

Service Plan

2025/26

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 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. It provides a high-level picture of what activities the service will carry out to achieve or address those priorities, and how success will be measured. The Service will enter 2025/26 with a total agreed budget from partners of just under £4.863M. The budget 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. Following the clarification that the increased Employers National Insurance contributions are to be supplied to individual partners not to the staffing host, these are also included in the figures. The total does not include the amount for Bromsgrove and Redditch for their Enviro-crime and Planning Enforcement functions as this is being treated separately for now to avoid any impacts on broader partnership contribution calculations.

Plans for 2025/26 are based on the recently revised Strategic Assessment for the service, which identifies several cross-cutting priorities. These feature several areas that create the most issues for partners. Addressing these via relevant control strategies is how we now work under the Intelligence Operating Model, allowing all relevant elements of the service to focus on problem solving and working with partners, including the Trading Standards team to address them. Uncertainty remains with world events including on-going issues in Ukraine and the Middle East. The change of incumbent in the US may play a part in world events, with impacts both nationally and internationally remaining uncertain. Government's indication of changes to local authority funding, with a one-year then three-year settlement, plus the devolution agenda and the proposals for wide-scale local government reorganisation, make this a difficult period to predict for the sector. Although the overall financial settlement offered is an improvement, it mainly benefits those with social care responsibilities and won't cure all ills. Pressures will remain, including the risk of further section 114 announcements. Thankfully, so far this has not been a necessary consideration for the authorities here.

Although the financial and structural uncertainties 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 legally required of local councils may look more attractive for those with difficult financial positions. Local Government re-organisation will have some impact on this, but it will also impact this service, so we will proceed but with caution. 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 will remain at the heart of service delivery moving forward.

Simon Wilkes
Head of Worcestershire Regulatory Services

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Interim Executive Director of Resources Bromsgrove District and Redditch Borough Councils

1. INTRODUCTION

This is the fifteenth 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 2025/26, 2026/27, and 2027/28 however the operational detail reflects the planned activities that the service will undertake in 2025/26.

2024/25 has been another very busy year for WRS. 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 several serious accidents to investigate, including some involving fatalities, along with reviews and re-writes of Air Quality action plans, the successful bid to DEFRA for real-time Air Quality monitoring equipment, plus the need to identify places to install this. Licensing moved on from policy around taxis and the deployment of the revised national standards into local policies to presenting alcohol and other policies for review and re-adoption.

Work from our usual local authority customers continued and we won new contracts, particularly involving the dog control functions. 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. The big feather in our collective cap this year was Muller Dairies, closely followed by another national business, Timpsons. We hope to build the close working relationships necessary to make a success of this during the coming 12 months.

Government's announcement of the phasing out of 2-tier local government will change the council landscape in Worcestershire. The County Council's Cabinet has indicated its preference is to pursue a unitary Worcestershire model, which would meet the Devolution White Paper's indicated minimum half-million population footprint. There have been concerns expressed by some district members and alternative options have been suggested. The County Council's request to be included in a fast-track process was turned down, so May 2025's elections will go ahead, but they still seem keen to put in a high-level plan in time for the 21st March as required by Government. We await further developments, but it seems clear that Government will legislate for the change it feels is appropriate should local authorities disagree on a way forward. We have yet to see what form of combined authority any new Worcestershire arrangement would feed into. Whatever happens, it will not be occurring in the next 12-months, the period covered by this plan, so whilst it provides a backdrop, normal service delivery needs to continue.

Legal process again featured in the work of the service during 2024/5 with several cases coming to fruition, which will be reported in the Annual Report that will come to the Board in June 2025.

The Food Standards Agency continues to explore different ways of potentially delivering food controls and to push against the reductions in capacity by local authorities. They remain insistent that authorities align their activities more closely to the Food Law Enforcement Code of Practice. The appointment of 5 additional staff, which partners agreed to fund going forward from April 2024 has gone some way to addressing their demands, but we will see how this develops in the coming years, particularly as re-organisation will feature for many Environmental Health services. Giving certain sectors like the large supermarkets more autonomy and lower inspection burdens was floated as an option during 2024, but this must be seen as part of a broader modernisation programme that the Agency will be developing in the coming years that will include revisions to the Food Hygiene Code to compliment what they have already done with the one for Food Standards work, which is delivered in Worcestershire by the County Council's Trading Standards team. The Agency remains insistent that there will be a role for local enforcement, but there are no signs that their approach will fully embrace the intelligence-led approach. The Agency's role as the national body tasked with ensuring the food law regime operates so as to give confidence to countries receiving exported UK products will remain a dominant factor influencing its approach to operations.

