

Service Plan 2026/27

Worcestershire Regulatory Services Vision

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

CONTENTS

	Page Number
Executive Summary	3
Introduction	4
Strategic Assessment and Priorities	6
Finance	9
Audit Arrangements	10
Activities and Outcomes	11
Food delivery	14
Performance Reporting	16
Structure	17
Training and Development	18
Business Continuity	19
Local Partnerships	20
Consultation/Engagement	22
Governance & Risk	22
Appendix A Structure Chart	23
Appendix B Regulatory Services Budget Tables 2025/6	24
Appendix C Performance Measures Relating to Outcomes	30
Appendix D Risk Register	32
Appendix E Council Priorities	38
Appendix F Food Action Plan	41

EXECUTIVE SUMMARY

Our Service Plan is similar to previous years, outlining how the organisation will operate over the following year to deliver on both national and local priorities. This document will showcase the actions we will make as a team to achieve or address those priorities, and how success will be measured. Worcestershire Regulatory Services will enter 2026/27 with a total agreed budget from partners of just over £5M.

The budget includes the necessary uplift to cover the pay increases previously agreed, the cost of increased pension contributions by the employer, and increasing hosting costs reflected by the on-going inflationary pressures faced in recent years. In line with the Food Standard Agency's Food Law Code of Practice, the budget has also allocated for three new food officers to engage with local businesses and vendors. The total does not include the amount for Bromsgrove District and Redditch Borough Council for their Enviro-Crime and Planning Enforcement functions as this continues to be treated separately to avoid any impacts on broader partnership contribution calculations.

Plans for 2026/27 are based on the Strategic Assessment for the service, intelligence-led findings that identify several cross-cutting priorities that will help to inform service delivery, until Local Government Re-organisation (LGR) comes to fruition in April 2028. These priorities feature several areas that create challenges for councils across the county.

The final decision on a revised local authority structure for Worcestershire is not anticipated before June or July 2026. Although a two-authority model would see a continuation of the shared service, a single authority could also result in the service entering the new structure at a suitable level, giving staff more certainty than many. Government's indication of changes to local authority funding, with the arrival of three-year settlements, has impacted some districts more so than others. The devolution agenda also remains somewhat opaque from our perspective, so this continues to be a difficult period to predict for the sector. Financial pressures will remain including the risk of further section 114 announcements, in effect a council declaring itself bankrupt, which is an issue that is yet to be considered by local authorities. Looking further afield, with uncertainty remaining surrounding on-going issues in Ukraine and the Middle East, as an organisation we must consider how this may influence our day-to-day business.

Despite uncertainties, the service will continue to pursue work and successfully deliver results for other local authorities. We have retained work from most of our customers who recognise the benefits of outsourcing work to us than engaging internally. So far, LGR has not impacted on this, but as new models become clear, we anticipate authorities will look at how to discharge functions using collective resource from within what will become the new unitary councils. The service will continue to risk assess what it does, considering 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. This will remain at the heart of service delivery moving forward.

Simon Wilkes

Director of Worcestershire Regulatory Services

Julie Lorraine

Interim s151 Officer Director of Resources Bromsgrove District and Redditch Borough Councils

1. INTRODUCTION

This is the 16th formal annual service plan to be produced by Worcestershire Regulatory Services and follows a similar format to previous iterations, outlining the operational details of planned activity for the service this year. Financial information covers the two-year accounting period 2026/27 and 2027/28. Due to the anticipated changes to local authority structures on 1st April 2028, it is challenging to forecast beyond this two-year period.

In 2025/26 workloads that resembled the pre-pandemic world returned, with problems associated with Environmental Health work being at 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, and this continued with the record-breaking temperatures we experienced. Interestingly levels of nuisance work did not go beyond those in 2023/4, where the summer was good but not outstanding. Reasoning for this could be attributed to our proactive work with Licensed premises ahead of the summer period, as a preventative measure for nuisance complaints. As ever, there was plenty of other work to address including, but not limited to, several serious accidents including fatalities to investigate; Air Quality action plans; and successful behaviour change engagements with educational institutions on air quality.

The Food Standards Agency (FSA) continued to engage with us and in late autumn once again challenged us over resourcing for the six partners' food hygiene related activities. This came at the time the FSA's revised Code of Practice was issued, which offered further flexibilities in approach but nothing like the intelligence-led model we have been pursuing. The continued threat of intervention led to an agreement to increase resourcing for food hygiene work, with three new posts budgeted for 2026/27. The FSA remains insistent that authorities align their activities wholly with the revised Food Law Enforcement Code of Practice. They also continue to examine national approaches to regulation including giving certain sectors like the large supermarkets more autonomy and lower inspection burdens as part of their developing broader modernisation programme. 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 to give confidence to countries receiving exported UK products will remain a dominant factor influencing its approach to operations.

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 by the partners. It was imperative to review some older policies that had not been looked at for some time and were up for review but also the implementation of new policies such as pavement licensing, primate keeper licensing and Mandatory Safeguarding training for drivers to enable a consistent approach across the County. As most of the previous year had been spent implementing new Policy decisions, 2026/7 will look at more partnership engagement focusing on compliance and enforcement activities focussing on the Nighttime Economy, illegal dog breeding and concentrating on ensuring town centres and events are licensed correctly through street trading and pavement licensing policies.

Work from our usual local authority customers has largely continued and we won new contracts, particularly involving the dog control functions. Income continued to grow and several of our Primary Authority relationships that had been semi-dormant during the pandemic created further opportunities. Work continued with Muller Dairies, and work with Timpsons began to develop following their acceptance of our offer of support. We will continue to build the close working relationships necessary to make a success of this during the coming twelve months.

Legal process again featured in the work of the service during 2025/6 with several cases coming to fruition, which will be reported in the Annual Report that will come to the Board in June 2026.

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

- The decision made by the Minister of State on the unitary structure question,
- 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,
- Maintaining existing income streams to help support local delivery, and where feasible taking on others,
- 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 into the on-line offer,
- Continued work with partners to scope the potential for adding functions to the WRS operational roster like planning enforcement, enviro-crime and others, especially considering the outcome of the “unitary conversation,”
- 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.

