## Worcestershire Regulatory Services

Supporting and protecting you

# Service Plan 2020/21

## **Worcestershire Regulatory Services Vision**

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

#### CONTENTS

	Page Number
Executive Summary	3
Introduction	4
Operating Environment	5
Strategic Priorities	6
Purposes	7
Finance	7
Audit Arrangements	8
Activities and Outcome Measures	8
Performance Reporting	11
Structure	11
Training and Development of Multi-Functional Teams	12
Business Continuity	13
Local Enterprise Partnerships	13
Other Partnerships	13
Consultation/Engagement	14
Governance	14
Risks	15
Appendix A Structure Chart	16
Appendix B Regulatory Services Budget Table 2013/2014	17
Appendix C Performance Measures Relating to Outcomes	20
Annendix D. Risk Register	22

#### **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 2020/21 with a total agreed budget from the district partners of £3.177M. This includes a budgetary uplift to cover the full 2% pay increase in this year and the cost of increased pension contribution by the employer. It also includes funding for a number of posts for specific work either in a particular function or for a particular partner. The £90,000 contribution for salary and pension costs represents the first uplift of general WRS funding since the service came together in 2010. Previously additional funding had only been provided for specific activities. Partners have recognised that there is a ceiling to the potential for income generation with the current officer capacity so the uplift in budget is welcome.

A new 3-year business plan, which has a number of strands for continuing the Service's development, has been created to guide the service through the immediate future. Key areas of focus will be:

- Continuing to develop new and existing income streams,
- Improve the use of the website, especially for transactions and payments so that efficiency can be increased,
- Better integrating enforcement activity across Community Environmental Health and Licensing to deal with problematic premises,
- Finding a better way to deliver licensing enforcement activity to meet the needs of partners,
- Ensuring staff have a better understanding of who local members are and what support they may need (obviously within resourcing constraints.)

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. 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 remains a key criterion against which we deploy resources, using an intelligence-led approach is adding an additional dimension to how the service works and allowing it to integrate better with other enforcement services. 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, with better long term solutions.

Simon Wilkes Head of Worcestershire Regulatory Services Jayne Pickering Director of Finance, Bromsgrove DC

#### 1. INTRODUCTION

This is the tenth 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 2020/21, 2021/22, and 2022/23 however the operational detail reflects the planned activities that the service will undertake in 2020/21.

2019/20 was again very busy and successful for WRS. The service managed to maintain its local authority customer base and increased its Primary Authority activity, in particular 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. Full details of activity will be reported in the Annual Report to be produced at the end of May 2020 and reported to the Board in June.

The coming year is likely to be dominated by:

- Seeking new and maintaining existing income streams to help support local delivery,
- The further development of the WRS website to better enable customer interactions and transactions,
- Developing the self-service model further for wider service elements
- Continue to develop and review 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,
- Supporting some of our businesses as they deal with the realities of BREXIT.

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. 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 will continue. The focus has been the development of tailored information to enable the public to self-serve which will continue. Moving the website onto an updated version of the software platform on which it is built should also allow us to improve the look and functionality of the system.

#### 2. OPERATING ENVIRONMENT

#### 2.1 Political

The political landscape continues to be dominated by the withdrawal of the UK from the European Union (EU), commonly known as 'Brexit'. The UK is due to leave on the 31st January 2020. The nature of our exit is still to be determined. Whilst Government departments, business and the general public have been urged to prepare for Brexit, including the possibility of a 'no deal' scenario, it is unclear how the UK intends to operate in spite of the Chancellor's indication that the UK will not be a rule taker. How this translates into actual legislative measures remains unclear. The wider implications of Brexit are also unclear, although much speculated upon; with some reports indicating an adverse effect on the UK economy and a period of uncertainty or fluctuation. Furthermore, the medium-term future of the UK's laws is also uncertain, particularly where they originate from EU directives such as those relating to air quality and food safety.

Whilst Government has indicated an end to its austerity measures, the funding for local authorities remains uncertain with the move to business rates and council tax being the major funding streams at least a little opaque. A number of local authorities now face a significant financial challenge, which is compounded by rising costs in areas such as social care and children's services.

West Mercia Police are in the process of withdrawing from the strategic alliance with Warwickshire Police. The reasons cited for this decision include delivering more effective and efficient services to communities and ensuring the public get better value for money. It is not known what impacts, if any, this will have on the tactical activity undertaken by WRS.

