of noise complaint per 1000 head of population</p>
4	Protecting the environment and the public through monitoring air quality and the use of contaminated land for development. Controlling environmental emissions leading to reduced environmental damage and better health	<p>Conduct risk based/ intelligence-led interventions with businesses, especially permitted premises</p> <p>Air quality monitoring</p> <p>Responding to contaminated land issues</p> <p>Supporting the planning system</p>	I want to assume everything is ok	2	<p>% businesses meeting purpose at first assessment/ inspection</p> <p>Monitoring of the County-wide Air Quality strategy</p> <p>% of service requests where resolution is achieved to customers satisfaction</p>
5	Licensed premises cause no significant alcohol-fuelled crime/ disorder and ASB.	<p>Respond to complaints regarding alcohol and similar licensing related issues e.g. underage sales, breach of conditions, poor conduct of licence holders, etc.</p> <p>Provide businesses with advice and assistance</p>	<p>I want to assume everything is ok</p> <p>Help me to solve my problem and stop it from happening to anyone else</p> <p>Help me trade well and ensure my competitors do the same</p>	1 and 3	% of licensed businesses subject to allegations of not upholding the 4 licensing objectives
6	Taxi's drivers are suitable people to be licensed for the role and vehicles are safe whilst in use for Hackney Carriage / Private Hire activity	<p>Conduct risk based/ intelligence-led interventions with taxi firms</p> <p>Respond to complaints and take appropriate action</p> <p>Provide businesses with advice and assistance</p>	<p>I want to assume everything is ok</p> <p>Help me to solve my problem and stop it from happening to anyone else</p> <p>Help me trade well and ensure my competitors do the same</p>	3	<p>% of applicants for driver licenses rejected as not fit and proper</p> <p>% of vehicles found to be defective whilst in service</p>

7	Consumers able to make informed choices on where to eat or purchase food through published food hygiene ratings.	Implement and promote a county wide food hygiene rating scheme Publish hygiene ratings and accrediting those which improve health and wellbeing of their workforce.	I want to assume everything is ok Help me trade well and ensure my competitors do the same	4 and 5	% businesses meeting purpose at first assessment/ inspection
8	High levels of customer satisfaction	Respond to complaints and take appropriate action Enabling customer access to services, where possible, by their chosen means Getting it right first time so, where possible, we deal with customers through a single contact Maintain a register of compliments and complaints with actions taken	I want to assume everything is ok Help me to solve my problem and stop it from happening to anyone else Help me trade well and ensure my competitors do the same	1, 2, 3 and 5	% of service requests where resolution is achieved to customers satisfaction % of service requests where resolution is achieved to business satisfaction
9	Having engaged and satisfied staff who have the right skills, tools and support	Develop a training plan Undertake annual staff survey. Undertake annual staff performance reviews with regular feedback sessions from supervisors and managers	All officers must be able to undertake work relating to the three purposes	1, 2, 3, 4 and 5	Staff sickness and absence at public sector national average or better % of staff who enjoy working for WRS
10	Maintained preparedness for response to emergencies, including disease outbreaks.	Take part in partner exercises to test plans, as appropriate Conduct risk based/ intelligence-led interventions with businesses Visit critical disease control points Respond to disease notifications and outbreaks	I want to assume everything is ok Help me to solve my problem and stop it from happening to anyone else Help me trade well and ensure my competitors do the same	1 and 5	Disease response plans are maintained, reviewed and updated on a regular basis Business Continuity plans are maintained, reviewed and updated on a regular basis

8. PERFORMANCE REPORTING

Performance against outcomes will be reported to Management Board and Joint Committee quarterly, six-monthly or annually, depending on the measure. The new IT platform has enabled the collection and analysis of measures data which will be both accurate and robust. The service's ability to provide activity data has improved over the past 12 months as the IT implementation plan has gone forward, and the system should be fully ready for reporting purposes by the beginning of 2015/16. Members will continue to be engaged so that we can update the type and extent of performance and activity type information required by them, so that they can be reassured that the service is delivering what is required.

9. STRUCTURE

The saving requirements for 2014/15 meant that we reduced management capacity at both Team Manager Level (5 to 4 NB: one Acting role,) and Senior Practitioner level (12 to 10,) to help maintain resources at the front line, and the need to meet further budget challenges on behalf of partners. Going into 2015/16 this management structure is retained and outlined at Appendix A:

- 1) The Community Environmental Health team provides Food Hygiene, Health and Safety at Work, Public Health and Nuisance functions using three teams. Two teams operate on an East: West Geographical basis, whilst the other delivers specialist Food and Health and Safety functionality county-wide.
- 2) The Trading Standards and Animal Health team provides Legal Metrology, Food and Agricultural Standards, Product Safety, Fair Trading and Animal Health functions on a county-wide basis,
- 3) The Technical Pollution and Dog Wardens team provides all environmental health support around planning matters, delivers IPPC inspection, most of the water quality work across Worcestershire, monitors the pest control contracts and directly delivers the Dog Wardens service. It is currently covered by an "acting-up" management role.
- 4) The Licensing and Support Services unit will deliver in-house first contacts, all WRS licensing administration and the wider in-house clerical/ administrative/ IT and financial support that is required.

10. TRAINING AND DEVELOPMENT OF MULTI-FUNCTIONAL TEAMS

Initial thinking when developing the service was that multi-functional officers could provide a wider range of options for intervention creating a more cost effective service. What we see from our activities is that where an activity requires good communication skills but can be undertaken with limited technical knowledge, a wide range of officers can undertake this work. Domestic nuisance complaints are probably the best example of this type of activity and they represent quite a large volume of reactive work. However, as soon as technical knowledge becomes a significant input into an activity, it requires a person with higher levels of competence to undertake this. So other activities, for example consumer safety investigations, industrial noise nuisance investigation, food factory inspection, all need both good communication skills and a high degree of competence to ensure correct legal process is followed and accurate legal advice is given. Hence, they require staff with significantly better specialist knowledge.

