

Worcestershire
Regulatory Services

Supporting and protecting you

Service Plan

2019/20

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 2019/20 with a total agreed budget from the district partners of £3.017M. The financial contributions from partners remain static, other than a minor change for Worcester City around accounting practices for taxi vehicle licenses. Partners have not requested savings this year, although we know that at least one will require some reduction in their contribution going into 2020/21. The cash standstill situation does not account for increasing costs in salaries and inflation, which will have to be met through increased income. Partners have recognised that. If the income generation strategy begins to plateau, the situation with contributions will need to be revisited.

The 3-year business plan, which has a number of strands for continuing the Service's development, was revised last year and remains fit for purpose for the next 12 months. Further work will be required and a further revision is likely going into 2020/21. Having said this, the service will continue to review and develop opportunities for commercial activities to bring in additional income. Primary Authority partnerships are likely to be a key area for development in the coming 2 years as the services looks to obtain more agreements to meet the challenge of the "invest to save" approach agreed by partners, which saw an additional member of staff being recruited. The service will also continue to pursue work for other local authorities going forward with a view to obtaining longer commitments from those buying our services to give some stability and certainty to the financial situation. We will also be looking at ways of enabling senior officers and members to promote the service with their colleagues outside Worcestershire with a view to them considering further service delivery options.

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?

Whilst risk will remain a key criterion against which we deploy resources, the intelligence picture for particular issues is also becoming more relevant as we become more intelligence-led. By gathering data and understanding issues, rather than simply rushing out to deal with problems, we will focus resources on where they deliver the best outcomes and we will try to get better at finding longer term solutions.

Simon Wilkes
Head of Worcestershire Regulatory Services

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1. INTRODUCTION

This is the ninth formal annual service plan to be produced by Worcestershire Regulatory Services and 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 2019/20, 2020/21, and 2021/22 however the operational detail reflects the planned activities that the service will undertake in 2019/20 only in recognition of the on-going uncertainty of local government finances in general and those of the service in particular.

2018/19 was again very busy and successful for WRS. The service managed to maintain the majority of local authority customers and increased its Primary Authority portfolio, with notable firsts in terms of agreements with businesses for Environmental Permitting support. This very much reflects the service's leading position in this technical area. In these financially challenging times, officers have continued to deliver excellent work with a number of legal files being prepared for prosecution this year including at least one against large national businesses. Details of this will be reported in the Annual Report to be produced at the end of May 2018 and reported to Board in June.

The coming year is likely to be dominated by:

- Seeking new and maintaining existing income streams to help support local delivery in the face of further potential strains on partner's ability to fund the service.
- Working hard to continue to deliver excellent service without any increase in partner contributions,
- Developing the self service model further for wider service elements and increasing the volume of published information routinely asked as FOIs and other areas where information is in high demand.
- The further development of the WRS website to better enable customer interactions including making service requests and applying for licenses.
- Establishing practical procedures to maintain resilience and the benefits from service elements such as Legal Support and the Intel Unit that provide operational support to both WRS and Trading Standards functions,

The focus on income generation will be to target areas of greatest benefit in terms of economies of scale, the required resource intensity and income reward. The appointment of the Business and Relationship Manager in 2016 has resulted in many more opportunities being identified although these have not all come to fruition. It is important that only those opportunities meriting our focus are pursued as the scoping and drafting of tender documents are time consuming and onerous.

For existing partners, managers will continue to identify any changes that can be made to service delivery to either improve marginal efficiency or improve service. This is particularly relevant for areas of high demand such as planning referrals and areas of significant officer resource, such as long-standing complaints or enforcement action. This will require close working relationships to support and assist partner colleagues to ensure that we are all working as effectively as possible together.

Improvements to our website continue. The focus has been the development of tailoring information to enable the public to self-serve which will continue as we look at ways to allow members of the public to make requests through the website which automatically load into our back office systems. Following the full revision of the licensing pages on the six partner websites, we will continue to develop and maintain these going forward.

2. OPERATING ENVIRONMENT

At the national level the external environment in which Local Government operates continues to face unprecedented financial challenges. The fact that the seven local authorities in Worcestershire have been accepted for a 75% business rate retention pilot may provide some respite from this and the service will look at developing projects that might allow it to bid for some of these funds. The BREXIT process continues to create uncertainty for the local business community particularly local exporters as we will become a third country on departure and, without a trade deal, there may be more regulatory barriers to overcome. We already provide certification to food businesses exporting outside of the EU. This may increase if there is a hard BREXIT.

The combined authority in the West Midlands conurbation continues to be a focus for economic development from Government. With plans for business development along the M42 corridor, it seems likely that there will be economic benefits arising from this for those districts bordering the route. With HS2 continuing and Worcester Parkway station coming on-line in the near future, it seems highly likely that Worcestershire will become of greater interest for businesses looking to relocate or develop new bases in the UK.

Government's approach to regulation is encapsulated in the Cabinet Office's Regulatory Futures review, and includes:

- Embracing outcome based approaches to regulation,
- Increasing reliance on self-assurance and earned recognition,
- Having charging regimes such that business pays the cost of regulation,
- Ensuring better information and data sharing between regulators.

