

# **Service Plan 2024/25**

# **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 2024/25 with a total agreed budget from the district partners of just under £4.372M, assuming partners agree the requested increase in food hygiene resourcing. This includes the necessary uplift to cover the pay increases previously agreed, the cost of increased pension contributions by the employer and increases for hosting costs reflected by the on-going inflationary pressures faced in recent years. This figure does not include the amount for Bromsgrove and Redditch to add their Enviro-crime and Planning Enforcement functions to the partnership as, at the time of writing, this has yet to be formally discharged.

Plans for 2024/25 are based on the most recent Strategic Assessment for the service, which identifies several cross-cutting priorities. These feature several areas that create the most issues for us and our partners. Addressing these via relevant control strategies will be an important modification to the way we have worked previously, allowing all relevant elements of the service to focus on problem solving and work with partners, including the Trading Standards team to address them. Uncertainty remains with world events like the war in Ukraine and the conflict in Israel/ Palestine making headlines still. With elections due in the UK and the US, and changes of incumbents a distinct possibility, policy direction both nationally and internationally remains uncertain. Government's latest settlement has provided limited respite for councils but is far from what bodies like the LGA regard as moving local authority finances onto a stable and sustainable footing. Seldom a week goes by without another local authority at least talking about the growing risk of section 114 notices. Closer to home, whilst no one has yet suggested this drastic step, we can see that several the seven councils in Worcestershire have financial issues to address either in the immediate future or in the coming years.

Although the financial uncertainty in the sector may make it more difficult, the service will continue to pursue work for other local authorities. We have already been successful with one or two new contracts and have retained work from most of our customers. Buying in capacity for work that must be done by law may begin to look more attractive for those with difficult financial positions. We saw the announcement of several county devolution deals towards the end of 2023, all of which seemed to be predicated on retaining 2-tier arrangements, so it may be that the threat we anticipated of losing business due to re-organisations may not come to fruition. Locally, we see little movement on this policy area. In making decisions regarding service delivery, the service will continue to risk assess what it does considering the economic impacts and impacts on health and well-being that arise from the issues to be addressed. 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.

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## 1. INTRODUCTION

This is the fourteenth 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 2024/5, 2025/26, and 2026/27 however the operational detail reflects the planned activities that the service will undertake in 2024/25.

2023/24 was another very busy year for WRS. Post-pandemic, we have now moved back to workloads that resemble the pre-pandemic world, with the problems we would normally associate with Environmental Health work returning to the fore. In the early part of the year, we saw a spike in nuisance work as the good weather of spring moved into early summer, but the shift into a wet July and August meant that the spike in these activities was somewhat curtailed. However, there was plenty of other work to address with a number of serious accidents to investigate, several of which involved fatalities, along with addressing the needs to review and re-write Air Quality action plans and the successful bid to DEFRA for real-time Air Quality monitoring equipment and the need to identify places to install this. Licensing moved on from policy around taxis with the deployment of the national standards into local approaches to presenting alcohol and other policies for review and re-adoption.

Work from our usual local authority customers continued, albeit at a slightly reduced level, but income continued to grow back toward pre-pandemic levels. Several 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 and the service was approached by several potential new customers. We hope to build the close working relationships necessary to make a success of this facility during the coming 12 months.

More recent announcements on Devolution and Levelling-up in two-tier areas appear to focus on county footprints, but without the shift to re-organisation or the introduction of Mayors. Last year we were anticipating more deals akin to the multi-county arrangements like the East Midlands or the single county deal areas like Cornwall. We did note that a significant number of 2-tier areas did not appear to be engaging significantly with this agenda for various reasons, and it appears that appetite for the structural changes associated with the maximum devolution deals on offer is limited, so at this stage the threat we envisaged of larger unitary county EH services not needing our support seems unlikely to impact us significant in the coming year or so. Government remains clear that re-organisation from the top down is not on the cards, which also reduces this potential threat. Time will tell whether financial pressures force areas to change their minds on this position.

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 2024 and reported to the Board in June.

One threat that has emerged is the growing willingness of the Food Standards Agency to push against the reductions in capacity by local authorities and to insist on closer alignment with the Food Law enforcement Code of Practice. Many of our peers have expressed concern that, at

a time of very difficult finances for local authorities, the insistence on addressing premises where risk is low is a pressure that the sector could do without. Post-BREXIT and post-Pandemic, with the Agency now being the national body that is tasked with ensuring the food law regime operates fully so that our export partners can have confidence in UK products, a change in emphasis back to the less interventionist is unlikely. The proposed revision of the Food Hygiene Code that was intended to embed intelligence practice into activities has been postponed till 2027 and, even then, if the example of the newly revised Food Standards Code (under-which Trading Standards is expected to operate,) it seems unlikely that the Agency will wholly embrace the intelligence operating model used by the service for other activities.

Hence, the coming year is likely to be dominated by:

- On-going engagement with the Food Standards Agency in relation to activities,
- The continued delivery of our programmes of work 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, and the finalisation of the automation project allowing for wider service elements like service requests to be integrated,
- Continued work with partners to scope the potential for adding functions to WRS operational roster following the pilot on planning enforcement for Bromsgrove and Redditch,
- 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 of them 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 following positive feedback on Safety at Sportsgrounds work and other aspects.

The website continues to improve post-rebuild, on an updated software platform, and the completion of our automation project in the first part of 2024/5 will increase its functionality further, including the taking of on-line payments and submission of service requests.

