

Worcestershire  
**Regulatory Services**

*Supporting and protecting you*

# **Service Plan**

## **2021/22**

# **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 2020/21 with a total agreed budget from the district partners of £3.197M. This includes a budgetary uplift to cover a pay increase of up to 2% and the cost of increased pension contribution by the employer, this latter amount being significantly less than last year. It also includes funding for a number of posts for specific work either in a particular function or for a particular partner. Partners have recognised that there is a ceiling to the potential for income generation with the current officer capacity and that the fight against the pandemic will limit the service's ability to bring in income from a wider range of sources in the immediate future. Hence, the uplift in budget is welcome.

Plans for 2020/21 were overtaken by the response to the pandemic. Members will be clear that WRS led the local authority enforcement response to business controls and engaged in a number of Public Health related work-streams whilst trying to balance this with the normal activities that did not go away. The whole team developed consummate juggling skills if they didn't have them already. Whilst at the time of writing, Government is pushing forward with the vaccination programme and promising that normality will be restored by Spring, the Director of Public Health has been clear with us that the impact of Covid 19 is likely to be felt for much of 2021/22 and we should plan for this to be part of our work in the immediate future.

Alongside this, the Management Team have also been asked to review the financial platform for the service, particularly with respect to hosting costs. This work will commence during the summer so that we can present our IT and accommodation providing host with a financial settlement that takes some account of their increased costs since taking on these roles.

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 economic impacts and impacts on health and well-being. Whilst risk will remain a key criterion against which we deploy resources, using an intelligence-led approach continues to add an additional dimension to how the service works, 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. This was a key part of our response to the pandemic and will remain at the heart of service delivery moving forward.

Simon Wilkes  
Head of Worcestershire Regulatory Services

Kevin Dicks  
Chief Executive of Bromsgrove District and Redditch Borough

## 1. INTRODUCTION

This is the eleventh 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 details in appendices that follow on from the main commentary. The financial information covers the three-year accounting period 2021/22, 2022/23, and 2023/24 however the operational detail reflects the planned activities that the service will undertake in 2021/22.

2020/21 was a very testing year for WRS in terms of responding to the pandemic whilst keeping things moving in the day job and continue to deliver on income generation to support the budget. The service had to focus much of its resource on the compliance role for the various Covid control regimes that have been put in place over the year. We also had to put resources into the Local Outbreak Response Team, mainly focused on dealing with business outbreaks but dealing with other activities too. We also delivered the county wide programme of Covid Advisors and took on the Lost to Follow-up contact tracing of positive cases that the national system could not contact.

Many of our usual local authority customers decided to park some of the work we do for them, particularly during the first lockdown, although later some of this work came back on-line. Many of our Primary Authority (PA) businesses had a relatively quiet time, the opposite to Trading Standards colleagues whose businesses had to be supported with the switch to on-line trading. It looks like all of our PA business have so far survived the pandemic and we hope to get back to our usual work with them at some point during 2021/22. Likewise, it seems possible that the financial pressures all councils will be facing will help us with getting back existing customers and possibly some new ones too, as councils look for cost-effective alternatives to direct service delivery. One thing that didn't change last year was the need to investigate breaches of the law and a number of cases were put through to council legal departments. Full details of activity will be reported in the Annual Report to be produced at the end of May 2021 and reported to the Board in June.

The coming year is likely to be dominated by:

- The on-going response to the pandemic
- 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
- Continuing to develop and review practical procedures to maintain resilience and the benefits from service elements such as Legal Support 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. Managers will also be looking at costs with Officer members of the Board to come to an agreed cost model for the hosting of various elements of the service. This follows from the issues generated by Wyre Forest DC's desire to increase its charges for hosting IT functions and accommodation.

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: PESTELO Review**

### **2.1 Political**

The achievement of a deal with the EU just before New Year will take some of the uncertainty away from the current position but there is still significant uncertainty over the broader impacts. Whilst Government departments, business and the general public have been urged to prepare for Brexit, it is unclear how everything will work and businesses continue to ask for clarity in relation to their individual circumstances. The wider implications of Brexit also remain unclear, although much speculated upon; with reports indicating an adverse effect on the UK economy and a period of uncertainty or fluctuation. Furthermore, the future of the UK's laws is also uncertain, as it appears that the deal requires the UK to continue to have regulatory equivalence in many areas but government claims that divergence can and will occur. Only time will tell what the outcome will be.