#### 2.2 Economic

As the UK seeks post Brexit trade deals, particularly with countries outside the EU, food and drinks manufacturers are expected to seek to export a greater volume of food and drink products. A greater volume of exports will result in a higher number of requests for export health certificates; something which has already been seen by WRS. In the event the UK is not part of the European Economic Area (EEA) and the European Free Trade Association (EFTA), the international food code set by the World Health Organisation and the United Nations, will become the international food standard by which UK food producers, processors and national food control agencies would have to operate.

Economic uncertainty and fluctuations in the value of sterling have an impact on the price of commodities. An increase in the price of goods, particularly food products and ingredients, means a greater risk of substitution and/or fraud. This becomes even more pertinent when considering the slow wage growth currently seen across the UK and the need for businesses to provided cheaper alternatives to consumers.

The Strategic Economic Plan and the Industrial Strategy for the West Midlands Combined Authority is likely to bring investment into the conurbation, which will influence developments in Worcestershire. Developments have been proposed in the South of Birmingham and around the airport that are likely to bring further business opportunities into the county along the M42 corridor. In addition, the development of Worcester Parkway and the electrification of the line through Worcestershire to Birmingham, providing a link to HS2 and shorter journey times to London, will also draw businesses to the area. Such developments are likely to lead to housing developments and the drive for affordable housing remains a national priority. As each of the Worcestershire districts strive to reach housing targets, developments are being considered on any available land including Greenfield and brownfield sites. Any developments (commercial or residential) will impact upon the volume of planning enquiries.

The previous air quality analysis identified a significant increase in the number of planning enquiries received from Worcestershire authorities. Such increases however, have also been identified in relation to contaminated land and nuisance enquiries. The number of planning enquiries received during the previous year represents an increase of 56% since 2016. It is believed that an increased proportion of cases have been incorrectly referred by authorities who are failing to use the 'planning checklist'. This checklist was created by WRS to assist planning officers in determining whether a consultation should be made to Environmental Health. The increase in planning enquiries was identified as an emerging threat to WRS service planning in the Strategic Assessment 2019-20.

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.

#### 2.3 Social

Latest data suggests that there is a slight increase in the level of deprivation across Worcestershire; with a greater number of neighbourhoods within the top10% of deprived areas nationally. Recent intelligence products have identified links between certain types of complaints (e.g. domestic noise) and deprivation therefore; an increase in the level of deprivation could result in a greater number and/or concentration of complaints or problematic areas.

On a biannual basis, the FSA publish the results of the public attitudes survey. The most recent survey was completed during May 2018 and encompassed 2,004 adults in England. The top food safety issues of concern were food hygiene when eating out, chemicals from the environment, food additives (29%) and food poisoning. Other key findings included; 45% of respondents being concerned about food safety in restaurants, pubs, cafes and takeaway, 82% being aware of hygiene standards in places they eat at or buy from and 15% being aware of specific rules about allergens. An increase in the level of public awareness is likely to lead to an increase in complaints.

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.

#### 2.4 Technological

The increased use of technology to commit or facilitate crime continues to pose a threat to local authorities, who are often ill-equipped to investigate such matters. Examples pertinent to WRS include the use of social media by persons or businesses to advertise services they are not legally allowed to offer. This includes using Facebook 'buy and sell' pages to advertise private hire or animal boarding services, and using social media feeds to find a lost dog or locate the owner of a dog found to be straying. The latter is problematic as, aside from an offence being

committed, dogs can be held in potentially unsafe environments or returned to individuals who are not the actual owners.

App-based private hire booking systems are becoming more prevalent both locally and nationally. This brings regulatory challenges as the legislation governing the taxi trade, as highlighted by the Local Government Association in 2017, is outdated. App-based booking systems also facilitate more instant "pre-bookings" which blur the lines between the hackney carriage and private hire trades. Furthermore, booking systems working across a number of district council areas help facilitate legitimate "cross-border" hiring to the annoyance of some areas of the trade.

Previous intelligence has suggested food safety offences are being facilitated by third party websites such as Deliveroo, JustEat and Uber Eats. It was previously identified, for example, that non-compliant food businesses were trading via JustEat, with consumers being unaware of the low food hygiene rating. An intelligence product to assess the threat of such websites is scheduled for completion during the year and is due to encompass Environmental Health, Licensing and Trading Standards functions.