The development of self-help as the initial response to less serious service requests will also support this approach. Work on the Worcester City pilot suggests that around 20-25% of non-noise related nuisance demand can be dealt with by self-service. These will, however be just the kind of simple requests that a “non-expert” could deal with. As this type of demand is more widely referred for self service, this will mean that the remaining volumes will by definition be more likely to fall into the category mentioned above that requires a higher level of knowledge to achieve resolution.

Similarly, with proactive work, businesses tend to fall into different spheres of influence, where the main focus of regulatory interest is either a combination of Food Hygiene/ Health and Safety/ Pollution or a combination of Food Standards/ Product Safety/ Fair Trading/ Weights and Measures. This fits with an assessment by the Trading Standards Service in Essex and their colleagues at two of their districts, where there was only a 3% overlap in businesses commonly contacted by both district EH teams and the county TS service. Given that one of the key messages from businesses seems to be that they want a single point of contact, knowledgeable about the things that matter, it is likely that their main contact will be either an officer with an Environmental Health background or an officer with a Trading Standards or licensing background.

The Managers of our Community Environmental Health team and the Trading Standards and Animal Health unit continue to test these ideas together. Their focus currently, however, is to make staff more generic within their relevant professional areas. Trading Standards staff are being trained more widely in Animal Health work and vice-versa to make this team more generic when it comes to County functionality. Likewise, in Community Environmental Health, the loss of one of our Senior Practitioner posts has led us to move some of our qualified Environmental Health Officers from the EH Commercial team (Food and Health and Safety,) into our Geographic teams where they do a mix of the commercial inspection work alongside investigating nuisance complaints, using all of the knowledge they learned when undertaking their professional qualifications. What we are finding is having the teams together under one roof allows us to utilise pairs of hands, extra eyes and ears and boots on the ground, when necessary, to tackle and incidents that may require additional resource. It is hoped that this can continue going forward.

The BRDO toolkit (RDNA) was originally envisaged as a key tool to support our officers in identifying the gaps in their on-going competence however it has not been as successful as we had hoped. BRDO has not achieved the level of buy-in that they had hoped and they have yet to create a full portfolio of modules covering all relevant aspects of regulation. This tool, based on a model used by the Health and Safety Executive, retains its original failing in that it is highly bureaucratic for officers delivering more than one function, because the officer must review each of the functions that they deliver separately. BRDO accept that this is a flaw in the basis of the model but they do not appear to be looking at how this can be resolved.

We have looked to develop our own lists of competency requirements for post holders. Our ‘in house’ technical training days will continue to be held to increase awareness of the different professions knowledge base and to support relevant cross training. This continues to provide a cost effective way of increasing the skills base of our work force and will therefore continue as appropriate. The leadership team continues to meet regularly following its leadership development programme to look at ways of deploying the learning to support day-to-day activities. We will also continue to use the training offered by the regional Trading Standards group (CEnTSA,) who look to provide low cost/ high quality training across a range of regulatory areas, including some environmental health and licensing aspects.

11. BUSINESS CONTINUITY

Business continuity plans for the service are in development (and may change with the impending office re-location) and we hope to take these through the process of Management Board and Joint Committee for information during 2015/16. Recognising the reduction in the County Council's contribution we have adopted the updated generic Animal Health response plans from the National Trading Standards Board's Programme Office as these revised versions will reflect the reduced staffing levels at local level. The experience of the recent avian influenza outbreaks in the East of England would suggest we will struggle to respond if we can only use staff currently allocated to delivering County Council functionality. We would need to commit staff currently undertaking district functions in order to fulfil all of the requirements in the plan. The County Council has indicated, informally, that in such an eventuality, it would consider covering the cost of utilising such staff to facilitate the delivery of its duty. Larger reductions than currently envisaged in relation to district functions might also threaten our ability to maintain the full range of interventions across these functions whilst responding to large scale events.

12. LOCAL ENTERPRISE PARTNERSHIPS

The service has remained engaged with the two Local Enterprise Partnerships (Greater Birmingham and Solihull, and Worcestershire,) with the aim of improving our relationships with local businesses, identifying their needs with a view to contributing to the growth of the local economy. The Business Charter for Regulators, launched during 2012 in both LEPs, clearly outlines the relationship that we are seeking to have with the business community in Worcestershire. We are seeking funding to support an initiative To allow SMEs to gain "Earned Recognition" looking at reducing burdens on businesses in the food and horticulture sector in a range of regulatory areas. We have made it clear to the LEP that this cannot go forward without financial support and at the time of compiling this plan the indicators were that this support was indeed on track. Government still seems keen to use the LEPs to drive economic growth at a local level so we will seek to maintain engagement into 2015 at a suitable level.

13. OTHER PARTNERSHIPS

The service continues to need to work closely with a range of partners to deliver what is required against a number of agendas. The importance of the seven local authority partners is recognised and we will continue to maintain our existing interfaces with other elements of these organisations e.g. Planning, Worcestershire Hub, Economic Development teams, etc. Customer demand will have a significant impact on the nature of these interfaces as we move the service forward. Close partnership working with a range of professional and community groups is key to further developing the service to deliver the outcomes required. Key partners for engagement include:

- West Mercia Police & West Mercia Police and Crime Commissioner
- Hereford & Worcester Fire & Rescue Service
- The Environment Agency
- The Health and Safety Executive
- Health Protection England
- Local Partnership bodies e.g. District Crime and Disorder Reduction Partnerships (often known as Community Safety Partnerships)
- Citizens Advice Consumer Service, local Citizens Advice Bureaux and other 3rd sector organisations
- GP Consortia and Public Health team at the County Council
- Regional Regulatory Partnerships and National Bodies (TSI, ACTSO, NTSB, CIEH).

Existing links to these bodies will be maintained.

14. CONSULTATION/ ENGAGEMENT

In relation to national consultations on legislative changes, we will address these through the relevant professional channels at both local and regional level. We will continue to engage local members in relation to local policy issues, especially around licensing matters. For general engagement with the wider community of elected members, we will provide at least 3 Member Newsletters per year so that all are updated on the various activities that the service undertakes across the County. We will try to make this information specific to districts where it is relevant to reassure members that our activities are seeking to protect everyone and support businesses across the whole of Worcestershire. Licensing specific newsletters will also be produced for committee members and these may be more frequent due to the nature of this function.