The Food Standards Agency is, of our associated regulatory bodies, furthest down the road to reform and this could lead to dramatic changes to inspection regimes or other programmes where accredited, private sector, third party audit will replace inspection by local authority or government officials. This could leave the public sector to deal with the most serious cases of non-compliance as they arise, although it seems unlikely that smaller businesses will be in a position to avail themselves of some of these earned recognition systems.

There is also a perceptible shift in the public's willingness or otherwise to accept the views of our officers. Expectations of what the service can achieve are outgrowing the legal framework that determines what the service can or cannot do. This is creating increased pressures in terms of both officers having to explain to people why they cannot act in the manner that is requested and an increased demand on manager's time to deal with these issues at a corporate level.

The Better Business for All philosophy developed by BEIS's Regulatory Delivery arm (now called the Office for Product Safety and Standards) will continue to inform our approach to the regulation of legitimate traders. Whilst local business continue to have a limited appetite for paying local regulators for the advice that they have received previously without charge, the Primary Authority scheme, where the advice given is deemed assured and there are additional potential protections for businesses if this advice is followed remains popular with larger businesses and the service will continue to look to grow this area of work. Government sees this as a key regulatory tool for achieving compliance and growth

at a local level for strategic businesses. We will also continue to work with bodies like the Worcestershire LEP to engage with businesses where possible.

The risk to our potential income streams suggested last year, that financial pressures may finally start to drive district councils outside of Worcestershire to work more closely together as partners where, in the past, they have chosen to use our services instead has yet to occur. However, it is a threat that we must remain aware of. We will continue to watch the development of Publica, the company owned by two Gloucestershire & one Oxfordshire district as this is the nearest threat locally.

The budget for 2019/20 is agreed at £3.017M. This slight change has resulted from a small change in licensing processes in Worcester City that means taxi testing fees will no longer form part of the WRS financial allocation. To achieve this target, WRS has set itself a very stretching income target to maintain the level of staffing that is required. WRS will continue to seek marginal efficiency savings for the benefit of the Partner Authorities and further income streams to maintain the workforce capacity. Members have agreed that minor shortfalls in the next year can be covered by the service's reserve so that further thought can be given and action taken to resolve this funding dilemma.

Shifting demand to more cost efficient digital channels remains a major focus of efficiency proposals, with self-help in relation to service requests and licensing applications 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, in particular reducing Environmental Information and Freedom of Information requests. Giving customers the ability to monitor the progress of their service requests on-line will also deliver some improvements in efficiency at the margins, although this is some way off yet.

The team will continue to work with planning colleagues to improve the efficiency of these service areas. Helping planners to understand when to consult their WRS colleagues on particular matters will streamline their processes and create more capacity within WRS to deal with those applications or planning matters that require more detailed appraisal and support income generation work.

The development of technology, and increased use of the internet to commit and facilitate crime, continues to pose a threat to local authorities who are often ill-equipped to investigate such matters. A particular threat involves the use of social media as persons or business use websites such as Facebook or Twitter to advertise services or sell products they are not legally allowed to offer. This includes an increasing number of people using Facebook 'buy and sell' pages to advertise taxi services or business advertising animal boarding establishments, without holding the required licences. Another example includes the continued sale of dogs through various websites where the dog has incorrect or misleading documentation, missing vaccinations or has been illegally imported. There has been a continued increase in people using social media to either find a lost dog or locate the owner of a dog they have found to be straying. As a result, dogs can be held in potentially unsafe environments or be returned to individuals who don't actually own the dog.

App-based taxi and private hire booking systems are becoming more prevalent both locally and nationally. This brings with it challenges as the legislation regulating taxi and private hire services, as referenced previously, is ageing and not suited for modern technological advancements. App-based booking systems also facilitate more instant "pre-bookings" which blur the lines between the taxi and private hire trades. App-based booking systems working across a number of district Council areas also help to facilitate a greater prevalence of "cross-border" hiring's, which poses a number of regulatory challenges.

The benefits of the re-tendered Pest Control contracts for domestic treatment of pests for those partners who continue to offer these services will continue to be used as required in estimating the impact of potential alterations to the current level of service.

Staff have been effectively using the new IT system for some time now and this has significantly improved our ability to provide performance and activity data to members. Officers are already working flexibly, which helps to control the mileage bill and allows staff to have a better work/ life balance. Significant improvements have been made in Officer time allocated to specific work streams or client authorities which is enabling a detailed emerging picture of resource allocation. The internal audit during 2016 identified a number of challenges which Managers and Staff have addressed and were audited again in a review, December 2016. The requirements of these audits have now been signed off by the auditors. One remaining area to be addressed is licensing reconciliation and it is hoped that, if partners agree to move to on-line application processes currently in discussion, this issue could be much improved. The role out of our host authorities' digital HR system for leave and mileage requests assisted staff in reducing unnecessary journeys and enabling greater flexibility in work patterns.