Whilst technology poses a threat to local authorities, it also provides opportunities as WRS can promote its services and circulate guidance to a wider audience through its website and social media feed. It can also operate more efficiently by accepting online payments and accepting demand through alternative channels.

#### 2.5 Environmental

In July 2017, the government published its revised UK plan for tackling roadside nitrogen dioxide concentrations. This outlined, alongside existing measures, a number of additional actions to be undertaken by government departments and local authorities including; the creation of 'clean air zones', a focus on alternatively fuelled vehicles and electric vehicles, a potential taxation on diesel vehicles, additional testing of commercial vehicles and a greater emphasis on cycling and walking schemes. In January 2019, Government launched the Clean Air Strategy which aims to improve air quality by reducing pollution from a wide range of sources including transport, at home, farming and industry. There is a desire to improve air quality generally, but the focus of air quality work for WRS must remain the improvement of air quality where current national objectives are being breached, based on values relating to health based criteria. WRS will however assist with promotion of the wider air quality agenda of partner authorities.

The Environmental (Principles and Governance) Bill includes provisions to maintain the level of environmental protection once the UK leaves the EU. In particular, it proposes to establish an Office for Environmental Protection; to uphold environmental legislation and hold government and public bodies to account over environmental standards. This includes receiving complaints that may relate to weak enforcement of environmental law which, from a WRS perspective, could include complaints from residents living in air quality management areas. The bill also proposes the inclusion of 'environmental principles' into domestic legislation, and giving the 25 Year Environment Plan' statutory status.

Climate change continues to impact upon Worcestershire, like all areas of the UK. Mild winters and, in particular, hot summers are likely to result in a greater volume of nuisance complaints as residents spend greater time in outdoor spaces. As outlined previously, this is especially pertinent for areas with higher population densities. Flooding is also likely to continue to impact with more frequent severe weather events.

#### 2.6 Legal

The European Commission put forward its EU Data Protection Reform in January 2012 to make Europe fit for the digital age. More than 90% of Europeans said they wanted the same data protection rights across the EU – and regardless of where their data is processed. As a result, the General Data Protection Regulation entered into force during May 2016 and was applied in May 2018. Whilst broadly similar to existing data protection laws, the regulation places an emphasis on consent, lawful bases for processing data and individual rights such as those to erasure and access. It is realistic such regulations will lead to a greater number of enquiries from the general public.

The Investigatory Powers Act 2016 received Royal Assent towards the end of 2016 and, from a WRS perspective, consolidated existing powers available to law enforcement to obtain communications and data about communications. It also overhauled the way these powers were authorised and overseen and created and Investigatory Powers Commissioner to oversee how powers are used. Whilst Regulatory Services have historically had restricted access to communications data, access is now confined to cases such as food fraud where the threshold for 'serious organised crime' can be met.

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 of work. The Agency is in the process of revising all of its codes and there will be a greater emphasis on the use of intelligence to determine the nature of interventions required. At this time some of the more radical proposals such as the use of private sector authorised auditors as an alternative to local authority inspection have been shelved. Neither the professional stakeholders nor the public who were consulted on these provisions were happy with this proposal. It also seems likely that, in two tier areas, the division between the County Council and the district councils in terms of their roles as food authorities will remain with districts focusing on hygiene standards and county councils focusing on composition, labelling and animal feed...

#### 2.7 Organisational

Since its inception, the budget for WRS has primarily comprised of contributions from its strategic partners. With local authorities facing significant financial challenges however, future budgets for the service are continually 'subject to potential change'. The on-going challenge for WRS is to offset any future reductions through income generation whilst being able to fulfil its statutory responsibilities. With an intelligence-led approach now preferred, the level of risk and the known intelligence picture should be considered throughout decision making processes. A failure to understand, and therefore undertake, such processes risks undermining the effectiveness of future enforcement activity.

Analysis undertaken for the latest Strategic Assessment has identified a number of 'gaps' which could hinder future intelligence analysis. Most notable is the absence of temporal data, specifically the hours when incidents occur, which is critical for the assessment of functions such as nuisance and alcohol licensing. A further limitation is the limited number of intelligence reports generated in relation to tactical activity. This, in

turn, raises further questions as to which sources of information and intelligence are being utilised during investigative processes.