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. The impact on the high street of the move to on-line trading is likely to be accelerated post pandemic, with the public unlikely to fully move back to their previous behaviours. This may cast doubt on the viability of this funding route, especially as many businesses are calling for an overhaul of the business rates model. There is also an increased number of local authorities now facing significant financial challenges due to the response to the pandemic, especially where this is alongside rising costs in areas such as social care and children's services.

### **2.2 Economic**

As the UK seeks post-Brexit trade deals, particularly with countries outside the EU, food and drinks manufactures 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. With the UK now being outside of the single market and other EU bodies, the international food code set by the World Health Organisation and the United Nations, becomes the international food standard by which UK food producers, processors and national food control agencies will have to operate<sup>1</sup>. Officers will work with businesses to understand any changes necessary.

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

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<sup>1</sup><http://www.ehn-online.com/news/article.aspx?id=16146>

the slow wage growth currently seen across the UK and the need for businesses to provide cheaper alternatives to consumers. Hopefully the EU deal will limit some of these issues but there is always a possibility that additional burdens and barriers to trade will increase costs that will feed through into prices. Nationally, some businesses are already complaining that there are already frictions and transaction costs are up significantly.

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 that are referred to WRS.

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 have increased by more than 50% since 2016. Some of this increase is because a proportion of cases have been referred by authorities who have decided not to use the 'planning checklist' created by WRS to assist planning officers in determining whether a consultation should be made to Environmental Health. This does provide a safety net for applications that may have something unusual about them but, at a time when financial pressures are high, perhaps this needs further consideration.

### **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 top 10% 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<sup>2</sup>. An increase in the level of public awareness is likely to lead to an increase in complaints, rightly or wrongly as other work has shown that the public are not very good at spotting unhygienic food businesses. We say rightly or wrongly as our own review of complaint data has indicated that, in general, the public are poor judges of when a food premise is not trading in a hygienic way. Only some 5% of premises subject to complaints about general hygiene matters we found to be so poor that their Food Hygiene Rating was downgraded. Hence, we try to use wider data before making visits to premises subject to such complaints.

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<sup>2</sup> <https://www.food.gov.uk/sites/default/files/media/document/biannual-public-attitudes-tracker-wave-16-final-270718.pdf>

## 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 "cross-border" hiring. The National Taxi Standards that the service will start to roll out this year should improve the public's experience of service and help level up across council areas but it may add to the financial burdens on operators, which could easily make app-based operating financially even more attractive.

Previous intelligence has suggested food safety offences could be being facilitated by third party websites such as Deliveroo, JustEat and Uber Eats through their provision of services to low scoring food takeaways. It was previously identified, for example, that non-complaint 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 later this 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. The ability for WRS to be able to take payments associated with licenses, environmental permits and stray dogs would improve the customer journey and could be considered by the partners.

## 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<sup>3</sup>. In January this year, 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<sup>4</sup>.

The draft 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

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<sup>3</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633270/air-quality-plan-detail.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf)

<sup>4</sup><https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation>



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. Environmental Groups have expressed concerns that the powers of the new body have been significantly watered down as the legislation has moved through Parliament, Time will tell as to what impacts this new body will have on local authorities discharging their responsibilities.

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 may also have wider impacts on local businesses.

## 2.6 Legal

The deal with the EU cements the current regulatory position linking us, for now, to shared EU standards for products. Government ensured, as part of the Withdrawal Act, that the current regulatory framework would be re-enacted into UK law where necessary. Legislation previously given effect by use of the European Communities Act 1972 remains in place by virtue of these provisions. The key questions will begin to arise when government chooses to move away from the framework or where it enters into new deals with third countries that require regulatory recognition of their standards that would otherwise not pass EU controls. The United States and its food products like hormone-fed beef and chlorine washed chicken are the kind of products that would not be allowed under the current legal framework, but they may appear (with or without labelling,) if the US regulatory regime was given regulatory equivalence with our own as part of a trade deal.

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<sup>5</sup>. 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<sup>6</sup>. It is realistic such regulations will lead to a greater number of enquiries from the general public. In spite of BREXIT, this system remains in place until the UK choses to deviate from it.

