

Worcestershire
Regulatory Services

Supporting and protecting you

Service Plan

2022/23

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, outlining 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, and indicating at a high level what activities the service will carry out to achieve or address those priorities and how success will be measured. The Service will enter 2022/23 with a total agreed budget from the district partners of £3.257M. This includes a budgetary uplift to cover a pay increase of up to 2% and the cost of increased pension contributions 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. 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 continue to 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 2021/22 recognised the on-going contribution of the service to the pandemic response, which has yet to relent fully. Indeed, as the year went on, whilst enforcement responsibilities declined as business restrictions were relaxed, the need for Covid Advisor support in various guises remained essential and the service took on the new responsibility of local contact tracing. It has to be said that none of this would have been possible without the financial support from Public Health colleagues at the County Council, and we hope that they continue to recognise our efforts in contributing to the response in 2022/23. During last year, the service kept the Board apprised of activities, both Covid related and business as usual work, as clearly the latter did not go away. Officers continued to develop the skills of juggling the various demands placed upon them. At the time of writing, Government has been clear that it thinks the current wave of infections can be ridden without the need for the introduction of further measures, but the on-going vaccination programme and the contact tracing demands due to high case numbers, continue to create significant demands for our service. Uncertainty over what the world will look like in the Spring remains, but Government has agreed to roll forward the current Covid grant funding into the new financial year, so we must assume WRS will continue to have at least some engagement with pandemic measures for a period of 2022/23 and we should plan for this.

The service will also continue to pursue work for other local authorities. It will be interesting to see whether the pandemic has increased appetites for our support and particularly what impact the "Levelling Up" White Paper has on the focus of councils in two-tier areas. 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, intelligence will be a major contributor, especially in relation to issues which cut across our teams. 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

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Executive Director of Resources Bromsgrove District and Redditch Borough Councils

1. INTRODUCTION

This is the twelfth 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 2022/23, 2023/24, and 2024/25 however the operational detail reflects the planned activities that the service will undertake in 2022/23.

2021/22 was another very testing year for WRS in terms of responding to the pandemic whilst keeping things moving in the day job and continuing to deliver on income generation to support the budget. The service had to respond to the various changes in the regime of Covid business controls and maintained an embedded resource within the Local Outbreak Response Team, mainly focused on dealing with business outbreaks but also other activities. We continued to deliver the county wide programme of Covid Advisors and the Lost to Follow-up contact tracing of positive cases that the national system could not contact, which later transformed into us delivering local contact tracing and taking some of the initial calls instead of the national system.

Work from our usual local authority customers continued to come in, albeit at a slightly reduced level, and a number of our Primary Authority relationships that had been semi-dormant during the most stringent of pandemic controls began to come to life as businesses responded to the re-opening of the economy. It looks like all of our Primary Authority business have so far survived the pandemic and we hope to re-build our working relationships with them during the coming 12 months.

It is probably too early to say whether the experience of the past 2 years will lead to more local authorities seeking our support. The long-awaited Devolution White Paper that is now to be the Levelling Up White Paper is likely to shape local authority thinking in the coming few years. Whilst Government has been clear that re-organisation from the top down is not on the cards, some areas may see this as the only way forward and others may become more focused on co-operation within their county boundaries in two tier areas. Time will tell what impact this will have on our ability to generate income. One thing that didn't change during the pandemic 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 2022 and reported to the Board in June.

The coming year is likely to be dominated by:

- The continuing response to the pandemic
- Following up on the Food Standards Agency's roadmap to recovery for food law enforcement,
- Trying to find innovative ways to tackle cross cutting issues,
- Seeking new, and maintaining existing, income streams to help support local delivery,
- The further development of the WRS website to better enable public interaction,

- 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 and the Intel Unit that provide operational support to both WRS and Trading Standards functions

The focus on income generation will be to target areas of greatest benefit in terms of economies of scale, the required resource intensity and income reward. 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. We will also continue to work with colleagues from various districts to see what functions might reasonably be added to the WRS platform to improve delivery and possibly deliver some savings through economies of scale. Such changes may not cover all partners but all partners need to agree if other partners wish to add functions to what WRS delivers on their behalf. We will also continue to engage with the County Council around its relationship with the partnership.

The website is now built on an updated version of the software platform on which it operates. This has allowed us to improve the look of the system but we hope to also improve the functionality too. We will have further discussions with partners about whether payments may be enabled but this will have significant cost implications for the partners and it has been felt that, during the pandemic, there have been too many pressures on both staff time and local authority finances to give this serious thought.

2. OPERATING ENVIRONMENT: PESTELO Review

2.1 Political

The UK withdrawal from the European Union (EU), commonly known as 'Brexit', continues to be a significant factor in the political landscape. The UK officially left the EU on 31st January 2020 but remained in the EU single market and customs union during a twelve-month transition period. This period ended on 31st December 2020 however, whilst the UK and EU have been operating under a trade and cooperation agreement, there continues to be uncertainty as to how future trade will be conducted with EU member states. The agreement, for example, does not cover certain aspects of financial services or the exportation of food products¹. In addition, there are broader trade concerns as the UK seeks trade agreements with other nations.

¹https://ec.europa.eu/info/strategy/relations-non-eu-countries/relations-united-kingdom/eu-uk-trade-and-cooperation-agreement_en

Aside from trade, the future of the UK's laws is also uncertain, particularly where they originate from EU directives such as those relating to employment standards, environmental protection, and food safety. The UK Withdrawal Act 2018 effectively transferred EU laws onto the UK books, and gave ministers powers to amend laws using secondary legislation².

2.2 Economic

The impacts of Brexit, whilst uncertain, are forecast to be worse in the long run compared to the Coronavirus pandemic³. Recent forecasts suggest that leaving the EU will reduce the UK's potential gross domestic product (GDP) by 4%, whilst the pandemic would reduce GDP by a further 2%. A shrinking economy can result in lower wages, job losses, restricted access to credit, and general fear or uncertainty. Whilst this affects large and small businesses, the latter generally faces greater challenges due to a lack of cash reserves and working capital. From a short-term perspective, the impacts of Brexit have seen significant disruptions to supply chains caused by delays at ports and contributed to shortages of delivery drivers.

As the UK seeks post Brexit trade deals, particularly with countries outside the EU, food and drinks manufactures are seeking 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 which are issued by local authorities to confirm that goods meet health requirements of the destination country.