## 2. STRATEGIC ASSESSMENT AND PRIORITIES

The Priority Regulatory Outcomes for England for local authorities, developed by a previous incarnation of the Office for Product Safety and Standards still provide a useful framework to link activities back to the broader priorities of the local authorities. 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 our partners have priorities around supporting economic growth, protecting the environment, residents, neighbourhoods, and improving health and well-being in communities. While all 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, is due for review during 2024/5. It looks at a broad swathe of local, regional, and national data to help identify the key issues to be tackled over a 2 or 3-year period, with an annual sense check to ensure the environment has not changed significantly. Analysis for this purpose focussed on the six functions which generated a higher level of complaints and notifications and/or a higher level of proactive activity. This led to thirty-four analytical assessments and the recommendation for five tactical priorities to be adopted by the service for the period of the assessment's validity. Nothing has emerged during the last 12-months that would indicate a need to amend these so the tactical priorities outlined below will remain in place.

- **Supporting a safe and vibrant night-time economy**

The night-time economy is cross-cutting and was referenced within several analytical assessments. Pubs, clubs, restaurants, and takeaways were all prominent within the analysis of alcohol licensing, food safety and nuisance due to breaches of the public nuisance objective, the non-payment of annual fees, and/or poor hygiene standards and practices. Night-time economy hotspots such as Worcester City Centre were also connected to taxi licensing issues (over-ranking etc.), whilst persistent offenders were a significant factor influencing the rate of complaints in prominent neighbourhoods. In addition, PESTELO analysis has outlined a potential for an increase in offences at smaller businesses due to financial pressures, and the continued prominence of third-party platforms such as Deliveroo, Just Eat, and Uber Eats in servicing delivery of takeaway food. It is very clear that this market is changing and introducing new methods of trading, including single kitchens offering multiple brands offers, which create their own issues from a regulatory perspective.

A good example of how follow-up on this priority works, is the enforcement programme undertaken before Christmas 2023 in Bewdley Town centre. This arose from an intelligence product, a problem profile created by the Intelligence team, that looked at issues in the town, including persistent complaints about noise and other issues from licensed premises. The profile recommended actions that were executed by mixed teams from Licensing and Community Environmental Health. Whilst the service could not support this kind of activity for all partners at the same time, we hope this model will provide a good basis for addressing persistent issues in any of our town centres where it occurs.

- **Promoting the responsible sale, breeding, and ownership of dogs**

The sale and ownership of dogs is also cross-cutting and was referenced within several analytical assessments. Whilst stray dogs are generally found to be in good condition, and are usually reunited with their owners, a significant proportion of dogs are not microchipped, and dogs continue to be found in need of veterinary examination or treatment. In addition, noise from barking dogs is one of the most prominent nuisances, whilst PESTELO analysis has outlined potential issues in terms of the level of post-pandemic cases and trends regarding the breeding and sale of dogs via online platforms.

- **Promoting safe and healthy communities**

Whilst domestic nuisance activity is significantly influenced by dogs, noise from audio-visual equipment and smoke caused by the burning of domestic and garden waste were prominent nuisances. Broader work on Air Quality would also fit within this priority and the service has taken strides forward with this, reviewing strategy and action plans as well as developing real-time monitoring capacity, where the data created may help influence behaviours of both those at risk of impact from adverse air quality but also reducing overall contributions to pollutants.

- **Supporting commercial businesses to operate safely and responsibly.**

Whilst commercial activity is significantly influenced by the night-time economy and the hospitality sector, retail food outlets were prominent within the analysis of food safety. Smaller retailers, for example, are more likely to be issued with 0, 1, or 2 food hygiene rating and are also known to be potentially connected to Trading Standards offences. In addition, whilst problematic sectors are unknown, nuisances and health and safety at work offences were more prominent in non-food businesses which will include commercial businesses. This would also include the taxi trade, however, issues reported to the service are primarily the responsibility of other enforcement bodies. Furthermore, as outlined previously, financial pressures may lead to an increase in offences at smaller businesses.

- **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.

The five recommended tactical priorities can be aligned to one or more of the priorities outlined by our partners in their corporate plans or strategies. Whilst the language varies, key priorities generally relate to economic growth that works for all, health and well-being, safer and stronger communities, and a maintained or improved environment.

Whilst the overall Council financial settlements for 2024/5 are slightly better than anticipated, finance colleagues across the partners tell us they will be faced with a challenging financial situation for the foreseeable future. In the past, from a WRS perspective, this was addressed through transforming how things are done and generating income. We will continue to support partners with this difficult situation but, as we have seen in 2023/4, it is difficult to find any further meaningful savings from these functions and the intervention of the Food Standards Agency and the pressure applied to increase capacity only re-enforces this. We will however 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. Whilst we have not been able to include it in this plan, it is hoped that members will sign-off on the addition of both planning enforcement and elements of enviro-crime to the partner requirements for Bromsgrove and Redditch. These functions have been piloted for a period with the two councils directly funding additional capacity within WRS. If members agree, this will be the first formal extension of district functionality since the original agreement was signed in 2010. It will leave the other 4 partners with the option to port their own services onto the WRS platform should they see this as a positive and for the service to explore other options for building district enforcement functions into what is delivered. It also allows the service to build its areas of expertise to potentially sell outside of Worcestershire once we are happy with our staff levels and systems.

If the financial situation deteriorates significantly and all partners need to reduce their financial commitment, there will need to be agreement across the partners as to where reductions might fall. The service will use the following 3 key criteria to assess the risk and impacts of any proposed further reductions in 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?

In a financially constrained environment, using intelligence to direct capacity in a way that addressed the most significant risks becomes even more relevant. 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 other forms of complaint. Historically we have felt that the likelihood of central government interventions in our areas was very limited. The Food Standards Agency's intervention changes this but no other national bodies are currently pursuing this route. It is however worth considering which other national competent bodies may follow suit if pressed to demonstrate the soundness of regimes they oversee. Suggestions have been made that DEFRA are considering a framework regime for Animal Health and Welfare, but we do not know what functions this might embrace.