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 an Investigatory Powers Commissioner to oversee how powers are used<sup>7</sup>. 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.

The Food Standards Agency is, of our associated regulatory bodies, furthest down the road to reform and, although there were concerns that this could lead to dramatic changes to inspection regimes or other programmes where accredited, private sector, third party audit replacing inspection

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<sup>5</sup>[http://ec.europa.eu/justice/data-protection/reform/index\\_en.htm](http://ec.europa.eu/justice/data-protection/reform/index_en.htm)

<sup>6</sup><https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>

<sup>7</sup><https://www.gov.uk/government/collections/investigatory-powers-bill#investigatory-powers-bill>

by local authority or government officials, some of these fears have been allayed. Currently, the more radical proposals previously tabled have been withdrawn, however an amended code of practice that will be launched this year is likely to give more strength to 3<sup>rd</sup> party accreditation systems and require local authorities to take these into account when conducting their own inspections and audits. There is also a proposal to integrate the delivery of food hygiene and food standards which, at a local level, is understood to mean food safety regulation will become the sole responsibility of Environmental Health<sup>8</sup>, has also been removed. Agency spokespersons have said they see a clear role for Trading Standards in food law enforcement moving forward and the revised code of practice is likely to take a much more intelligence-led approach to food standards law enforcement, which fits with the Trading Standards operating model.

## **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'. This has been highlighted by one of the host authorities last year in terms of their costs for providing those services.

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 this 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, outlined previously, 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. The service will look to improve recording practices in these areas this year.

## **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

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<sup>8</sup><https://www.food.gov.uk/sites/default/files/rof-paper-july2017.pdf>

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 2021/22 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. No audits took place during 2020/21. 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 are requested by the legal agreement liaise about requests from their Overview and Scrutiny Committees and should use reasonable endeavours to agree joint scrutiny arrangements with a view to avoiding duplication of effort. Historically, WRS developed good working relationships with several of the district partners' Overview and Scrutiny Committees, leading to the positive re-enforcement of performance in those areas. It has been some time since we were asked to speak to any of these committees.

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 2021/22. Whilst the non-business customer satisfaction figures have improved in the past 12-18 months, work will continue to try to better understand the issues and improve performance during the coming year. A number of internal performance indicators have been introduced that should help with some of the issues raised by customers. Given the impact of Covid last year it has been difficult to fully review and embed these new internal measures but this will continue this 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 continues to perform well, given the current financial constraints, and it continues to contribute 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.

There is a specific section for pandemic related activity but it is difficult to know specifically what will be asked of us and how this will impact on resources. Currently, we have dedicated capacity in the Local Outbreak Response Team undertaking a range of duties, we are delivering the Covid Advisor project county-wide, are leading on the “lost to follow-up” activity where we try to contact positive cases missed by the national system and dealing with enforcement of the various business controls. With the roll-out of vaccines planned for the coming months and already seeing some delayed from the originally planned timescales, we will have to plan for similar input to the current levels at least for the first quarter of the year and possibly the second too. That means a commitment of around 15FTE from the existing WRS staffing cohort and, whilst some of the activity will hopefully still be funded and allow the service to bring in additional capacity, the enforcement activity is unlikely to be funded from external sources.

	<b>OUTCOME</b>	<b>WHAT WE WILL DO</b>	<b>PURPOSE</b>	<b>NATIONAL PRIORITY</b>	<b>MEASURES</b>
1	Response to the Covid 19 pandemic	<p>Provide enforcement capacity to tackle non-compliance with any control regime remaining in place</p> <p>Be part of the local Outbreak Response Team, focused on dealing with outbreaks on business premises and undertaking backwards contract tracing to establish infection patterns and causes within communities.</p> <p>To deliver other Covid related activities either to support contact tracing or community compliance such as Covid Advisors or Local Contact Tracing systems</p>	<p>I want to assume everything is ok.</p> <p>Help me trade well and ensure my competitors do the same</p>	4	<ul style="list-style-type: none"> <li>• Number of cases handled on behalf of the LORT leading to breaches</li> <li>• Number of formal actions undertaken</li> <li>• Number of formal warnings</li> </ul>
2	Businesses are supported to become economically successful and compliant with the law (Pollution, H&S, Food Safety, Licensing)	<p>Provide businesses with advice and assistance using a range of channels.</p> <p>Conduct risk based/ intelligence-led interventions with businesses;</p>	<p>I want to assume everything is ok.</p> <p>Help me trade well and ensure my competitors do the same</p>	1, 2, 3 and 5	<p>% food businesses broadly compliant at first visit/ inspection</p> <p>% of service requests where resolution is achieved to business satisfaction</p>