In terms of customer engagement, we will continue to work with colleagues at both the Worcestershire LEP and the Greater Birmingham and Solihull LEP on engaging with our business customers to improve our ability to address their needs. The approach outlined in our business charter will provide the basis for our interactions with the business community. We will continue to survey those businesses subject to interventions to identify how to improve and to help ensure businesses remain satisfied with our performance.

For members of the public, we will continue to survey customers who have used the service to look at how we dealt with their issues, not only from a satisfaction point of view, but also to see if they feel better equipped to deal with future problems. Helping people to help themselves is at the heart of “the Big Society” model of public service engagement and it is essential we move people down this route and reduce the expectation that we will always do it for them. The pilot work done with Worcester City on using self-help with certain forms of nuisance case has shown that this approach can help reduce service delivery costs and this is being rolled out County-wide for some aspects of nuisance work.

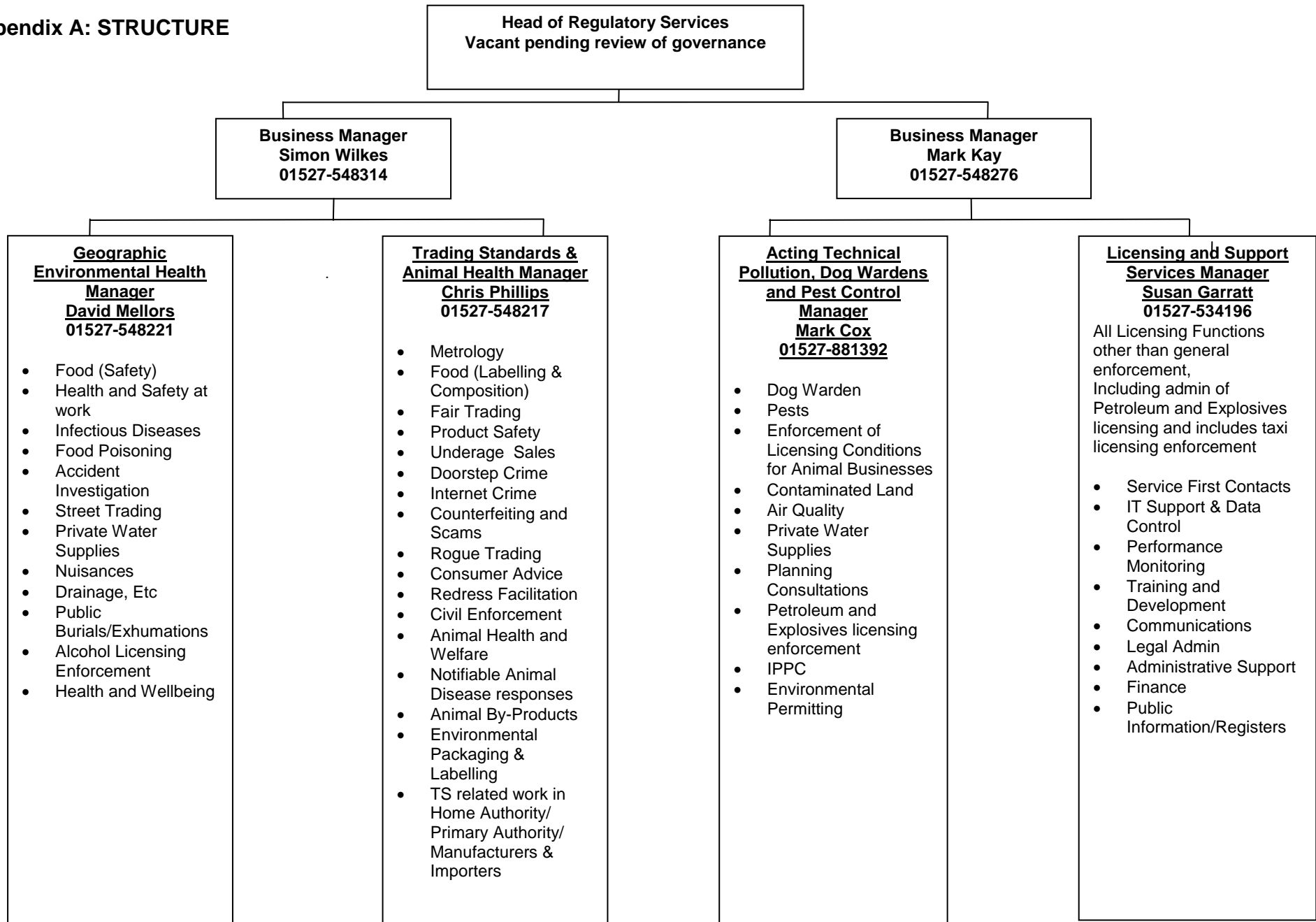
15. GOVERNANCE REVIEW

Now that Strategic Partnering is not going ahead, the Management Board will start to consider future governance arrangements for the service in 2015/16. This was one of the recommendations of the Joint Overview and Scrutiny report published in 2014/15. It will also include a look at the current business model and how this could be changed to better fit the financial position of partners. The departure of the Head of Service for a new role outside of WRS will allow the Board to also consider whether changes to the senior management structure might be desirable, depending on the model of governance adopted going forward. In the interim, the Chair of the Management Board will provide support to the two Business Managers in order to ensure that the service continues to deliver.

16. RISKS

The service risk register is completed and has been approved by Management Board. A copy of the current Risk Register is appended at Appendix E. It is included in the service’s forward plan so it is reviewed at Board on an annual basis. It already includes an entry relating to the potential impacts of partners reducing their budget contributions, so anticipated our current difficulties. The reductions in budget are likely to increase some risks, particularly in relation to responding to larger scale disease outbreaks and, in relation to other County Council functions, in relation to responding to low and moderate impact issues that the public may perceive as important.