Staff have been effectively using a single 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.

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 defendable.

#### 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 2020/21 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 ones on Air Quality and the Taxi Strategy. 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 2020/21. Concerns still remain around the non-business customer satisfaction figures and work will continue to try to improve these during the coming year. A number of internal performance indicators will be introduced that should help with some of the issues raised by customers.

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

2	Ensuring that nuisance and other pollution related issues are tackled	Respond to complaints and take appropriate action  Provide relevant advice and information, available through a range of channels.	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	2, 3 and 4	% of service requests where resolution is achieved to customers satisfaction  Rate of noise complaint per 1000 head of population
3	Protecting the environment and the public through monitoring air quality, and ensuring that contaminated land is suitable for development.  Controlling environmental emissions leading to reduced environmental damage and better health	Conduct risk based/ intelligence-led interventions with businesses, especially permitted premises  Air quality monitoring & responding to contaminated land issues  Supporting the planning system	I want to assume everything is ok	2 and 4	% permitted businesses broadly compliant at first visit/ inspection  Monitoring of the County-wide Air Quality strategy is delivered  % of service requests where resolution is achieved to customers satisfaction
4	Licensed premises cause no significant alcohol-fuelled crime/ disorder and ASB.	Respond to complaints regarding alcohol and similar licensing related issues e.g. underage sales, breach of conditions, poor conduct of licence holders, etc.  Provide businesses with advice and assistance  Monthly alcohol profile to be shared with partners, reviewed and suitable work tasked	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 3	% of licensed businesses subject to allegations of not upholding the 4 licensing objectives
5	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.  Vehicles in use by the Taxi trades are fit whilst in service	Safeguard and ensure that all licence applications are processed in a timely manner and those granted meet the fit and proper test.  Undertake a number of enforcement interventions to test compliance	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 3	% of drivers licence renewal applications issued within 5 working days.  Vehicles requiring work or taken off the road following intervention (Number and % of the total fleet.)

6	Consumers able to make informed choices on where to eat or purchase food through published food hygiene ratings.	Implement and promote the FHRS and publish hygiene ratings and accrediting those which improve health and wellbeing of their workforce.  Incentivise maintaining star ratings through the Healthy Eating Award and Triple 5 Award  Support food exporters through the BREXIT process	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  Number of 4* and 5* business signing up for the Healthy Eating Award
7	High levels of customer satisfaction	Respond to complaints and take appropriate action  Building our ability to resolve issues or re-direct callers on their first contact with us  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
8	Having engaged and satisfied staff who have the right skills, tools and support	Ensure necessary training is identified and delivered  Undertake annual staff survey.  Undertake annual staff performance reviews with regular feedback sessions from supervisors and managers	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	1, 2, 3, 4 and 5	Staff sickness and absence at public sector national average or better  % of staff who enjoy working for WRS
9	Maintained preparedness for response to emergencies, including disease outbreaks.	Maintain links with county-wide TCG. Take part in partner exercises to test plans, as appropriate  Respond to disease notifications and outbreaks	I want to assume everything is ok	1 2, 3, 4 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

As well as the table above, the Strategic Assessment has made a number of recommendations for activity which will form part of the detailed plan that will sit below this. With a number of intelligence gaps or limitations identified, it is recommended these are considered and, where necessary, action to taken to address them. This could include the introduction of several 'intelligence development' days where resources from across the service will conduct a range of activities in relation to an agreed function and/or theme. Specific recommended activities include:

#### A monthly assessment of alcohol premises

With alcohol premises, particularly pubs/clubs, featuring within the analysis of alcohol licensing, food safety and nuisance; it is recommended a routine assessment is produced to assess cross service breaches of the licensing objectives, and identify persistent offenders.

## • Review investigative processes in relation to the retail sector, particularly where complaints relate to the night time economy and/or food premises

Following on from the previous recommendation, it is suggested that processes are reviewed to ensure cross service breaches are considered before part of a problem is investigated. This is specifically recommended for certain sectors (pubs, clubs, restaurants, takeaways etc.) but is of course dependent on the level of risk.