		targeting resources towards potentially non-compliant businesses.			% of food businesses scoring 0,1,2* at 1 <sup>st</sup> April each year
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3	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	<b>2, 3 and 4</b>	% of service requests where resolution is achieved to customers satisfaction  Rate of noise complaint per 1000 head of population
4	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	<b>2 and 4</b>	% 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
5	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	<b>1 and 3</b>	% of licensed businesses subject to allegations of not upholding the 4 licensing objectives
6	Hackney Carriage and Private Hire Drivers Licence applications are processed in a timely manner and that all	Safeguard and ensure that all licence applications are processed in a timely manner and those granted meet the fit and proper	I want to assume everything is ok  Help me to solve my	<b>1 and 3</b>	% of drivers licence renewal applications issued within 5 working days.

	drivers and operators granted licenses meet the fit and proper test.  Vehicles in use by the Taxi trades are fit whilst in service	test.  Undertake a number of enforcement interventions to test compliance	problem and stop it from happening to anyone else  Help me trade well and ensure my competitors do the same		Vehicles requiring work or taken off the road following intervention (Number and % of the total fleet.)
7	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	<b>4 and 5</b>	% businesses meeting purpose at first assessment/ inspection  Number of 4* and 5* business signing up for the Healthy Eating Award
8	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	<b>1, 2, 3 and 5</b>	% of service requests where resolution is achieved to customers satisfaction  % of service requests where resolution is achieved to business satisfaction
9	Having engaged and satisfied staff who have the right skills, tools and support	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	<b>1, 2, 3, 4 and 5</b>	Staff sickness and absence at public sector national average or better  % of staff who enjoy working for WRS

10	Maintained preparedness for response to emergencies, including disease outbreaks.	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	<b>1 2, 3, 4 and 5</b>	Disease response plans are maintained, reviewed and updated on a regular basis  Business Continuity plans are maintained, reviewed and updated on a regular basis
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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. Many of these could not be taken forward during 2020/21 due to the pandemic so this year should see them being delivered, assuming the pandemic is under control. With a number of intelligence gaps or limitations identified, it is recommended these are considered and, where necessary, action 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 included the things listed below. Some are from last year and will be carried forward into this:

- **A monthly assessment of alcohol premises**

This was delivered and now forms part of the non-domestic section of the routine, bi-monthly tactical assessment.

- **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. This still needs to be looked at, following a discussion about cross team action and triaging complaints, which may free up capacity but also lead to a greater consideration of intelligence products by team managers/SPs.

- **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. This is on the work plan for the Technical Services team during 2021/22.

- **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 was recommended that intelligence analysis is undertaken to assess any similarities between cases and identify opportunities for prevention and/or enforcement action. This was completed and led to the inclusion of the micro-chipping project in this year's plan.

- **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 a project should include, or be considered by,



Worcestershire Trading Standards Service. This work needs to carry on into 2021/22. The Trading Standards team have started following up on intelligence from Environmental Health and Licensing activities so the results will be followed up during 2021/22.

- **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. Given the impact of Covid on the Care sector, at this stage we have parked this project. It may be picked up at a later date once the impacts of the pandemic have come out of the system.

- **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. This is a piece of strategic work that we will look to take forward in 2021/22 as it may inform alternative approaches to tackling persistent nuisance issues

- **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. The key elements of this are now picked up in the bi-monthly tactical assessment so should lead to more consistent interventions.

- **An intelligence product relating to illegal puppy breeding**

Worcestershire Regulatory Services officers and Worcestershire Trading Standards Service are known to receive/obtain a range of information relating to the sale/ownership of dogs. Such information is likely to identify illegal breeding activity and this requirement would aid the collation of this information to identify and analyse where this maybe apparent.

## **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.

The pandemic has led to the Agency deferring the majority of proactive work that would normally take place within food control. A list of areas that we needed to remain engaged with was provided and the service has endeavoured to discharge these. However, it does mean that there is a significant back log of work to be undertaken and the Agency has yet to outline how it expects local authorities to deal with this. Initial estimates indicate around 1939 visits will be overdue from last year and this will add to the overdue visits from the previous year. Clearly this creates an issue but it is one that the majority of local services will find themselves with.