The pandemic continues to pose additional financial uncertainty for businesses and consumers. The implementation of restrictions (such as national lockdowns), and the varying of those restrictions at times, or within different regions, meant that business sectors had to close and/or could only operate under certain conditions. The travel sector, for example has faced ongoing uncertainty due to border closures and countries having differing travel requirements. The hospitality and events industries were largely required cease trading or change their method of operation to trade outdoors or offer delivery services. Whilst businesses have been able to access financial support (e.g. the job retention scheme or business rates relief), this has failed to cover the full financial obligations of businesses and the level of support as varied by sector. Although many businesses will continue to trade, some will be forced to close or enter administration.

From a consumer perspective, the cost of living has continued to rise with inflation at its highest rate for ten years⁴. The rate of inflation impacts upon the cost of goods and services with, for example, household energy, petrol, used car, hotel, clothing, household goods, and raw material prices becoming more expensive in the past twelve months. In addition, the Food and Drink Federation has recently warned that consumers will

²<https://www.instituteforgovernment.org.uk/explainers/eu-withdrawal-act>

³<https://www.bbc.co.uk/news/business-59070020>

⁴<https://www.bbc.co.uk/news/business-59316544>

inevitably face higher food and drink prices if manufactures are forced to absorb the cost of proposed Government policies during the few years⁵. Their report entitled “Eating into household budgets: The Government’s “recipe for food price inflation” states that the price of shopping per household could increase by more than £160 per year.

Economic uncertainties, whether caused by Brexit, the pandemic, or a rise in the cost of living may lead to businesses needing to provide cheaper alternatives or implement cost cutting measures. Both are of concern to regulatory bodies as they are more likely to result in non-compliances and fraud.

Whilst the above highlights economic uncertainty, there continues to be a drive for local development. The West Midlands Industrial Strategy aims to bring investment into the conurbation which, in turn, will influence developments in North Worcestershire and bring business opportunities to the County along the M42 corridor. Further developments are also likely following rail improvements such as the completion of Worcestershire Parkway and the ongoing HS2 project. Aside from commercial development, the drive for affordable housing remains a national priority. As district councils strive to reach housing targets, developments are being considered on available land, including brownfield and some greenfield sites. In addition, planning reforms continue to be discussed which aim to implement housing targets for local authorities, digitize the planning process, replace ‘Section 106 obligations’ with a national levy, and create a traffic light system for land classification⁶.

Any developments, whether commercial or residential, could impact upon the volume of planning enquiries received by WRS. Over a five-year period, there has been a 76% increase in the volume of planning enquiries referred to the service by planning departments. Whilst most cases have been received from Worcestershire authorities, approximately 1 in 5 enquiries has been undertaken on behalf of contract authorities including Gloucester City Council, Tewkesbury Borough Council, and Mendip District Council. Approximately 90% of planning enquiries have been consultations, whilst 50% have related to contaminated land. Planning authorities are required to consider air quality, contaminated land, and nuisance.

2.3 Social

As outlined previously, there has been a well-documented increase in the number of households purchasing dogs during COVID restrictions. The price of certain breeds was reported to have double during the initial lockdown with dogs, on average, costing around £1,900. This led to a significant increase in the number of breeders, particularly unlicensed breeders, as people sought to supplement lost income and/or expand existing hobbies. The Dogs Trust are now reporting, however, that owners are reconsidering owning pet as their circumstances have changed following the easing of restrictions. This has resulted in a 35% increase in calls from people looking to ‘give up’ their dog⁷. Where dogs become

⁵<https://www.fdf.org.uk/dfd/news-media/press-releases/2021-press-releases/cost-of-government-regulation-will-mean-higher-food-prices-for-consumers>

⁶<https://www.homebuilding.co.uk/news/planning-reforms>

⁷<https://www.bbc.co.uk/news/uk-58518892>

unwanted pets, this could lead to an increase in the number of stray dogs and/or the number of complaints about noise from barking dogs left unattended. In addition, the Dogs Trust also state there has been a 66% increase in puppies requiring assistance from their puppy pilot scheme which rehabilitates and rehomes dogs that have been seized (and quarantined) after being illegally imported into the country⁸. There has also been an increase in breeders offering to mutilate (ear cropping) puppies to follow a social media trend.

A study commissioned for the Department for Food, Environment and Rural Affairs (Defra) has found that, whilst diets are slowly changing, UK consumers are not meeting the standards required for a healthy diet. There have been reductions in salt, sugar, and red and processed meat consumption, but consumption of fruit, vegetables, and fibre, has shown little or no change⁹. The study also found that, although consumers continue to buy food from large supermarkets, other forms of retailer (e.g. mini supermarkets) and the online grocery market (vegetable boxes, Hello Fresh etc.) have increased in popularity. In terms of the 'out-of-home environment', there has been significant growth in the proportion of individuals eating out on a regular basis, whilst digital technology has contributed towards the expansion of online food delivery platforms such as Deliveroo, Just Eat, and Uber Eats. As a final consideration, the study found that there has been an increase in the sale of ethical and sustainable products over the last ten years, including the consumption of plant-based meals. In addition, whilst consumers are concerned about food provenance and safety, this is dependent on the food group, and other factors such as price, availability, and quality. There are, however, more people choosing to adopt specific diets such as vegan or flexitarian.

The Licensed Private Hire Car Association have stated that more than half of the licensed taxi drivers in the UK have not returned to the trade since the pandemic. This scale of loss has not been seen across the country but there has been a reduction. In some parts of the country, the shortage has prompted concerns of the safety of women, students, and night-time workers struggling to get home¹⁰ and several councils have responded by cutting the cost of a licence, whilst the Department for Transport has stated it plans to revise taxi licensing guidelines in 2022.

There has been a significant increase in the number of drink spiking incidents reported to Police forces across the UK in recent months. Whilst drink spiking is not directly investigated by WRS, the National Police Chief's Council state that most cases have involved young women and have taken place at licensed premises or private parties¹¹. There have been calls for drink covers, better training for night-life staff, and for more rigorous searches of clubbers. Campaigners have also called for dedicated welfare staff within venues to help people get home safely.