### **3. FINANCE**

A summary of the budget position for 2024/5 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 to maintain a greater resilience than would otherwise be possible.

### **4. AUDIT AND SCRUTINY ARRANGEMENTS**

The critical review of the Animal Licensing processes and procedures was carried out in accordance with the Worcestershire Internal Audit Shared Service Audit Plan for Bromsgrove District Council for 2023 as approved by the Audit, Standards and Governance Committee on 21st July 2022. The audit was a critical review of the Animal Licensing processes and covered the proposed processes and procedures to be implemented as part of an internal review by the licensing manager. Internal systems and documentation were scrutinised, alongside current and proposed processes. The reviewing officer was content with the proposals and the changes outlined within specified timeframes and the commitment the team would make to ensure these were implemented to create more efficiencies in the team. This work has commenced, and each process will be implemented in turn with changes checked, reviewed, and evaluated.

Where any broad and in-depth scrutiny of the service maybe required, the legal agreement requests that member Authorities consider the priority of requests from their individual Overview and Scrutiny Committees and that they should use reasonable endeavours to agree joint scrutiny arrangements with a view to avoiding duplication of effort. However, where Scrutiny Committees have expressed an interest in simply understanding more about the service's work, officers have always obliged and attended. This has led to good working relationships with several Overview and Scrutiny Committees, leading to the positive re-enforcement for what the service does in those council areas. During 2023/4, presentations were undertaken to O&S Committees in both Wychavon and Malvern Hills Districts to help members get a better understanding of the service, particularly those members new to local government.

Engaging with partners in this way and working with partners on projects like the redevelopment of town and city centres, helps to build, and maintain relationships with partner colleagues and helps to highlight the important role of regulation when looking at wider, long term policy development. Being able to support the work with Ukrainian refugees has also shown the ability of the service to be flexible with resource

deployment. In this case capacity that was originally created during the pandemic, was re-directed to support a number of the partners with this work, however, when the various funding streams come to an end, this capacity may no longer be available unless it is funded for something else.

## **5. 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 2024/25. The non-business customer satisfaction figures improved in the run up to the pandemic, but we have struggled to maintain them at the levels we would like since then. The sheer demand for nuisance and other complaint work has at times, simply outstripped capacity to address it, so customers were less happy with how long it took us to get to them and to resolve issues where we could. Whilst we have introduced some measures to improve first response times, it can still take some time for a suitably qualified officer to get to look at and assess a nuisance problem. The need to continue to deliver food interventions to meet the increasing expectations of the Food Standards Agency does risk exacerbating this, especially if they don't accept our tactical approach of severely limiting proactive food activity during times of high nuisance demand, as we are unable to switch this work off. Expectations of what can be delivered remain very high in some cases and often are beyond what the law can deliver. No one is entitled to silence all the time at their home. We will continue to try to better understand the issues customers present and look to improve performance during the coming year.

The activities outlined below are examples of what is planned by the service, structured either as addressing a cross cutting priority or as a more business-as-usual activity. We have also included corporate, and staff related activities as our staff is our most important resource. We are a people business.

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.

	OUTCOME	WHAT WE WILL DO	NATIONAL PRIORITY	MEASURES
1	<b>Supporting a safe and vibrant night-time economy</b>	<p>Vehicles in use by the Taxi trades are fit whilst in service.</p> <p>Ensuring that all drivers and operators granted licenses meet the fit and proper test.</p> <p>Prevent Licensed premises from causing significant alcohol-fuelled crime/ disorder and ASB</p> <p>Ensuring that nuisance and other pollution related issues occurring within the NTE are tackled</p> <p>Monthly alcohol profile to be shared with partners, reviewed and suitable work tasked</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>	<b>1,3,4,5</b>	<p>% of licensed businesses subject to allegations of not upholding the 4 licensing objectives</p> <p>Vehicles requiring work or taken off the road following intervention (Number and % of the total fleet.)</p> <p>% of service requests where resolution is achieved to customers satisfaction</p>
2	<b>Promoting the responsible sale, breeding, and ownership of dogs</b>	<p>Provide dog owners and businesses with advice, assistance and support using a range of channels and through events.</p> <p>Conduct risk based/ intelligence-led interventions with dog owners and businesses, targeting</p>	<b>1, 2, 3, 4</b>	<p>% of service requests where resolution is achieved to business satisfaction</p> <p>% of service requests where resolution is achieved to customers satisfaction</p> <p>% of stray dogs seized in that are compliant with microchipping regulations</p>

		resources towards areas of high non-compliance or risk.  Ensuring that dog-related nuisance and similar issues are tackled		
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3	<b>Promoting safe and healthy communities</b>	<p>Ensure that nuisance and other pollution related issues are appropriately tackled.</p> <p>Respond to complaints and take appropriate action.</p> <p>Provide relevant advice and information, available through a range of channels.</p> <p>Maintain preparedness for response to emergencies, including disease outbreaks.</p> <p>Protect the environment and the public through monitoring air quality and ensuring that contaminated land is suitable for development.</p> <p>Monitor Air quality and respond to contaminated land issues.</p> <p>Supporting the planning system</p> <p>Respond to disease notifications and outbreaks.</p>	2, 3, 4	<p>% of service requests where resolution is achieved to customers satisfaction.</p> <p>Delivery of the annual air quality reporting duties.</p> <p>Rate of noise complaint per 1000 head of population.</p> <p>Disease response plans maintained, reviewed and updated on a regular basis.</p>
4	<b>Supporting commercial businesses to operate safely and responsibly.</b>	Maintain an intelligence led response to complaints and take appropriate action, building our	1, 2, 4, 5	% food businesses broadly compliant at first visit/ inspection

