

WORCESTERSHIRE DISTRICT COUNCILS

MEETING OF THE WORCESTERSHIRE REGULATORY SERVICES BOARD

THURSDAY 16TH FEBRUARY 2023

AT 4.30 P.M.

PARKSIDE SUITE, PARKSIDE, MARKET STREET, BROMSGROVE,
WORCESTERSHIRE, B61 8DA

MEMBERS: Bromsgrove District Council: Councillor H. J. Jones
Bromsgrove District Council: Councillor P. L. Thomas
Malvern Hills District Council: Councillor J. Raine
Malvern Hills District Council: Councillor B. Nielsen
Redditch Borough Council: Councillor S. Khan
Redditch Borough Council: Councillor N. Nazir
Worcester City Council: Councillor S. Cronin – Vice-Chairman
Worcester City Council: Councillor C. Mitchell
Wychavon District Council: Councillor D. Morris
Wychavon District Council: Councillor T. Rowley – Chairman
Wyre Forest District Council: Councillor N. Martin
Wyre Forest District Council: Councillor L. Whitehouse

AGENDA

1. Apologies for absence and notification of substitutes
2. Declarations of Interest

To invite Councillors to declare any Disclosable Pecuniary Interests or Other Disclosable Interests they may have in items on the agenda, and to confirm the nature of those interests.
3. To confirm the accuracy of the minutes of the meeting of the Worcestershire Regulatory Services Board held on 17th November 2022 (Pages 7 - 20)
4. WRS Board Revenue Monitoring (Pages 21 - 28)
5. Worcestershire Regulatory Services, Business Plan 2023-2026 (Pages 29 - 66)
6. Worcestershire Regulatory Services, Service Plan 2023-2024 (Pages 67 - 110)
7. Activity and Performance Data Quarter 3 - 2022/2023 (Pages 111 - 154)

8. Information Report Food Safety Recovery Plan (Pages 155 - 164)
9. Update Report on Automation Project (Pages 165 - 166)
10. To consider any other business, details of which have been notified to the Head of Legal, Equalities and Democratic Services prior to the commencement of the meeting and which the Chairman considers to be of so urgent a nature that it cannot wait until the next meeting.

Parkside
Market Street
BROMSGROVE
Worcestershire
B61 8DA

8th February 2023

K. DICKS
Chief Executive

**If you have any queries on this Agenda please contact
Pauline Ross**

**Parkside, Market Street, Bromsgrove, B61 8DA
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Email: p.ross@bromsgroveandredditch.gov.uk**

**If you have any questions regarding the agenda or attached papers,
please do not hesitate to contact the officer named above.**

Notes:

Although this is a public meeting, there are circumstances when the Board might have to move into closed session to consider exempt or confidential information. For agenda items that are exempt, the public are excluded and for any such items.



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WORCESTERSHIRE DISTRICT COUNCILS

MEETING OF THE WORCESTERSHIRE REGULATORY SERVICES BOARD

THURSDAY, 17TH NOVEMBER 2022, AT 4.30 P.M.

PRESENT: Councillors: T. Rowley (Chairman), S. Cronin (Vice-Chairman, during Minute No's 24/22 to 27/22), H. J. Jones, P.L. Thomas, S. Khan, L. Harrison (substituting for Councillor N. Nazir), J. Raine, B. Nielsen, C. Mitchell, D. Morris and N. Martin

Officers: Mr. S. Wilkes, Mr. P. Carpenter, Mr. R. Keyte, Mr. D. Mellors, Ms. K. Lahel, Mr. M. Cox and Mrs. P. Ross

Partner Officers: Mr. L. Griffiths, Worcester City Council, Mr. I. Miller, Wyre Forest District Council, Mr. I. Edwards, Malvern Hills and Wychavon District Councils (all via Microsoft Teams)

19/22 **APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTES**

Apologies for absence were received from Councillor N. Nazir, Redditch Borough Council, with Councillor L. Harrison in attendance as the substitute Member; and Councillor L. Whitehouse, Wyre Forest District Council.

20/22 **DECLARATIONS OF INTEREST**

There were no declarations of interest.

21/22 **MINUTES**

The minutes of the meetings of the Worcestershire Regulatory Services Board held on 23rd June and 6th October 2022, were submitted.

RESOLVED that the minutes of the Worcestershire Regulatory Services Board meetings held on 23rd June and 6th October 2022, be approved as correct records.

22/22 **WRS BOARD AGENDA PAPERS FROM 6TH OCTOBER 2022**

The Head of Regulatory Services reminded the Board that the meeting of the Board on Thursday 6th October 2022 was not quorate due to unforeseen circumstances impacting on one Board Member, which had resulted in one partner authority not being represented at the meeting.

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Having discussed all options with the Council's Legal Advisor and Head of Regulatory Services, the Chairman determined that the meeting would go ahead in order to avoid wasted journeys; having noted that no papers on the agenda required a formal vote for decision, they were all simply for noting. Members who were in attendance were then able to ask questions of the officer's present on the reports presented and a broad ranging discussion of the issues raised took place.

However, in order to address what was effectively outstanding business, this report introduced those previously scheduled papers as background papers; in order for them to be formally noted by the Board and to agree the minutes of the previous meeting held on 23rd June 2022.

The reports that were presented to Board Members on 6th October 2022, were included as background papers, with the agenda distributed for 17th November 2022.

Thus, enabling those Board Members who were not in attendance to address their contents and to ask any questions during today's meeting.

RESOLVED that the Board papers report for 6th October 2022 be noted, and that the relevant recommendations in each of the reports as detailed in the background papers as provided, be noted.

23/22

WRS REVENUE MONITORING APRIL - SEPT 2022

The Interim S151 officer, Finance, Bromsgrove District Council (BDC) and Redditch Borough Council (RBC), introduced the report and in doing so drew Members' attention to the Recommendations as detailed on pages 27 to 29 of the main agenda report.

The Interim S151 officer, confirmed that the report covered the period April to September 2022.