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

- On-going engagement with the Food Standards Agency in relation to activities, and working towards delivering their expectations,
- 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 the WRS operational roster like planning enforcement, enviro-crime and others,
- 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 of 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. The revised rolling agreement for the management of the Trading Standards service and the continued delivery of the Safety at Sportsgrounds function means we will continue the service's engagement with the County Council. Feedback remains positive on all aspects of this relationship.

The website continues to improve post-rebuild on an updated software platform, and on-going automation project will continue to increase its functionality for 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. If all our work supports one or more of the above outcomes, we know we are delivering what partners want.

Our Strategic Assessment, the key document that helps us determine priorities has been reviewed during 2024/5 and a new version created for the 3 years from April 2025/6. It looks at a broad swathe of local, regional, and national data to help identify the key issues to be tackled over the period, and the Intelligence Unit will do an annual sense check to ensure the environment has not changed significantly. Analysis for this purpose focussed on the functions which generated a higher level of complaints and notifications and/or a higher level of proactive activity. This led to multiple analytical assessments and the recommendation for three tactical priorities to be adopted by the service for the period of the assessment's validity. These are outlined below:

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

The night-time economy is carried forward from the last assessment. It is a cross-cutting aspect for the service, requiring input from several WRS teams. Pubs, clubs, restaurants, and takeaways were all prominent within the analysis of alcohol licensing for the non-payment of annual fees. They also feature in food safety with respect to alleged poor hygiene standards and practices, and whilst domestic nuisance is more prominent, these premises feature strongly in the figures for allegations of nuisance from non-domestic outlets. Allegations of pest infestations also feature from time to time in urban centres and associated with activities in the Night-Time Economy. 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. The use of these services has continued to grow, and these newer methods of trading continue to adapt, including the development of businesses with single kitchens offering multiple brands offers, which create their own issues from a regulatory perspective.

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

The sale and ownership of dogs also remains a cross-cutting priority and, as with Night-Time Economy, issues are referenced within several parts of the analytical assessment. In the main, stray dogs are found to be in good condition but only around half are reunited with their owners, and increasing numbers appear to have some welfare issues or are found to need veterinary examination or treatment. A significant proportion of dogs are either not microchipped or, the details held on the microchip have not been updated, making identifying owners very difficult in many cases. In addition, noise from barking dogs is one of the most prominent alleged statutory nuisances. There is also the on-going issue of the unlicensed trade in dogs brought to light by Operations Lisbon 1 and 2, that will require revisiting.

- **Promoting safe, clean, and healthy communities**

Again, this cross-cutting issue is highlighted in several parts of the assessment and can be derived from various areas of more traditional Environmental health work. Whilst domestic nuisance activity is significantly influenced by dog ownership, noise from audio-visual equipment remains a significant cause for allegations of statutory nuisance, as does the difficult to address issue of smoke caused by the burning of garden waste or from wood-burning appliances. Health and safety at work offences were more prominent in non-food businesses, and this has been what the Community Environmental Health unit's investigative work has focused on in recent years. Broader work on Air Quality also fits within this priority and the service has taken strides forward with this during the period of the last assessment, with reviews of strategy and action plans and the development of real-time monitoring capacity. Towards the end of the last assessment period, capacity was taken on to help support work on influencing behaviours of both those at risk of impact from adverse air quality but also reducing overall contributions to pollutants. Food safety work in premises not linked to the Night-Time Economy sits nicely in here with the prevention of food-borne illness through good hygiene standards protecting the health of our communities. Small retail food outlets were relatively prominent within the analysis of food safety, and more likely to be issued with 0, 1, or 2 food hygiene ratings than larger outlets. In certain areas these businesses are also known to be potentially connected to Trading Standards offences. Whilst larger food businesses, including manufacturers, importers and distributors tend to be a lesser threat from a food hygiene perspective, they are of interest to Trading Standards and may be caught by other regulatory aspects like Environmental Permitting. The case last year that related to a pollution incident at a timber treatment business demonstrates why this last function is also included in this priority area.