		<p>ability to resolve issues or re-direct callers on their first contact with us.</p> <p>Support Businesses to become economically successful and compliant with the law (Pollution, H&amp;S, Food Safety, Licensing) through risk based/ intelligence-led interventions.</p> <p>Ensure Hackney Carriage and Private Hire Drivers Licence applications are processed in a timely manner.</p> <p>Facilitate Consumers in being 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.</p>		<p>% of food businesses scoring 0,1,2* as at 1<sup>st</sup> April each year</p> <p>% of service requests where resolution is achieved to customers satisfaction</p>
5	<b>Supporting industry to operate safely and responsibly.</b>	<p>Maintain an intelligence led response to complaints and take appropriate action, building our ability to resolve issues or re-direct callers on their first contact with us.</p> <p>Provide businesses with advice and assistance.</p> <p>Ensure business controls of environmental emissions are in place leading to reduced environmental damage and better health.</p>	1 2, 4, 5	<p>% permitted businesses broadly compliant at first visit/ inspection</p> <p>% of service requests where resolution is achieved to customers satisfaction</p>
6	<b>Addressing Corporate issues</b>	Respond to complaints and take appropriate action, building our	NR	% of service requests where resolution is achieved to customers satisfaction

		<p>ability to resolve issues or re-direct callers on their first contact with us.</p> <p>Maintain a register of compliments and complaints with actions taken.</p> <p>Maintain links with county-wide TCG &amp; take part in partner exercises to test plans, as appropriate.</p>		<p>% of service requests where resolution is achieved to business satisfaction</p> <p>Business Continuity plans are maintained, reviewed and updated on a regular basis</p>
7	<b>Supporting staff to perform well</b>	<p>Ensure necessary training is identified and delivered.</p> <p>Undertake annual staff survey.</p> <p>Undertake annual staff performance reviews with regular feedback sessions from supervisors and managers.</p>	<b>NR</b>	<p>Staff sickness and absence at public sector national average or better</p> <p>% of staff who enjoy working for WRS</p>

## 5A: FOOD SERVICE DELIVERY

If partners agree the budget increase, the recent re-enforcement by the Food Standards Agency of the need to operate to the letter of the Food Hygiene Code of Practice will mean an increase in staffing commitment and therefore the level of outputs. Whilst it is clear that the Agency wants more direct interventions with low-risk premises, this does not mean that we must wholly abandon the intelligence model of working, particularly in determining reactive activity. We have known for some time that general hygiene complaints tend to reveal very few significant issues and that 95% of premises are broadly compliant if visited solely based on this type of complaint. So, we will continue to use intelligence thinking to shape our reactive approach, even if we cannot use it to wholly drive proactive activities. It can still also drive any proactive project work if we see themes emerging in particular food premises.

Time recording estimates indicate that 6-9 FTE are committed annually to Food Hygiene work, with an average quoted to the Agency of 8.2FTE. If partners agree to increase this by the 5FTE mentioned in the earlier paper, this will increase the volume of lower risk (category D and E premises,) and new registrations that can be subject to direct intervention, and hopefully provide some capacity to address other food premises. The levels indicated in the table below reflect this, however there will be a need to allow for recruitment time for all posts and training time for the

new Regulatory Compliance Officer capacity, so 2024/5 is unlikely to see the full benefit of what this new capacity can deliver. It may take time to recruit into some of these posts, particularly the higher competency ones as there are only limited numbers of people available who are qualified. We do hope however, that all staff will be in post by the beginning of Q2 and those who need training will be trained by the beginning of Q3. For comparison, we have also retained last year's figures (in italics) so that members can see where the expanded focus lies.

The table below is our best estimate currently of where we are in terms of visits due and what we will aim to discharge within proposed resource based on the assumption that visit levels will need to be somewhat curtailed over the summer to address significant reactive nuisance demand.

<b>Element of Food plan</b>	<b>Visits that we will aim to complete</b>
<i>Estimated number of Food Hygiene visits scheduled for 2023/4 (based on the Food Hygiene rating system.)</i>	<i>1742 of which approximately 175 will be in the higher risk categories and the remainder in categories C and D</i>
<b>Estimated number of Food Hygiene visits scheduled for 2024/5 (based on the Food Hygiene rating system.)</b>	<p><b>The FSA have now directed through our engagement that they consider Categories A-C and the majority of D rated premises to require a site visit.</b></p> <p><b>Hence 1167 across all categories A-D of which approximately 110 will be in the highest A-B risk categories with 415 Cs and 633 Ds.</b></p> <p><b>Category Es may continue to follow an alternative enforcement approach subject to Food Lead assessment. This comprises 569 E rated premises.</b></p>
<i>Estimated number of premises scheduled for alternative approaches to inspection during 2023/24</i>	<i>500</i>
<b>Estimated number of premises scheduled for alternative approaches to inspection during 2024/25</b>	<b>181 E rated premises</b>

<i>Estimated number of new registrations/ unrated premises that will require inspection during 2023/24</i>	<i>800, of which about one-third will be low risk and can be dealt with initially by questionnaires</i>
<b>Estimated number of new registrations/ unrated premises that will require inspection during 2024/25</b>	<b>800, of which about one-third will be low risk and can be dealt with initially by questionnaires</b>
<i>Estimated number of overdue premises assessed as requiring a visit during 2023/24</i>	<i>350 from previous years plus those previously identified on the system that would otherwise have been picked up during 2022/23</i>
<b>Estimated number of overdue premises assessed as requiring a visit during 2024/25</b>	<p><b>1512 from previous years (Apr 22-Mar 24) including the period for which inspections were suspended due to Covid restrictions.</b></p> <p><b>790 other premises remain outstanding from pre-2021. The vast majority of these are very low risk premises together with anomalies that remain from legacy data systems and require data cleansing. These will all require an audit check to establish their status.</b></p>

These figures should give members a reasonable picture of the volume of pro-active food hygiene related activity that should take place during 2024/25.