We are unlikely to know what the Agency is going to ask for until after members have signed off this plan. Hence, there will be a significant number of overdue visits, beyond what could be delivered without significant additional resources and at this stage we cannot tell members what the Agency's intentions are. The Agency has already taken the decision to extend its moratorium on the usual work programme until 30<sup>th</sup> June 2021, so it seems likely that both members and officers will need to wait for a clear picture of what the Agency's future expectations will be. In terms of resource, the service normally commits 8-12 FTE between October and March to deliver the bulk of the food work programme each year, so an annualised equivalent of 4-6 FTE posts. This is the level of investment that may be needed to catch up but it may be possible to spread this over several years, depending on what the Agency asks. Given the breadth of local authorities that will be in the same situation and the limited availability of agency staff, it is doubtful that the Agency will be able to require the catch up to be achieved within 12 months. The team is looking at what resource can be carved out but until Covid demands abate, it will be difficult to allocate resource to this area, especially going into the Summer when nuisance demand peaks.

The table below is our best estimate currently of where we will be in terms of visits due and what we will be able to discharge with current resource based on the assumption that visits can be delivered normally from September onwards.

<b>Element of Food plan</b>	<b>Visits that would otherwise be scheduled</b>	<b>Visits deliverable with existing resources assuming normality is restored by the end of Q2</b>
<b>Estimated number of Food Hygiene visits scheduled for 2021/22 (based on the Food Hygiene rating system.)</b>	1900, of which about 1000 will be in the higher risk bands A, B, or C.	If we are able to resume 'full' service from June we could achieve half and would only do higher risk visits 950
<b>Estimated number of premises scheduled for alternative approaches to inspection during 2021/22</b>	1100	500
<b>Estimated number of new registrations/ unrated premises that will require inspection during 2021/22</b>	800, of which about one-third will be low risk and can be dealt with by questionnaires	400
<b>Estimated number of overdue premises assessed as requiring a visit during 2021/22</b>	1939 from last year plus those previously identified on the system that would otherwise have been picked up during 2020/21	With existing resource, capacity could cover 250, depending on when visits can re-commence

These figures should give members a reasonable picture of the volume of pro-active food hygiene related activity that should take place during 2021/22, depending on the on-going impact of the pandemic.

## **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. These are listed as appendix C.

## **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 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.

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 2021/22 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. The County Council last year asked the service to deliver the Safety at Sports Ground function and this

will continue through 2021/22. WRS is also delivering petroleum licensing activities for the County Council alongside the petrol vapour recovery work of the Environmental Permitting team.

## **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. This paid dividends in the pandemic response as it allowed us to move people into either directly servicing the pandemic response or to backfill that capacity in high demand areas like nuisance. At one point, 3 members of the Technical Services team were moved into the Community E.H. Team to deliver our normal Environmental Health work whilst some of that team joined the Local Outbreak Response Team.

Within Licensing, the pandemic gave the opportunity to review administrative processes and reduce the burden of several paper systems. This has allowed officers to look proactively at enforcement across the districts and this will be a focus for the next 12 months. There are some disciplines within licensing that our competent qualified technical officers require training within such as caravan licensing and animal health and this will be the focus to ensure that no officer only has experience of just 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**

There is no doubt that the Covid 19 pandemic has tested the business continuity plans of the service and it has risen to the challenges. The decision by the six districts to have a single Environmental Health service has paid dividends in terms of the service's ability to balance pandemic controls with business as usual activities. It is doubtful that six separate services, subject to similar levels of financial reduction over the past 10 years could have responded as well as the shared service.

Business continuity plans for the service were developed and have been 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 remains 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. Throughout the pandemic, the service has engaged with the "One Worcestershire" approach to recovery and business support, engaging with Economic Development colleagues as part of the recovery group. Things like the Business Charter for Regulators, launched during 2012, will continue to inform how we engage with the business community in Worcestershire and we hope that the LEP and others will continue to champion the service and our balanced approach to regulation and enforcement. We wait to see how government's "levelling up" agenda will interface with the LEP-led local Industrial Strategy. Previously, Government has seen this as a way of translating national policy on creating economic growth into local action and, where possible, we will look to support this.