Although only undertaken for 2 partners, enviro-crime (illegal waste disposal,) will be a significant area of work for the dedicated team covering this, and it fits nicely into this priority. Between June and December, some 2000 incidents were reported to the service for illegal waste disposal/ fly-tipping for two districts alone. It is likely that district colleagues dealing with this issue elsewhere in the county will be facing proportionately similar workloads. Unlicensed scrap metal collection, covered for all six partners, may also feature in this priority area.

In previous plans we have had additional priorities around supporting commercial and industrial businesses to operate safely and responsibly to encompass some business-as-usual activities but, these do fit well into the other three priorities, so we have left these out this year. However, WRS will continue to investigate complaints, provide advice, and conduct routine interventions across its functions.

The three 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 maintained or improved environmental standards.

Government has indicated its intention to have a 1-year financial settlement for 2025/6, followed by a 3-year budget settlement for 2026/7 onwards. Whilst the overall Council financial settlements for 2025/6 are slightly better than anticipated, much of the uplift has been focused on higher tier functions and district finance colleagues across the partners tell us, in the main that they will be faced with a challenging but manageable financial situation for next year. Whilst the County Council's recent financial statements are concerning, it is hoped that the situation will not adversely impact the work done on its behalf in managing Trading Standards functions, discharging petroleum licensing requirements and delivering safety at sportsgrounds functions, all of which are statutory duties upon the authority.

In the past, from a WRS perspective, financial challenges have been 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 the previous 2-years, it is difficult to find any further meaningful savings from these functions. The intervention of the Food Standards Agency and the pressure applied to increase capacity only re-enforces this. We will continue to encourage partners to consider what other enforcement related functions they might wish to operate under the WRS banner, where economies of scale might be created to assist with delivery and potentially reduce costs in the longer term. If the financial situation deteriorates significantly and all partners need to reduce their financial commitments, there will need to be agreement across the partners as to where reductions in service delivery might fall.

The service will continue to 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 addresses 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.

3. FINANCE

A summary of the budget position for 2025/6 is shown at Appendix B. More detailed breakdowns of financial activity will be available to the Joint Board in its regular financial reports.

4. AUDIT AND SCRUTINY ARRANGEMENTS

The internal audit shared service has continued to provide support to the automation project to ensure proportionate oversight for the project given the spend. No other areas of WRS activity were audited in 2024/5. The shared audit service has always been viewed by WRS managers as a helpful critical friend and if they find resource in 2025/6 to look at any other aspects of activity, they will be welcomed with this approach in mind.

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.

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 several 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. At times, the sheer demand for nuisance and other complaint work has 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 potential nuisance problem. Public expectation of what the law can deliver also continues to be an issue, particularly in relation to noise in more rural areas. The law does not legislate to provide people with silence, which can lead to conflicts with those looking to diversify activities in the rural environment and the subjective nature of the decision as to whether something constitutes a statutory nuisance is equally galling to many. The fact that there is no red line beyond which something is deemed a nuisance is something people find difficult to accept in the 21st century, but unless Government looks to amend these mid-20th century legal provisions, local authorities can do little to address this. We will continue to try to better understand the issues customers present and look to improve performance during the coming year.

The need to continue to deliver food interventions to meet the increasing expectations of the Food Standards Agency may exacerbate pressures on nuisance work, 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. The additional resources recruited during 2024/5 will have completed their training by April 2025, so we should see a greater number of lower-risk food interventions, which is the issue the FSA wanted us to address.

The activities outlined below are examples of what is planned by the service, presented in a structured way that links them to a cross-cutting priority. 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	MEASURES
1	Supporting a safe and vibrant night-time economy	<p>Ensure Hackney Carriage and Private Hire Drivers Licence applications are processed in a timely manner.</p> <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> <p>Facilitate Consumers in being able to make informed choices on where to eat or purchase food through published food hygiene ratings.</p>	<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> <p>% food businesses broadly compliant at first visit/ inspection</p> <p>% of food businesses scoring 0,1,2* as at 1st April each year</p>
2	Promoting the responsible sale, breeding, and ownership of dogs	<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 resources towards areas of high non-compliance or risk.</p> <p>Ensuring that dog-related nuisance and similar issues are tackled</p>	<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>