We anticipate that new income streams from district councils outside of Worcestershire will be harder to come by once there is clarity on new unitary structures. The focus will be on maintaining income where possible in areas our economies of scale offer the most benefits, with the required resource intensity generating the best income rewards. We can however look more widely to other neighbours to see if there are opportunities. It will remain 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 on-going automation project will continue to increase our website's functionality for on-line payments and submission of service requests. Our temporary Communications Officer will also be looking at the site to see what improvements might be possible to improve accessibility and customer journey.

2. STRATEGIC ASSESSMENT AND PRIORITIES

The Priority Regulatory Outcomes for England, 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 and communities, and improving overall health and well-being. If all our work supports one or more of the above outcomes, we know we are delivering what partners want. Appendix E contains details of the current corporate priorities for the six partners, with a few words that help give context.

Our Strategic Assessment, the key document that helps us determine priorities, has been reviewed and created for three years from April 2025/6, taking us to the point of re-organisation. The document 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 undertakes an annual evaluation to ensure the environment has not changed significantly.

Analysis focusses on the service areas which generate 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 continues to be a cross-cutting theme referenced within the analysis of alcohol licensing, food safety, general licensing, nuisances, pest control, and planning enforcement. It is also an issue highlighted by partners as a priority to regulate for the overall safety and enjoyment of residents.

Pubs, clubs, restaurants and takeaways, through analysis, that were connected to breaches of crime and disorder objects were more likely to have their premises licences suspended due to the non-payment of annual fees. Further complaints from local communities for establishments include food safety and hygiene standards, noise disturbances and nuisances, and pest infestation. Busy night-time economy areas such as Worcester City centre also saw some taxi licensing issues raised (over-ranking etc.), something that is not exclusively aligned with the night-time economy, but levels of risk may increase at night. The presence of persistent offenders was also a significant factor influencing the rate of complaints in a range of neighbourhoods.

The analysis also identified a potential for an increase in offences at smaller businesses due to financial pressures, and non-compliant food businesses being able to continue trading via platforms such as Deliveroo, Just Eat, and Uber Eats. The use of these delivery 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.

We will continue to conduct visits and monitor breaches of licensing objectives in businesses, particularly in areas where the night-time economy is busiest, including checks of taxi ranks. Support will also continue to be offered support at large scale events hosted by partners, such as the Victorian Christmas Fayre in Worcester.

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

Many people enjoy keeping dogs for various reasons, with many animals becoming one of the family, but across WRS service areas, reports, often from concerned neighbours, show that people are not taking their responsibilities seriously.

Contained strays were one of the most prominent case types identified by the service and, whilst dogs were generally found to be in good condition, there has been a notable increase in the number of dogs seized in a condition which required them to be taken to a vet for examination or treatment.

Aside from stray dogs, noise from barking or howling dogs was the most prominent reason for a resident to make a nuisance complaint, and issues like dog fouling is investigated by staff on behalf of Bromsgrove, Redditch and Wychavon Councils. Although less prominent, dogs were also referenced in planning enforcement cases (for Bromsgrove and Redditch) due to individuals operating boarding or walking businesses from residential properties.

Half of the general licensing cases handled by the service related to unlicensed dog breeders or the conditions at licensed establishments. Operations conducted by WRS named Lisbon 1 and 2 demonstrated the huge amounts of money involved in the supply chain for animals, which can attract those whose only interest is in making money and not the welfare of the animals they are selling or the impact on new owners.

A significant proportion of dogs seized by our warden service are either not microchipped, the details held on the microchip have not been updated or there are not contact details on the collar, making identifying owners very difficult and increases the level of fees owners face when claiming their dog.

Last year saw the South Worcestershire Community Safety Partnership support the service financially with a responsible dog ownership campaign which included dog-microchipping events in the three southern districts. The campaign continues to promote responsible dog ownership but, as it moves into its third year is to be expanded, with a stronger position being taken on the enforcement of legal requirements around micro-chipping, and collar and tag.

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

Protecting communities and the environment is at the heart of this priority after being referenced through analysis of environmental crime, general licensing, pest control, and planning enforcement.

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 issue of smoke caused by the burning of garden waste or wood-burning appliances.

Significant health and safety at work breaches and serious accidents have been a focus of the Community Environmental Health division's investigative work in recent years. Whilst the partners no longer fund proactive work in this area, our responses to intelligence reports of dangerous occurrences will help address workplace health issues.

Technical Services' broader work on Air Quality fits within this priority and the service has taken strides forward since the last assessment, with reviews of strategy, action plans and the development of real-time monitoring capacity. Likewise, Environmental Permitting work helps to control the outputs from industrial processes that are polluting and, if poorly controlled, might represent a health risk to communities.

Food safety work includes the prevention of food-borne illness for the health of our communities. Small retail food outlets were relatively prominent 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 have other permits or licenses.

This priority area also encompasses the high volume of fly-tipping incidents reported by the Bromsgrove and Redditch Councils and the problems residents experience due to breaches of planning laws, pest activity, accumulations, and scrap metal collections.

Towards the end of the last assessment period, capacity was taken on to help support work on influencing behaviours from adverse air quality but also reducing overall contributions to pollutants. This behaviour change project work has been incredibly well received, particularly in local schools. Environmental improvement features strongly in all the partners' priorities, so we hope this will contribute to aspirations in this area.

- **Further Priorities**

Previous plans have had additional priorities around supporting commercial and industrial businesses to operate safely and responsibly but these do fit well into the three priorities above. Routine interventions/inspections, the investigation of complaints, and the provision of advice will all be part of the work developed for each priority.

In the past, WRS has sought to address financial challenges through transformation and generating income. We will continue to support partners with this difficult situation but, in the recent years, it is difficult to find any further meaningful savings from these functions, particularly for a single partner. The intervention of the FSA and the pressure applied to increase capacity continues to re-enforce this. We will remain committed to encouraging 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 reduce costs in the longer term. This may become more relevant based upon the unitary solution for Worcestershire, and the conversations begin to shape the new arrangements.

The service will continue to use the following three key criteria to assess the risk and impacts of any proposed further reductions in service provision:

1. Are vulnerable people impacted?
2. Is there health and well-being issues involved?
3. 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 more relevant. There remains a risk that demand which can no longer be met by WRS is re-directed to partners in other ways e.g., via other forms of complaint.

3. FINANCE

A summary of the budget position for 2026/7 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 given the level of spend. The shared audit service has always been viewed by WRS managers as a critical friend, and reviews of the service's activities are welcomed with this approach in mind.