Appendix A: STRUCTURE



Appendix B: REGULATORY SERVICES BUDGET 2015/2016 - 2017/2018

Account description	Budget 2015 / 2016 £000's	Budget 2016 / 2017 £000's	Budget 2017 / 2018
Employees			
Monthly salaries - assumes savings made to fund incremental increase	3,390	3,395	3,400
Training for professional qualifications	2	2	2
Medical fees (employees')	2	2	2
Employers' liability insurance	16	16	16
Employees' professional subscriptions	3	3	3
Employees	3,413	3,418	3,423
Premises			
Internal repair/maint.	0	0	0
Rents	55	55	55
Utilities	0	0	0
Business Rates	0	0	0
Room hire	12	12	12
Trade Waste	1	1	1
Cleaning and domestic supplies	0	0	0
Premises	68	68	68
Transport			
Vehicle repairs/maint'ce	3	3	3
Diesel fuel	8	8	8
Licences	1	1	1
Contract hire of vehicles	5	5	5

Vehicle insurances	3	3	3
Van Lease	9	9	9
Fares & Car Parking	5	5	5
Car allowances	123	123	123
Transport	157	157	157
Supplies & Service			
Equipment - purchase/maintenance/rental	34	34	34
Materials/test purchases/vending	14	14	14
Clothing and uniforms	3	3	3
Laundry	1	1	1
Training fees	24	24	24
General insurances	30	30	30
Printing and stationery	25	25	25
Books and publications	3	3	3
Postage/packaging	11	11	11
ICT	69	69	69
Telephones	39	39	39
Taxi Tests	30	30	30
CRB Checks (taxi)	25	25	25
Legal fees	7	7	7
Support service recharges	112	100	100
IT Hosting	60	60	60
Audit	5	5	5
Supplies & Service	492	480	480
Contractors			
Consultants / Contractors' fees/charges/SLA's	261	261	261
Advertising (general)	11	11	11
Grants and subscriptions	22	22	22
Marketing/promotion/publicity	2	2	2
Contractors	296	296	296

TOTAL NET SPEND	4,426	4,419	4,424
Savings to be identified to keep council targets for 2014/15 & 2015/16			
Pension Forward Funding	-66	-66	-66
Pension Deficit Funding	-119	-124	-129
Savings for partner councils		-160	-754
Sub-Total - Savings to be identified	-185	-350	-949
PROPOSED BUDGET	4,241	4,069	3,475
Savings for Partner Councils			
Bromsgrove	0	-50	
Malvern	0	-27	
Redditch	0	-50	
Worcs City	-30	-30	
Wychavon	0	-50	
Wyre Forest	-38	-37	
County	-92	-350	
Sub-Total - Savings for Partner Councils	-160	-594	0
BUDGET ASSUMING ALL SAVINGS DELIVERED	4,081	3,475	3,475

Appendix C: Performance Measures Relating to Outcomes

For the majority of indicators, good will be shown by a stable or improving baseline from that year.

	Measure	Reporting Frequency	Background
1	% of service requests where resolution is achieved to customers satisfaction	Quarterly	Based on questionnaires send out to a significant number of members of the public who use the service.
2	% of service requests where resolution is achieved to business satisfaction	Quarterly	Based on questionnaires send out to a significant number of businesses inspected or otherwise contacted by the service.
3	% businesses broadly compliant at first assessment/ inspection	Annually	Based on the proportion of businesses meeting the key purpose from a regulatory perspective i.e. food businesses produce safe food.
4	% of food businesses scoring 0,1 or 2 at 1 st April each year	Annually	Based on proportion of businesses scoring 1-2 star on a national Food Hygiene Rating Scheme assessment (2 stars and below is deemed to be at risk of not producing safe food.)
5	% of applicants for driver licenses rejected as not fit and proper	6-monthly	Percentage of applications received during the year that end up at Committee and are rejected for not being fit and proper persons.
6	% of vehicles found to be defective whilst in service	6-monthly	Percentage of vehicles stopped during enforcement exercises that are required to be removed from service for remedial work before being allowed to carry on operating.
7	% of service requests where customer indicates they feel better equipped to deal with issues themselves in future	Quarterly	Based on questionnaires send out to a significant number of members of the public and businesses who have used the service.
8	Review of register of complaints and compliments	Quarterly	All are recorded Increasing compliments/ Reduced complaints
9	Staff sickness absence at public sector average or better	Quarterly	Sickness recorded using host processes. Public sector average 8.75 or better
10	% of staff who enjoy working for WRS	Annually	Taken from the staff survey.
11	% of licensed businesses subject to allegations of not upholding the 4 licensing objectives	6-monthly	New indicator, linked to Crime & Disorder agenda, develop baseline in 2014/15 and look for reductions over time.
12	Rate of noise complaint per 1000 head of population	6-monthly	Previous indicator, re-introduced to address gap in performance relating to potential ASB.

Appendix D: PESTEL Analysis

A: Political

The political is currently linked strongly to the economic at both local and national levels, with the on-going impacts of the austerity agenda.

At the national level, the coalition's priorities included a range of policing, environmental and consumer protection measures, albeit there was no mention of the roles of Trading Standards, Environmental Health or Licensing in dealing with them. It is difficult to predict what the next 12 months will bring at a national level due to the impending General Election in May. However, since all parties are likely to have economic growth as a key element in their manifestos, we are unlikely to see much change in terms of the demands for reduced burdens on businesses. We are still likely to see conflicting stances being taken by Government, identifying the need for regulators to act in one breath, but then publicising bonfires of regulations and criticising officials for being overbearing in another.

Whilst much of the harder anti-regulator rhetoric has passed, there are still strong pressures on Government from the business lobby to reduce regulator's power to undertake routine inspection. The Consumer Rights bill, which contains a set of consolidated powers applying to all BIS related regulation, will contain the requirement to give "reasonable notice" pending an inspection. Whilst this particular argument has been lost, BIS does seem to accept the generally positive impacts of local regulatory services on business performance and they are urging their Ministers to understand that local regulation done well is supportive of local businesses and the economy.