3	<p>Promoting safe, clean and healthy communities</p>	<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>Support Businesses to become economically successful and compliant with the law (Pollution, H&S, Food Safety, Licensing) through risk based/ intelligence-led interventions. 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>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> <p>Facilitate Consumers in being able to make informed choices on where to eat or purchase food through published food hygiene ratings.</p> <p>Respond to disease notifications and outbreaks.</p>	<p>% food businesses broadly compliant at first visit/ inspection</p> <p>% of food businesses scoring 0,1,2* as at 1st April each year</p> <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>% permitted businesses broadly compliant at first visit/ inspection</p> <p>Disease response plans maintained, reviewed and updated on a regular basis.</p>
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4	Addressing Corporate issues	<p>Respond to complaints and take appropriate action, building our ability to resolve issues or re-direct callers on their first contact with us.</p> <p>Maintain a register of compliments and complaints with actions taken.</p> <p>Maintain links with county-wide TCG & take part in partner exercises to test plans, as appropriate.</p>	<p>% of service requests where resolution is achieved to customers satisfaction</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>
5	Supporting staff to perform well	<p>Ensure necessary training is identified and delivered.</p> <p>Undertake annual staff survey.</p> <p>Undertake annual staff performance reviews with regular feedback sessions from supervisors and managers.</p>	<p>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

We include a specific section on the Food delivery plan to meet the requirements of the Agency and the Code. A pre-pandemic audit led to a recommendation that we provide members with a more detailed brief on food work for the coming year.

Whilst we will move to delivery of food interventions more focused on the Code of Practice, 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 specific type of food premise.

Recruitment to all new food posts was completed by September 2024. All have learned quickly and are now making a positive contribution to the food programme. Credit goes to the WRS Food Lead for organising the training process to get us to this position. Time recording estimates indicate that 10-12 FTE are now committed annually to Food Hygiene work (6-9 FTE last year,) with an average quoted to the Agency of 11 FTE. This may increase during the financial year as the 5FTE new posts will be contributing during 2025/6.

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. Figures for 2025/6 are in bold. Last year's figures are retained in italics for comparison.

Element of Food plan	Visits that we will aim to complete
<p><i>Estimated number of Food Hygiene visits scheduled for 2024/5 (based on the Food Hygiene rating system.)</i></p> <p>Estimated number of Food Hygiene visits scheduled for 2025/6 (based on the Food Hygiene rating system.)</p>	<p><i>1971 of which approximately 105 will be in the higher risk categories and the remainder in categories C and D</i></p> <p>1762: The FSA have now directed through our engagement that they consider Categories A-C and most D rated premises to require a site visit.</p> <p>Hence across all categories A-D of which approximately 101 will be in the highest A-B risk categories with 435 Cs and 688 Ds. Category Es will continue to follow a mix of inspection and alternative enforcement approach, subject to Food Lead assessment. This comprises 538 E rated premises.</p>
<p><i>Estimated number of premises scheduled for alternative approaches to inspection during 2024/25</i></p> <p>Estimated number of premises scheduled for alternative approaches to inspection during 2025/26</p>	<p><i>500</i></p> <p>250 E rated premises</p>
<p><i>Estimated number of new registrations/ unrated premises that will require inspection during 2024/25</i></p> <p>Estimated number of new registrations/ unrated premises that will require inspection during 2025/26</p>	<p><i>800, of which about one-third will be low risk and can be dealt with initially by questionnaires</i></p> <p>800, of which about one-third will be low risk and can be dealt with initially by questionnaires. This number appears to be relatively stable now, with this number of new registrations, a mix of people taking over existing outlets or wholly new operations.</p>
<p><i>Estimated number of overdue premises assessed as requiring a visit during 2024/25</i></p> <p>Estimated number of overdue premises assessed as requiring a visit during 2024/25</p>	<p><i>790 from previous years plus those previously identified on the system that would otherwise have been picked up during 2022/23</i></p> <p>150 high risk from previous years (Apr 24-Mar 25)</p> <p>450 other premises remain outstanding from previous years. The vast majority of these are very low risk together with anomalies that remain from legacy data systems and require data cleansing. These will all require an audit check to establish their status.</p>

These figures should give members a reasonable picture of the volume of pro-active food hygiene related activity that should take place during 2025/6.