⁸https://www.dogstrust.org.uk/about-us/accounts-annual-reviews/annual-report/dt_annualreport2020_v21_final.pdf

⁹https://www.rand.org/content/dam/rand/pubs/research_reports/RR4300/RR4379/RAND_RR4379.pdf

¹⁰<https://www.bbc.co.uk/news/business-59158230>

¹¹<https://www.theguardian.com/uk-news/2021/oct/23/hundreds-of-uk-drink-spiking-reports-in-the-past-two-months>

2.4 Technological

The development of technology continues to play a significant role in modern society, with the UK previously identified as one of the most cyber-dependant economies of G20 member nations. Technology is increasingly used, therefore, to commit criminal offences. This poses a threat to local authorities who are often ill-equipped to investigate such matters; particularly where the offence relates to social media platforms like Facebook and Instagram. This was emphasised several years ago when Government, as part of a wider strategy, created the National Trading Standards eCrime Team to monitor and investigate consumer and business frauds. Whilst the use of technology has not been significantly referenced previously, the most prominent offences enabled by technology relate to unlicensed or unregistered dog breeding, scrap metal, food, and taxi services advertising via websites or “buy and sell groups”. Facebook has also become a prominent place to report stray dogs, app-based private hire booking systems are becoming increasingly popular, and technology has been used during the pandemic to circulate ant-COVID rhetoric.

A recent study of shopping behaviour in the UK suggests that there has been strong shift towards online purchases in the past year¹². This shift has, of course, been driven by the pandemic and the need for consumers to restrict their movements to ‘essential journeys’. The study also suggests that shopping habits continue to be driven by convenience, home delivery and availability; whilst over third of consumers have completed a purchase via a mobile app. There has also been an increase in the proportion of consumers utilising a research-based approach prior to purchasing; however, this is largely driven by older consumers (persons aged 45 and above). Separate studies suggest that consumers would be more likely to shop for fresh and packaged food online in future due to the pandemic¹³, whilst the most prominent platforms to purchase from included the major supermarket chains¹⁴. As outlined above, there has also been significant expansion of online food delivery platforms.

Whilst technology poses a threat to local authorities, it also provides significant opportunities as WRS can promote its services and circulate guidance to wider audiences via its website and social media feeds. It can also operate more efficiently by accepting online payments, updating customers via public access, and referring complainants to more suitable organisations. In addition, the development of technology provides additional opportunities for the service, and its partners, to prevent, detect, and disrupt crime, whether through the sharing of intelligence or via tactical action.

¹²<https://www.thinkwithgoogle.com/intl/en-gb/consumer-insights/consumer-trends/consumers-adapted-shopping-behaviour-covid>

¹³<https://www.statista.com/statistics/1232115/uk-shoppers-that-will-mostly-shop-online-by-category/>

¹⁴<https://www.statista.com/forecasts/870307/united-kingdom-top-online-stores-united-kingdom-ecommercedb>

2.5 Environmental

Local authorities have a responsibility to regularly review and assess air quality in their areas against national objectives. Where areas are unlikely to meet the objectives, they must be designated Air Quality Management Areas and action taken to work towards meeting the objectives. Whilst regulations refer to several pollutants, nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) are of primary concern and are commonly connected to combustion processes for fossil fuels such as vehicle exhaust emissions and industrial processes. The implementation of restrictions, particularly lockdowns and home working requirements are likely to have led to greatly improved air quality across the country during the periods when traffic was limited. Research has indicated that cities and large towns have experienced a 38% reduction in the level of NO₂ concentrations, whilst monitoring data within Worcestershire has also identified general improvements. Despite this, there continues to be areas of concern and seven air quality management areas remain in force across the county. Any changes to the status of areas, however, is dependent on reliable long-term data being available for assessment. This can only begin once public behaviour return to 'normal' (whatever that looks like in a post restriction environment). It is not known, for example, whether the levels of travel will return to those seen in 2019, or whether flexible working will mean more people continue to work from home. Air quality monitoring continues to be a significant factor in the planning and environmental permitting processes.

The AQMAs in Worcestershire include:

- Welch Gate, Bewdley
- Horsefair/Coventry Street, Kidderminster
- Lickey End, Bromsgrove
- Worcester Road, Bromsgrove
- Redditch Road, Bromsgrove
- Worcester Road, Wychbold
- Worcester City

The Office for Environmental Protection is a new public body which was legally created in November under the Environment Act 2021. It is due to be fully established early in 2022 and will review and report on government's progress in meeting environmental goals, monitor and report on the implementation of environmental law, advise government on proposed changes to the law, and investigate suspected failures to comply with environmental law by government and other public bodies¹⁵. From a WRS perspective, the latter would include compliance with national air quality objectives, so we will wait and see what impact the new body will have on local authority behaviours.

¹⁵<https://www.theoep.org.uk/what-we-do>

After 2020 was named one of the warmest, wettest, and sunniest years on record, scientists warned that extremes of weather will strike the UK more frequently. Due to the climate crisis, heatwaves are expected to become longer, hotter, and more frequent, whilst rainfall could become more variable and more extreme¹⁶. In recent years, the UK has seen storms which have resulted in record levels of flooding. More extreme weather could significantly impact upon the level of complaints received by WRS, particularly noise and smoke nuisance complaints as people spend more time outdoors.

2.6 Legal

Aside from laws resulting from EU directives and ongoing reforms to planning laws, there are limited legal changes currently in the pipeline that would significantly impact upon the functions undertaken by WRS.

The Government has launched reforms to the Human Rights Act which aim to respect common law traditions and strengthen the role of the UK Supreme Court, restore sharper focus on protecting fundamental rights, prevent the incremental expansion of rights without proper democratic oversight, and emphasise the role of responsibilities within the human rights framework¹⁷. In particular, the proposals seek to prevent abuses of the system by foreign criminals, and strike a proper balance between individuals' rights, personal responsibility, and the wider public interest. The proposals, however, commit to staying within the European Convention on Human Rights. It is not known what impact reforms will have on intelligence gathering processes with the right to privacy, for example, covered by Article 8 of the existing act.

New powers to crack down on puppy smuggling and increase protections for farm animals have been introduced by Government. The Animal Welfare (Kept Animals) Bill aims to address primates being kept as pets, dogs attacking or worrying livestock, the exportation of livestock, the importation of dogs, cats, and ferrets, and legislation connected to Zoos¹⁸. The bill follows additional legislation, which received royal assent during April 2021, which increased the maximum sentence for animal cruelty offences.