With the on-going development of the work of the National Trading Standards Board, local authority officers have been trusted to deliver on regional and national priorities. NTSB has developed a strong relationship with various central government bodies and is being seen by many departments as a means of channelling relevant funding for local delivery. The CIEH has now created its own National Environmental Health Board, which it hopes to use as a similar conduit, although no funding has been placed with NEHB at this time.

Whilst most of the more radical suggestions in Lord Heseltine's report, "No stone unturned," have not been taken forward, the Local Enterprise Partnerships do seem to be perceived as a key driver of economic growth into the future. Since Heseltine's report highlighted that good regulation was a key underpinning to a high performance economy, it remains important for services to engage with these bodies.

In terms of local priorities, we have not yet seen any significant divergence of priorities away from those previously identified. Whilst there is a local flavour to how the priorities are described, the areas identified nationally of supporting the local economy, improving the health and well-being of the public and protecting communities still predominate.

At a local level, cuts in local authority income continue to prove a huge challenge to the seven partners. All authorities in Worcestershire are under financial pressure to a greater or lesser extent, and this will almost certainly worsen going forward as both of the main parties have indicated the need to continue with the policies of austerity for some time to come. Currently we have one Labour controlled partner and 6 Conservative-led partners. This could easily change at the next election, depending on the performance of the minor parties including UKIP. Two of the partners already have coalitions led by the Conservatives so we will have to see how May impacts on these two authorities in particular. However, all parties seem to be working well together in relation to the Joint Committee and, whilst there are still some concerns from local back-bench district members that the service is not delivering what they had previously, last year's favourable joint Overview and Scrutiny Report has gone some way to providing reassurance.

The commissioning of services has become a key driver for local government nationally, particularly higher tier and unitary authorities. The on-going pressure, following on from the Public Service White Paper "Open Public Services," continues to push local government to become an enabler rather than a deliverer of services. Of the seven partners locally, the County Council is driving hardest down the commissioning route, declaring itself an enabling council.

The White Paper categorised services into Individual Services, Neighbourhood Services and Commissioned Services. Trading Standards was specifically mentioned in the section on Commissioned services, indicating government's view that it is not one that should be seen as suitable for individualisation, nor for delivery at neighbourhood level. The same is probably

true for the majority of Environmental Health and Licensing functionality. So far only North Tyneside Metropolitan Borough Council and the London Borough of Barnet have outsourced their EH, TS and Licensing services, with provision going to Capita. We have also recently seen Burnley Borough Council (district tier,) ask for tenders for a range of its environmental services, including regulation. In all of these cases, regulation was or has been packaged with other services with a significant capital base. The WRS experience with outsourcing as a single regulatory entity would suggest that these bundles of services offer a far more lucrative prospect to service providers and hence, we are unlikely to see large volume outsourcing of regulatory services outside of such bundled packages.

Finally, localism remains a strong driver of how local government looks at itself. This can make regulation a difficult topic as this activity is not neighbourhood specific or individualised. It remains a protective activity for the community as a collective and its activities often impact well beyond the local authority area because the businesses being regulated do not operate within local boundaries and the internet has internationalised the shopping habits of many. Some areas of work e.g. domestic nuisance remain locally focused but these are the exception not the rule. For the first time in its history, the Local Government Association started to ask if local government was still the right place for regulation to happen, however, this debate was short lived due to the strong divergence of views held by member authorities. It will be interesting to see if this debate re-surfaces following the General Election in May.

B: Economic

i. Central Government Policy

Central Governments focus remains on deficit reduction and local government continues to find itself receiving reductions in grant funding. Impacts are particularly serious for higher tier authorities, where the areas of Adult Social Care and Children’s Services take the lion’s share of funding, which seriously limits what is left for other services, including regulation. District Councils seem less impacted and the DCLG seems to be looking to support them financially to move towards shared management and staffing arrangements. With Redditch and Bromsgrove having done this already and Malvern and Wychavon going down this road too, it will be interesting to see how Worcester City and Wyre Forest respond. The latter is already working closely with its northern neighbours in a number of areas

ii. Businesses: Births and Deaths

There were 2,185 [enterprise births](#) in Worcestershire in 2012, with 92.7% surviving the first year. The one year survival rate remains slightly above the national average. The table below is taken from the ONS [business demography](#) for 2013, showing the numbers of active business entities within the County and districts from 2009 to 2013.

Worcestershire County	24,100	23,925	23,515	23,550	23,680
Bromsgrove	4,560	4,510	4,455	4,520	4,590
Malvern Hills	3,805	3,850	3,825	3,770	3,675
Redditch	2,865	2,815	2,730	2,715	2,710
Worcester	3,175	3,155	3,100	3,110	3,185
Wychavon	5,930	5,880	5,790	5,790	5,865
Wyre Forest	3,765	3,715	3,615	3,645	3,655

The numbers appear to have remained reasonably stable following on from the recession. The 5 year survival rate for businesses born in Worcestershire is 51.8%, slightly above the UK average. Nationally, the rate of business births returned to a level higher than the rate of business deaths in 2011. This pick-up followed the economy’s emergence from the downturn and is consistent with the strengthening of the labour market since the end of 2011. Locally, the number of claimants for Job Seekers Allowance is now at levels below those seen during the recession suggesting the local economy has recovered from the down-turn.

Of the business in Worcestershire 97% are classed as Small and Medium-sized Enterprises, comprising less than 50 employees, which compares with both the West Midlands and nationally. Within Worcestershire around 50% of the total workforce is employed within these small and medium-sized enterprises, highlighting the importance of providing adequate support to these businesses so that their competitiveness and viability can be enhanced to encourage the private sector led recovery. It should be noted however, that businesses with more than 200 employees account for just 0.5% of companies in the county, but directly employ almost one-quarter of the workforce. It is essential, therefore, that action is taken to

engage with and support these businesses, encouraging them to remain in Worcestershire, due to the contribution they make in terms of jobs, and because of the benefits to the local supply chains.

Economically then, it is important that, where possible, the services continues to offer support to businesses of all sizes. The factors outlined above are indicative that the recovery has embedded itself within Worcestershire and that generally businesses are doing as well as they were pre-recession. There are comments from some at a national level that the recovery is fragile, so the service must also focus on tackling rogue businesses who may undermine the viability of some of these businesses as they build from the recession.