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 allows the Intelligence Unit to collection and analyse data which is both accurate and robust and recent improvements in data extraction have increased the frequency with which several measures can be reported by the team. 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 division provides Food Hygiene, Health and Safety at Work, Public Health and Nuisance functions using three teams. Currently, the 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 team has decided to continue with this approach, adding the new food officers to the three teams so they will be dedicated to delivering food work from within our multi-functional teams. The legal support role continues to sit in this team as most of the casework emanates from here.
- 2) The Technical Services division provides all environmental health support around planning matters, delivers IPPC inspection, Air Quality and Contaminated Land regime work, manages the pest control contracts, and directly delivers the Dog Wardens service. The internal IT support and system management roles also sit here due to the complex technical nature of the work and the in-house first-contact team of Duty Officers is also part of this team. The team also delivers much of the income generation work for other local authorities as well as the Planning and Enviro-crime enforcement and Homes for Ukraine work for two of our partner authorities.
- 3) The Licensing and Support Services division 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/ Service Director 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 Service/ Service Director have been providing management support to the Trading Standards team. The review of arrangements with County Council Public Health colleagues during 2024/5 led to the integration of the content of 3 previous agreements into one document, and there is now a rolling agreement in place for the partnership to supervise and support the Trading Standards function. The Service Director continues to act as informant for criminal cases and retains the position as authoriser of surveillance activities under Regulation of Investigatory Powers Act 2000, where he has significant experience and understanding. The agreement also appoints the Director to the statutory role of Chief Inspector of Weights and Measures for the County Council, to meet its obligations under section 72 of the Weights and Measures Act 1985. 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.

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.

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.

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 the animal licensing regime introduced in 2018 latterly included a formal qualification requirement. Broadening officer experience will help to ensure that no officer only has experience of just a single local licensing regime. Discussions will take place about the longer-term internal structure of the Licensing team, which members will be made aware of in due course.

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 preceding 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 several 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. Moving to holding important documents needed on a day-to-day basis to cloud storage will help to ensure continuity but loss of systems in recent incidents still suggest that temporarily we may need to return to full paper recording for a period before digital resource can be restored!

We will continue to try to test the team's systems so we can identify relevant gaps. This kind of exercise, if undertaken regularly will improve the response should a genuine emergency occur. Given the prevalence of cyber-attacks, testing plans cannot be seen as a luxury anymore, it must be seen as a necessity.

Despite Trading Standards returning to direct County Council control, Community Environmental Health staff and the Trading Standards and Animal Health staff 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. The continued co-location of WRS teams with County Council Trading Standards and Animal Health officers at Wyre Forest House ensures strong links between both groups of staff. 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. Maintaining contacts with Economic Development colleagues at both County and District level helps ensure that we are providing relevant support to legitimate businesses and to participate in projects where regulatory involvement may be required.

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, scams and intellectual property work, and builds on the work of licensing colleagues in relation to addressing CSE. The service has seats at both tactical and operational multi-agency 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 aim to provide Member Newsletters 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, but a proportion will be generic and relevant county-wide, matching the way in which regulatory functions have changed over the years. People seldom limit their economic activities within the boundaries of a district. It is hoped that the Activity Data reports that will continue to be delivered 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.

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 the 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.