The Taxis and Private Hire Vehicles (Safeguarding and Road Safety) Bill is a Private Member's Bill sponsored by Peter Gibson, Conservative MP for Darlington. It seeks to improve the safety of taxi passengers and address the issue of a driver obtaining a licence from one authority, after having their licence refused or revoked by a different authority¹⁹. The bill would mandate local licensing authorities to

¹⁶https://www.globalcitizen.org/en/content/climate-change-extreme-weather-uk-britain-future/?utm_source=paidsearch&utm_medium=ukgrant&utm_campaign=genericbrandname&gclid=EAlalQobChMI99u8zezI9AIVDevCh06ugSYEAAAYASAAEgLSJ_D_BwE

¹⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040409/human-rights-reform-consultation.pdf

¹⁸<https://commonslibrary.parliament.uk/research-briefings/cbp-9229>

¹⁹<https://commonslibrary.parliament.uk/research-briefings/cbp-9305>

record taxi licence refusals, revocations, and suspensions on a national database, which other authorities would be required to consult and seeks to build on previous legislation which led to the development of the NR3 Taxi Sanctions database hosted by NAFN.

2.7 Organisational

Local authorities are primarily funded through government grants, council tax, and business rates. Since its inception, the budget for WRS has comprised of contributions from its strategic partners, supported by income generated from various activities. This does not include Licensing income, which goes back to the partners and some income streams which were present before WRS was formed. Between 2016 and 2020, WRS was required to meet all increases in financial pressure through increased income generation and managed to achieve this. Several WRS partners however, and local authorities in general, continue to face financial challenges. This means that future budgets for the service are continually 'subject to potential change'. The on-going problem for WRS is to offset any future reductions through income generation, whilst being able to fulfil statutory responsibilities.

Worcestershire is a 'two-tier' area for local government, which means functions are divided between the county and district councils. In July 2021, Government produced a report entitled "Unitary local government" which considered proposals, rationales, and alternatives to local government restructuring²⁰. A recent leak in relation to the White paper on Levelling-up suggested that Government were planning, as part of that process, to move wholesale to unitary arrangements. Subsequent responses from Government indicated that this will not be the case and further steps to unitary arrangements will continue to require local unanimity.

The Intelligence Operating Model, and National Intelligence Model, have, at their centres, several key principles. These include clear and consistent tasking, adopting a problem-solving approach and taking evidence-based decisions. Whilst WRS has chosen to adopt the principles and the processes associated with intelligence-led enforcement, this continues to pose significant challenges. Decision makers, for example, are continuing to adjust to tasking and coordination requirements, whilst thinking more broadly about "knowns" and "unknowns". In addition, operational officers require further training to understand their role in an intelligence-led organisation, the importance of evaluating information, and concepts such as the problem analysis triangle (a crime requires an offender, a victim, and a location). The most significant challenge faced by the service, however, is how it becomes more proactive and less reactive. This is also connected to how the service utilises its intelligence capabilities to develop its understanding of the entities committing offences, any emerging threats, and any problem sectors.

²⁰<https://researchbriefings.files.parliament.uk/documents/CBP-9056/CBP-9056.pdf>

3. STRATEGIC PRIORITIES

The service continues to use the Priority Regulatory Outcomes for England for local authorities, developed by a previous incarnation of the Office for Product Safety and Standards as a framework to link its activities back to the priorities of the partners. 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

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 the above aims, we know we are delivering what partners want.

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. It looks at a broad swathe of local, regional and national data 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 operational activities mentioned later in the plan.

Whilst the overall Council financial settlements for 2022/3 are slightly better than anticipated, our finance colleagues from a number of partners tell us they will be faced with a challenging financial situation for the foreseeable future. In the past this was addressed through transforming how things are done and generating income. We will look to support partners with this and encourage partners to consider what other enforcement related functions they might wish to consider operating under the WRS banner, where we might create economies of scale to assist with delivery and potentially reduce long term costs. Should further financial pressure be directed at savings from the existing WRS budget, 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 that 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 2022/23 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 only audit during 2021/22 related to how we manage suspended taxi drivers. It resulted in minor changes to what we do. 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.

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 partners' Overview and Scrutiny Committees, leading to the positive re-enforcement of performance in those areas.

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 2022/23. The non-business customer satisfaction figures improved in the run up to the pandemic but slipped last Summer when the sheer demand for nuisance and other complaint work simply outstripped supply so customers were less happy with how long it took us to get to them and to resolve issues where we could. Hopefully this will improve again once we come out of pandemic response and work will continue to try to better understand the issues and improve performance during the coming year.

The activities outlined below are examples of what is planned by the service. We believe that activity data combined with the core performance indicators will give Members the confidence that the Service 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 and the local contact tracing system. We also still have a role in Covid business controls but our response has been limited as the current controls are fairly minimal and only have a significant impact on a relative small number of businesses. Having said this, we still have a commitment of around 12FTE from the existing WRS staffing cohort to pandemic controls and, whilst some of the activity will still be funded and allow the service to bring in additional capacity, there is very little competent agency capacity left and enforcement activity is unlikely to be funded from external sources.

As well as the table below, the Strategic Assessment has made a number of recommendations for activity which will form part of the detailed plan that will sit below this. The assessment is based on our more recent data and will cover us for the period 2022/23 to the end of 2023/24 on the assumption that there are no major emerging threats.