Members were informed that the detailed revenue report, as attached at Appendix 1 to the report; showed a projected outturn 2022/23 of £1k refund to partners. It was appreciated that this was an estimation to the year-end based on the following assumptions: -

- A 2% pay award had been added to the April to September Actual and projected outturn figures.
- Agency staff costs were being incurred due to backfilling of staff working on grant funded work and other contractual work e.g., food recovery programme, contaminated land.
- If April to September 2022 spend on pest control continued on the same trend for the rest of year, there would be an overspend on this service of £14k. WRS officers would continue to monitor and

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analyse this spend and advise of any changes in the projected outturn figure at quarter 3. The projected outturn figure to be funded by partners was, as follows: -

| | |
|---------------------------|-----|
| Redditch Borough Council | £6k |
| Wychavon District Council | £7k |
| Worcester City Council | £1k |

- The following was the actual bereavements costs April to September 2022 to be funded by partners. These costs were charged on an as and when basis. Due to the nature of the charge, it was not possible to project a final outturn figure: -

| | |
|--------------------------------|-----|
| Bromsgrove District Council | £8k |
| Malvern Hills District Council | £4k |
| Redditch Borough Council | £2k |
| Worcester City Council | £6k |

- Appendix 2 to the report, detailed the income achieved by WRS for April to September 2022.
- Any grant funded expenditure was shown separate to the core service costs as this was not funded by the participating Councils.

WRS had budgeted for a 2% pay award in 2022-23. The current proposed pay award was £1,925 per annum on all pay points (pro rata for part time work,) had now been accepted by employers and unions; the additional pressure on WRS would be £115,757. WRS were unable to cover this increase, therefore an increase to partner funding would be required as follows: -

| Council | 2022/23 |
|--------------------------------|----------------|
| | £ |
| Bromsgrove District Council | 16,843 |
| Malvern Hills District Council | 15,083 |
| Redditch Borough Council | 20,292 |
| Worcester City Council | 19,146 |
| Wychavon District Council | 26,902 |
| Wyre Forest District Council | 17,491 |
| Total | 115,757 |

RESOLVED that the Board notes the final financial position for the period April – Sept 2022, and that

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- 1.1 partner councils be informed of their liabilities for 2022-23 in relation to Pest Control, as follows:-

| Council | Projected Outturn for Pest Control £000 |
|---------------------------|--|
| Redditch Borough Council | 6 |
| Wychavon District Council | 7 |
| Worcester City Council | 1 |
| Total | 14 |

- 1.2 partner councils be informed of their liabilities for 2022-23 in relation to Bereavements, as follows:-

| Council | Apr–Sept 22 Actual for Bereavements £000 |
|--------------------------------|---|
| Bromsgrove District Council | 8 |
| Malvern Hills District Council | 4 |
| Redditch Borough Council | 2 |
| Worcester City Council | 6 |
| Total | 20 |

- 1.3 partner councils be informed of their liabilities for 2022-23 in relation to three additional Technical Officers; as follows:-

| Council | Estimated Projected Outturn 2022/23 Tech Officer Income Generation £000 | Estimated Projected Outturn 2022/23 Tech Officer Animal Activity £000 | Estimated Projected Outturn 2022/23 Gull Control £000 |
|--------------------------|--|--|--|
| Redditch Borough Council | 6 | 2 | |
| Malvern Hills District | 4 | 7 | |

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| | | | |
|------------------------------|-----------|-----------|-----------|
| Council | | | |
| Worcester City Council | 5 | 2 | 70 |
| Bromsgrove District Council | 5 | 8 | |
| Wychavon District Council | 8 | 13 | |
| Wyre Forest District Council | 5 | 8 | |
| Total | 33 | 40 | 70 |

- 1.4 Approve the additional partner liabilities for 2022/23 in relation to the additional increase in pay award and recommend the increase to individual partner councils, as follows:-

| Council | £000 |
|--------------------------------|------------|
| Bromsgrove District Council | 17 |
| Malvern Hills District Council | 15 |
| Redditch Borough Council | 20 |
| Worcester City Council | 19 |
| Wychavon District Council | 27 |
| Wyre Forest District Council | 18 |
| Total | 116 |

- 1.5 Approve additional partner liabilities for 2022/23 in relation to the additional increase in hosting cost in Wyre Forest and Bromsgrove District Councils relating to ICT, accommodation and support staffing costs and recommend the increase to individual partner councils; as follows: -

| Council | 2022/23 Increase in Rent £000 | 2022/23 Increase in ICT Hosting £000 | 2022/23 Increase in Support Hosting £000 |
|-----------------------------|-------------------------------|--------------------------------------|--|
| Bromsgrove District Council | 0.8 | 0.4 | 0.7 |
| Malvern Hills | 0.7 | 0.4 | 0.6 |

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| | | | |
|------------------------------|------------|------------|------------|
| District Council | | | |
| Redditch Borough Council | 1.0 | 0.5 | 0.9 |
| Worcester City Council | 0.9 | 0.5 | 0.8 |
| Wychavon District Council | 1.3 | 0.7 | 1.2 |
| Wyre Forest District Council | .8 | 0.5 | 0.8 |
| Total | 5.5 | 3.0 | 5.0 |

24/22

WRS BUDGETS 2023/24 - 2025/26

The Interim S151 officer, Finance, Bromsgrove District Council (BDC) and Redditch Borough Council (RBC), introduced the report and in doing highlighted that no one could have anticipated the extent of the inflationary pressures and economic conditions currently being experienced by all councils; with the sharp increases in energy costs and utilities.

IT suppliers were also experiencing increased financial pressures with many passing these on to users. WRS had therefore incurred increased costs with licensing and Uniform costs. However, some costs were offset against a decrease in transport costs now that the essential car user allowance could no longer be claimed.

The Head of Regulatory Services responded to questions regarding the non-Partner Council revenue side; and in doing so briefly explained that the Service were doing an excellent job working with Worcestershire County Council on areas like Safety at Sportsgrounds and petroleum licensing, with the Technical Services Manager's Team were doing an excellent job on delivering this alongside the vapour recovery work of Environmental Health, both of which had generated an additional income. Officers would continue to look more broadly at other public authorities to work with as the legislative framework made this more straight forward than dealing with the private sector; although no one would know the medium term financial situation for some time. If WRS were struggling with the budget, then partner officers would look at how services could be delivered differently if necessary.