WRS will continue to look for marginal efficiencies where possible and look to generate income to assist with the offsetting of budget shortfalls, particularly where economies of scale produce a benefit far greater than the cost of delivery. As was previously established during the Strategic Partnering exercise, there are no longer significant profit margins available or easy wins for the delivery of cost saving efficiencies left within the shared service

3. STRATEGIC PRIORITIES

In 2011, the Government tasked what was then the Local Better Regulation Office (now the Office for Product Safety and Standards, part of BEIS,) with developing Priority Regulatory Outcomes for England for local authorities to consider when undertaking their service planning processes. These are outlined below:

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 benefit of consumers and the rural economy

Whilst these are now years old and no longer used by OPSS, they still provide a useful framework with which WRS can link back into key partner priorities without having to list things six times. All of our partners have priorities around supporting economic growth, protecting the environment, residents and neighbourhoods and improving health and well-being in communities. As long as our work meets one or more of these aims we know we are delivering what partners want.

Work by our Intelligence Officer on creating our Strategic Assessment, the key document that helps us determine priorities has demonstrated that these 5 priorities also remain at the heart of what the data is saying we should focus on. The Strategic Assessment looks at a broad swathe of local, regional and national data, and this is used to help identify the key issues to be tackled over a 2-year period, with an annual sense check to

ensure the environment has not changed significantly. The priorities identified in the Strategic Assessment are reflected in the detail of operational activities later in the plan.

The service will be faced with a challenging financial situation for the foreseeable future. In the past this was addressed through transforming how things are done. Moving forward, with the financial environment continuing to be difficult, for the service to continue to deliver against national and local priorities there is no question that further changes will be an inevitable consequence. We will need to prioritise what is delivered, to whom and how. To assist in this decision making, the service will continue to use 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

We will also continue to develop our use of intelligence to support this. 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. At this stage, with the reductions we have seen so far, the risk of district partners facing challenges relating to whether or not they are meeting their statutory obligations are low and the position remains defensible.

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 were agreed by the previous Joint Committee. These purposes, combined with the priority outcomes 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 2019/20 is shown at Appendix B, along with the proposed budgets for the following two years. A more detailed breakdown will be available to the Joint Board 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 consider the Audit Plan of the Host to ensure adequate arrangements are in place. Changes to the level of funding mean that WRS accounts no longer need to be audited separately, so they will be done within the accounts of the host Authority and the Joint Board will be provided with relevant report information to give them the necessary assurances. The deadline for this remains the end of June.

Where broad and in-depth scrutiny of the service is requested, member Authorities will liaise about requests from their Overview and Scrutiny Committees and will use reasonable endeavours to agree joint scrutiny arrangements with a view to avoiding duplication of effort. However, WRS has developed good working relationships with several of the district partners' Overview and Scrutiny Committees and this has led to the positive re-enforcement of performance in those areas. This approach will be continued where it offers benefit to all partners by helping to give confidence to the wider memberships.

The service's ability to provide bespoke support to individual partners is highlighted by the work done with task and finish groups of the City Council's Environmental Health and Licensing Committee, particularly the one on Air Quality. Whilst the service could not support this kind of activity for all partners at the same time, we do hope to be able to offer this type of work more widely when it can be scheduled. Engaging with the City in this way and with projects like the future vision for Worcester has helped to build and maintain relationships with officers at the City Council and helped to highlight the important role of regulation when looking at wider, long term policy development.

7. ACTIVITIES & OUTCOME MEASURES

The service's IT system allows accurate reporting 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. Over time, with one or two notable exceptions, we have seen improvement or maintenance of most of these indicators, which we hope will continue in 2019/20. Concerns still remain around the non-business customer satisfaction figures and work will continue to try to improve these during the coming year.

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, businesses and the other departments of partner authorities within Worcestershire.

	OUTCOME	WHAT WE WILL DO	PURPOSE	NATIONAL PRIORITY	MEASURES
1	Businesses are supported to become economically successful and compliant with the law (Pollution, H&S, Food Safety, Licensing)	Provide businesses with advice and assistance using a range of channels. Conduct risk based/ intelligence-led interventions with businesses; targeting resources towards potentially non-compliant businesses.	I want to assume everything is ok. Help me trade well and ensure my competitors do the same	1, 2, 3 and 5	% food businesses broadly compliant at first visit/ inspection % of service requests where resolution is achieved to business satisfaction % of food businesses scoring 0,1,2* at 1 st April each year

2	<p>Ensuring that nuisance and other pollution related issues are tackled</p>	<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, 3 and 4	<p>% of service requests where resolution is achieved to customers satisfaction</p> <p>Rate of noise complaint per 1000 head of population</p>
3	<p>Protecting the environment and the public through monitoring air quality, and ensuring that contaminated land is suitable for development.</p> <p>Controlling environmental emissions leading to reduced environmental damage and better health</p>	<p>Conduct risk based/ intelligence-led interventions with businesses, especially permitted premises</p> <p>Air quality monitoring & responding to contaminated land issues</p> <p>Supporting the planning system</p>	<p>I want to assume everything is ok</p>	2 and 4	<p>% permitted businesses broadly compliant at first visit/ inspection</p> <p>Monitoring of the County-wide Air Quality strategy is delivered</p> <p>% of service requests where resolution is achieved to customers satisfaction</p>
4	<p>Licensed premises cause no significant alcohol-fuelled crime/ disorder and ASB.</p>	<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	<p>% of licensed businesses subject to allegations of not upholding the 4 licensing objectives</p>
5	<p>Hackney Carriage and Private Hire Drivers Licence applications are processed in a timely manner and that all drivers and operators granted licenses meet the fit and proper test.</p> <p>Vehicles in use by the Taxi trades are fit whilst in service</p>	<p>Safeguard and ensure that all licence applications are processed in a timely manner and those granted meet the fit and proper test.</p> <p>Undertake a number of enforcement interventions to test compliance</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	<p>% of drivers licence renewal applications issued within 5 working days.</p> <p>Vehicles requiring work or taken off the road following intervention (Number and % of the total fleet.)</p>