#### A project focussing on microchipping and dog ownership

With a significant proportion of stray or lost dogs having no means of identification, particularly where there are welfare concerns, it is recommended that a promotional project is undertaken to inform and/or remind dog owners about their responsibilities in terms of microchipping and updating ownership information.

#### • An intelligence product relating to the welfare of stray/lost dogs

With the rate of welfare cases for stray and lost dogs increasing, albeit slightly, it is recommended that intelligence analysis is undertaken to assess any similarities between cases and identify opportunities for prevention and/or enforcement action.

#### A food safety project targeting takeaways

With takeaways consistently identified throughout the assessment of food safety data, it is recommended that a project is undertaken to provide advice to relevant businesses owners on commonly identified issues. It is also suggested that an project should include, or be considered by, Worcestershire Trading Standards Service.

#### • A combined food safety/health and safety project targeting residential care homes

With residential care homes identified within the analysis of food safety interventions and health and safety accidents, it is recommended that a dual project should be considered to assess the level of compliance.

#### Review the domestic noise profile

With a significant proportion of nuisance complaints relating to domestic noise, and an intelligence product recently completed, it is recommended the key findings, assessments and intelligence gaps are reviewed, and appropriate measures taken forward.

#### An intelligence product relating to taxi licensing

With a potential inconsistencies identified in relation to taxi licensing complaints and officer enforcement visits, it is recommended that an intelligence product is completed in order to explore incident locations and identify opportunities for intervention.

#### **FOOD SERVICE DELIVERY**

One of the outcomes from the Food Standards Agency audit of the service in relation to the work done on behalf of Wyre Forest was the suggestion from 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 2020/21 (based on the Food Hygiene rating system.): 1364 Estimated number of premises scheduled for alternative approaches to inspection during 2020/21: 400 Estimated number of new registrations/ unrated premises that will require inspection during 2020/21: 700 Estimated number of overdue premises assessed as requiring a visit during 2020/21: 800

The overdue number will be less than this by 1<sup>st</sup> April as work is on-going on these premises. All are low risk premises that are dealt with by alternative measures such as survey letters. These figures should give members a reasonable picture of the volume of pro-active food hygiene related activity that should take place during 2020/21.

#### 8. 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 participated in a session in October 2019 with officers part of which was to consider the suite of current measures and it was agreed that no changes were required currently.

#### 9. STRUCTURE

In terms of posts, 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, due to the complex technical nature of the work and the in-house first-contact team of Duty Officers also sit within this team.
- 3) The Licensing and Support Services unit delivers all WRS licensing administration and licensing enforcement, along with the wider inhouse 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.

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

However, the departure of the incumbent in the Licensing and Support Services Manager post has created a gap. Initially the intention is for this role to be fulfilled by the current post holder in the Business and Relationships Manager post, with her normal duties being picked up by other members of the management team. This will be a test of resilience for current arrangements but also provides the opportunity of reducing the pressures on the budget. The vacant post will be retained unfilled during 2020/21 with a decision being made on whether to move permanently to the revised arrangement towards the end of the financial year.

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 2020/21 with the County Council being very happy with the arrangement. 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 both WRS partners and the County Council.

#### 10. TRAINING AND DEVELOPMENT

Changes to the legal framework occur reasonably frequently and the increased income generation work requires highly competent individuals. To maintain the competence of its staff, meet contractual obligations and ensure that the partner's statutory duties are correctly discharged, the service must maintain a training budget for its staff. Over the life of WRS 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.

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.

#### 11. 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 and delivering contractual obligations. 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.

#### 12. 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 LEP has assisted us with the Worcestershire Food and Drink Project and this will hopefully come to fruition in the near future. 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.) Currently there is much interest in the development of the local Industrial Strategy that is being led by the LEP. Clearly Government sees this as a way of translating national policy on creating economic growth into local action and, where possible, we will look to support the relevant sectors identified by the LEP.

#### 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 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 Growth 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 3<sup>rd</sup> 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.

#### 14. 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.

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. We will look at ways of making this more efficient using digital channels but previous experience showed a drastic fall in responses when this was used as the only route for getting feedback. For now we will have to continue with a mixed model of paper surveys and digital feedback.

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 is being tailored to suit the various digital devices used to access services on-line.

#### 15. 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 but it contains no formal end date. Officers have asked the Legal Officers from the partner councils to look at this and the view from the majority of Legal Officers is that review is not required and that the current agreement can, in theory continue in perpetuity.