## **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.

Locally, the service has made a good commitment to engaging with the agenda around organised crime. Serious Organised Crime groups are a key target for policing at regional and national level. Business premises are a good way of providing a vehicle for the laundering of money as are property purchases in general. Modern day slavery and other forms of exploitation are now part of what officers are asked to keep an eye out for when visiting businesses. This goes well beyond what Trading Standards colleagues have traditionally dealt with in doorstep crime and scams and builds on the work of licensing colleagues in relation to addressing CSE. The service has seats at the Serious and Organised Crime Joint Actions Groups (SOCJAG,) in the county and regularly contributes to Multi-Agency Tasked Enforcement (MATES,) interventions with the police and other enforcement partners from various agencies.

#### **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.

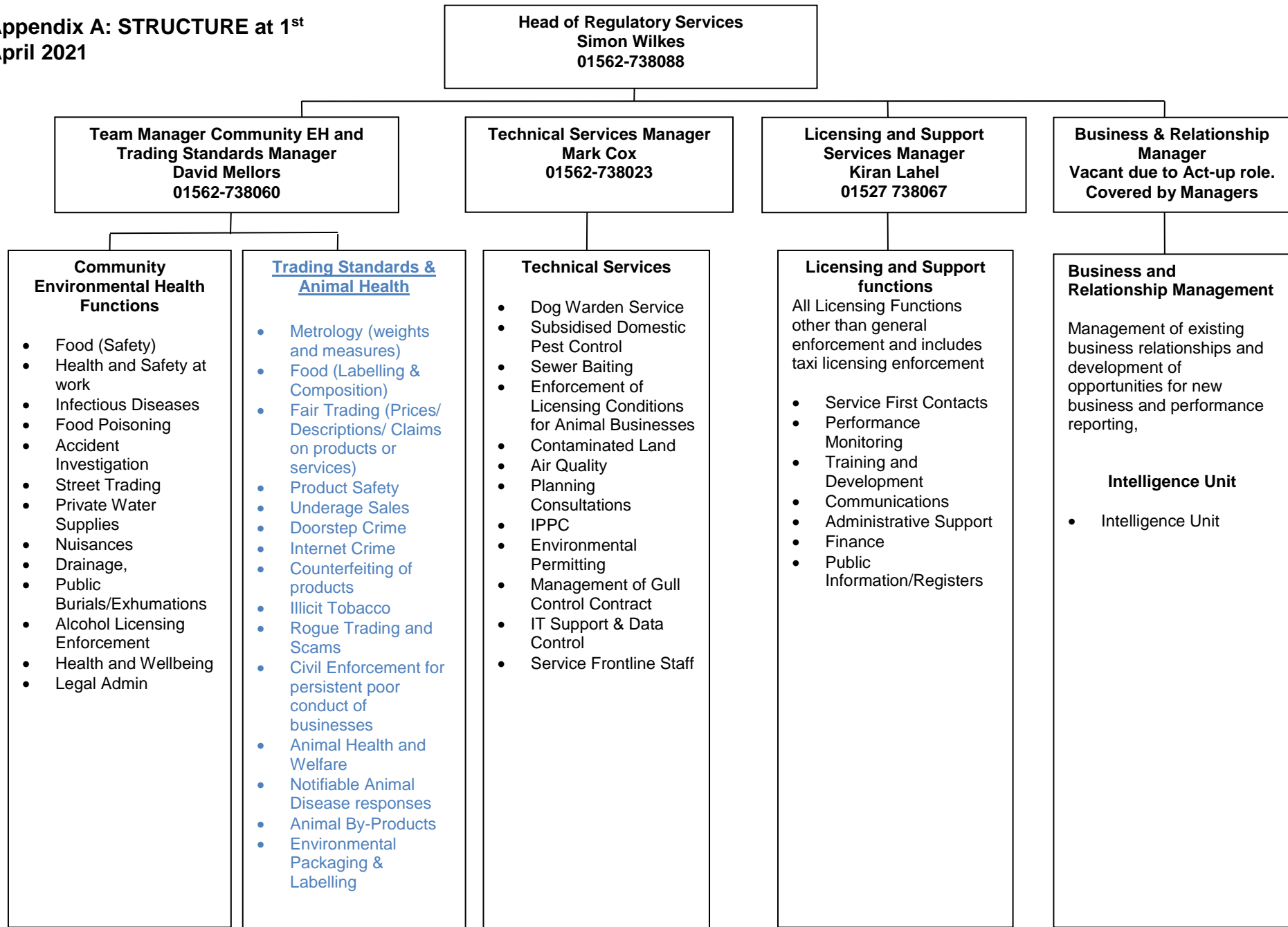
## **15. GOVERNANCE**

The current arrangements came into force on 1<sup>st</sup> April 2016 following the departure of the county Council from the formal partnership. 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. A review of funding, focused on hosting costs will be undertaken during 2021/22.

## **16. RISKS**

A copy of the current Risk Register is appended at Appendix D and has been reviewed and updated for this plan. The impact of the pandemic has created some risks around whether all customers will come back, but so far we have had positive news from most. The number of commercial contracts and obligations increases still carries risk, 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. The good news is that the pandemic has confirmed our preparedness for a number of the eventualities identified and we have been able to continue to function well in most work areas throughout.