WRS was relatively unique, there were no other district council partnership models delivering services on the scale of WRS. The shared services model on which WRS is based was a tried and tested model and officers had been successful in bringing in additional income and had built a strong team to achieve this. The work of WRS was nationally

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recognised by the Department for Environment, Food and Rural Affairs (DEFRA); and WRS was very well known to the Local Government Association (LGA). The Licensing and Support Services Manager, WRS, chaired the Primary Authority group and the Food Standards Agency (FSA) was visiting WRS in the near future to look at the service's use of intelligence, with a view to using this in part of the amendments to its Code of Practice.

Officers would continue to scope other areas of expertise and also build on more Primary Authority work.

With regard to promoting WRS, the Head of Regulatory Services commented that most of the business was generated by peer to peer contact, by word of mouth. Officers had looked at trying to market services. However, he would also ask Senior Officers and Members to champion WRS when / whenever possible at relevant forums.

The Chairman thanked officers and stated that we all had a role to play in promoting WRS.

RECOMMENDED that partner authorities approve the following for 2023/24 – 2025/26: -:

- 1.1 Approve the 2023/24 gross expenditure budget of £4,288k as shown at Appendix 1 to the report,
- 1.2 Approve the 2023/24 income budget of £781k as shown at Appendix 1, to the report;
- 1.3 Approve the revenue budget and partner percentage allocations for 2023/24 as follows: -

| Council | £'000 | Revised % |
|--------------------------------|--------------|------------------|
| Bromsgrove District Council | 510 | 14.52 |
| Malvern Hills District Council | 457 | 13.00 |
| Redditch Borough Council | 615 | 17.49 |
| Worcester City Council | 580 | 16.72 |
| Wychavon District | 815 | 23.19 |
| Wyre Forest District Council | 530 | 15.08 |
| Total | 3,507 | |

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1.4 Approve the additional partner liabilities for 2023/24 in relation to unavoidable salary pressure, as follows: -.

| Council | £'000 |
|--------------------------------|--------------|
| Bromsgrove District Council | 12 |
| Malvern Hills District Council | 11 |
| Redditch Borough Council | 14 |
| Worcester City Council | 14 |
| Wychavon District Council | 19 |
| Wyre Forest District Council | 12 |
| Total | 82 |

1.5 Approve the additional partner liabilities for 2023/24 in relation to increase in hosting costs, as follows: -

| Council | Increase in Rent £000 | Increase in ICT Hosting £000 | Increase in Support Hosting £000 |
|--------------------------------|----------------------------------|---|---|
| Bromsgrove District Council | 1 | 1 | 1 |
| Malvern Hills District Council | 1 | 1 | 1 |
| Redditch Borough Council | 2 | 1 | 2 |
| Worcester City Council | 1 | 1 | 1 |
| Wychavon District Council | 2 | 1 | 2 |
| Wyre Forest District Council | 1 | 1 | 1 |
| Total | 8 | 7 | 8 |

1.6 Approve the additional partner liabilities for 2023/24 in relation to three Technical Officers, as follows: -

| Council | Tech Officer Income Generation £000 | Tech Officer Animal Activity £000 | Tech Officer Gull Control £000 |
|-----------------------------|--|--|---|
| Bromsgrove District Council | 5 | 7 | |
| Malvern Hills | 5 | 13 | |

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| | | | |
|------------------------------|-----------|-----------|-----------|
| District Council | | | |
| Redditch Borough Council | 6 | 2 | |
| Worcester City Council | 6 | 3 | 65 |
| Wychavon District Council | 8 | 11 | |
| Wyre Forest District Council | 6 | 5 | |
| Total | 36 | 41 | 65 |

25/22

ACTIVITY AND PERFORMANCE DATA QUARTER 2 - 2022/2023

The Community Environmental Health and Trading Standards Manager, Worcestershire Regulatory Services presented the Activity and Performance Data for Quarter 2, 2022/2023 and in doing so highlighted the following key points: -

ACTIVITY DATA

The number of food safety cases recorded by WRS during the year to date was a reduction of 28% compared to 2021-22, but an increase of 18% compared to 2020-21. In general terms, a higher proportion of food safety cases were enquiries such as requests for business advice or export health certificates.

Of the interventions conducted at businesses included in the Food Hygiene Rating Scheme (FHRS), 39 were rated as non-compliant (0, 1 or 2) with most of these ratings issued to takeaways, restaurants and small retailers.

Approximately 71% of recorded cases related to noise nuisances, with noise from domestic properties (such as from dog barking or noise from audio-visual equipment) being the most prominent sources. A further 11% of recorded cases related to smoke nuisances and issues such as the burning of domestic or commercial waste.

PERFORMANCE

At the end of last year, officers saw an increase in the number of defective vehicles reported, driven mainly by higher numbers in one of the six fleets. There was a similar picture at the end of quarter 2 this year, with 37 vehicles being suspended in the period but with 25 being in that same fleet area. Even with this number, only 2.37% of the fleet county-wide were recorded as potentially problematic. Members' attention was drawn to the table detailed at Appendix B to the report. Officers hoped that they could work with the operators to reduce this figure, but members of the trade needed to be aware that they must

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always keep their vehicles up to standard and that the regular tests undertaken, were not there to be used to assess what maintenance may be required on their vehicles.

The rate of noise complaints against population was 0.91. This was slightly lower than the figure at quarter 2 last year (1.08,) but like the figures in the previous 2 years (0.94 and 0.85 respectively.) Members may be aware that this measure had been significantly higher at this point in previous years with 1.7 in 2018/19 and 2.1 in 2017/18. Hopefully, the current figure again was indicative of a return to normal levels.