| | OUTCOME | WHAT WE WILL DO | PURPOSE | NATIONAL PRIORITY | MEASURES |
|---|--|--|---|--------------------------|---|
| 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 elements of the Local Contact Tracing system and lost to follow-up activity to trace contacts of those infected</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"> • Number of cases handled on behalf of the LORT leading to breaches • Number of formal actions undertaken • Number of formal warnings |
| 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; targeting resources towards potentially non-compliant 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> <p>% of food businesses scoring 0,1,2* at 1st April each year</p> |

| | | | | | |
|---|---|---|--|-------------------|--|
| 3 | Ensuring that nuisance and other pollution related issues are tackled | <p>Respond to complaints and take appropriate action</p> <p>Provide relevant advice and information, available through a range of channels.</p> | <p>Help me to solve my problem and stop it from happening to anyone else</p> <p>Help me trade well and ensure my competitors do the same</p> | 2, 3 and 4 | <p>% of service requests where resolution is achieved to customers satisfaction</p> <p>Rate of noise complaint per 1000 head of population</p> |
| 4 | Protecting the environment | Conduct risk based/ intelligence- | I want to assume everything | 2 and 4 | % permitted businesses broadly |

| | | | | | |
|---|--|--|---|----------------|--|
| | <p>and the public through monitoring air quality, and ensuring that contaminated land is suitable for development.</p> <p>Controlling environmental emissions leading to reduced environmental damage and better health</p> | <p>led interventions with businesses, especially permitted premises</p> <p>Air quality monitoring & responding to contaminated land issues</p> <p>Supporting the planning system</p> | <p>is ok</p> | | <p>compliant at first visit/ inspection</p> <p>Monitoring of the County-wide Air Quality strategy is delivered</p> <p>% of service requests where resolution is achieved to customers satisfaction</p> |
| 5 | <p>Licensed premises cause no significant alcohol-fuelled crime/ disorder and ASB.</p> | <p>Respond to complaints regarding alcohol and similar licensing related issues e.g. underage sales, breach of conditions, poor conduct of licence holders, etc.</p> <p>Provide businesses with advice and assistance</p> <p>Monthly alcohol profile to be shared with partners, reviewed and suitable work tasked</p> | <p>I want to assume everything is ok</p> <p>Help me to solve my problem and stop it from happening to anyone else</p> <p>Help me trade well and ensure my competitors do the same</p> | 1 and 3 | <p>% of licensed businesses subject to allegations of not upholding the 4 licensing objectives</p> |
| 6 | <p>Hackney Carriage and Private Hire Drivers Licence applications are processed in a timely manner and that all drivers and operators granted licenses meet the fit and proper test.</p> <p>Vehicles in use by the Taxi trades are fit whilst in service</p> | <p>Safeguard and ensure that all licence applications are processed in a timely manner and those granted meet the fit and proper test.</p> <p>Undertake a number of enforcement interventions to test compliance</p> | <p>I want to assume everything is ok</p> <p>Help me to solve my problem and stop it from happening to anyone else</p> <p>Help me trade well and ensure my competitors do the same</p> | 1 and 3 | <p>% of drivers licence renewal applications issued within 5 working days.</p> <p>Vehicles requiring work or taken off the road following intervention (Number and % of the total fleet.)</p> |
| 7 | <p>Consumers able to make informed choices on where to eat or purchase food through published food hygiene ratings.</p> | <p>Implement and promote the FHRS and publish hygiene ratings and accrediting those which improve health and wellbeing of their workforce.</p> <p>Incentivise maintaining star ratings</p> | <p>I want to assume everything is ok</p> <p>Help me trade well and ensure my competitors do the same</p> | 4 and 5 | <p>% businesses meeting purpose at first assessment/ inspection</p> <p>Number of 4* and 5* business signing up for the Healthy Eating Award</p> |

| | | | | | |
|----|---|---|---|-------------------------|---|
| | | through the Healthy Eating Award and Triple 5 Award Support food exporters through the BREXIT process | | | |
| 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 | 1, 2, 3 and 5 | % of service requests where resolution is achieved to customers satisfaction % of service requests where resolution is achieved to business satisfaction |
| 9 | Having engaged and satisfied staff who have the right skills, tools and support | 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 |
| 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 | 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 |

The extract from the Strategic Assessment below identifies specific the following cross cutting priorities and recommended activities:

Supporting a safe and vibrant night-time economy

Whilst WRS will continue to investigate complaints, provide advice, process applications for alcohol licences, and conduct routine food hygiene interventions; it is recommended that the service considers the following activities during the coming year:

- Review allocation and investigative processes to ensure a collaborative and problem-solving approach is adopted for complaints relating to the night-time economy, and persistent offenders can be effectively identified and targeted
- Commission an intelligence product to assess prominent neighbourhoods, and continue to share intelligence with partner agencies who need to know and are able to act
- Conduct proactive monitoring of night-time economy businesses to assess the level of compliance and identify significant changes to methods of operation

Promoting the responsible sale, breeding, and ownership of dogs

Whilst WRS will continue to respond to reports of stray dogs, investigate complaints, and process applications for animal activity licences; it is recommended the service considers the following activities during the coming year:

- Ensure a collaborative and problem-solving approach is adopted to tackle problem entities (e.g. offering dog behaviour training to owners being served noise abatement notices due to their dog continually barking)
- Create and distribute, utilising physical and digital outlets, an “owners guide” which provides guidance in relation to buying, rehoming, and looking after a dog
- Undertake a promotional campaign in relation to microchipping, offering support to dog owners, with a view to introducing full enforcement of the microchipping regulations
- Commission an intelligence product to assess dog welfare incidents in North Worcestershire
- Repeat the proactive monitoring exercise to assess the level of breeding activity on prominent selling sites and the level of compliance

Promoting safe and clean communities

Whilst domestic activity is significantly influenced by dogs, noise from audio-visual equipment and smoke caused by the burning of domestic waste, mainly garden waste were prominent nuisances. Although WRS will continue to investigate complaints and offer self-help resources, it is recommended that materials are refreshed, and regular guidance issued to communities through varying channels. It is also recommended that an intelligence product is commissioned to assess nuisances in the most prominent districts (Redditch and Worcester City) and to further explore the connection to aspects of deprivation. The promotion of safe and clean communities also ties in with other functions, such as the continued assessment of air quality.

Supporting commercial businesses to operate safely and responsibly

Whilst WRS will continue to investigate complaints, provide advice, process applications, and conduct routine food hygiene interventions; it is recommended that the service considers the following activities during the coming year:

- Commission an intelligence product to explore the problematic non-food sectors connected to commercial nuisances and health and safety at work offences, and continue to share intelligence with partner agencies who need to know and are able to act
- Conduct proactive monitoring of commercial businesses and the taxi trade to assess the level of compliance and identify significant changes to methods of operation
- Review the recording practices associated with taxi licensing offences to facilitate the assessment of problematic locations

Supporting industry to operate safely and responsibly

In parallel with the previous priority recommendation, nuisances and health and safety at work offences were more prominent in non-food businesses which will include manufacturers, importers, and distributors. Such businesses are also higher risk from a food perspective (although they did not feature prominently within the analysis of food safety) and tie in with other functions such as Environmental Permitting. WRS will continue to investigate complaints, provide advice, and conduct routine interventions.