6	Consumers able to make informed choices on where to eat or purchase food through published food hygiene ratings.	<p>Implement and promote a county wide food hygiene rating scheme</p> <p>Publish hygiene ratings and accrediting those which improve health and wellbeing of their workforce.</p> <p>Offer incentive to maintain star ratings through the Healthy Eating Award</p>	<p>I want to assume everything is ok</p> <p>Help me trade well and ensure my competitors do the same</p>	4 and 5	<p>% businesses meeting purpose at first assessment/ inspection</p> <p>Number of 4* and 5* business signing up for the Healthy Eating Award</p>
7	High levels of customer satisfaction	<p>Respond to complaints and take appropriate action</p> <p>Building our ability to resolve issues or re-direct callers on their first contact with us</p> <p>Maintain a register of compliments and complaints with actions taken</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, 2, 3 and 5	<p>% of service requests where resolution is achieved to customers satisfaction</p> <p>% of service requests where resolution is achieved to business satisfaction</p>
8	Having engaged and satisfied staff who have the right skills, tools and support	<p>Ensure necessary training is identified and delivered</p> <p>Undertake annual staff survey.</p> <p>Undertake annual staff performance reviews with regular feedback sessions from supervisors and managers</p>	<p>All officers must be able to undertake a range of activities that address our strategic priorities focusing on ensuring that the three purposes are met by/ for customers</p>	1, 2, 3, 4 and 5	<p>Staff sickness and absence at public sector national average or better</p> <p>% of staff who enjoy working for WRS</p>
9	Maintained preparedness for response to emergencies, including disease outbreaks.	<p>Maintain links with county-wide TCG.</p> <p>Take part in partner exercises to test plans, as appropriate</p> <p>Respond to disease notifications and outbreaks</p>	<p>I want to assume everything is ok</p>	1, 2, 3, 4 and 5	<p>Disease response plans are maintained, reviewed and updated on a regular basis</p> <p>Business Continuity plans are maintained, reviewed and updated on a regular basis</p>

8. FOOD SERVICE DELIVERY

One of the outcomes from the audit of the service in relation to the work done on behalf of Wyre Forest was the suggestion from Food Standards Agency colleagues that the service needed to be clearer with members on what work the service faced each year. Whilst the Agency had no significant concerns regarding what the service was doing, they felt that members should be more aware of what the service intended to deliver each year so that, when approving the service plan, members were also giving their approval to the level of commitment in relation to food law enforcement.

Because this plan is being written ahead of the end of the financial year, the service cannot be exact about the numbers of visits intended as this may vary slightly if premises inspected in Q4 of 2018/19 find themselves with a lower rating and therefore need another inspection next year. On that basis, the currently anticipated level of food work is:

Estimated number of Food Hygiene visits scheduled for 2019/20 (based on the Food Hygiene rating system.): 1189

Estimated number of premises scheduled for alternative approaches to inspection during 2019/20: 172

Estimated number of new registrations/ unrated premises that will require inspection during 2019/20: 589

Estimated number of overdue premises assessed as requiring a visit during 2019/20: 445

The overdue number will be less than this by 1st April as work is on-going on these premises. These figures should give members a reasonable picture of the volume of pro-active food hygiene related activity that should take place during 2019/20.

9. PERFORMANCE REPORTING

Performance against outcomes will be reported to the WRS Board, quarterly, six-monthly or annually, depending on the individual measure. The IT platform enables the collection and analysis of data which is both accurate and robust and recent improvements in data extraction have increased the frequency with which a number of measures can be reported. The service's ability to provide activity data has continued to improve as the benefits of the IT platform have been implemented. Use of time recording to give a better understanding of how much it costs to undertake particular activities is continuing to be refined. Members will 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.

10. STRUCTURE

The Management Team structure implemented in October 2015 is retained with one minor change which is included in the chart outlined at Appendix A. The WRS team's functions are as follows:

- 1) The Community Environmental Health team provides Food Hygiene, Health and Safety at Work, Public Health and Nuisance functions using three teams. Three teams operate on a geographical split covering Redditch/ Bromsgrove, Wychavon/Malvern Hills, Worcester City/ Wyre Forest. The teams rotate around the three geographical areas on a quarterly basis so officers experience and become familiar with the whole county. The geographical teams are organised to reflect the balance of demand across the County. The legal support role also sits in this team as the majority of casework emanates from here.