The only other area subject to any form of audit last year was Licensing, on behalf of Wyre Forest. This work was undertaken by BDO, which WFDC uses for its internal audit function, having been unable to secure membership of the shared audit service. This audit reviewed several policies and applications dealt with by the Licensing team on behalf of Wyre Forest and uncovered a small number of minor issues which were addressed or noted. No concerns were raised by the Council's CEO. No other areas of WRS activity were audited in 2025/6.

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 endeavour to agree to joint scrutiny arrangements and avoid duplication of effort.

Where Scrutiny Committees have expressed an interest in understanding more about WRS' 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.

In 2025/6, the service met with the Wyre Forest O&S Committee and presented on the current work of the service, which the Chair and Councillors found informative. In recent years, the service has provided similar input at Malvern Hills and Wychavon, and last year officers also presented to Redditch and Bromsgrove O&S committees in relation to aspects of the Planning enforcement work and at Redditch Crime and Disorder Scrutiny Board in relation to Enviro-crime work undertaken on their behalf. During 2026, reports on wider Enviro-crime work will be taken to Bromsgrove and Redditch O&S Committees.

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 and increased 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.

Engaging with partners in this way and working with partners on projects like the redevelopment of town and city centres, helps to maintain relationships with colleagues and highlights the important role of regulation when looking at wider, long-term policy development.

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 (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 2025/6.

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. 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 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 potential nuisance problems.

Public expectation of what the law can deliver also continues to be an issue, particularly in relation to noise and nuisances 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 what constitutes a statutory nuisance is equally infuriating to many. There is no red line for when something is deemed a nuisance and people find this 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 re-shape our food interventions to meet the increasing expectations of the FSA may exacerbate pressures on nuisance work. The new structure of CEH Commercial and Environmental teams means a stronger focus on food work during busier periods for nuisance work. Managers in the CEH division will likely have to juggle some resource to meet demand, but it will be essential that we meet FSA expectations moving forward. Last summer we noted that nuisance issues did not reach the peaks they have in previous years, despite the weather, so we hope our proactive interventions are helping to control this. The additional Food Officers recruited during 2024/5 are now competent and delivering, and we hope that the further resource partners are allocating to the food service area will become available as soon as possible after April 2026.

We believe that activity data combined with the core performance indicators will give Members the confidence that WRS continues to perform well. The approach is in line with government thinking in terms of supporting local businesses whilst protecting communities, tackling rogues who would ignore their responsibilities, and criminals who use business as a model for generating criminal assets. 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.

	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	Promoting safe, clean and healthy communities	<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>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 complaints 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>
---	--	---	---

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

Specific detail of the Food Delivery Plan is provided at Appendix F to meet the requirements of the Food Standards Agency (FSA) and the revised Code of Practice in providing members with a detailed brief on food work for the coming and subsequent financial years.

Recruitment to the five new food posts previously approved by the Board following FSA intervention was completed by September 2024. All have learned quickly and made a positive contribution to the food programme 2025/6.

The Food Delivery Plan 2026-2028 was created following further intervention by the FSA, requiring the shared service to fully align its activities with the revised (October 2025) Food Law Code of Practice.

An initial assessment of staffing requirements was undertaken using the time and motion tool created by the Agency. At the same time discussions were taking place with the partners regarding the allocation of additional resource to this work, which led to agreement in principle for three additional full-time equivalent Technical Officers, whose competencies would allow them to inspect all premises. This plan assumes that this additional resource is available. Depending on the capability level of the incoming staff, time may be needed to develop them to the required standard of competency, which may affect the number of interventions initially achieved.

At its heart, the plan operates through the recreation of two geographically focused Environmental Health Commercial teams within the Community Environmental Health division. Their focus will be food, but they will retain responsibility for the investigation of serious accidents incidents under health and safety at work, and infectious diseases, which are mainly food related, and the work under Primary Authority agreements, for which costs are fully recovered and can be re-invested.

Time recording estimates that this will provide for an estimated 18 FTE available for food safety work given these other responsibilities. Depending on the capability level of the incoming staff, time will be needed to develop them up to the required standard of competency, which may affect the numbers achieved initially.

The split is roughly even in terms of geographical area and workload, with the West team covering Wyre Forest, Malvern Hills and Worcester City and the East team covering Bromsgrove, Redditch and Wychavon.

5 separate workstreams have been identified to ease management of the process:

- Stream 1: Premises risk rated category A-C (highest risk)
- Stream 2: Premises risk rated category D (moderate to low risk)
- Stream 3: New Premises registrations
- Stream 4: Premises risk rated category E (lowest risk)
- Stream 5: Premises which are overdue from previous periods.

The following table provides the Number of interventions falling due in the upcoming financial year, 2026/7. All categories will be subject to intervention in adherence with the FLCoP during the year.

Risk Rating of Premises	Compliance	Number of interventions planned in the 2026/7 financial year
A	Broadly Compliant	3
A	Non-Broadly Compliant	1
B	Broadly Compliant	146
B	Non-Broadly Compliant	14
C	Broadly Compliant	470
C	Non-Broadly Compliant	23
D	Broadly Compliant	743

D	Non-Broadly Compliant	4
E	Broadly Compliant	243
E	Non-Broadly Compliant	1
Unrated	N/A	0
Estimated New Premises Registered	N/A	900
Total	N/A	2548

The Food Delivery Plan at Appendix F gives additional detail in respect of how the overdue interventions and new registrations will be recovered.

The plan further describes provisions to revise policy and process documentation to ensure efficiency and a pilot of digital inspection to reduce the administrative burden on staff associated with the inspection process. These changes will also look to exploit to the maximum some of the new flexible approaches allowed in the revised Code.

Whilst the teams will work in line with the Code, the service will remain intelligence-led and will seek to use the provisions of the intelligence operating model developed over the life of the service to maximise efficiency and ensure that information regarding activities/ issues at premises is shared both across the service and more widely with partners and other food authorities where appropriate.

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 collect 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 staff, 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 (CEH) division continues to provide Food Hygiene, Health and Safety at Work, Public Health and Nuisance functions using three teams. With the recent interventions of the FSA, it has become necessary to revise the operating model for the team, moving back towards a more traditional approach that splits what is referred to as Commercial and Environmental functions.