FOOD SERVICE DELIVERY

As has become the norm since the Food Standards Agency audit of the service in relation to the work done on behalf of Wyre Forest, the table below outlines the likely commitment to food law work in the coming 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 led to the Agency deferring the majority of proactive work that would normally take place within food control, however, in the middle of last year they launched their roadmap to restoring the normal process for food law enforcement, with the end of this process in April 2023, when we are told that a new set of processes will be in place. The Agency has given local authorities this period to visit all of the relevant food businesses in its area following a timetable they have laid out starting with the highest risk businesses. The backlog of visits from the period when routine work was switched off is making this a challenging target to achieve and the service will look at the best ways to deliver this looking towards the end of the financial year. Initial estimates indicate around 2850 visits will be required to meet the timetable laid down by the Agency, excluding the lowest risk premises that can be dealt with by way of alternative enforcement approaches. Clearly this creates an issue but it is one that the majority of local services will find themselves with. The number of visits scheduled on the system is lower this year as many premises in categories C and D would have been due a visit this year (they have 18 months and 2 year visit intervals as the norm,) but because they were not visited during the period when visits were suspended, they sit in the backlog rather than having a scheduled visit.

As we said last year, 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. At least this level of investment of capacity will be needed to achieve the Agency's desired outcome. Given the breadth of local authorities that will be in the same situation and the limited availability of agency staff, it seems likely that the Agency will have to compromise on some of its ask.

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.

| Element of Food plan | Visits that we will aim to complete |
|---|---|
| Estimated number of Food Hygiene visits scheduled for 2022/23 (based on the Food Hygiene rating system.) | 790, of which about 517 will be in the higher risk bands A, B, C or D |
| Estimated number of premises scheduled for alternative approaches to inspection during 2022/23 | 750 |
| Estimated number of new registrations/ unrated premises that will require inspection during 2022/23 | 750, of which about one-third will be low risk and can be dealt with by questionnaires |
| Estimated number of overdue premises assessed as requiring a visit during 2022/23 | 2055 from previous years plus those previously identified on the system that would otherwise have been picked up during 2020/21 onward but weren't due to Covid |

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

The WRS team's functions and management structure remain 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: This role has been vacant for some time and managers are in discussion as to how best to redeploy this resource. Management capacity has been severely stretched by the pandemic so re-investing this in other supervisor capacity may well be helpful.

The arrangement has successfully provided the necessary management cover and support, as well as promoting income generation in many areas of the service, although the pandemic has stretched this to breaking point, hence the suggestion of installing additional capacity below.

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 into 2022/23 with the County Council being happy with the arrangement, although the Director of Public Health who is responsible for the team is keen to increase capacity further, which may mean it is necessary to appoint a full-time manager but with a continued close relationship with WRS and the Head of Service in particular. 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 2022/23. WRS will also continue to deliver the petroleum licensing function 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.

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. On-line and virtual training is now offered on a number of platforms, helping to manage costs and allowing officers to maintain competence in the absence of face to face courses.

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 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. Cyber security is the major consideration currently with a number of high-profile attacks on local authorities that have caused chaos for the delivery of services and have resulted in the complete loss of a lot of data. We are working closely with Wyre Forest's IT team to ensure we limit the threat and are giving wider thought to contingency measures. Recent incidents suggest that temporarily we may need to return to full paper recording for a period before digital resource can be restored!

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. The Trading Standards team has also engaged significantly more with Licensing as it has developed its work on illicit tobacco as a number of these premises are licensed.

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 3rd sector organisations
- County Council Public Health team
- Regional Regulatory Partnerships and National Bodies (CIEH, MJAC, CEnEHMB, CEnTSA, CTSI, ACTSO, NTSB,).

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

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

We will address national consultation on legislative change through the relevant professional channels. 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 covering 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

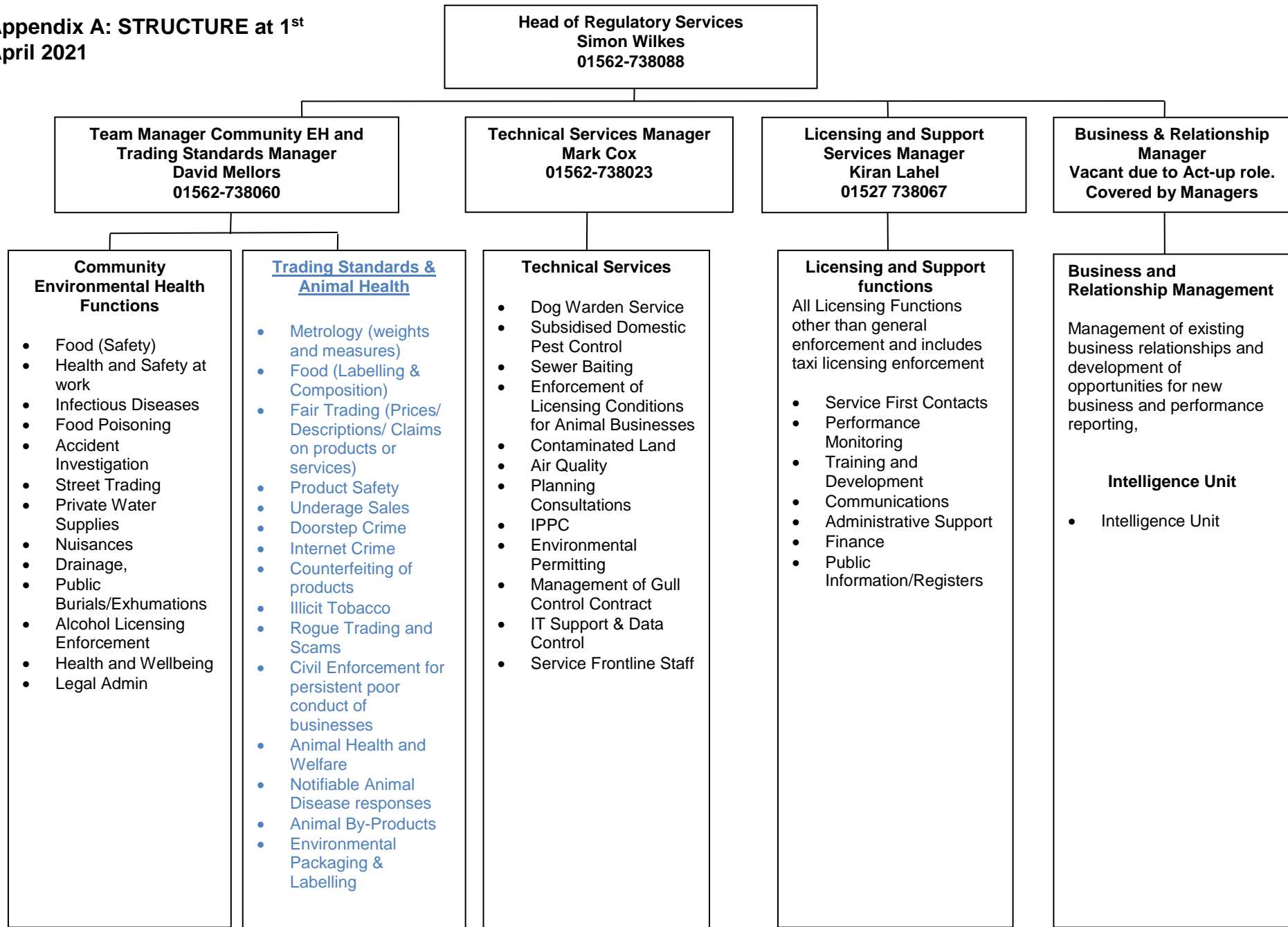
The current arrangements came into force on 1st April 2016 following the departure of the county Council from the formal partnership. The original legal agreement indicated that partners would pursue the shared services model for a period of at least 10 years. The 2016 agreement re-iterated this but 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.