Income brought in during the first half of 2022/23 was £232,520, which was significantly up on last year at this point (£163, 583,) and the previous year (£131,901). Using the historic budget figure for 2016/17 (£3,017,000) to maintain the comparison with previous years, this comes out at 7.7%. Hopefully, this showed that WRS were starting to see more normality returned in the areas that generated our income streams. Officers had not included additional income for work on issues like supporting Ukrainian refugees as this was work done on behalf of the six partners and officers tried to use this measure to look at the work that WRS carried out for others.

Officers responded to questions from the Chairman and Members of the Board, with regard to the information as detailed at Appendix 2, on page 59 of the main agenda report; with regard to defective vehicles and why Redditch Borough Council appeared to be out of kilter compared to other partner authorities.

It was suggested as mentioned above that some drivers may be using the taxi checks at the depot, as a way of seeing what work was required on their vehicles in order to keep them operating within policy and safe. Members were reassured that the Licensing and Support Services Manager, WRS was looking into this. Licensing officers needed to ensure that drivers were carrying out safety checks and that regular maintenance on their vehicles was taking place.

Officers further responded to questions regarding the use of domestic log burners. Members were briefly informed that new powers under the Environment Act 2021 could allow local authorities to issue Penalty Notices for illegal smoke emissions, however, officers needed a better understanding on how log burners were being used incorrectly before they could do this as there were a number of reasons that could result in an illegal emission, particularly if the wrong fuel was used, and most log burners on the market were tested to standards that made them suitable for use in smokeless zones. The Head of Regulatory Services reminded

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members that the service's enforcement policy would require that officers take a proportionate approach, making members of the public aware of what to / what not to buy, what can / can't be used as fuel with log burners; and that officers had to have the tools to deal with any concerns / issues raised in this area before any kind of formal action would be instituted.

The Chairman expressed his sincere thanks to officers for an informative report.

RESOLVED that the Activity and Performance Data Quarter 2, for 2022/2023, be noted and that Members use the contents of the activity data in their own reporting back to fellow Members of their partner authorities.

26/22

UPDATE ON PROGRESS OF THE AUTOMATION PROJECT

The Licensing and Support Services Manager introduced a further update report on the Automation progress, as agreed.

Members were informed that progress on making a final decision on a system had progressed. WRS had found two suppliers who seemed most positive about working with WRS and being able to deliver within our proposed timescales. The specification was being finalised and discussions were taking place with procurement colleagues this would enable WRS to make a direct award to the one that best fits the needs of WRS.

In the coming few weeks WRS will be working with the Procurement solicitor at Bromsgrove District Council to ensure that the necessary procurement processes were followed, whilst utilising one of the two Government portals available for direct award.

In parallel to the wider automation project officers had also been discussing the implementation of electronic ID Cards in the taxi trades for both safeguarding and enforcement measures. Since there was only one supplier on the market for this technology the procurement process was not as burdensome so officers would continue to work with the supplier to ensure that all of the needs would be met on implementation.

RESOLVED that the update on progress of the automation project be noted.

27/22

INFORMATION REPORT - FLEXIBLE WRS WORKFORCE

The Technical Services Manager, WRS, introduced the report and in doing so informed the Board that as detailed in the report that, during the last three years, WRS had provided reports or updates to Members on the various COVID-19 related workstreams. At the peak of demand, we

had teams working to support businesses and the public in a variety of ways throughout the pandemic. This led to a massive recruitment drive to fill the 80 plus temporary posts created.

The pandemic had created a unique situation which WRS was able to use to its benefit, in giving lots of talented, conscientious, and highly skilled individuals a chance to work alongside Environmental Health and Licensing staff to get a taste of our world. Whilst much of that work has come to an end during 2022 many of the staff previously employed in COVID-19 workstreams had been able and willing to be redeployed in regulatory and public health related matters utilising the skills developed and supporting the WRS budget.

The Head of Regulatory reiterated this and commented that the Technical Services Manager had provided a good summary for Members. They had employed some very talented people during Covid-19.

Planning Enforcement

WRS had been utilising the knowledge and skills we have in this area to support our partner authorities. During the spring we trained former contact tracing staff where required (as some had considerable experience in enforcement previously) to deliver planning enforcement work on behalf of four of the Worcestershire District Councils. Whilst the work for Wychavon and Malvern Hills Districts ceased in June, WRS continued to work alongside Planning colleagues in Bromsgrove District and Redditch Borough Councils.

Members' attention was drawn to the table, as detailed on page 96 of the main agenda report.

Homes for Ukrainians

Much of the work of the COVID Advisors during the pandemic was to support businesses and members of the public with a variety of issues, concerns, and worries. The Advisors were selected for their communication skills and drive to help people. This has served well in supporting housing colleagues at Bromsgrove District, Malvern Hills District, Redditch Borough, and Wychavon District Council's in delivering the work of supporting Ukrainians who had arrived in the county.

In July two more COVID Advisors started to assist but this time in Wychavon District and Malvern Hills District Council areas to carry out property checks to ensure that the properties were suitable for the Ukrainian guests.

COVID Advisors were always happy to take on any new challenges and were flexible in their approach to the regular changing guidelines during

COVID and now the regular change in workplace. They adapted well in these important roles using their previous experiences dealing with a range of different people (the general public, business owners, colleagues and management across the county in the six districts, county public health and councillors) and transferable skills such as their caring, empathic approach from visiting the clinically extremely vulnerable during lockdown, helping on vaccine centres to now carrying out Safeguarding checks for the Homes for Ukraine scheme.

In the last few months there had been some complex and sensitive cases, as one would envisage in a scheme where hosts offered to open their homes to strangers who had had to leave their homes and, in many cases, suffered terribly from the conflict.

Benefit to Partners

As well as supporting our colleagues in the District Councils, we have retained staff with valuable skills and knowledge. In terms of WRS' income generation from these work strands, we have only covered costs, but it had enabled us to utilise the associated opportunities in developing and enhancing our baseline workforce with managerial experience, a variety of work and an opportunity to provide value to our society; whilst being flexible and adaptable to our partners and residents in managing and delivering services for the benefit of all.