Going forward, two teams will discharge the functions on an East/West geographical split with the East team covering Redditch, Bromsgrove and Wychavon, whilst the West team will cover Malvern Hills, Worcester City and Wyre Forest. The geographical teams are organised to reflect the balance of demand across the county for these functions. A single team will cover the Environmental Nuisance and related work county-wide. 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 across Worcestershire and further afield.

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 division. Technical Services 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. It also commissions/ discharges gull control work for the City Council.

- 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 three 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. Capacity is stretched thin at times, with incidents like the pandemic testing the resilience of those involved to breaking point.

The County Council's functional elements have been retained in the structure chart as they are numerous and wide ranging, and since October 2016 the Community EH Manager and the Head of Service/Service Director have been providing direct management support to the Trading Standards team. The review of arrangements with County Council Public Health colleagues during 2024/5 led to a rolling agreement being put 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 the County Council's 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 division's continuing delivery of the County Council's statutory role on Petroleum Licensing alongside the district councils' permitting function for vapour recovery at sites, giving businesses a single point of contact for both functions. The County Council also asked the service to deliver the Safety at Sports Ground function several years ago through its health and safety expertise in Community Environmental Health. This has now also moved onto a rolling contract, 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 correctly discharge partner statutory duties, the service must maintain a training budget for its staff.

Funding for training 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. The Food Standards Agency's push for more food interventions does undermine this to some extent, but the service will look to maintain some environmental enforcement competence within its fully qualified Commercial 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 characteristic of the functions in this division of the service. A competency framework for Technical Officers is in place and is used to identify training needs and develop the competency of officers more widely. Broader competencies will allow a wider range of people to deliver work in Technical Services and enable the service to tender for suitable contracts and/ or maintain existing contractual relationships outside of the partnership in the run-up to re-organisation.

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 and several application forms are now automated via Victoria Forms.

This is a continuing process and should free up some capacity to allow 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 Gambling Inspections regime. 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. Of course, any decision on unitary structures in 2026 will have to inform thinking on this moving forward.

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 the partners, our Trading Standards colleagues and some of our neighbours where we have spaces available on the courses that we arrange.

In the last two years, officers have received training on the basic underpinnings of criminal investigation, with updates on Criminal Procedure and Investigations requirements, as well as Police and Criminal Evidence Act interviews. These were done face-to face, but 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.

Traditional issues for business continuity such as the loss of premises have been addressed by the adoption of mobile/flexible working. All WRS staff can now use home as their start and finish point for work purposes for an extended period. The smaller scale impacts of things like seasonal flu, if they were on sufficient scale to create a resource issue can be addressed by prioritisation and, if this were on a larger pandemic scale, there would be national protocols of what should and should not be done, as there were in 2020.

The threat of on-going financial constraints for the partners if not local government generally, is likely to be time limited due to the impending re-organisation, but if partners were to require reductions that are not currently envisaged, this would threaten the service's ability to maintain the full range of interventions whilst responding to large scale events and delivering contractual obligations.

As part of the Business Continuity Planning process, officers have identified priority areas for activity so the service is clear what will stop and what will continue in event of an emergency. 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 losses 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. This includes moving to holding important documents needed on a day-to-day basis into cloud storage to ensure continuity, but loss of systems in recent incidents still suggest that a temporary return to full paper recording may be necessary for a period before digital resource can be restored. Wyre Forest's IT team continue to invest in additional security measures, and the constant feed of reminder training should help to keep cyber issues at the forefront of people's minds. The weak link in most systems is the human one, so safe behaviours must be embedded in day-to-day practice.

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 additional staff 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 must continue 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, WRS Managers have had 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 twelve-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).

Although the re-organisation process does provide a threat to income streams going forward, given one of the proposed unitary solutions sees WRS as a continuing partnership, it will remain important that officers ensure WRS provides an attractive product for external clients.

Engagement with equivalent partners in other geographical regions will continue to be pursued, which may include the collation/interpretation and review of intelligence data in such areas. This will help us to better understand the emerging discussion around re-organisation elsewhere and may enable the service to continue to engage beyond the county borders post April 2028.

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 provide a vehicle for the laundering of money as are property purchases. 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 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 Child Sexual Exploitation. The service has seats at both tactical and operational multi-agency groups that address organised crime and has worked with Trading Standards and the police on several recent national initiatives aimed at crime on high streets. Where relevant, this will continue going forward.

11. CONSULTATION & ENGAGEMENT

We will usually address national consultation on legislative change through the relevant professional channels unless there is a 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 relevant, to reassure members that our activities are seeking to protect residents and support businesses across the whole of Worcestershire. A proportion of articles will be generic and relevant county-wide, matching the way in which regulatory functions have changed over the years.

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.

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 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 support individuals down this route and reduce the expectation that we will always do it for them. Partners are aware of the cost variance of different contact channels and the fact that digital will be cheapest, if not always the only route the public will want to be enabled. The WRS website will be maintained so that it is suitably accessible from the various digital devices. The Victoria Forms system for making service requests/complaints and applications on-line that are directly entered into our back-office system will also improve efficiency in this area.