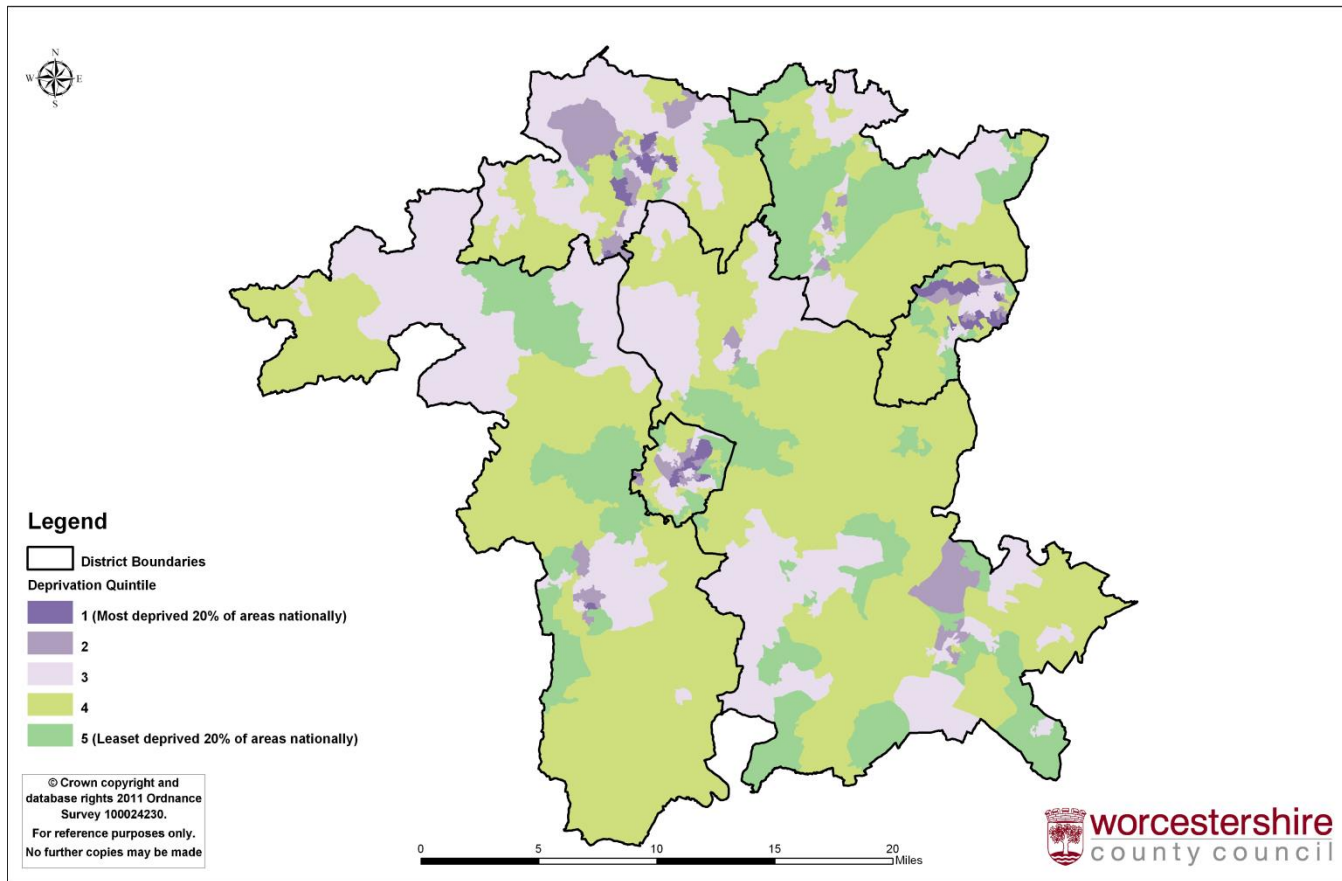
C: Social

i. Income

From the WCC County Economic data, [median](#) household incomes in Worcestershire are higher than they are elsewhere in the West Midlands and England. Household incomes are highest in Bromsgrove (£34,492 pa) and lowest in Wyre Forest (£27,821 pa). Household income includes income from employment (earnings) as well as that from other sources, for example investments and savings. Earnings for people who live in Worcestershire are higher than those for people who work in Worcestershire. This difference is explained by the net out-commuting from Worcestershire to other places, particularly amongst those employed in higher paid occupations. For example, full-time earnings amongst residents were highest in Bromsgrove (£29,552 pa), however, for those who work in Bromsgrove, median earnings were the second lowest in the county (£20,697 pa). These figures demonstrate the considerable impact that commuting has. Bromsgrove experiences the greatest level of commuting outside of the county, with Birmingham the destination for most people.

ii. Deprivation

Deprivation is a key factor affecting people's life chances and the opportunities open to them. It influences their levels of education, ability to access employment, health and wellbeing, and the extent to which they are able to engage with wider society. From an economic perspective, deprivation is frequently associated with income, employment and education. The figures for 2010 remain the most recent (Government intends to update these during 2015.) Using this data, the six districts of the county, in partnership with Worcestershire County Council and other bodies, identified a number of Areas of Highest Need, where activities designed to combat deprivation and the disadvantaged associated with it can be targeted



Index of Multiple Deprivation, 2010

Produced on behalf of the R&I Unit, December 2011

VN

As part of Communities and Local Government's English [Indices of Deprivation 2010](#), there is an Income Deprivation Domain, which captures the proportion of the population experiencing deprivation in an area related to low income. It shows that in 2010, Wyre Forest was the most income deprived Worcestershire local authority ranked 168 out of 354 (where 1 is the most deprived). This is followed by Worcester (189), Redditch (205), Wychavon (209), Malvern Hills (277) and Bromsgrove (286).