Officer members of the Board will need to keep a watching brief on the service and perhaps look at reviews every few years to ensure the service is continuing to deliver.

#### 16. 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 1<sup>st</sup> April 2019

#### Head of Regulatory Services Simon Wilkes 01562-738088

Team Manager Community EH and Trading Standards Manager David Mellors 01562-738060

#### Technical Services Manager Mark Cox 01562-738023

Licensing and Support Services Manager Kiran Lahel (Acting) 01527 738067 Business & Relationship Manager Vacant due to Act-up role. Covered by Managers

#### Community Environmental Health Functions

- Food (Safety)
- Health and Safety at work
- Infectious Diseases
- Food Poisoning
- Accident Investigation
- Street Trading
- Private Water Supplies
- Nuisances
- Drainage,
- Public Burials/Exhumations
- Alcohol Licensing Enforcement
- Health and Wellbeing
- Legal Admin

## Trading Standards & Animal Health

- Metrology (weights and measures)
- Food (Labelling & Composition)
- Fair Trading (Prices/ Descriptions/ Claims on products or services)
- Product Safety
- Underage Sales
- Doorstep Crime
- Internet Crime
- Counterfeiting of products
- Illicit Tobacco
- Rogue Trading and Scams
- Civil Enforcement for persistent poor conduct of businesses
- Animal Health and Welfare
- Notifiable Animal Disease responses
- Animal By-Products
- Environmental Packaging & Labelling

#### **Technical Services**

- Dog Warden Service
- Subsidised Domestic Pest Control
- Sewer Baiting
- Enforcement of Licensing Conditions for Animal Businesses
- Contaminated Land
- Air Quality
- Planning Consultations
- IPPC
- Environmental Permitting
- Management of Gull Control Contract
- IT Support & Data Control
- Service Frontline Staff

## Licensing and Support functions

All Licensing Functions other than general enforcement and includes taxi licensing enforcement

- Service First Contacts
- Performance Monitoring
- Training and Development
- Communications
- Administrative Support
- Finance
- Public Information/Registers

## Business and Relationship Management

Management of existing business relationships and development of opportunities for new business and performance reporting,

#### Intelligence Unit

Intelligence Unit

Appendix B: 3 years of budgets (figures in £000's) Account description	Budget	Budget	Budget
	2020 / 2021	2021 / 2022	2022 / 2023
	£000's	£000's	£000's
Employees	0.740	0.700	0.000
Monthly salaries	2,749	2,789	2,833
Training for professional qualifications	0	0	0
Medical fees (employees')	2	2	2
Employers' liability insurance	40	40	40
Employees' professional subscriptions	2	2	2
Sub-Total - Employees	2,793	2,833	2,877
Premises			
Rents	52	52	52
Room hire	2	2	2
Trade Waste	0	0	0
Sub-Total - Premises	54	54	54
oub rotal Fromisco			
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	70	70	70
Sub-Total - Transport	105	105	105_
Supplies & Service			
Equipment - purchase/maintenance/rental	22	22	22

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	344	344	344
Contractors Consultants / Contractors' fees/charges/SLA's Advertising (general) Grants and subscriptions	234 5 11	234 5 11	234 5 11
Marketing/promotion/publicity	2	2	2
Sub-Total - Contractors	252	252	252
Income Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc	-310	-310	-310
Sub-Total - Income	-310	-310	-310
Income			
From partners for Technical Officers	-70	-64	-66
Sub-Total - Income	-70	-64	-66

#### **Additional Income**

Income to be Determined	-60	-60	-60
Income to be found due to unavoidable salary pressures	-90	-136	-178
Sub-Total - Income	-150	-196	-238
DISTRICT PARTNERSHIP BUDGET	3,017	3,017	3,017
20-21 Partner Percentages			
Bromsgrove District Council	14.55%		
Malvern Hills District Council	12.79%		
Redditch Borough Council	17.53%		
Worcester City Council	16.54%		
Wychavon District Council	23.24%		
Wyre Forest District Council	15.35%		
Total	100.00%		

Additional costs for posts for new or additional activities will be allocated using this formula unless the work is requested by either one partner or a group of partners, in which case the relevant partners will agree a formula for cost allocation.