12. RISK & GOVERNANCE

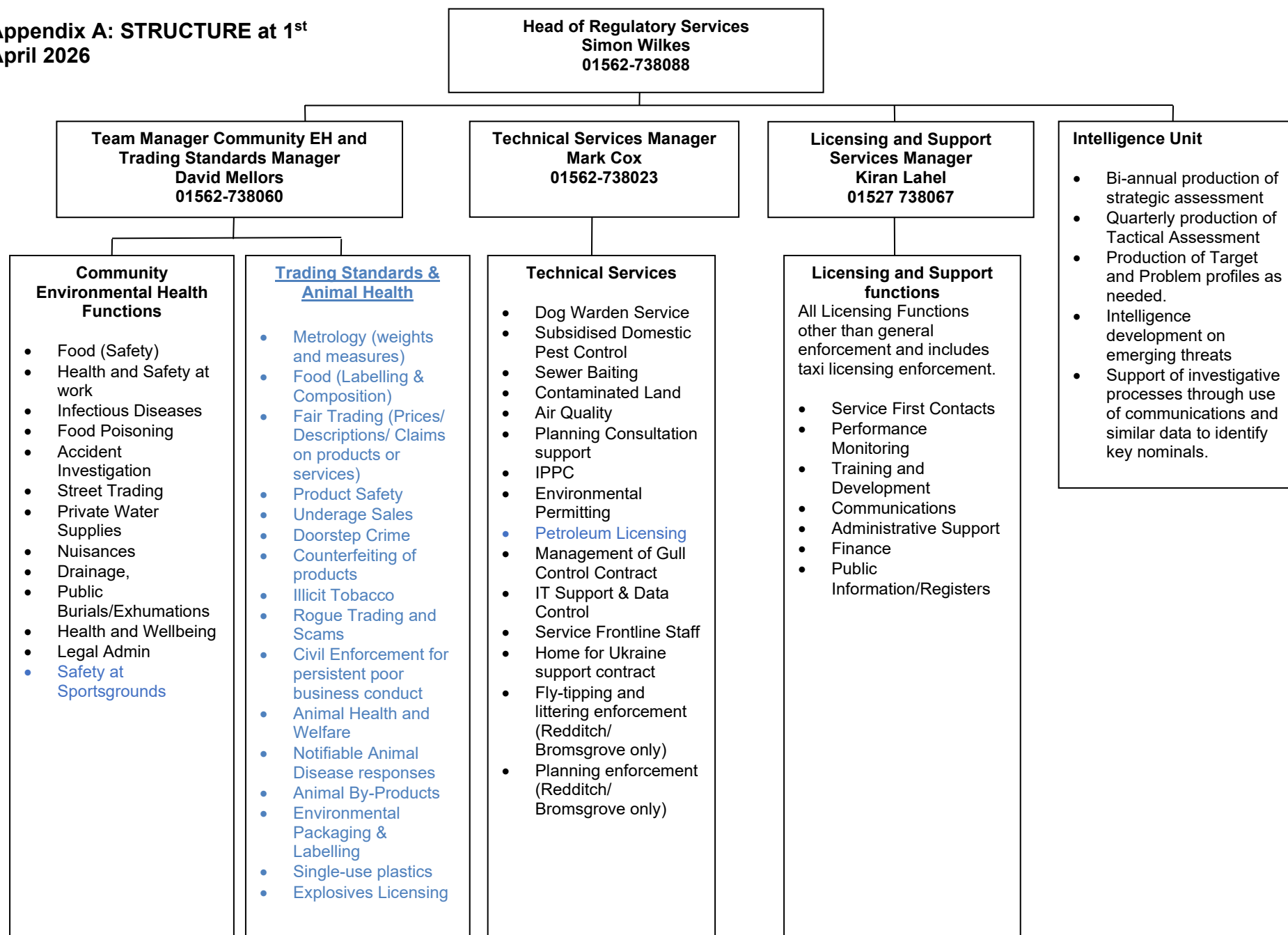
The current governance arrangements came into force on 1st April 2016 following the departure of the County Council from the formal partnership. The original legal agreement indicated that partners would pursue the shared services model for a period of at least 10 years. The 2016 agreement re-iterated 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 continue. Officer Members of the Board kept a watching brief on the service and can consider reviews 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, which has been reviewed and updated for this plan is appended at Appendix D. A line was added to address the FSA's recent interventions in 2024/5, although there has been the possibility of central government bodies commenting since at least 2014, and specific reference to the potential for FSA intervention since 2016. The increased forcefulness of the FSA's position in relation to adherence to the Code of Practice is noted, along with the risk of other central competent bodies creating codes or performance frameworks against which local authority activity may be judged.

Re-organisation was also added last year as a reminder that the issue that will need to be addressed in the coming years. The entry reflects our current understanding of the position. The plans submitted by the partners and Worcestershire County Council indicate one of two potential futures for the service, either continuing as a shared arrangement under the two-council model or being integrated into the structure of a unitary council arrangement. We have a timetable for this and await the decision ahead of summer 2026.

The number of commercial contracts and obligations providing financial support to the service has always created some risk, particularly where sub-contractors or skilled technical staff are involved. This revised document continues to recognise the wider geographical area that the service now covers and level of technical expertise that must be maintained to facilitate this. Re-organisation does create a threat to this income, but by continuing to engage with the contracted partners, we will be best placed to ameliorate this and potentially ensure some continuity, where buying in capacity may continue to be a suitable solution for the newly created authorities.

**Appendix A: STRUCTURE at 1st
April 2026**



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

Account description	Budget	Budget	Budget
	2026 / 2027	2027 / 2028	2028 / 2029
	£000's	£000's	£000's
Employees			
Monthly salaries	4,582	4,726	4,886
Medical fees (employees')	2	2	2
Employers' liability insurance	21	21	21
Employees' professional subscriptions	4	4	4
Sub-Total - Employees	4,609	4,753	4,913
Premises			
Rents	83	86	89
Room hire	2	2	2
Trade Waste	1	1	1
Sub-Total - Premises	86	88	92
Transport			
Vehicle repairs/maint'ce	3	3	3
Diesel fuel	8	8	8
Licences	1	1	1
Contract hire of vehicles	3	3	3
Vehicle insurances	5	5	5
Van Lease	9	9	9
Car allowances & Car Parking	51	51	51
Sub-Total - Transport	80	80	80
Supplies & Service			

Equipment - purchase / maintenance / rental	46	46	46
Clothing, uniforms & laundry	2	2	2
Training fees	34	34	34
General insurances	16	16	16
Printing and stationery	17	17	17
Postage/packaging	11	11	11
ICT	114	114	114
Telephones	36	36	36
Support service recharges - Hosting	137	141	145
Support service recharges - ICT	80	82	84
Sub-Total - Supplies & Service	493	499	505

Budget
2026 / 2027
£000's

Budget
2027 / 2028
£000's

Budget
2028 / 2029
£000's

Contractors

Consultants / Contractors' fees/charges/SLA's	242	242	242
Advertising (general)	5	5	5
Grants and subscriptions	13	13	13
Sub-Total - Contractors	260	260	260

Total Expenditure Budget

5,528	5,681	5,850
--------------	--------------	--------------

Income

Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc	-483	-483	-483
Sub-Total - Income	-483	-483	-483