Further detailed discussion followed on the role of the flexible workforce in dealing with planning enforcement. Officers reassured Members that the flexible workforce had the crucial skills in adhering to enforcement policies and in enabling successful prosecutions. All enforcement goes through the planning department who direct WRS. Key communication with planning officers takes place and officers ensure that each of the partner authorities' policies are followed. It's about a flexible workforce having the abilities to undertake investigation without falling foul of legislation, the law and regulations; and assisting with quite onerous cases that could take between 1 and 2 years.

Further discussion took place on other enforcement work that WRS might take on. The Head of Regulatory Services directed Members to those areas mentioned in the WRS 3-year business plan as options that partners could consider, although he added that the view expressed by some members about wanting to retain services locally was understandable and reasonable.

RESOLVED that the Information Report – Flexible Worcestershire Regulatory Services workforce, be noted.

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The meeting closed at 5.30 p.m.

Chairman



WRS Board 16th February 2023

WORCESTERSHIRE REGULATORY SERVICES REVENUE MONITORING

April – Dec 2023

Recommendation

It is recommended that the Board:

- 1.1 Note the final financial position for the period April – Dec 2023
- 1.2 That partner councils are informed of their liabilities for 2022-23 in relation to Pest Control

| Council | Projected Outturn for Pest Control £000 |
|---------------------------|--|
| Redditch Borough Council | 6 |
| Wychavon District Council | 7 |
| Worcester City Council | 2 |
| Total | 15 |

- 1.3 That partner councils are informed of their liabilities for 2022-23 in relation to Bereavements

| Council | Apr–Dec 22 Actual for Bereavements £000 |
|--------------------------------|--|
| Bromsgrove District Council | 9 |
| Malvern Hills District Council | 5 |
| Redditch Borough Council | 2 |
| Worcester City Council | 10 |
| Wychavon District Council | 2 |
| Total | 28 |

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1.4 That partner councils are informed of their liabilities for 2022-23 in relation to three additional Technical Officers

| Council | Estimated Projected Outturn 2022/23 Tech Officer Income Generation £000 | Estimated Projected Outturn 2022/23 Tech Officer Animal Activity £000 | Estimated Projected Outturn 2022/23 Gull Control £000 |
|--------------------------------|--|--|--|
| Redditch Borough Council | 6 | 2 | |
| Malvern Hills District Council | 4 | 7 | |
| Worcester City Council | 5 | 2 | 70 |
| Bromsgrove District Council | 5 | 8 | |
| Wychavon District Council | 8 | 13 | |
| Wyre Forest District Council | 5 | 8 | |
| Total | 33 | 40 | 70 |

Contribution to Priorities

The robust financial management arrangements ensure the priorities of the service can be delivered effectively.

Introduction/Summary

This report presents the financial position for Worcestershire Regulatory Services for the period April – Dec 2022.

Background

The financial monitoring reports are presented to this meeting on a quarterly basis.

Report

The following reports are included for Joint Board's Attention:

- Revenue Monitoring - April – Dec 22 – Appendix 1
- Income Breakdown - April – Dec 22 – Appendix 2

Revenue Monitoring

The detailed revenue report is attached at Appendix 1.. This shows a projected outturn 2022/23 of £31k refund to partners. It is appreciated this is an estimation to the year end based on following assumptions:-

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- Agency staff costs are being incurred due to backfilling of staff working on grant funded work & other contractual work eg food recovery programme, contaminated land.
- If April to Dec 22 spend on pest control continue on the same trend for the rest of year, there will be a overspend on this service of £16k. WRS officers will continue to monitor and analyse this spend. The projected outturn figure to be funded by partners is:-

| | |
|---------------------------|-----|
| Redditch Borough Council | £6k |
| Wychavon District Council | £7k |
| Worcester City Council | £2k |

This income is included in the income projected outturn.

- The following is the actual bereavements costs Apr – Dec 22 to be funded by partners. These costs are charged on an as and when basis. Due to the nature of the charge it is not possible to project a final outturn figure:-

| | |
|--------------------------------|------|
| Bromsgrove District Council | £9k |
| Malvern Hills District Council | £5k |
| Redditch Borough Council | £2k |
| Worcester City Council | £10k |
| Wychavon District Council | £2k |

This income is included in the income projected outturn.

- Appendix 2 shows the detail of the income achieved by WRS April – Dec 22

Any grant funded expenditure is shown separate to the core service costs as this is not funded by the participating Councils.

Financial Implications

None other than those stated in the report

Sustainability

None as a direct result of this report

Contact Points

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Background Papers

Detailed financial business case

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WRS - Profit & Loss Report 2022/23
Total WRS Dec 22 / Period 9 - 22/23