The table below covers off the additional payments that are likely to flow from the current allocations of additional funding for the additional Technical Officer capacity required for a number of pieces of work and also to cover the salary and pension pressures going forward. The latter elements may need to be addressed on a year by year basis.

	Budget	Contribution Technical Officers	Partner Contribution	Unavoidable Salary Pressure	Total Partner Contribution	
	2020 / 2021	2020 / 2021	2020 / 2021	2020 / 2021	2020 / 2021	
Budget 2020 / 21	£000's	£000's	£000's	£000's	£000's	
Bromsgrove District Council	439	7	446	13	459	
Malvern Hills District Council	386	10	396	11	407	
Redditch Borough Council	529	2	531	16	547	
Worcester City Council	499	35	534	15	549	
Wychavon District Council	701	11	712	21	733	
Wyre Forest District Council	463	5	468	14	482	
Total	3,017	70	3,087	90	3,177	
	Budget	Contribution Technical Officers	Partner Contribution	Unavoidable Salary Pressure	Total Partner Contribution	
	2021 / 2022	2021 / 2022	2021 / 2022	2021 / 2022	2021 / 2022	
Budget 2021 / 22	£000's	£000's	£000's	£000's	£000's	
Bromsgrove District Council	439	6	445	20	465	
Redditch Borough Council	529	1	530	19	549	
Wyre Forest District Council	463	5	468	23	491	
Wychavon District Council	701	9	710	25	735	
Malvern Hills District Council	386	9	395	27	422	
Worcester City Council	499	34	533	22	555	
Total	3,017	64	3,081	136	3,217	
	Budget	Contribution Technical Officers	Partner Contribution	Unavoidable Salary Pressure	Total Partner Contribution	
	2022 / 2023	2022 / 2023	2022 / 2023	2022 / 2023	2022 / 2023	
Budget 2022 / 23	£000's	£000's	£000's	£000's	£000's	
Bromsgrove District Council	439	6	445	26	471	
Redditch Borough Council	529	2	531	26	557	
Wyre Forest District Council	463	5	468	30	498	
Wychavon District Council	701	9	710	35	745	
Malvern Hills District Council	386	10	396	32	428	
Worcester City Council	499	34	533	29	562	
Total	3,017	66	3,083	178	3,261	

## **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 <sup>st</sup> 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

			Current Position			
Risk Description	Consequences	When is this likely to happen	Likelihood	Impact	Matrix RAG Status	Control measures
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. WFDC upgraded relevant systems including Windows, and staff hardware going through update process across 2019 and 2020.
Issues with the WRS database system	Impact on work planning. Self-help may not enable savings required	On-going	Low	High	Green	Re-tendering of the system is scheduled during 2020/21. Beyond this all work on the system will be treated as business as usual, with priority going to public access and self-help/ self-service to continue the channel shift process. Service website remains key access point and an upgrading process started in 2019. Tested disaster recovery of our Uniform back up and fail over to the business continuity server. Has been completed.
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 new depot successfully tested over Christmas period 2019. Staff used the old depot site during previous shut down of Wyre Forest House and the location was workable.
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.  Consultants are available to provide short term cover and this has worked well where we have used them to

						cover peak demand periods. 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.  Regional and sub-regional groups are in place so can provide shared resources for local authorities 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	Framework contract has multiple 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	Issues around access to the financial system from Wyre Forest House should be relieved with new BDC finance system procurement. Workarounds remain in place in the interim.
One or more partners continue to be under great financial pressure and may consider alternatives to the partnership to deliver their	Creates reputational issues for remaining partners and increases the need to manage overheads.  Difficulties in delivering highly varied	On-going	Medium	High	Amber	New legal agreement limits variations in contribution before partners have to move to contractual relationship but this is quite high before it kicks in (20%.) Leanness of organisation minimises overheads

service	levels of service					and focuses resource at the front line. Growth strategy should generate income to support partners in the future but capacity may be needed going forward to grow income streams.
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 does 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. Fewer interventions/ audits by government. Service has developed systems that follow the principles of the requirements of bodies like FSA so can show some level of compliance but service isn't operating to the letter of the current Code. The Code is however currently going through major changes.  Environmental reporting for Local Air Quality Management, Pollution Prevention and Control and Private Water Supply Inspection reports to Defra and DWI have received positive responses with no issues of concern raised by these bodies.
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