Income

Funding from Bromsgrove & Redditch for Enforcement Work	-473	-479	-498
Funding from partners for Technical Officers	-79	-80	-82
Funding from partners for Increase in Rent	-3	-6	-8
Funding from partners for Increase in ICT	-3	-5	-8
Funding from partners for Increase in Hosting Charges	-4	-8	-12
Funding from partners due to unavoidable salary pressures 26-27	-118	-118	-118
Funding from partners due to unavoidable salary pressures 27-28		-134	-134
Funding from partners due to unavoidable salary pressures 28-29			-137
Funding from partners for Additional FSA Resource	-171	-176	-182
Savings due to change in forward pension rate	98	101	104
Sub-Total - Income	-752	-905	-1,075

Additional Income

Add back reduced charge to Worcester City Council			0
Sub-Total - Income	0	0	0

Total Income Budget

-1,235	-1,388	-1,558
---------------	---------------	---------------

DISTRICT PARTNERSHIP BUDGET

4,293	4,293	4,292
--------------	--------------	--------------

2026/7 Partner Percentages		%'s
Bromsgrove District Council		14.35%
Malvern Hills District Council		13.05%
Redditch Borough Council		17.56%
Worcester City Council		16.64%
Wychavon District Council		23.27%
Wyre Forest District Council		15.14%
Total		100.00%

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.

	Base Budget	Agreed reduced charge to Worcs City to be added back	Contribution Technical Officers	Contribution Increase in Rent, ICT & Hosting Charges	Additional FSA Resource	Savings due changes in Forward Pension Rate	Unavoidable Salary Pressures	Total Partner Contribution
	2025 / 2026	2026 / 2027	2026 / 2027	2026 / 2027	2026 / 2027	2026 / 2027	2026 / 2027	2026 / 2027
Budget 2026 / 27	£000's	£000's	£000's	£000's	£000's	£000's	£000's	£000's
Bromsgrove District Council	620		338	1	25	-14	17	987
Malvern Hills District Council	564		8	1	22	-13	15	597
Redditch Borough Council	759		148	2	30	-17	21	943
Worcester City Council	690	30	34	2	28	-16	20	788
Wychavon District Council	1,006		14	2	40	-23	27	1,066
Wyre Forest District Council	654		10	2	26	-15	18	695
Total	4,293	30	552	10	171	-98	118	5,076

	Base Budget	Agreed reduced charge to Worcs City to be added back	Contribution Technical Officers	Contribution Increase in Rent, ICT & Hosting Charges	Additional FSA Resource	Savings due changes in Forward Pension Rate	Unavoidable Salary Pressures	Total Partner Contribution
	2025 / 2026	2027 / 2028	2027 / 2028	26-27 & 27-28	26-27 & 27-28	26-27 & 27-28	26-27 & 27-28	2027 / 2028
Budget 2027 / 28	£000's	£000's	£000's	£000's	£000's	£000's	£000's	£000's
Bromsgrove District Council	620		343	3	25	-15	36	1,012
Malvern Hills District Council	564		8	3	23	-13	33	618
Redditch Borough Council	759		150	3	31	-18	44	969
Worcester City Council	690	30	34	3	29	-17	42	811
Wychavon District Council	1,006		15	4	41	-24	59	1,101
Wyre Forest District Council	654		10	3	27	-15	38	717
Total	4,293	30	560	19	176	-102	252	5,228
	Base Budget	Agreed reduced charge to Worcs City to be added back	Contribution Technical Officers	Contribution Increase in Rent, ICT & Hosting Charges	Additional FSA Resource	Savings due changes in Forward Pension Rate	Unavoidable Salary Pressures	Total Partner Contribution
	2025 / 2026	2028 / 2029	2028 / 2029	26-27, 27-28 & 28-29	26-27, 27-28 & 28-29	26-27, 27-28 & 28-29	26-27, 27-28 & 28-29	2028 / 2029
Budget 2028 / 29	£000's	£000's	£000's	£000's	£000's	£000's	£000's	£000's
Bromsgrove District Council	620		355	4	26	-15	56	1,046
Malvern Hills District Council	564		9	4	24	-14	51	638
Redditch Borough Council	759		155	5	32	-18	68	1,001
Worcester City Council	690	30	34	5	30	-17	65	837
Wychavon District Council	1,006		15	6	42	-24	90	1,135
Wyre Forest District Council	654		11	4	28	-16	59	740
Total	4,293	30	579	28	182	-104	389	5,397

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 2026/7

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 for all public bodies. Wyre Forest ICT has effective processes and business continuity plans in place. WFDC has upgraded relevant systems including Windows and Office 365, and is looking to increase security with further additions, which the service will pay for. 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	Idox Uniform is an old system but, it provides the necessary functionality and has been capable of integrating with Victoria Forms to provide a sound on-line payment platform that updates the back-office without additional inputting. Bromsgrove & Redditch's additional functions have been integrated into the system so, it does have some flexibility for deployment directly to new enforcement functions. Complexities might arise with potential new service areas not currently catered for within the database, where existing partner databases may need 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	Whilst the pandemic showed that we were well prepared for the need to maximise working from home and touchdown stations remain available in partner council locations, WRS Managers continue to build their 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 continue 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	<p>Whilst the service was able to broaden its activities during the pandemic, engaging people with no formal background to cover roles, it also helped us to better understand the limited availability of competent and qualified officer capacity. This has been re-enforced by recent difficulties in recruiting, particularly into traditional Environmental Health roles. 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>Demand has increased over the years as we have taken on contracts, effectively operating as a centre of excellence for certain activities. This does however mean that, whilst we have good resource of our own, in event of an issue, there are limited places where we could ask for help. Our service is better resourced and qualified than would be possible if we didn't provide such services for income. Which balances this.</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. Maintenance of training budgets has been essential in holding onto our competitive edge for income generation.</p> <p>Regular inventory and maintenance of equipment is undertaken. In the future, budget for replacement kit may be an issue but would be a relatively small amount for partners to share. For example, we know our provider of noise monitoring equipment from Germany no longer makes the equipment we use and, while we can get it repaired by a UK-provider, longer term new forms of kit will need to be assessed to replace the traditional "Matrons."</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. Increased public health risks	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 distance. Retendering for conventional contracts in kennelling and support services remains difficult and consideration may be given to creating our own kennel capacity. Contractual obligations provide additional pressure. We procured our kennelling contracts for three years, in October 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 BDC finance system have mainly been resolved, however some workarounds remain in place. Roll out of reporting by managers has yet to be finalised. HR capacity remains pressured and there are some frustrations around expectations that are being addressed. We need to continue communication with our hosts to ensure the needs of the shared service do not get missed during any significant changes to systems or processes. This has been flagged to the CEO.
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	The 2016 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 our organisation minimises overheads and focuses resource at the front line. The growth strategy has generated income to support partners, but there are limits to this without additional capacity being added to the system. Historically, invest to save capacity has paid for itself within a relatively short period of time. The impending re-organisation may see significant changes to the way in which external partners require our services, which