**Appendix A: STRUCTURE at 1<sup>st</sup>  
April 2021**





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

**Account description**

	<b>Budget</b>	<b>Budget</b>	<b>Budget</b>
	<b>2021 / 2022</b>	<b>2022 / 2023</b>	<b>2023 / 2024</b>
	<b>£000's</b>	<b>£000's</b>	<b>£000's</b>
<b>Employees</b>			
Monthly salaries	2,935	3,012	3,090
Training for professional qualifications	0	0	0
Medical fees (employees')	2	2	2
Employers' liability insurance	25	25	25
Employees' professional subscriptions	2	2	2
<b>Sub-Total - Employees</b>	<b>2,964</b>	<b>3,041</b>	<b>3,119</b>
<b>Premises</b>			
Rents	52	52	52
Room hire	2	2	2
Trade Waste	1	1	1
<b>Sub-Total - Premises</b>	<b>55</b>	<b>55</b>	<b>55</b>
<b>Transport</b>			
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
<b>Sub-Total - Transport</b>	<b>105</b>	<b>105</b>	<b>105</b>

**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	19	19	19
Printing and stationery	17	17	17
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
<b>Sub-Total - Supplies &amp; Service</b>	<b>356</b>	<b>356</b>	<b>356</b>

**Contractors**

Consultants / Contractors' fees/charges/SLA's	229	229	229
Advertising (general)	5	5	5
Grants and subscriptions	11	11	11
Marketing/promotion/publicity	2	2	2
<b>Sub-Total - Contractors</b>	<b>247</b>	<b>247</b>	<b>247</b>

**Income**

Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc	-372	-372	-372
<b>Sub-Total - Income</b>	<b>-372</b>	<b>-372</b>	<b>-372</b>

**Income**

From partners for Technical Officers	-97	-100	-104
<b>Sub-Total - Income</b>	<b>-97</b>	<b>-100</b>	<b>-104</b>

**Additional Income**

Income to be found due to unavoidable salary pressures

**Sub-Total - Income****DISTRICT PARTNERSHIP BUDGET****21-22 Partner Percentages**

Bromsgrove District Council	14.59%
Malvern Hills District Council	12.82%
Redditch Borough Council	17.57%
Worcester City Council	16.58%
Wychavon District Council	23.29%
Wyre Forest District Council	15.15%
<b>Total</b>	<b>100.00%</b>