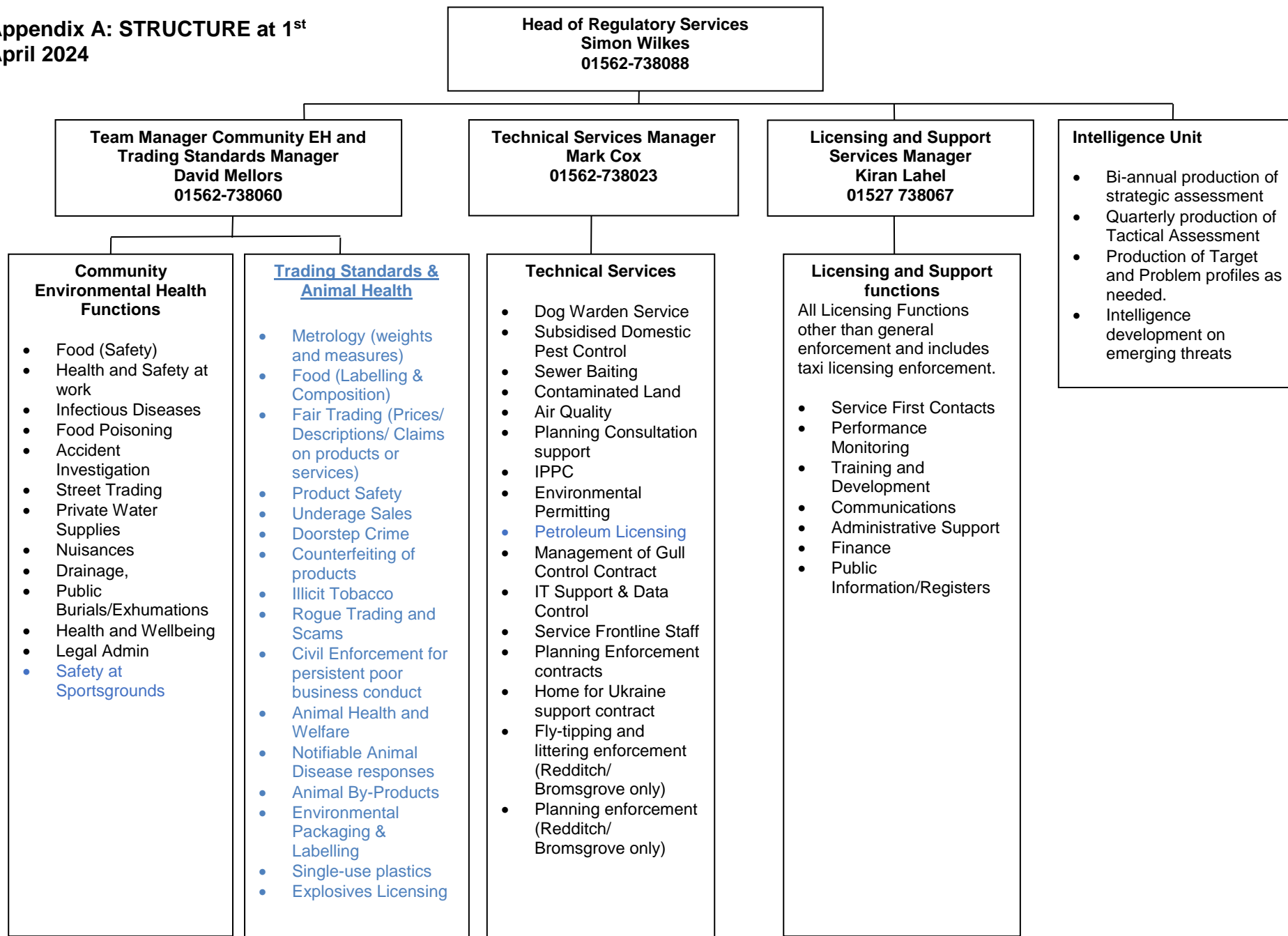
12. RISK & GOVERNANCE

The current governance arrangements came into force on 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. 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. Clearly the re-organisation announcement will have some impacts on the service but until the future structure of local government is agreed and a timetable set, the service will continue to deliver as it has since inception.

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. We will also add re-organisation to the register as a reminder that this is an issue that will need to be addressed in the coming years.

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 1st
April 2024**



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

Account description	Budget	Budget	Budget
	2025 / 2026	2026 / 2027	2027 / 2028
	£000's	£000's	£000's
Employees			
Monthly salaries	4,395	4,501	4,606
Training for professional qualifications	0	0	0
Medical fees (employees')	2	2	2
Employers' liability insurance	21	21	21
Employees' professional subscriptions	4	4	4
Sub-Total - Employees	4,421	4,527	4,633
Premises			
Rents	80	82	84
Room hire	2	2	2
Trade Waste	1	1	1
Sub-Total - Premises	82	85	87
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	58	58	58
Sub-Total - Transport	92	92	92

Supplies & Service

Equipment - purchase/maintenance/rental	36	36	36
Materials	9	9	9
Clothing, uniforms & laundry	2	2	2
Training fees	34	34	34
General insurances	16	16	16
Printing and stationery	17	17	17
Books and publications	2	2	2
Postage/packaging	11	11	11
ICT	70	70	70
Telephones	40	40	40
Taxi Tests	14	14	14
CRB Checks (taxi)	26	26	26
Support service recharges	132	136	140
Support service recharges - ICT	77	79	82
Sub-Total - Supplies & Service	486	492	498