						needs to be considered one we know the decision on structures from 2028 onwards.
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 for Environmental Health in particular, and new emergent issues can leave the law at a disadvantage or not being addressed without the significant cost of establishing case law. Membership of, and attendance of Officer Technical Groups outside the County does assist with communication of emergent issues, solutions and case results.
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 as suitable minimum levels of service. 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. NB: Food Standards Agency is addressed below.	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 Government cannot expect what it had previously. Fewer interventions/ audits by government. The Service's engagement with the Food Standards Agency in recent years has led to a significant increase in investment in relation to food law activity, to bring the service into line more with the Food Law Code of Practice. This has meant bringing back a more traditional approach to these activities rather than the innovative intelligence-led approach being previously used, which of itself did not appear to generate significant risk. 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*.

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. Papers have been submitted to the Board twice in recent years alerting members to the challenges faced to the innovative approach that the service has been taking.</p> <p>The partners made a significant investment in new resources to address many of the Agency's concerns at the end of 2023/4 and this has been fruitful in terms of improved performance, but the Agency is now insistent on full alignment with its Code, so further investment is planned. This has necessitated a re-design of operations within the Community Environmental Health division, with the creation of geographical teams for the delivery of food and other commercial functions, and a separate environmental enforcement team that will operate across the County.</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. Whilst this is not an issue currently,</p>

						income may become harder to pick up as the re-organisation process gathers momentum.
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	There is little for officers to do before any decisions on final 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 the decision be to establish a unitary county model. The alternative two-unitary model clearly indicates a preference for the retention of the shared service alongside a shared County-wide Public Health service. Whilst there would need to be conversations on how governance for these shared services might sit and, for regulation, what functions would remain/ be added, there does appear to be some certainty for officers looking forward.

Appendix E: Current Partner Council Priorities

Bromsgrove

Economic Development: Economic development is key for delivering our vision for the district, with the aim of cultivating a thriving and resilient local economy. We will focus on supporting businesses, enabling individuals, and developing communities.

Housing: We want to address the diverse housing needs within our District, ensuring quality homes for our residents and families.

Environment: We are committed to safeguarding the natural environment, addressing issues ranging from biodiversity conservation to climate change mitigation, supporting recycling to reducing waste production, all with the goal of enhancing the quality of life for current and future generations.

Infrastructure: Prioritising infrastructure is paramount for our District, as it serves as the bedrock of not only our communities but also growth. This priority underpins the other three, as they can only be delivered with the right infrastructure in place.

Malvern Hills

Our Health and Well-being: Continue to invest to support and enable our communities to become healthier, safer and stronger, Help residents to prevent, survive and recover from financial hardship, Preventing homelessness and rough sleeping or ensuring it is rare, brief and non-recurring, Give young people the opportunity to have a say in their communities and their future, Create a vibrant culture and arts community that delivers social, economic and health benefits for our residents.

Our Economy: Enable economic growth through increased provision of suitable commercial premises, support vibrant town centres and an attractive tourism offer, Ensure Malvern Hills District is recognised as a leading location for highly productive, high growth businesses.

Our Environment: Lead Malvern Hills District Council and the wider district to become carbon neutral, Encourage low carbon development, design measures and infrastructure to improve resilience and adaptation to climate change, Reduce the amount of non-recyclable waste sent to the Energy from Waste Plant from the district's households, Reduce the incidence of Environmental Crime across the District.

Redditch

Economy & Regeneration: We want a healthy and thriving economy, building on and celebrating the existing businesses within the borough.

Green, Clean & Safe Redditch: We will support communities in reducing energy bills through exploring affordable green solutions..... We are committed to making Redditch a cleaner and safer place for our residents, whether that is by addressing litter and dog mess or the impact of fly-tipping and antisocial behaviour.

Community & Housing: We will work with partners across the county to deliver the Worcestershire Housing Strategy 2023-2040 and the Worcestershire Homelessness Strategy.

Worcester City

A city where everyone can prosper: We want prosperity for everyone, founded on secure livelihoods and an inclusive and diverse economy.

A resilient and sustainable city: We want Worcester to contribute to the global response to climate change and its impact on nature and biodiversity and have the resilience to cope with the changing climate and extreme weather.

Strong and engaged communities: Worcester will be a place where people have a sense of shared ownership and pride, alongside kindness and respect for all. They will feel that they belong to multiple and overlapping communities with varied interests and ambitions, communities that support each other and celebrate each other's differences and varied heritage.

An attractive heritage city with a vibrant modern culture: Worcester is a historic city with a remarkable built and natural environment that we want to sustain and pass on to future generations. We want to celebrate the city's natural heritage, whilst supporting Worcester as a modern vibrant city. It will be a university and cathedral city that is renowned for a broad range of modern cultural experiences and is proud of its remarkable history and the legacy that is visible in its architecture and open spaces.

A healthy and active city: We want our citizens to enjoy long, healthy and fulfilling lives, and have a choice as to how they achieve this. We want a city that promotes health and wellbeing by providing attractive open spaces, quality provision for play, leisure centres, sporting facilities, and attractive options for active travel.

Wychavon

People: Improving Health and Well-being by supporting H&WB hubs and other tailored approaches including champions in workplaces, raising awareness of issues around vaping with young people and supporting community youth projects, support best start in life and uptake of free school meals, and providing opportunities for everyone, reducing inequalities and helping people to live healthier lives, and supporting young people and raising their aspirations, look at the need for community transport in rural areas.

Place: Helping everyone to access a good place to live, delivering affordable homes and preventing homelessness, supporting businesses to thrive and growing our local economy, revitalising our town centres creating vibrant and accessible places. Encourage the development of neighbourhood plans and their use to increase the amount and quality of social housing, developing options to bring empty homes back into use, improving the response to homelessness and developing suitable facilities, especially for the younger homeless, increase investment in business units, work with tourism and hospitality to increase visitor numbers, link schools to the local business community, and revitalise town centres working with our Place Boards.