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 1st
April 2021**



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

| Account description | Budget | Budget | Budget |
|--|--------------|--------------|--------------|
| | 2022 / 2023 | 2023 / 2024 | 2024 / 2025 |
| | £000's | £000's | £000's |
| Employees | | | |
| Monthly salaries | 3,015 | 3,093 | 3,166 |
| 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 |
| Sub-Total - Employees | 3,044 | 3,122 | 3,195 |
| Premises | | | |
| Rents | 59 | 59 | 59 |
| Room hire | 2 | 2 | 2 |
| Trade Waste | 1 | 1 | 1 |
| Sub-Total - Premises | 62 | 62 | 62 |
| 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 | 19 | 19 | 19 |
| Printing and stationery | 17 | 17 | 17 |
| Books and publications | 2 | 2 | 2 |
| Postage/packaging | 11 | 11 | 11 |
| ICT | 55 | 55 | 55 |
| Telephones | 21 | 21 | 21 |
| Taxi Tests | 22 | 22 | 22 |
| CRB Checks (taxi) | 26 | 26 | 26 |
| Support service recharges | 110 | 110 | 110 |
| Support service recharges - ICT | 60 | 60 | 60 |
| Sub-Total - Supplies & Service | 397 | 397 | 397 |

| | Budget 2022 / 2023 £000's | Budget 2023 / 2024 £000's | Budget 2024 / 2025 £000's |
|---|--|--|--|
| Contractors | | | |
| Consultants / Contractors' fees/charges/SLA's | 266 | 229 | 229 |
| Advertising (general) | 5 | 5 | 5 |
| Grants and subscriptions | 13 | 13 | 13 |
| Sub-Total - Contractors | 284 | 247 | 247 |
| Total Expenditure Budget | 3,891 | 3,932 | 4,005 |

Income

| | | | |
|--|------|------|------|
| Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc | -372 | -372 | -372 |
|--|------|------|------|

Funding approved for unavoidable Salary Pressures

| | | | |
|---|--------------|--------------|--------------|
| Sub-Total - Income | -372 | -372 | -372 |
| Income to be approved - funded by partners | | | |
| Technical Officers | -141 | -104 | -106 |
| Malvern Hills District Council - Pest Control | -8 | -8 | -8 |
| Increase in Rent | -7 | -7 | -7 |
| Increase in ICT | -16 | -16 | -16 |
| Increase in Hosting Charges | -10 | -10 | -10 |
| Unavoidable salary pressures | -81 | -159 | -230 |
| Sub-Total - Income to be approved | -262 | -303 | -376 |
| Total Income Budget | -634 | -675 | -748 |
| DISTRICT PARTNERSHIP BUDGET | 3,257 | 3,257 | 3,257 |

22-23 Partner Percentages

| | |
|--------------------------------|----------------|
| Bromsgrove District Council | 14.55% |
| Malvern Hills District Council | 13.03% |
| Redditch Borough Council | 17.53% |
| Worcester City Council | 16.54% |
| Wychavon District Council | 23.24% |
| Wyre Forest District Council | 15.11% |
| 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 Pest Control | Contribution Technical Officers | Partner Contribution |
|--------------------------------|--------------|---------------------------|---------------------------------|----------------------|
| | 2022 / 2023 | 2022 / 2023 | 2022 / 2023 | 2022 / 2023 |
| Budget 2022 / 23 | £000's | £000's | £000's | £000's |
| Bromsgrove District Council | 475 | | 11 | 486 |
| Malvern Hills District Council | 418 | 8 | 15 | 440 |
| Redditch Borough Council | 572 | | 7 | 579 |
| Worcester City Council | 540 | | 80 | 620 |
| Wychavon District Council | 759 | | 17 | 776 |
| Wyre Forest District Council | 493 | | 10 | 503 |
| Total | 3,257 | 8 | 141 | 3,405 |
| | Budget | Contribution Pest Control | Contribution Technical Officers | Partner Contribution |
| | 2023 / 2024 | 2023 / 2024 | 2023 / 2024 | 2023 / 2024 |
| Budget 2023 / 24 | £000's | £000's | £000's | £000's |
| Bromsgrove District Council | 475 | | 12 | 487 |
| Malvern Hills District Council | 418 | 8 | 15 | 441 |
| Redditch Borough Council | 572 | | 8 | 580 |
| Worcester City Council | 540 | | 40 | 580 |
| Wychavon District Council | 759 | | 18 | 777 |
| Wyre Forest District Council | 493 | | 10 | 503 |
| Total | 3,257 | 8 | 104 | 3,368 |
| | Budget | Contribution Pest Control | Contribution Technical Officers | Partner Contribution |
| | 2024 / 2025 | 2024 / 2025 | 2024 / 2025 | 2024 / 2025 |
| Budget 2024 / 25 | £000's | £000's | £000's | £000's |
| Bromsgrove District Council | 475 | | 12 | 487 |
| Malvern Hills District Council | 418 | 8 | 16 | 441 |
| Redditch Borough Council | 572 | | 8 | 580 |
| Worcester City Council | 540 | | 40 | 580 |
| Wychavon District Council | 759 | | 19 | 778 |
| Wyre Forest District Council | 493 | | 11 | 504 |
| Total | 3,257 | 8 | 106 | 3,371 |