There are a total of eleven Worcestershire Lower Super Output Areas (LSOAs) in the 10% most income deprived areas nationally. The Indices of Deprivation, 2010 uses several deprivation indicator measures to rank each Lower Super Output Area (LSOA) relative to other LSOAs for seven domains (Income, Employment, Education, Health, Barriers to Housing and Services, Crime, and Living Environment). The scores for each domain are then assigned different weights and combined to create an overall Index of Multiple Deprivation. The overall index highlights pockets of deprivation in Worcestershire, particularly in the Redditch, Worcester and Kidderminster. A small part of Malvern also features.

iii. Population

In mid-2011 population estimate for Worcestershire was 566,500. The county has a lower proportion of young children (0-4) and young adults (18-34) and a higher proportion of people aged 45-plus than are seen regionally and nationally. Around 50.7% of the Worcestershire population is female, a similar proportion as the national average. Worcestershire follows the

national pattern of having a population "spike" at around the 60-64 age group. This is a product of the large increase in births just after World War II, known as the "baby boomers". Many of these people will reach retirement age, and therefore be lost to the work-force, in the next 5 years or so. In terms of five-year age bands, the highest percentages in the county are in the 40-44, 45-49 and 60-64 groups. In older age groups, most notably those aged 75-plus, the female population is significantly higher than the males, due to higher life expectancy and lower death rates in females in comparison to males.

ONS mid-2008 trend-based population projections suggest that by 2031 Worcestershire is projected to have a population of almost 607,000, representing an increase of around 51,600 on the 2008 figure, or just over 9%. This is a lower proportional increase than projected in the West Midlands region as a whole (12.1%), and a notably smaller projected increase than the national average of almost 17%.

There are around 48,800 (8.8%) BME (Black and Minority Ethnic) persons living in Worcestershire, varying from just over 11% in Worcester City, to around 7% in each of Malvern Hills, Wychavon, and Wyre Forest. This is significantly lower than national and regional averages. The proportion of BME people in the county is still relatively small but is growing, from a figure of just 4.5% in 2001.

The number of persons defined as White Other (i.e. White but originating from outside Great Britain and Ireland) has also risen, from 6,900 in 2001 to 11,200 (2.0%) in 2009, and is highest in Worcester City, at 3.6%. The "White Other" group will include Eastern Europeans, who have a legal right to work anywhere in the EU since A8 accession in May 2004. With the exception of the White Other group, the largest ethnic minorities in Worcestershire are among the Indian and Pakistani populations, each at around 1.1%. At a district level the highest Pakistani population is in Redditch, at 2.4%, and the highest Indian population is in Bromsgrove at 1.8%.

On a social level, Worcestershire has a population older than the national average and also somewhat more affluent, so we should expect to see the impacts of this in what services are required. There is likely to be a targeting of the vulnerable elements of our older populations by rogue traders of various types, so this needs to be accommodated in any long term service planning. Whilst household incomes are generally above average, for those who work within Worcestershire the picture is less good and the County remains a relatively low wage economy with some pockets of severe deprivation. The needs of people in these areas are likely to be different from those who are more affluent. The service may need to work with partners in a different way in deprived areas to deliver the relevant strategic outcomes. Similarly, there are a number of ethnic minority communities who may need to be supported in a different way from the core.

D: Technology

I. Technological Economy

The County Economic Assessment for 2008 stated the following vision for the future of Worcestershire:

"In ten years time, technology-led growth will have contributed to the sustainable development of Worcestershire and strengthened its role as an economic driver for the region - acting as a catalyst for all sectors of the economy and areas of the County to benefit and providing well paid and highly skilled jobs and high quality of life for residents"

The Central Technology Belt (CTB) made up of a number of educational establishments (Aston, Birmingham and Central England Universities, University College Worcester,) and QinetiQ in Malvern was the basis for this concept. The aim was to exploit the expertise of these organisations to develop Knowledge based industries along the A38 corridor, which formed one cornerstone of Worcestershire's Economic Strategy. Other elements included supporting sustainable infrastructure development, removing barriers to employment and increasing access to skills. Whilst this remains a part of the strategy, other areas that are ripe for potential development have been identified more recently in both Redditch and Kidderminster that could provide locations for growth opportunities.

Research and Intelligence have also created the concept of strategic businesses, i.e. those that are important to the local economy. Across Worcestershire, businesses with more than 50 people, which represent just 3% of all businesses in the county, employ 49% of the workforce. Indeed, businesses with more than 200 employees, which account for 0.5% of businesses, employ almost one-quarter of the Worcestershire workforce. Approximately 100 businesses have been identified as 'strategic' based on their significance in the county, their sector, turnover and number of employees. These businesses are located predominantly in Worcester, Redditch, Kidderminster and Malvern, and along key transport corridors such as the A449, A442 and the A38. Although the businesses identified are within a variety of industrial sectors, the majority are involved in manufacturing and many in technology.

It is essential that the service has regular engagement with the strategic businesses and that effective working relationships are established with key employers, to ensure that they stay within the county and are supported to grow. There is an opportunity for businesses such as these to act as an anchor, so that others in similar industries choose to locate in Worcestershire.

ii. Technology & the market:

Technological change brings with it new goods and services, and ways of trading. The Internet has become the new market place with goods potentially moving long distances without the intervention of wholesale and retail elements in the supply chain. Electronic trading also massively increases the potential for fraud, as buyer and seller seldom meet in the virtual saleroom. The decline in the package holiday market and the increased use of the internet to book hotel rooms and other accommodation directly is just one example of this. The development of Fulfillment Houses, which allow smaller businesses to import goods directly from manufacturers in the Far East, has also created significant issues in areas such as product safety and intellectual property. Other areas for high levels of sales are books, CDs/DVDs and tickets for events. The internet has also given organised crime a further outlet for counterfeit goods, and made detection of large quantities more difficult as bulk can be broken and sold under different names more easily. Work in recent years has only scratched the surface, but already we are identifying larger than expected numbers of car dealers, food distributors, sellers of counterfeit goods and businesses that are importing products directly, all using the internet as their sole trading place.

More and more customer interaction is moving to the internet and with the new upcoming "digital" generation, there is an expectation that services will seek to diversify in terms of what they offer and how they offer it, enabling services to be consumed. WRS has already entered the social networking arena with its face book page and twitter feed. Its website will provide a source of information and advice to customers as well as a handy signposting tool and an access channel to the service. WRS must continue to monitor developments to ensure it maintains access channels but must not forget the range of households that do not use digital access methods.