## 6. 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 several 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 specific 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.

## 7. 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. Currently, 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. This may change slightly should the new Food resource be approved, and Board can be updated on how this will operate once in place. The legal support role also sits in this team as most of the 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. The team also delivers the majority of the income generation work for other local authorities as well as the Planning Enforcement and Homes for Ukraine work for two of our partner authorities.
- 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.

The arrangement of 3 Team Managers and the Head of Service has successfully provided the necessary management cover and support in recent years, as well as promoting income generation in many areas of the service, although the pandemic stretched this to breaking point.

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 2024/25 with the County Council being happy with the arrangement and the funding situation meaning it is unlikely that further resource can be made available soon. 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. This led to the Technical Services unit delivering the County Council's statutory role on Petroleum Licensing alongside the district councils' permitting function for vapour recovery at sites. This means businesses have a single point of contact for both.

The County Council asked the service to deliver the Safety at Sports Ground function several years ago and this has now moved onto a rolling contract rather than a time limited one, so WRS will continue to discharge this until either the County Council decides to take it back or the districts chose to end this relationship. The move of new enforcement functions from Bromsgrove and Redditch onto the structure chart has yet to be agreed, so it is not included here but members will be made aware of how this will work within the Technical Services unit in due course.

## **8. 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 their 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. Whilst the Food Standards Agency's push for more food interventions does undermine this to some extent, the service will look to retain this principle with its fully qualified Environmental Health Officers. In Technical Services, where traditional Environmental Health backgrounds are less helpful, officers have been recruited with a range of backgrounds to deliver more specialised activities characterised by the functions in this division of the service.

Within Licensing, the pandemic gave the opportunity to review administrative processes and reduce the burden of several paper systems. Automating application processes and payment will further support this. This has allowed officers to look proactively at enforcement across the districts and the service hopes to give this greater focus in 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 help 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 several platforms, helping to manage costs, and allowing officers to maintain competence.

## **9. BUSINESS CONTINUITY**

There is no doubt that the Covid 19 pandemic tested the business continuity plans of the service and it rose 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! Recently the Technical Service Unit ran a short exercise to test the staff, particularly our supervisor cohort's response in a cyber incident. This helped highlight several gaps in information held in emergency documents and was helpful in getting officers to think the unthinkable. This kind of exercise, if undertaken regularly will improve the response should a genuine emergency occur, so the other WRS units will undertake a similar exercise. Given the prevalence of cyber-attacks, testing plans cannot be seen as a luxury anymore, it must become a necessity.

Despite Trading Standards returning to direct 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.

## **10. PARTNERSHIPS**

The service continues to need to work closely with a range of partners to deliver what is required against several agendas. The importance of the six local authority partners is recognised, and WRS will continue to maintain our existing engagement with other district services.

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 Intelligence posts that are split between the two organisations. Now that Trading Standards is part of the Public Health Directorate, it also allows WRS managers the opportunity to build relationships with the Director of Public Health and her consultants, which can assist in a range of activities and has been particularly relevant in Air Quality developments in the past 12-months.

With Government deciding to move the functions of LEPs into higher tier local authorities, it will be more important than ever to maintain links with Economic Development colleagues at both County and District level to ensure that we are providing relevant support to business and to participate in and projects where regulatory involvement may be required.

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
- UKHSA
- 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
- County Council Public Health team

- Regional Regulatory Partnerships and National Bodies (ACEHO Group, CECEHO Group, CIEH, OPSS/ PARG, MJAC, NCLOG, 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 activities 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 both tactical and operational multiagency groups that address organised crime.

## **11. CONSULTATION & ENGAGEMENT**

We will usually address national consultation on legislative change through the relevant professional channels unless there is a particular reason why a specific district councils' response from the partners may be appropriate. 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 go back to providing several 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, with the functions of the LEP moving into Worcestershire County Council, we will continue to work with colleagues within Economic Development at district and county level on engaging with our business customers to improve our ability to address their needs. The approach outlined in our business charter will continue to inform 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 WRS website will be maintained so that it is suitably accessible from the various digital devices used to access services on-line. The new system for on-line applications and making service requests/ complaints on-line that are directly entered into our back-office system will also improve efficiency in this area.