Budget
2025 / 2026
£000's

Budget
2026 / 2027
£000's

Budget
2027 / 2028
£000's

Contractors

Consultants / Contractors' fees/charges/SLA's	257	247	247
Advertising (general)	6	6	6
Grants and subscriptions	13	13	13
Sub-Total - Contractors	275	265	265

Total Expenditure Budget**5,356****5,461****5,575**

Income

Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc	-463	-463	-463
Funding from Bromsgrove & Redditch for Enforcement Work	-482	-497	-512
Sub-Total - Income	-945	-960	-975

Income

Funding from partners for Technical Officers	-88	-78	-79
Funding from partners for Increase in Rent	-3	-5	-8
Funding from partners for Increase in ICT	-3	-5	-7
Funding from partners for Increase in Hosting Charges	-4	-8	-12
Funding from partners due to unavoidable salary pressures 24-25	-21	-21	-21
Funding from partners due to unavoidable salary pressures Excluding NI Increases 25-26	-94	-94	-94
Funding from partners due to unavoidable salary pressures NI Increases 25-26	-71	-71	-71
Funding from partners due to unavoidable salary pressures 26-27		-92	-92
Funding from partners due to unavoidable salary pressures 27-28			-89
Sub-Total - Income	-283	-374	-473

Additional Income

Agreed reduced charge to Worcester City Council	-30	-30	-30
Sub-Total - Income	-30	-30	-30

Total Income Budget

DISTRICT PARTNERSHIP BUDGET	4,098	4,097	4,098
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25-26 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%
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 several pieces of work and to cover the salary and pension pressures going forward.

	Contribution Technical Officers - Including NI Increase	Contribution Increase in Rent, ICT & Hosting Charges	Unavoidable Salary Pressures	Total Partner Contribution
	2025 / 2026	2025 / 2026	24-25 & 25-26	2025 / 2026
Budget 2025 / 26	£000's	£000's	£000's	£000's
Bromsgrove District Council	324	1	27	352
Malvern Hills District Council	8	1	24	33
Redditch Borough Council	171	2	33	205
Worcester City Council	44	1	30	75
Wychavon District Council	15	2	44	61
Wyre Forest District Council	9	1	28	38
Total	569	9	186	765

	Contribution Technical Officers - Including NI Increase	Contribution Increase in Rent, ICT & Hosting Charges	Unavoidable Salary Pressures	Total Partner Contribution
	2026 / 2027	25-26 & 26-27	24-25, 25-26 & 26-27	Total Partner Contribution
Budget 2026 / 27	£000's	£000's	£000's	£000's
Bromsgrove District Council	334	3	40	376
Malvern Hills District Council	8	2	37	47
Redditch Borough Council	176	3	49	228
Worcester City Council	33	3	45	81
Wychavon District Council	15	4	65	85
Wyre Forest District Council	9	3	42	54
Total	575	18	278	871
	Contribution Technical Officers	Contribution Increase in Rent, ICT & Hosting Charges	Unavoidable Salary Pressures	Total Partner Contribution
	2027 / 2028	25-26, 26-27 & 27-28	24-25, 25-26, 26-27 & 27-28	Total Partner Contribution
Budget 2027 / 28	£000's	£000's	£000's	£000's
Bromsgrove District Council	344	4	53	401
Malvern Hills District Council	8	4	48	60
Redditch Borough Council	181	5	65	251
Worcester City Council	33	4	59	97
Wychavon District Council	16	6	86	108
Wyre Forest District Council	9	4	56	69
Total	591	27	367	984

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 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	Green	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	Amber	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	Amber/Red	<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	Green	<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>
Local government Re-organisation	Ensuring the statutory regulatory functions are accommodated in any new unitary arrangements to meet the requirements of the new structure	On-going	High	Medium/ Low	Green/ Amber	<p>There is little for officers to do before any decisions on structures and timetable are made. The structuring of the shared service means that integration of these elements into one authority would be relatively straight-forward should a decision be taken on a unitary county model and, in the eventuality of multiple unitary authorities being the chosen model, the option to retain shared arrangement would remain, although it seems unlikely given previous re-organisations elsewhere.</p>