Environment: Boosting and enhancing our natural environment including the restoration of some woodlands, increasing biodiversity and enhancing natural assets, parks and green spaces to be more resilient to climate change, cutting carbon emissions including from council facilities, minimise waste, and encouraging low-carbon travel through enhanced walking and cycling routes/ bike hire pilot schemes. Continue to deliver against our Intelligently Green plan and support businesses and communities to develop their own resilience to climate change and emergencies.

Wyre Forest

Economic growth and regeneration: Working with partners to redevelop and regenerate various sites across the district, working with partners to improve skill levels, ensuring they are what employers need, and make sure business support services are available to support growth.

Securing financial sustainability for services that local communities value: increase income from commercial activities, improve access to outdoor facilities and investigate ways to allow developers to make the necessary biodiversity contributions.

A clean, safe and green place to live, work and visit: Secure housing growth and improvements in temporary accommodation, invest in tackling environmental crime, littering particularly in Summer months and tackle parking issues, improve parks and open spaces with increased cultural events, create a carbon reduction plan, supporting improvements in household energy efficiency and increased electric vehicle charging capacity in the three main towns.

Appendix F: Food Plan for Worcestershire Regulatory Services

Period: January 2026 to March 2028

Actions must be specific, measurable and time bound.

What - issue to be addressed	How - Planned action to secure improvement	By whom (name)	By when (date)	Completed
Capacity to deliver FLCoP	<p>Management to complete Time & Motion Study to assess staffing levels to meet requirements 2026/7.</p> <p>Continue the use of the advanced WRS intelligence model to inform tactical and strategic assessments.</p>	SW/DM/HC	December 2025	Completed 16-12-25
Capacity to deliver FLCoP	Report conclusions of Time & Motion Study to Member Officers of the Board	SW/DM	December 2025	Completed November 2025 Provisional approval for 3 additional FTE for Food Safety work (In addition to the 5 agreed previously as part of Recovery Plan)

Capacity to deliver FLCoP	Report to WRS Management Board seeking additional resource of 3 FTE for Food Safety work	SW	February 2026	Briefing Report to Board completed November 2025. Provisional approval for 3 additional FTE for Food Safety work to be formally ratified at February 2026 Board
Capacity to deliver FLCoP and Focus on Food Safety Work	<p>CEH Team reorganisation from generalist capacity to provide dedicated Business Compliance Team (West) and Business Compliance Team (East)</p> <p>7 FTE Business Compliance Team (West) (Malvern Hills, Worcester City and Wyre Forest districts)</p> <p>8 FTE Business Compliance Team (East) (Bromsgrove, Redditch and Wychavon districts)</p> <p>* 3 FTE to be added to these teams April 2026 with approval of Board.</p> <p><i>Note: The remit of the Business Compliance Teams is to provide food safety, health and safety, infection control and Primary Authority work on behalf of the six district councils in Worcestershire.</i></p>	DM	January 2026	

To deliver requirements of FLCoP	Work Stream 1 A-C: 571 due 2026/7 All require a qualified officer visit within one month of due date. All 2025/26 inspections allocated to team via Living List. All 2026/7 inspections to be completed within one month of due date. All 2027/28 inspections to be completed within one month of due date.	HC/LE/DM Quarterly Performance Reviews with CEH Team Manager	March 2027 March 2028	
To deliver requirements of FLCoP	Work Stream 2 D: 747 due 2026/7 80% subject to inspection by qualified Officer. 20% subject to official food hygiene controls by competent RSOs. 2025-26 inspections allocated via Living List. All 2026/7 inspections to be completed within one/three months of due date. All 2027/28 inspections to be completed within one/three months of due date.	HC/LE/DM Quarterly Performance Reviews with CEH Team Manager	March 2027 March 2028	
To deliver requirements of FLCoP	Work Stream 3 NPR: 850 Estimated 2026/7 Inherent risk assessed at point of registration FLCoP: High Risk 28 days (60%), Low Risk 3 months (40%). All 2025-26 allocated via Living List Allocate two qualified officers (One per Business Compliance Team) + RSO support to deal with NPR on rotation (approx. 65 pcm)	HC/LE/DM Quarterly Performance Reviews with CEH Team Manager	February 2026	
To deliver requirements of FLCoP	Workstream 4 E Low Risk: 244 RSO led official food hygiene controls (alternative interventions) within 3 months of due date. All 2025-26 allocated via Living List. 2026-27 allocation via Living List	HC/LE/DM Quarterly Performance Reviews with CEH Team Manager	March 2027	

To deliver requirements of FLCoP	<p>Work stream 5</p> <p>Outstanding interventions due official food hygiene controls. Current 756 pre-2025-26. Note: Assessment already carried out shows that the majority of these are low risk. AES tool to be used.</p> <p>Estimated 500 Cs & Ds carry over from 2025-26. Figures to be confirmed by MIS report financial year end 2025/6, with allocation to Living List to follow.</p>	<p>HC/LE/DM</p> <p>Quarterly Performance Reviews with CEH Team Manager</p>	April 2026 to March 2028	
Improved efficiency to develop capacity to deliver FLCoP	<p>Continue the development of the “Living List” of real-time allocations.</p> <p>Digital inspection pilot: (To reduce inspection paper load and significant administration demand on officer time)</p> <p>Dedicate 2 officers to pilot the newly developed in-house digital system.</p> <p>Facilitates daily monitoring of food inspections.</p>	HC/RW/NW/NB	July-October 2026	
To deliver requirements of FLCoP	<p>Complaints/Service Requests: Estimate 500 per year</p> <p>Review food complaints policy and update operational process.</p>	HC/LE/DM	April 2026	
To deliver requirements of FLCoP	<p>Policy documents</p> <p>Complete review of food management system after changes implemented.</p>	HC	March 2026	

Performance Management of Planned Interventions	Review audit reports from MIS system to inform the monthly performance meetings	HC/SE		
	Weekly monitoring of performance by Principal Officers Business Compliance Team (West) and Business Compliance Team (East)	HC/LE/DM/SW	Weekly	
	Monthly reporting of performance against the Action Plan to CEH Team Manager at regularly monthly Performance Meetings		Monthly	
	Quarterly reporting of performance against the Action Plan to Director of Service		Quarterly	