- 2) The Technical Services team provides all environmental health support around planning matters, delivers IPPC inspection, Air Quality and Contaminated Land Regime work, manages the pest control contracts and directly delivers the Dog Wardens service. The internal IT support and system management roles also sit within this team due to the complex technical nature of the work.
- 3) The Licensing and Support Services unit delivers all WRS licensing administration and licensing enforcement, along with the wider in-house clerical/ administrative support that is required.
- 4) Business and Relationships Management: Supports the Head of Service and Team Managers in their efforts to bring in new business and maintain existing contracts, provides Line Management to our Intelligence Officer and the in-house first-contact team of Duty Officers. The officer in this role is likely to be on maternity leave for much of 2019/20 so the work is being shared across the Management team.

The arrangement has successfully provided the necessary management cover and support, as well as promoting income generation in many areas of the service.

The Trading Standards element has been retained in the structure chart as, since October 2016, the Community EH Manager and the Head of Regulatory Services have been providing management support to the Trading Standards team. This will continue through 2019/20. The support of management across the Trading Standard functions by WRS provides additional benefits with cross team working and knowledge, especially in areas of income generation and business support, to the benefit of WRS partners and the County Council.

11. TRAINING AND DEVELOPMENT

Changes to the legal framework occur reasonably frequently so to maintain the competence of its staff and ensure that the partner's statutory duties are correctly discharged, the service must maintain a training budget for its staff. Over the period this has been massively reduced reflecting the financial realities that the service faces and the service uses various approaches to ensure the money is spent wisely. Developing staff to ensure there are opportunities to plan succession is also essential.

In recent years, there has been a focus on enabling staff to work across the Environmental Health professional areas. Few officers only remain competent for one of the professional disciplines. Officers from the Community Environmental Health team and the Technical Services team will continue to develop their skills, to provide resilience and enable support where contracts bring in additional demand.

Within Licensing, the focus has been on getting work done at the most effective cost, so administration is done at administrative rates and the more complex issues handled by qualified and competent professionals, with both being done across a number of districts so that no officer only has experience of a single local licensing regime. In pursuit of this, a competency framework for Technical Officers was developed and it will continue to be used with the aim of identifying training needs and developing the competency of officers more widely. Broader competencies will allow a wider range of people to deliver technical work and enable the service to tender for such contracts outside of the existing Partnership arrangements.

The size of the officer cohort in the service makes buying in trainers to deliver technical training to our teams economically viable for the service. A lot of aspects of professional practice and process are common across the enforcement professions so we can continue to offer this as an option to colleagues within Trading Standards and some of our neighbours where we have spaces available on the courses that we arrange. We ran a number of food forums and other training sessions during last year that were attended by officers from outside of the County.

The regional heads of Trading Standards Group (CEnTSA,) run a significant number of training courses through its regional co-ordination unit which we will use where we can and the regional Heads of Environmental Health Group (CEnEHMB,) is set to start working with the CEnTSA Co-ordination unit to offer more bespoke professional courses. WRS has been approached by CEnTSA, due to our proactive and innovative intelligence led approach to Environmental Health work, to deliver regional training on their behalf. Engagement with colleagues across the region remains essential to ensure co-ordinated responses to government and a common approach to businesses, thus ensuring the level playing field for competition.

12. BUSINESS CONTINUITY

Business continuity plans for the service have been developed and shared with the relevant Emergency Planning teams in the partner authorities. If the impact of the on-going financial constraints is that partners require reductions that are not currently envisaged, this will threaten our ability to maintain the full range of interventions across these functions whilst responding to large scale events. Priorities have therefore been established as part of the Business Continuity Planning process so the service is clear what will stop and what will continue in event of an emergency and how the service would respond to incidents such as the potential destruction of our office base or at least it temporarily being out of action. Additional consideration is required where reductions are suggested to ensure the impact on income generation is understood and this item is included in the current Risk Register, discussed below.

Despite Trading Standards returning to County Council control, the Community Environmental Health team and the Trading Standards and Animal Health unit will continue to work closely together to ensure that, in event of an emergency or capacity shortage, officers can support each other when necessary. Having the teams managed by the same Manager on a day to day basis, together under one roof and in one office space will continue to allow both teams to utilise pairs of hands, extra eyes and ears and boots on the ground, to tackle any incident or alteration to work demands that may require additional resource or a different workforce allocation. In event of a significant issue like an animal disease outbreak, the County Council has previously agreed that any support required from WRS staff will be paid for.

13. LOCAL ENTERPRISE PARTNERSHIPS

The service has remained engaged with the Worcestershire Local Enterprise Partnership with the aim of improving our relationships with local businesses and identifying their needs with a view to contributing to the growth of the local economy. The Business Charter for Regulators, launched during 2012, clearly outlines the relationship that we are seeking to have with the business community in Worcestershire.