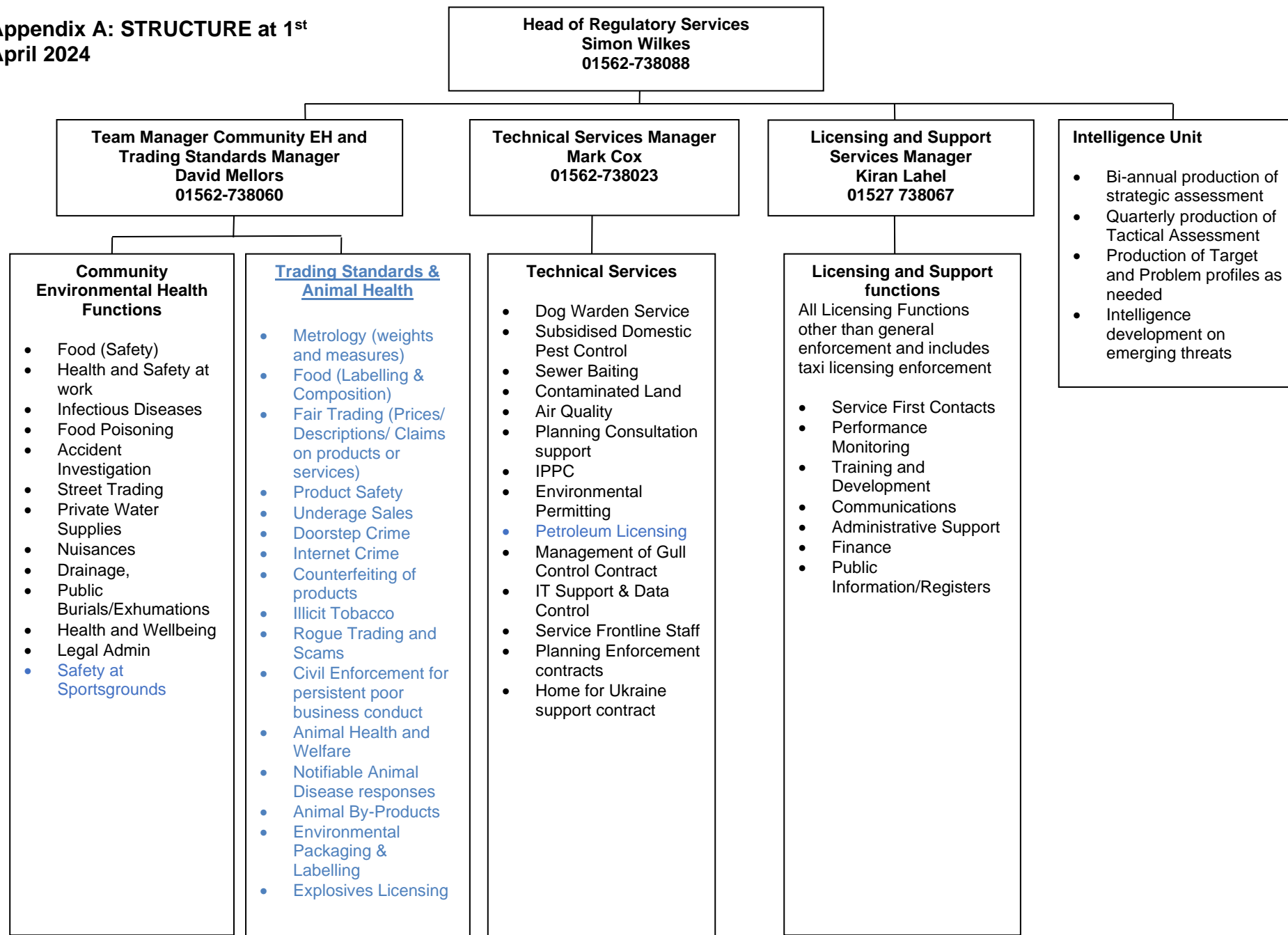
## **12. RISK & GOVERNANCE**

The current governance 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. The Legal Officers from the six partner councils are of the view 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 may look at reviews every few years to ensure the service is continuing to deliver, however it is generally accepted that any partner wishing to deliver these functions alone would need to spend significantly more to achieve the same outcomes.

A copy of the current Risk Register is appended at Appendix D and has been reviewed and updated for this plan. A line has been added to address the Food Standards Agency’s recent intervention, although there has always been a clear indication of the possibility of central government bodies commenting since at least 2014 and specific reference to the potential for FSA intervention since 2016. It is fair to say that the increased forcefulness of the Agency’s position in relation to the code was not anticipated, but it is now noted, along with the risk of other central competent bodies creating codes or performance frameworks against which local authority activity may be judged.

The number of commercial contracts and obligations increasing creates some risk, particularly where sub-contractors or skilled technical staff are involved. This revised document recognises the wider geographical area that the service now covers and level of technical expertise that must 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 2024**



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

Account description	Budget	Budget	Budget
	2024 / 2025	2025 / 2026	2026 / 2027
	£000's	£000's	£000's
<b>Employees</b>			
Monthly salaries	3,667	3,765	3,857
Training for professional qualifications	0	0	0
Medical fees (employees')	0	0	0
Employers' liability insurance	21	21	21
Employees' professional subscriptions	3	3	3
<b>Sub-Total - Employees</b>	<b>3,690</b>	<b>3,788</b>	<b>3,880</b>
<b>Premises</b>			
Rents	77	80	83
Room hire	0	0	0
Trade Waste	0	0	0
<b>Sub-Total - Premises</b>	<b>77</b>	<b>80</b>	<b>83</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	50	50	50
<b>Sub-Total - Transport</b>	<b>84</b>	<b>84</b>	<b>84</b>
<b>Supplies &amp; Service</b>			

Equipment - purchase/maintenance/rental	29	29	29
Materials	9	9	9
Clothing, uniforms & laundry	2	2	2
Training fees	23	23	23
General insurances	16	16	16
Printing and stationery	17	17	17
Books and publications	2	2	2
Postage/packaging	11	11	11
ICT	67	67	67
Telephones	37	37	37
Taxi Tests	14	14	14
CRB Checks (taxi)	26	26	26
Support service recharges	126	130	134
Support service recharges - ICT	74	77	80
<b>Sub-Total - Supplies &amp; Service</b>	<b>452</b>	<b>459</b>	<b>466</b>