Appendix C: Performance Measures Relating to Outcomes

| | Measure | Reporting Frequency | Background |
|---|---|---------------------|--|
| 1 | % of service requests where resolution is achieved to customers satisfaction | Quarterly | Based on questionnaires send out to a significant number of members of the public who use the service. |
| 2 | % of service requests where resolution is achieved to business satisfaction | Quarterly | Based on questionnaires send out to a significant number of businesses inspected or otherwise contacted by the service. |
| 3 | % businesses broadly compliant at first assessment/ inspection | Annually | Based on the proportion of businesses meeting the key purpose from a regulatory perspective i.e. food businesses produce safe food. |
| 4 | % of food businesses scoring 0,1 or 2 at 1 st April each year | Annually | Based on proportion of businesses scoring 0 1 or 2 star on a national Food Hygiene Rating Scheme assessment (2 stars and below is deemed to be at risk of not producing safe food.) |
| 5 | % of drivers licence renewal applications issued within 5 working days. | 6-monthly | Based on the proportion of drivers licence renewals issued within 5 working days of receipt of application. Note new applicants all require DBS checks and time frames for these fall outside of WRS control, hence they are not included. |
| 6 | % of vehicles found to be defective whilst in service | 6-monthly | Percentage of vehicles stopped during enforcement exercises that are required to be removed from service for remedial work before being allowed to carry on operating. |
| 7 | % of service requests where customer indicates they feel better equipped to deal with issues themselves in future | Quarterly | Based on questionnaires send out to a significant number of members of the public and businesses who have used the service. |
| 8 | Review of register of complaints and compliments | Quarterly | All are recorded Increasing compliments/ Reduced complaints |

| | | | |
|----|---|-----------|--|
| 9 | Staff sickness absence at public sector average or better | Quarterly | Sickness recorded using host processes. The last figure obtained by the host's HR team was that the Public sector average was 8.75 |
| 10 | % of staff who enjoy working for WRS | Annually | Taken from the staff survey. |
| 11 | % of licensed businesses subject to allegations of not upholding the 4 licensing objectives | 6-monthly | Indicator, linked to Crime & Disorder agenda, looking at performance of premises license holders and control on their activity. |
| 12 | Rate of noise complaint per 1000 head of population | 6-monthly | Place indicator, potential link to quality of life and health and well-being. |
| 13 | Total income | 6-monthly | Expressed as a % of the base district contributions to the revenue budget for this year |
| 14 | Cost of regulatory services per head of population | Annually | Will be total spend divided by the total population, based on the most recent mid-year estimate available at the time of publication. NB: Calculation will offset income against revenue budget to account for external income sources |

Appendix D: Risk Register 2022/3

| 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 | Medium | High | Amber | Wyre Forest ICT has effective processes and business continuity plans in place. WFDC upgraded relevant systems including Windows. The service should be fully onto Office 365 by the turn of 2022/3, which will provide better access to a range of provisions including Microsoft Teams and Power BI. WFDC has also introduced a full range of training for cyber security in light of the increased risk of cyber terrorism and cyber-fraud. Business Continuity Plans are being redrafted with supporting systems in light of emerging threat |
| 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. The absence of significant funds for investment mitigates against a shift to a new product currently, so the service will continue with the existing provider until such time as the financial situation improves. |
| 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. Managers can look at whether a reduction in space occupied is feasible once the end of pandemic controls is reached. Currently, with approximately double the normal staffing cohort, moving to a smaller footprint within Wyre Forest house would create risk. The service is also looking at bringing other functions in. |

| | | | | | | |
|---|--|----------|-----|--------|--------------|---|
| 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 | <p>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, with some of this resulting from household transmission from children. Consultants are available to provide short term cover 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 replacement kit 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 | Green | <p>The Pest control framework contract has multiple pest control suppliers so the loss of one allows work to be moved to the others. This limits risk. The unlikely loss of multiple companies might create capacity issues.</p> |

| | | | | | | |
|--|---|----------|--------|------|--------------|--|
| Effective and efficient contract arrangement for dog control | Disruption to service if no kennels available. Negative media coverage. Increased public health risks | On-going | Medium | High | Amber | Various contracts have been tendered and are now in place but there are geographic restrictions and incomplete coverage of our commercial area. Resilience in some places is a potential issue as the charitable sector, particularly kennels come under more pressure. |
| 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 | Whilst the new BDC finance system is now reasonably accessible for managers, there have been significant teething troubles with it but these have not got in the way of good probity and sensible budget management. Some workarounds remain in place in until issues are fully resolved. Support from our Technical Accountant remains excellent. |
| 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 | Amber | <p>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. The pandemic has shown us exactly how lean the organisation is and management capacity in particular has been very stretched with the additional work taken on.</p> <p>While the growth strategy continues to generate income to support partners, in recent years it has been necessary to ask partners for additional funds as pay increases in particular have outstripped the service's ability to grow. There remain limits to this without additional capacity being added to the system. Invest to save capacity has been committed by partners and this has achieved the necessary outcomes so far.</p> <p>The Levelling-up (Devolution) White Paper will give an indication of the future direction of travel for policy at a local level and should give an idea of what funding will look like in the future.</p> |

| | | | | | | |
|---|--|----------|-----|--------|--------------|--|
| 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 limits risk. Technical and legal training days for staff support this too. There is however difficulty in keeping informed of Case Law developments as these are not reported in the EH press. 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 can make decision making difficult around minimum requirements. Whilst codes of practice help, they are only "to have regard to." LGA clearly aware of impact of budget reductions on regulation and has made it clear Government cannot expect what it had previously. 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 coming in for 2023/4. 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 |