	-60	-134	-208
	-60	-134	-208
	3,197	3,197	3,197

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 Pressures	Total Partner Contribution
	2021 / 2022	2021 / 2022	2021 / 2022	2021 / 2022	2021 / 2022
	£000's	£000's	£000's	£000's	£000's
<b>Budget 2021 / 22</b>					
Bromsgrove District Council	466	11	477	9	486
Malvern Hills District Council	410	14	424	8	432
Redditch Borough Council	562	8	570	10	580
Worcester City Council	530	39	569	10	579
Wychavon District Council	745	16	761	14	775
Wyre Forest District Council	484	10	494	9	503
<b>Total</b>	<b>3,197</b>	<b>98</b>	<b>3,295</b>	<b>60</b>	<b>3,355</b>
	Budget	Contribution Technical Officers	Partner Contribution	Unavoidable Salary Pressures	Total Partner Contribution
	2022 / 2023	2022 / 2023	2022 / 2023	2022 / 2023	2022 / 2023
	£000's	£000's	£000's	£000's	£000's
<b>Budget 2022 / 23</b>					
Bromsgrove District Council	466	12	478	20	498
Malvern Hills District Council	410	14	424	18	442
Redditch Borough Council	562	8	570	23	593
Worcester City Council	530	39	569	22	591
Wychavon District Council	745	18	763	31	794
Wyre Forest District Council	484	10	494	20	514
<b>Total</b>	<b>3,197</b>	<b>101</b>	<b>3,298</b>	<b>134</b>	<b>3,432</b>
	Budget	Contribution Technical Officers	Partner Contribution	Unavoidable Salary Pressures	Total Partner Contribution
	2023 / 2024	2023 / 2024	2023 / 2024	2023 / 2024	2023 / 2024
	£000's	£000's	£000's	£000's	£000's
<b>Budget 2023 / 24</b>					
Bromsgrove District Council	466	12	478	31	509
Malvern Hills District Council	410	15	425	28	453
Redditch Borough Council	562	8	570	36	606
Worcester City Council	530	40	570	34	604
Wychavon District Council	745	18	763	48	811
Wyre Forest District Council	484	10	494	31	525
<b>Total</b>	<b>3,197</b>	<b>103</b>	<b>3,300</b>	<b>208</b>	<b>3,508</b>

## 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

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. WFDC upgraded relevant systems including Windows. The service is in the process of moving to Office 365 during 2021/22, which will provide better access to a range of provisions including Microsoft Teams and Power BI
Issues with the WRS database system	Impact on work planning. Self-help may not enable savings required	On-going	Low	High	Green	The contract has been retendered and awarded through the CCS framework for a two-year term with a view to moving to a cloud based system via a tendering process at that point. This will begin to be investigated next year.
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	The pandemic has shown that we were well prepared for the need to maximise working from home and now all staff, including some previously regarded as office based can now do this. Touchdown stations remain available in partner council locations. Working from WFDC new depot was not required in 2020 because of the other steps taken. Managers can look at whether a further reduction in space occupied is feasible once the end of pandemic controls is reached.
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	The pandemic response has shown that the service was well-placed to respond and less than a handful of officers have themselves suffered the illness. Consultants are available to provide short term cover

						<p>and, whilst this worked well in peace-time to cover peak demand periods, the pandemic has revealed the limits to this type of capacity. These pressures will only be resolved in the longer term by local and central government investing in additional capacity and additional training to bring more people into the regulatory professions.</p> <p>Having taken on contracts with additional authorities the demand has increased and neighbouring authorities have lost the ability to assist with some technical specialisms. This is the double edged sword of effectively operating as a centre of excellence. Whilst we have good resource of our own, in event of an issue, there are limits to who we can ask for help. Regional and sub-regional groups are in place so can provide shared resources for local authorities if required.</p> <p>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.</p> <p>Regular inventory and maintenance of equipment is undertaken. In the future, budget for replace may be an issue but would be a relatively small amount for partners to share.</p>
Pest contractors cease operations.	Disruption to service. Negative media coverage. Increased public health risks	On-going	Low	High	<b>Green</b>	The Pest control framework contract has multiple pest control suppliers so the loss of one allows work to be moved to the others. This should limit or eliminate risk, although the unlikely loss of multiple companies might create capacity issues.
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	<b>Green</b>	The Out of Hours and Kennelling contracts are currently being tendered to enhance the existing arrangements and provide resilience.



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	<b>Amber</b>	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 service	Creates reputational issues for remaining partners and increases the need to manage overheads. Difficulties in delivering highly varied levels of service	On-going	Medium	High	<b>Amber</b>	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 and focuses resource at the front line. Growth strategy should generate income to support partners in the future but there are limits to this without additional capacity being added to the system. Invest to save capacity has been committed by partners to see if this achieves the necessary outcomes.
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	<b>Green</b>	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	<b>Amber</b>	Limited detail of what statutory minima are can make decision making difficult around what is required in law as a minimum.  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 and likely to move to a point where it is closer to the WRS model of

						<p>operation.</p> <p>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.</p>
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	<b>Green</b>	<p>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</p>