#### Contractors

Consultants / Contractors' fees/charges/SLA's	246	241	241
Advertising (general)	6	6	6
Grants and subscriptions	13	13	13
<b>Sub-Total - Contractors</b>	<b>264</b>	<b>259</b>	<b>259</b>

#### Total Expenditure Budget

<b>4,567</b>	<b>4,670</b>	<b>4,772</b>
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#### Income

Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc	-407	-407	-407
Funding from Bromsgrove & Redditch for Enforcement Work	-195	-201	-208
<b>Sub-Total - Income</b>	<b>-602</b>	<b>-608</b>	<b>-615</b>

**Income**

Funding from partners for Technical Officers	-117	-115	-117
Funding from partners for Increase in Rent	-5	-8	-11
Funding from partners for Increase in ICT	-4	-7	-11
Funding from partners for Increase in Hosting Charges	-5	-9	-13
Funding from partners due to unavoidable salary pressures 23-24	-115	-115	-115
Funding from partners due to unavoidable salary pressures 24-25	-113	-113	-113
Funding from partners due to unavoidable salary pressures 25-26		-88	-88
Funding from partners due to unavoidable salary pressures 26-27			-82

**Sub-Total - Income**

-359	-455	-550
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**Additional Income**

Agreed reduced charge to Worcester City Council

-30	-30	-30
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**Sub-Total - Income**

-30	-30	-30
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**Total Income Budget**

-991	-1,093	-1,195
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**DISTRICT PARTNERSHIP BUDGET**

3,576	3,577	3,577
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24-25 Partner Percentages	%s
Bromsgrove District Council	14.45%
Malvern Hills District Council	13.13%
Redditch Borough Council	17.68%
Worcester City Council	16.07%
Wychavon District Council	23.43%
Wyre Forest District Council	15.24%
<b>Total</b>	<b>100.00%</b>

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 several pieces of work and to cover the salary and pension pressures going forward.

	Budget	Change in Taxi Test Policy	Agreed reduced charge to Worcs City	Contribution Technical Officers	Contribution Increase in Rent, ICT & Hosting Charges	Unavoidable Salary Pressures	Total Partner Contribution
	2024 / 2025	2024 / 2025	2024 / 2025	2024 / 2025	2024 / 2025	23-24 & 24-25	2024 / 2025
Budget 2024 / 25	£000's	£000's	£000's	£000's	£000's	£000's	£000's
Bromsgrove District Council	526	-8		208	2	33	761
Malvern Hills District Council	471			19	2	30	522
Redditch Borough Council	633			9	2	40	685
Worcester City Council	605		-30	44	2	37	658
Wychavon District Council	840			21	3	54	918
Wyre Forest District Council	546			11	2	35	594
<b>Total</b>	<b>3,621</b>	<b>-8</b>	<b>-30</b>	<b>312</b>	<b>14</b>	<b>229</b>	<b>4,138</b>
	Budget	Change in Taxi Test Policy	Agreed reduced charge to	Contribution Technical Officers	Contribution Increase in Rent, ICT &	Unavoidable Salary Pressures	Total Partner Contribution

			<b>Worcs City</b>			<b>Hosting Charges</b>		
	<b>2025 / 2026</b>	<b>2025 / 2026</b>	<b>2025 / 2026</b>		<b>2025 / 2026</b>	<b>24-25 &amp; 25- 26</b>	<b>23-24, 24-25 &amp; 25-26</b>	<b>Total Partner Contribution</b>
<b>Budget 2025 / 26</b>	<b>£000's</b>	<b>£000's</b>	<b>£000's</b>		<b>£000's</b>	<b>£000's</b>	<b>£000's</b>	<b>£000's</b>
<b>Bromsgrove District Council</b>	<b>526</b>	<b>-8</b>			<b>215</b>	<b>3</b>	<b>46</b>	<b>782</b>
<b>Malvern Hills District Council</b>	<b>471</b>				<b>19</b>	<b>3</b>	<b>42</b>	<b>535</b>
<b>Redditch Borough Council</b>	<b>633</b>				<b>9</b>	<b>4</b>	<b>56</b>	<b>703</b>
<b>Worcester City Council</b>	<b>605</b>		<b>-30</b>		<b>40</b>	<b>4</b>	<b>51</b>	<b>670</b>
<b>Wychavon District Council</b>	<b>840</b>				<b>21</b>	<b>6</b>	<b>74</b>	<b>941</b>
<b>Wyre Forest District Council</b>	<b>546</b>				<b>12</b>	<b>4</b>	<b>48</b>	<b>610</b>
<b>Total</b>	<b>3,621</b>	<b>-8</b>	<b>-30</b>		<b>316</b>	<b>24</b>	<b>317</b>	<b>4,240</b>
	<b>Budget</b>	<b>Change in Taxi Test Policy</b>	<b>Agreed reduced charge to Worcs City</b>		<b>Contributio n Technical Officers</b>	<b>Contribution Increase in Rent, ICT &amp; Hosting Charges</b>	<b>Unavoidable Salary Pressures</b>	<b>Total Partner Contribution</b>

	2026 / 2027	2026 / 2027	2026 / 2027	2026 / 2027	24-25, 25-26 & 26-27	23-24, 24-25, 25-26 & 26- 27	Total Partner Contribution
Budget 2026 / 27	£000's	£000's	£000's	£000's	£000's	£000's	£000's
Bromsgrove District Council	526	-8		222	5	58	803
Malvern Hills District Council	471			20	4	52	548
Redditch Borough Council	633			10	6	71	719
Worcester City Council	605		-30	40	6	64	685
Wychavon District Council	840			22	8	93	963
Wyre Forest District Council	546			12	5	61	624
<b>Total</b>	<b>3,621</b>	<b>-8</b>	<b>-30</b>	<b>326</b>	<b>34</b>	<b>399</b>	<b>4,342</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 stars 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 this 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 either found defective on routine inspection or 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	Ratio of compliments received to complaints against service

9	Staff sickness absence at public sector average or better	Quarterly	Sickness recorded using host processes. The service will ask HR to provide details of the public sector average to compare against at year-end.
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 the year 2016/17 to provide comparison against base line but also % of the current base budget.
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
15	% of seized stray dog non-compliance with microchipping regulations	Quarterly	Collated through stray dog service and indicator of proactive work to promote compliance and its benefits for owners, and deterrent of enforcement activity.