The service therefore must consider not only how it polices transactions involving technology and the internet but also how to engage with a new technologically literate generation. The former is now better understood and a number of national projects are engaged in this. Partnership working with the police and other agencies will be essential to tackle the criminal element and recognising that legitimate businesses will be selling to much wider markets and need support to do this is essential. Making services accessible to "generation Y" as this new digital native generation is referred to is in hand, with more information being put through the website, making the site itself more accessible via mobile devices and increasing its interactive capabilities being the first steps on this journey.

E: Environment

i. 24/7 Operations & Rapid Transit:

The development of the 24-hour economy means that regulatory work is no longer a 9 to 5 occupation. Field officers need to visit businesses during their normal operating hours to assess compliance, and many illegitimate business activities e.g. supply of counterfeit goods, take place at the weekend. This latter issue is particularly important as organised crime looks for better ways of laundering the money it obtains from hard-core criminal activity such as drug dealing and robbery. The transport network in Worcestershire is good. The M5 runs through the county from top to bottom, and one of the main routes from the Welsh ports enters the south of the county. There are also fast A-roads running east across the county to Warwickshire. This gives criminals the potential to strike and move from the area quickly.

Global Warming

Increasing global temperatures are impacting everywhere. Flooding is an on-going issue for the County. The floods of summer 2007 had a major impact on residents living on the edges of the Severn, Avon and their various tributaries. Subsequent inundations have been on a smaller scale but equally difficult for residents affected. The damage caused by the flood to buildings and land can be an attractor for criminal activity as well as having wider environmental implications. Potential tactical responses to such incidents need to be tasked as part of the overall local authority response to the incident.

Noise and other Nuisances

The pattern of nuisance complaints is focused in the main on population centres and, as would be expected, noise remains the primary issue with in excess of 50% of nuisance complaints relating to it. Noise and nuisance are recognised as issues by DEFRA but do not appear to have particular primacy currently. Having said that, the DOH, via the HPA is taking an interest in noise in particular as a health issue and it will be interesting to see where this goes. We know that excessive noise can cause stress and other disorders that can have an impact on life expectancy and lifestyle.

I.P.P.C. / Air Quality/ Contaminated Land

DEFRA's original thoughts on reducing burdens have changed little. They have not moved radically from their 70% minimum inspection volumes position. Our own work locally suggests that only a handful of the permitted premises in the County cause any difficulties and need to be subject to any kind of regular and routine interventions. It now seems unlikely that DEFRA will agree to reductions from their current level.

Air quality does feature as a priority for DEFRA, however, whilst the service can monitor and make recommendations to partners, most of the issues in this County in relation to air quality are traffic related. Clearly we can raise these issues but the County Council's team who work on Transport and Traffic Management probably have greater influence than us on this agenda. The removal of controls over planning may, although we have yet to see it, cause an increase in demand for development land, which may increase work around contaminated land. However there is likely to be a push for green field development so this may not materialise.

Therefore, there are a number of environmental issues which the service must continue to address directly to meet the priorities of the partners. Noise nuisance is a major demand area so the development of any intelligence based proactive measures that can reduce impacts will be worth considering. The service must also recognise the environmental enablers of regulatory crime that Worcestershire offers and develop responses which factor these into delivery.

F: Legal

The election of the Police & Crime Commissioner (PCC) for West Mercia has had little impact on the delivery of regulation in Worcestershire. In other areas of the Country, there has been closer working with Police on areas like cyber-crime and these are beginning to come through the West Mercia PCC now. There may therefore be opportunities for closer working in the future.

The replacement of most of the Consumer Credit regime and the move of most credit regulation to the Financial Conduct Authority, has gone reasonably smoothly so far. There is still a transitional period until 1st April 2016, during which businesses will be formally assimilated into the new regime, however, there will be an on-going need for local authorities to provide information to the FCA about any issues of poor conduct from credit suppliers and the County Council will still have a statutory duty to enforce the criminal provisions of the Consumer Credit Act 1974, including illegal money-lending.

The introduction of the general power of competence means that local authorities and their services can trade but not in work that is statutory. Hence, we cannot charge for food inspections, but we could charge possibly for an additional audit. This power of competence will offer the opportunity for the service to general income however it seems likely that such activities will have to be done through an arms-length organisation, either a mutual or a limited liability company. This is one aspect that may be considered as part of the overall income generation strategy however, given the limited amounts of money likely to be raised through this route, it may not be cost effective.

BIS has indicated that the consolidated powers regime within the current Consumer Rights bill will contain the requirement to give reasonable notice to businesses in relation to routine inspections. This will apply across all BIS functions, so it will mainly impact Trading Standards work, but will also apply to legislation like the Scrap Metal Dealers Act, hence it could cover some licensing functions. The power to enter without permission is to be based on there being a reason to suspect offences have been committed. This is at odds with certain EU legislation, particularly around food, where the presumption is inspection is without notice. Hence, officers undertaking a comprehensive inspection will be able to enter without an appointment for food, but not for the majority of other trading standards legislation covered by BIS.

The above review of powers is being driven by the Home Office under its “protection of freedoms” remit and all Government Departments are being forced to review all of their powers legislation to see if they are fit for purpose. The removal of pre-emptive inspection provisions is likely to become common in all domestic legislation but where an EU provision such as the food directives requires pre-emptive entry this is unlikely to be challenged.

The changes to the RIPA regime remain in place. All directed surveillance and CHIS authorisations now have to be countersigned by the local Magistrates. This has not presented a significant barrier to investigative activity so far.

There are no other significant legal changes in the pipeline for 2015 as it is a general election year. It is unlikely that the major parties will feature any references to regulatory activity in their manifestos. However, there may be a spotlight shone on European regulation with the political profile the demands for a potential in: out referendum. This may be particularly relevant when some of the proposals currently sitting in Brussels in relation to making food businesses pay for the cost of regulation come into the public arena.

Appendix E: Risk Register