Appendix 1

| | Revised Full Year Budget 22-23 | Revised Budget - Apr - Dec 22 | Committed Expenditure Apr - Dec 22 | Variance | Qtr 3 Projected outturn | Qtr 3 Projected Outturn Variance | Comments |
|--|-----------------------------------|----------------------------------|--|-------------|----------------------------|--|---|
| | £ | £ | £ | £ | £ | £ | |
| Direct Expenditure | | | | | | | |
| Employees | | | | | | | |
| Salary | 3,164 | 2,351 | 2,292 | -59 | 3,092 | -72 | Saving due to employees working of comf grant working work. |
| Agency Staff | 0 | 0 | 206 | 206 | 287 | 287 | Due to backfilling of staff working on grant funded work & other contractual work eg Food recovery programme, contaminated land |
| Employee Insurance | 25 | 18 | 18 | -1 | 24 | -1 | |
| Sub-Total - Employees | 3,189 | 2,370 | 2,515 | 145 | 3,403 | 214 | |
| Premises | | | | | | | |
| Rent / Hire of Premise | 67 | 50 | 49 | -1 | 65 | -1 | |
| Cleaning | 1 | 1 | 1 | 0 | 1 | 0 | |
| Utilities | 0 | 0 | 0 | 0 | 0 | 0 | |
| Sub-Total - Premises | 67 | 51 | 50 | -1 | 66 | -1 | |
| Transport | | | | | | | |
| Vehicle Hire | 13 | 4 | 2 | -2 | 13 | 0 | |
| Vehicle Fuel | 8 | 6 | 3 | -3 | 4 | -4 | |
| Road Fund Tax | 1 | 1 | 1 | 0 | 1 | 0 | |
| Vehicle Insurance | 5 | 4 | 4 | -0 | 5 | 0 | |
| Vehicle Maintenance | 3 | 2 | 2 | -1 | 3 | 0 | |
| Car Allowances | 75 | 56 | 36 | -20 | 54 | -21 | Staff working patterns changed |
| Sub-Total - Transport | 104 | 73 | 47 | -26 | 79 | -25 | |
| Supplies and Services | | | | | | | |
| Furniture & Equipment | 32 | 24 | 22 | -1 | 41 | 10 | Essential calibrations |
| Clothes, uniforms and laundry | 2 | 1 | 0 | -1 | 1 | -1 | |
| Printing & Photocopying | 17 | 13 | 17 | 4 | 22 | 5 | |
| Postage | 11 | 8 | 9 | 1 | 11 | 0 | |
| ICT | 55 | 41 | 46 | 5 | 65 | 10 | Additional office 365 licences for temp staff |
| Telephones | 21 | 16 | 13 | -3 | 18 | -3 | |
| Training & Seminars | 23 | 17 | 8 | -9 | 21 | -1 | |
| Insurance | 20 | 15 | 15 | -0 | 20 | 0 | |
| Third Party Payments | 177 | 133 | 133 | 0 | 177 | -0 | |
| Sub-Total - Supplies & Service | 357 | 268 | 264 | -4 | 377 | 20 | |
| Contractors | | | | | | | |
| Dog Warden | 121 | 91 | 88 | -3 | 118 | -4 | |
| Pest Control | 103 | 77 | 87 | 10 | 118 | 16 | Recovered in income |
| Taxi / Alcohol / & Other Licensing | 70 | 53 | 41 | -11 | 56 | -14 | |
| Other contractors/consultants | 3 | 2 | 0 | -1 | 10 | 8 | |
| Water Safety | 5 | 4 | 5 | 2 | 6 | 1 | |
| Food Safety | 1 | 1 | 0 | -1 | 1 | -1 | |
| Environmental Protection | 12 | 9 | 37 | 29 | 40 | 28 | Bereavements recovered in income |
| Grants / Subscriptions | 13 | 9 | 13 | 3 | 18 | 5 | |
| Advertising, Publicity and Promotion | 6 | 4 | 6 | 2 | 13 | 8 | Fees & charges licensing increase 23-24 |
| Sub-Total | 332 | 249 | 279 | 30 | 380 | 48 | |
| Income | | | | | | | |
| Training Courses / Bereavement / Works in Default / Sewer Baiting etc | -543 | -385 | -627 | -242 | -829 | -286 | Additional contract for Planning Enforcement £104k and Ukrainian work £127k |
| Sub-Total | -543 | -385 | -627 | -242 | -829 | -286 | |
| Overall Total | 3,507 | 2,625 | 2,527 | -98 | 3,477 | -31 | |

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Worcestershire Regulatory Services Income 2022/23

| Income from Partners | April to Dec 22 |
|--|------------------------|
| | £ |
| Budget | 2,630,352 |
| Pension Backfunding | 21,900 |
| Bereavement / Public Burials | 28,008 |
| Pest Control - Worcs City, Wychavon & Redditch | 11,522 |
| Employee for Animal Activity | 30,283 |
| Employee for Income Generation | 23,127 |
| Employee for Additional Gull Work - Worcs City | 63,300 |
| Ukrainian Work - Malvern, Wychavon, Bromsgrove & Redditch | 91,655 |
| | 2,900,147 |
| | 2,900,147 |
| | |
| Grant Income | |
| Severn Trent - Sewer Baiting | 7,610 |
| | 7,610 |
| | 7,610 |
| | |
| Other Income | |
| Stray Dog Income | 34,319 |
| Worcester County - Mgmt, Legal & Admin Support | 39,900 |
| Worcester County - Safety at Sports Grounds | 15,000 |
| Worcester County - Petroleum Work | 15,750 |
| Planning Support Work | 91,336 |
| Contaminated Land Work | 41,210 |
| PPC Work | 2,275 |
| Primary Authority work | 8,066 |
| Pest Control - Bath & North East Somerset Council | 15,942 |
| Private Water Supplies | 6,691 |
| FSA - Funding Award Prioritisation | 16,235 |
| Sale of laptops | 2,100 |
| Vet Fee Inspection Costs Recovered | 14,662 |
| Licensing - Pre-App Advice | 725 |
| Food Training Courses / Certificates / Food Hygiene Rating / Pre-Opening | 10,708 |
| Support for Comf Grant Funded Work | 35,032 |
| | 349,951 |
| | 349,951 |
| | |
| Total Income Apr - Dec 22 | 3,257,708 |
| | 3,257,708 |
| | |
| 2022/23 Base Budget from Partners | -2,630,352 |
| Total Income Excluding Budget | 627,356 |

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WRS Board

Date: 16th February 2023

Business Plan for Worcestershire Regulatory Services 2023-2026

Recommendation

That the Board approve the updated approach outlined in the WRS business plan 2023-26

Report

The Business Plan for WRS was developed first in 2015 following on from the strategic procurement exercise. During the leadership training undertaken by the management team, it was determined that Worcestershire Regulatory Services needed a plan to ensure both the viability of the service and its ability to operate within the budgets available from the partners. This plan became the high-level document that would inform the development of the service for the foreseeable future. It was last updated in 2020, just before the pandemic struck. Following this period of great disruption to everyone's lives and to what is often called business-as-usual activities, it is timely to revisit the plan looking forward for an extended time-period.

The Business Plan shows how WRS will:

- Continue to provide a viable service within projected partner budget allocations
- Understand what a base level of service looks like for partners.
- Support other partners to maintain service levels above this, where this is desired.
- Provide details of plans to increase income to maintain resilience in the face of continued financial pressure.
- Identify potential areas for the partners to expand the use of WRS as a platform for delivery.