## Appendix D: Risk Register 2024/5

Risk Description	Consequences	When is this likely to happen	Current Position			Control measures
			Likelihood	Impact	Matrix RAG Status	
Loss of Data through IT failures or Cyber Incident	Disruption to Service Provision. Inability to produce records and data.	On-going	Low	High	Amber	Cyber-attacks are a growing threat. Wyre Forest ICT has effective processes and business continuity plans in place. WFDC upgraded relevant systems including Windows. The service moved to Office 365 during 2021/22, which provides better access to a range of provisions including Microsoft Teams and Power BI. Cyber security training is delivered regularly and risks identified are tackled.
Issues with the WRS database system	Impact on work planning. Self-help may not enable savings required	On-going	Low	High	Amber	New contract in place. The system provides the necessary functionality and will allow the enablement of data transfer from electronic forms which is currently in development. Complexities might arise with potential new service areas not currently catered for within the database or where existing partner databases have to be maintained in addition.
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	Amber/Red	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 do this. Touchdown stations remain available in partner council locations. WRS Managers do need to redraft contingency plans in the event of a prolonged IT failure or cyber-attack that will allow services to be maintained. This is the greatest risk facing local authorities currently and is one we all need to move forward with.
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 to what was required. Consultants are available to provide short term cover and, whilst this worked well in peacetime to cover peak demand periods, the pandemic has revealed the

						<p>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 but it does mean that we are better resourced and qualified than would be possible if we didn't provide such services for income.</p> <p>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.	On-going	Low	High	<b>Amber</b>	There have been significant increases in numbers of stray dogs, dog disease, breed and behavioural complexities and supplier contracts are restricted by

	Increased public health risks					distance. Retendering for conventional contracts in kennelling and support services remains difficult and consideration may be given to creating our own capacity. Contractual obligations provide additional pressure. The current kennelling contracts are to be extended until April 2025.
Hosting support does not deliver necessary financial and HR support to ensure efficient management	Efficiency of management reduced; staffing issues remain unaddressed, and performance suffers	On-going	Low	High	Amber	Issues with the new BDC finance system have mainly been resolved, however some workarounds remain in place due to some unforeseen issues. We need to improve communication with our hosts to ensure the needs of the shared service do not get missed during any significant changes to systems or processes.
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	New legal agreement limits variations in contribution before partners must 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 but even this is now fully occupied.
Robust arrangements in place in relation to obtaining legal advice and monitoring legislative changes.	Loss of cases is costly and damages reputation.	On-going	Low	Medium	Green	Continued close working with BDC legal team and other partners who don't use BDC for advocacy. Technical and legal training days for staff. Difficulty in keeping informed of Case Law developments. Membership and attendance of Officer Technical Groups outside the County does assist.
Service provision complies with Government requirements,  New performance regimes are introduced that the service is not staffed to address	Intervention by Government bodies  Other national bodies seek to introduce similar frameworks to the FSA Code to get what they regard	On-going	Low	High	Amber	Limited detail of what is required for statutory minima can make decision making difficult around what is required in law as a minimum.  The LGA is clearly aware of impact of budget reductions on regulation and has made it clear

	<p>as suitable minimum levels of service.</p> <p>We understand that Government is asking its central competent bodies to ensure that regulatory regimes are fit for purpose and do not pose a risk to UK exports post BREXIT as the UK no longer has the cover of the EU taking on this role. This may make new codes or performance frameworks in areas outside of food law more likely.</p> <p>NB: Food Standards Agency is addressed below.</p>					<p>Government cannot expect what it had previously. Fewer interventions/ audits by government.</p> <p>The 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. This has been noted by the Agency and they are now seeking to drive all authorities back into line with the Code, with the threat of ministerial direction if required. The major changes envisaged for the Code have been delayed until 2027. And whilst this change is likely to move closer to the WRS model of operation, it is unlikely to wholly embrace the intelligence-led approach. See below for specific risk.</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>
Compliance with Food Code of Practice	Adverse comments following audits. FSA, can seek ministerial direction to make LAs comply with its Code of Practice	On-going	High	High	<b>Amber/ Red</b>	<p>This is a subset of the section above line as FSA is the only body currently with a statutory code that LAs must have significant regard to, plus it has the power to apply for Ministerial Orders to force LAs to comply with the letter of the Code.</p> <p>Until recently the Agency appears to have been happy to allow LAs to experiment as long as they abide by the spirit of the code and resource the function at a reasonable level. It has now changed tack and is seeking to push local authorities to operate much more closely to the letter of the code in an effort to create additional resource. A paper went to the FSA Boar at the end of 2023, expressing concern about resourcing levels in both Env Health and Trading</p>

						<p>Standards resulting in a public call for local and central government to work together to remedy this.</p> <p>The partners are looking to make a significant investment in resources to address most of the Agency's concerns, but it will not allow full compliance with the Code. Having said this, there is limited risk in the variations that will remain in place and full compliance with the code would require a full redesign of operations within Community EH and further financial investment.</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>