The Worcestershire LEP has assisted us with the Worcestershire Food and Drink Project and this will hopefully come to fruition in the first half of 2019/20. It is an initiative to put the County on the map and be at the forefront of promoting food producers and manufacturers in Worcestershire. The LEP was also responsible for putting the service forward for an award (the work we have done with the Bangladeshi Catering trade in Worcestershire and our Healthy Eating Award.) We have made it clear to the LEP that, whilst partners are keen to continue with the Better Business for All approach, wider business support initiatives cannot go forward without financial support. Government still seems keen to use the

LEPs to drive economic growth at a local level so we will seek to maintain engagement into 2019/20 and beyond at a suitable level to make sure that funding can be accessed if it is available. This will be particularly relevant if the Government's review of the LEPs requires that the three partners in the North of the county have to members of only one LEP.

14. 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 six 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.

With the County Council having taken back direct control of Trading Standards functions, it has been essential to retain the strong links between both groups of staff. This is facilitated by the current co-location of teams, with Trading Standards and Animal Health continuing to occupy a section at Wyre Forest House for the foreseeable future. This is particularly relevant for the two Intelligence Officer posts that are split between the two organisations.

Customer demand will have a significant impact on the nature of our interactions with partners as we move the service forward. Close partnership working with a range of professional and community groups is essential to ensure deliver of the outcomes required by partners. Key partners for engagement include:

- West Mercia Police & West Mercia Police and Crime Commissioner
- The Environment Agency
- The Health and Safety Executive
- Public Health England
- Local Partnership bodies e.g. Community Safety Partnerships, Safer Communities Board, Health and Well-being Board
- Adult and Children Safeguarding Boards
- Hereford & Worcester Fire & Rescue Service
- Citizens Advice Consumer Service, local Citizens Advice Bureaux and other 3rd sector organisations
- County Council Public Health team
- Regional Regulatory Partnerships and National Bodies (CIEH, MJAC, CEnEHMB, CEnTSA, CTSI, ACTSO, NTSB,).

Existing links to these bodies will be maintained. Additionally, to ensure WRS provides an attractive product for external clients, engagement with equivalent partners in other geographical regions will be pursued, which will include the collation/interpretation and review of intelligence data in such areas.

15. CONSULTATION/ ENGAGEMENT

In relation to national consultations on legislative changes, we address these through the relevant professional channels at local, regional and national 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 a number of 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. It is hoped that the Activity Data reports that will continue to be provided to the WRS Board will provide elected members on the Board with sufficient information to also feedback to the wider membership in their respective authorities.

In terms of business engagement, we will continue to work with colleagues at Worcestershire LEP and Worcestershire Business Central 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 model of public service engagement we are pursuing and it is essential we move people down this route and reduce the expectation that we will always do it for them. This idea is now developing further with all partners signing up to the “digital first” concept that, where possible, initial contact with partners will always be via a digital channel rather than necessarily requiring either telephony or face-to-face interactions. The new format of the WRS website has been tailored to suit the various digital devices used to access services on-line.

16. GOVERNANCE

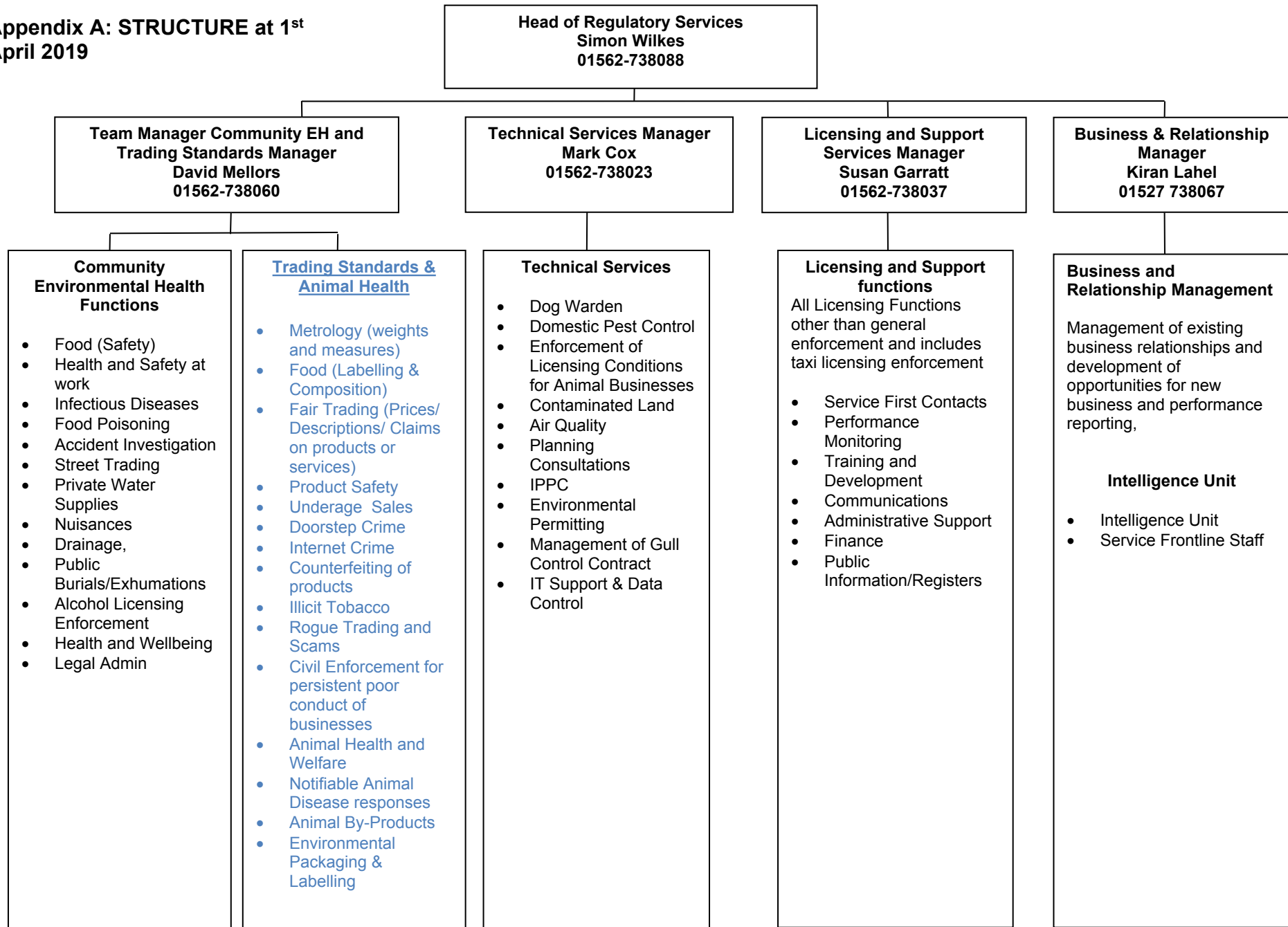
At the June 2015 meeting of the previous Joint Committee, it was agreed that the majority of the terms of the original 2010 partnership agreement remained relevant to the six district partnership following the exit of the County Council in 2016), as this should be used as the basis for the continued partnership. The service continues to operate under a Joint Board in accordance with Section 101 of the Local Government Act 1972 and Section 20 of the Local Government Act 2000, although the new Board comprised of both officers and members, with members having voting rights. The current arrangements came into force on 1st April 2016.