Local government finance remains difficult. The recent settlements offered by Government provide certainty to the partners in some ways, but they do not address many of the



pressures faced by local authorities, whether that is inflation, our aging populations or rising public expectations. Government has been clear that revisions to the local authority funding formulas will not come in the near future and the local government press is clear that it is going to be difficult for local authorities in the run up to the next general election.

As we understand it currently, all the partners have indicated that financial pressures are either current or visible in the near future. We have yet to be told whether WRS will need to be a source of the reductions that some partners may need to make.

Income generation remains a key factor in the service's business strategy. It is possible that local authorities outside of the county may be encouraged to engage more with WRS and look more widely at contracting services to those who can offer expertise and resilience in service delivery. However, there is growing evidence that our current clients may be unwilling to engage with the service beyond their current commitments, and as the process of county devolution deals moves forward, it is possible that district councils may look more closely at resources within their areas, even in the absence of moves to unitary status.

Although some local authorities are pursuing increased income generation, we do not currently see this as a significant threat if we can maintain our levels of expertise and reputation. We have yet to see the formal emergence of challengers with the same ability to deliver at high standards, but there does appear to be limited appetite for going significantly further in contracted arrangements with us. Support from partners at all levels, but particularly Director, Chief Executive and Leader level will remain necessary in selling WRS in what remains a financially difficult environment.

By understanding our costs and with good support from the host's Finance team, we have been able to forecast our income needs going forward. During the pandemic period, we have seen increases in partner contributions to cover unavoidable financial pressures from salary increases and pension adjustments, and to support those authorities that host some of the service's functions. If rates of salary increase remain higher than previously experienced and the inflationary cost pressures continue, particularly on our hosting authorities, it seems unlikely that the service will be able to revert to the model operated between 2016 and 2020, where increased income alone could cover all cost pressures experienced by the service.

To limit the need for future increases we will look to maintain the levels of income that we bring in and we will seek to tap into new income streams. This can only be done if the service retains its current flexibility to re-invest income in resources where



Financial Implications

necessary. We must also retain the current flexible and well-qualified staff cohort and build on it where we can.

More focus than in previous plans is placed on the ability of partners to add functions to the WRS structure, which may provide one way of offering savings in overall cost by rationalising the management and delivery of these activities. This has been raised in previous plans and the revised Business Plan identifies several areas where partners currently have in-house or slightly different shared arrangements where there may be some benefit in considering adding these to the WRS platform.

The current pilot with planning enforcement being delivered on behalf of Redditch and Bromsgrove, which appears to be having some success, is one example of how this might develop, and the plan identifies those areas, particularly those where the infringements are criminal in nature, might fit into WRS operations. Whilst it is understood that members may have a desire to keep certain functions close to the point of delivery, WRS Managers will continue to discuss with officer members of the Board options that may be viable, with a view to business case consideration within the partner authorities.

At the budget meeting in November 2022, members agreed to take back to their respective partners a WRS budget that included an increase in their contributions to cover the higher than anticipated salary settlement for 2022/3, an uplift for the hosting authorities in 2022/3 to cover huge inflationary pressures, and uplifts for the 2023/4 finances to address a further salary increase and increases in hosting. Uplifts in salary levels during the period are budgeted at 2% but only time will tell if this is a reasonable assumption. Hopefully, inflation will fall in the coming year so, whilst it is unlikely to return quickly to the low levels seen before the pandemic, pressures on both businesses and households should ease during the period of this plan.

There is a WRS reserve of somewhat over £100,000 that can be used to cushion the partners from financial shocks to the service. Members have previously agreed that the reserve can be used to cover small overspends at year-end should they occur. This would give the partners an opportunity to look at different options, whether through further funding or other delivery choices, to move forward with their regulatory functions.

The other significant reserve was established last year for the development of the WRS website to both allow direct submission of service requests and license applications into the back-office system and to enable on-line payment via the WRS website. Work on this project is progressing well and any remainder of the £150,000 allocated will be returned to partners at the end of 2023/4

Contact Point

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Tel: 01562-738088

Background Documents

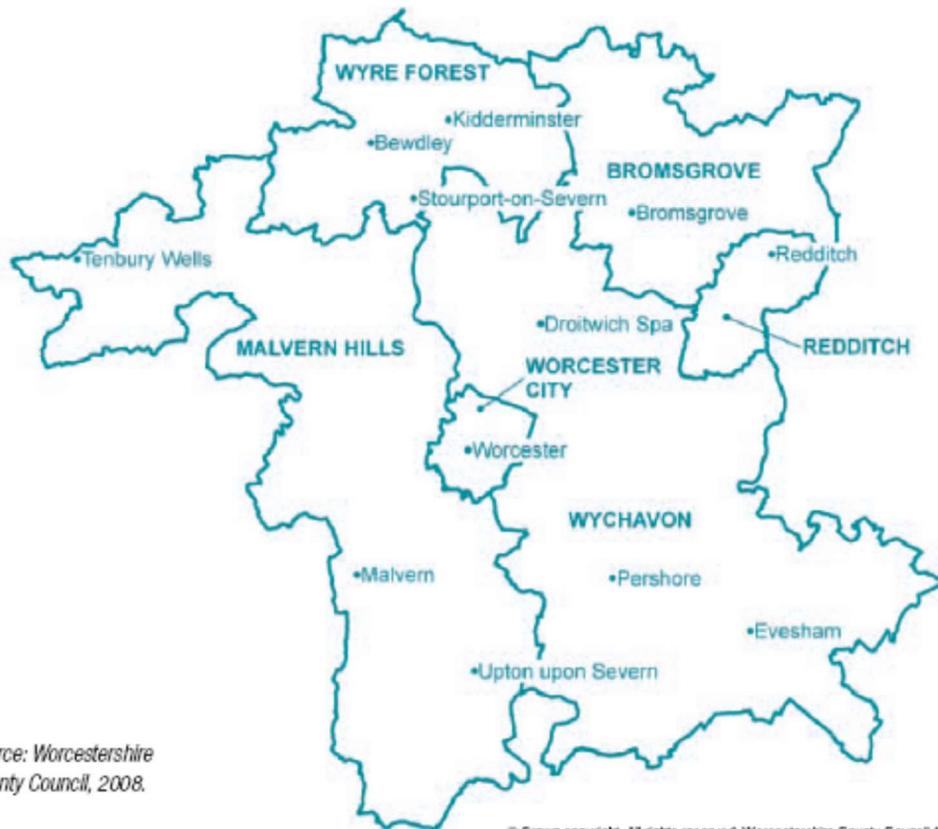
email: simon.wilkes@worcsregservices.gov.uk