The original legal agreement indicated that partners would pursue the shared services model for a period of at least 10 years. The 2016 agreement re-iterated this and it contains no formal end date. Officers have asked the Legal Officers from the partner councils to look at this and advise on whether any review or re-signing of agreements is required. At this stage, the view from the majority of Legal Officers is that this is not required and that the current agreement can, in theory continue in perpetuity.

17. RISKS

A copy of the current Risk Register is appended at Appendix D and has been reviewed and updated for this plan. The increased number of commercial contracts and obligations increases some risks, particularly where sub-contractors or skilled technical staff are involved. This recognises the wider geographical area that the service now covers and level of technical expertise that has to be maintained.

**Appendix A: STRUCTURE at 1st
April 2019**



Appendix B: 3 years of budgets (figures in £000's)

	2019 / 2020	2020 / 2021	2021 / 2022
Employees			
Monthly salaries	2,695	2,709	2,732
Training for professional qualifications	2	2	2
Medical fees (employees')	2	2	2
Employers' liability insurance	40	40	40
Employees' professional subscriptions	3	3	3
Sub-Total - Employees	2,741	2,755	2,778
Premises			
Rents	52	52	52
Room hire	2	2	2
Trade Waste	0	0	0
Sub-Total - Premises	54	54	54
Transport			
Vehicle repairs/maint'ce	3	3	3
Diesel fuel	8	8	8
Licences	1	1	1
Contract hire of vehicles	4	4	4
Vehicle insurances	5	5	5
Van Lease	9	9	9
Fares & Car Parking	5	5	5
Car allowances	75	75	75
Sub-Total - Transport	110	110	110
Supplies & Service			
Equipment - purchase/maintenance/rental	23	23	23
Materials	9	9	9
Clothing, uniforms & laundry	2	2	2
Training fees	23	23	23

General insurances	5	5	5
Printing and stationery	18	18	18
Books and publications	2	2	2
Postage/packaging	11	11	11
ICT	40	40	40
Telephones	21	21	21
Taxi Tests	22	22	22
CRB Checks (taxi)	26	26	26
Support service recharges	100	100	100
Support service recharges - ICT	44	44	44
Sub-Total - Supplies & Service	345	345	345
Contractors			
Consultants / Contractors' fees/charges/SLA's	239	239	239
Advertising (general)	5	5	5
Grants and subscriptions	11	11	11
Marketing/promotion/publicity	2	2	2
Sub-Total - Contractors	257	257	257
Income			
Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc	-410	-410	-410
Sub-Total - Income	-410	-410	-410
From partners for Technical Officers	-79	-52	-36
Sub-Total - Income	-79	-52	-36
Additional Income			
Income to be found due to unavoidable salary pressures		-41	-80
Sub-Total - Income	0	-41	-80
DISTRICT PARTNERSHIP BUDGET	3,017	3,017	3,017

Appendix C: Performance Measures Relating to Outcomes

	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 0 1 or 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 drivers licence renewal applications issued within 5 working days.	6-monthly	Based on the proportion of drivers licence renewals issued within 5 working days of receipt of application. Note new applicants all require DBS checks and time frames for these fall outside of WRS control, hence they are not included.
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. The last figure obtained by the host's HR team was that the Public sector average was 8.75
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	Indicator, linked to Crime & Disorder agenda, looking at performance of premises license holders and control on their activity.
12	Rate of noise complaint per 1000 head of population	6-monthly	Place indicator, potential link to quality of life and health and well-being.
13	Total income	6-monthly	Expressed as a % of the base district contributions to the revenue budget for this year
14	Cost of regulatory services per head of population	Annually	Will be total spend divided by the total population, based on the most recent mid-year estimate available at the time of publication. NB: Calculation will offset income against revenue budget to account for external income sources

Appendix D: Risk Register 2019/20

Risk Description	Consequences	When is this likely to happen	Current Position			Control measures
			Likelihood	Impact	Matrix RAG Status	
Loss of Data through IT failures	Disruption to Service Provision. Inability to produce records and data.	On-going	Low	High	Green	Wyre Forest ICT has effective processes and business continuity plans in place for disaster recovery.
Issues with the WRS database system	Impact on work planning. Self-help may not enable savings required	On-going	Low	High	Green	The system continues to be developed as business as usual, with priority currently going to public access and self-help/ self-service to continue the channel shift process. Service website remains key access point.
Effective and efficient Business Continuity arrangements in place	Disruption to service if e.g. Major Power failures or other reasons that access to Wyre Forest House is not possible.	On-going	Very Low	Medium	Green	Staff are equipped for mobile/home working. Touchdown stations available in partner council locations. Working from WFDC depot over Christmas period is operable.
Maintain our capacity to achieve service delivery	Disruption to service e.g. Major staff sickness (e.g. flu pandemic) or Unable to recruit or retain suitably qualified staff.	On-going	Low	Medium	Amber	In such event, service priorities to be managed and partners informed of any changes to service. Agency staff are available to provide short term cover. However, having taken on contracts with additional authorities the demand has increased and neighbouring authorities have lost the ability to be able to assist with technical specialisms. We are active within regional and sub-regional groups to share resources if required. Effective training and development processes are in place to ensure recruitment and retention of staff. There is increased training budget pressure, reduced technical knowledge in neighbouring authorities and increased importance in maintaining heightened skills for contractual obligations and commercial edge. Regular inventory and maintenance of equipment. In future budget for replace may be an issue but would be a relatively small amount for partners to share.
Pest contractors cease operations.	Disruption to service. Negative media coverage. Increased public health risks	On-going	Low	High	Green	New framework contract has 6 pest control suppliers so the loss of one allows work to be moved to the others.

Effective and efficient contract arrangement for dog control	Disruption to service if no kennels available. Negative media coverage. Increased public health risks	On-going	Low	High	Amber	Budget available to buy in use of other private sector providers in short term. Contracts tendered. The Dog Warden contracts are robust but we have one less kennel contractor but an additional three District Councils that we provide the service for.
Hosting support does not deliver necessary financial and HR support to ensure efficient management	Efficiency of management reduced; staffing issues remain unaddressed and performance suffers	On-going	Low	High	Amber	Some continuing issues around access to the financial system from Wyre Forest house, BDC considering revision to finance system that should help.
One or more partners continue to be under great financial pressure and may consider alternatives to the partnership to deliver their service	Creates reputational issues for remaining partners and increases the need to manage overheads. Difficulties in delivering highly varied levels of service	On-going	Low-Medium	High	Amber	Legal agreement limits variations in contribution before partners have to move to contractual relationship. Leanness of organisation minimises overheads and focuses resource at the front line. Growth strategy should generate income to support partners in the future. .
Robust arrangements in place in relation to obtaining legal advice and monitoring legislative changes.	Loss of cases is costly and damages reputation.	On-going	Low	Medium	Green	Continued close working with BDC legal team and other partners who don't use BDC for advocacy. Technical and legal training days for staff. Difficulty in keeping informed of Case Law developments. Membership and attendance of Officer Technical Groups outside the County would assist.
Service provision complies with Government requirements	Adverse comments following audits e.g. FSA Intervention by Government bodies i.e. FSA, whilst highly unlikely, is damaging to reputation.	On-going	Low	High	Amber	Limited detail of what statutory minima are. LGA clearly aware of impact of budget reductions on regulation and has made it clear Government cannot expect what it had previously. FSA audit showed Agency happy with WRS direction of travel and use of intelligence even though not Code of Practice compliant. Environmental reporting for Local Air Quality Management, Pollution Prevention and Control and Private Water Supply Inspections to Defra and DWI have received positive responses with no issues of concern being raised.
Failure to deliver external contract work at the level expected by the business or local authority with whom we have the contract	Damage to reputation, loss of future income streams, financial impact of paying damages	On-going	Low	High	Green	Ensure contract negotiations are clear on performance criteria and these are clearly recorded in the final documentation. Monthly reviews against performance criteria. Select staff to ensure competence of those undertaking work outside Worcestershire. Maintain strong links with the customer's monitoring staff. Intervene early with corrective action