WRS Business Plan 2020-23



Business Plan for Worcestershire Regulatory Services

2023-2026



“A Local Government Solution to Local Government Challenges “

Contents

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Worcestershire Regulatory Services Vision

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

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Executive Summary: Worcestershire Regulatory Services (WRS) has a history of delivering savings whilst continuing to deliver high quality services and remains a strong solution to the delivery of local authority regulatory responsibilities. Spending by the Worcestershire district councils on these aspects of regulation within the County fell from £5M at the birth of WRS in 2010/11 to just under £3.5M by the end of 2016/17. At £3.017M in 2019/20, the core spending had fallen by 40%, yet outcomes within Environmental Health and Licensing remain good and performance, in terms of customer satisfaction and business compliance, remain relatively high. Whilst the six partners have needed to invest further in WRS since 2020 it still remains a relatively low-cost and effective method of delivering these functions.

It is common knowledge that the financial situation for all local authorities is difficult. None of the partners are telling us that all is rosy in the garden, and they are set fair for the next three years. As mentioned above, WRS has a history of achievement at low cost, and we intend to continue this but the scope for further cashable savings is very limited indeed and more is likely to be achieved by re-investment and looking at savings via wider sharing of delivery. There are always small, marginal efficiency savings to be had, but without a change in the paradigm for regulation, based around inspection, advice and investigation, further savings will be limited in the future and are unlikely to be at cashable levels.

WRS is already an efficient well-run organisation which offers excellent value for money, as pointed out by the potential private partners to our Strategic Partnering offer. They were also clear that the derivable margins in delivering regulatory service elements are small and unlikely to be hugely profitable. The benefits would come from, offering our services to other local authorities and expanding the footprint for WRS delivery as this would undoubtedly add to the resilience of the service for partners and new customers alike, and almost certainly help spread overhead costs further, with small margins being re-invested to support service delivery.

Going forward WRS will try to offer flexibility, in terms of its ability to respond to the wide range of changing partner needs and any changes to the operating environment, including its ability to respond to emergencies. Service levels can be tailored to individual partner budget envelopes where operating models and economies of scale permit, using time recording as an indicator of demand, but this must take place within a wider framework of common delivery standards for the majority of activities. The Service will offer its services more widely to other local authorities and public bodies, seeking to build on the economies of scale created by the formation of WRS, maintaining resilience for existing partners and offering a flexible cost-effective service to potential new customers that a single district council could not achieve on its own in the current economic climate.

The market has concluded that Regulatory Services on its own is not a saleable commodity, and private sector service providers will now only take these services on if bundled with a range of others. This should add to the attractiveness of WRS as an option for others to consider as a vehicle for the delivery of these statutory functions. The shared service vehicle developed by the Worcestershire local authorities remains fit for purpose as a service delivery option for the next 3 years but there will be challenges for partners in agreeing budgets going forward, with so much financial uncertainty.

The service has already demonstrated its flexibility by being able to accommodate variations in service delivery for its existing partners. Its delivery model that mixes geographically focused and centralised functions offers an expandable platform that could encompass anything from the delivery of additional service elements for partners or customers, even whole regulatory services under contract for new local authority customers. WRS remains the right local government solution to local government challenges in the regulatory environment.

Simon Wilkes

Head of Regulatory Services

February 2023

1. Introduction

This plan outlines how managers will drive the development of Worcestershire Regulatory Services over the next 3 years to enable the service to:

- Respond to the financial pressures faced by the six partners
- Ensure the continued use of time recording as a reliable indicator of demand
- Continue to monitor the financial arrangements to avoid cross subsidy between functionality and partners,
- Continue to provide a core level of service that meets partner's statutory obligations and, offer the option to fund a higher level of service in all functional areas, or discharge new functions for partners.
- Maintain sufficient expertise to provide resilience, beyond the financial envelope envisaged by partners through income generating activities.
- Continue with high levels of performance

The plan provides partners with a clear route to continue to tackle the issues outlined above in a logical and cost-effective way. It may mean some changes to the look of the service and to what and how certain elements are delivered but partners must accept that all but marginal efficiencies are exhausted within the existing operational paradigm for regulatory activity and the delivery of further significant savings can only be based in mutually agreed changes in service levels.

WRS will meet the budget indicated by partners by:

- Seeking further efficiencies where possible, especially in relation to using digital channels for access,
- Whenever possible, continuing to develop new ways of working (streamlining processes and continue to innovate, first point of contact, etc.)
- Seek income by doing work for others and obtaining grant income for defined projects.

However, the pace of growth will be limited and shocks to the system such as pay awards beyond 1% and increases in pension requirements create financial pressures that the service cannot respond to immediately with income generation. Such increases in financial pressure will have to be found by the partner authorities to allow the income generation processes that underpins the level of service provided to continue.

The Strategic Partnering process in 2014 and our response to the pandemic have demonstrated how lean the WRS organisation already is, particularly in management roles. The levels of efficiency achieved should be a great selling point that will allow us to take on service delivery for other local authorities in those functional areas we already cover and potentially others that are aligned, either on behalf of partners or other authorities outside of the county e.g. EH Private Sector Housing, Enviro-crime enforcement. The delivery of entirely new work streams during the pandemic such as COVID Advisors and Contact Tracing demonstrates the flexibility of the WRS workforce and showcases a business model encouraging agile working, effective performance monitoring and a motivated skilled workforce.

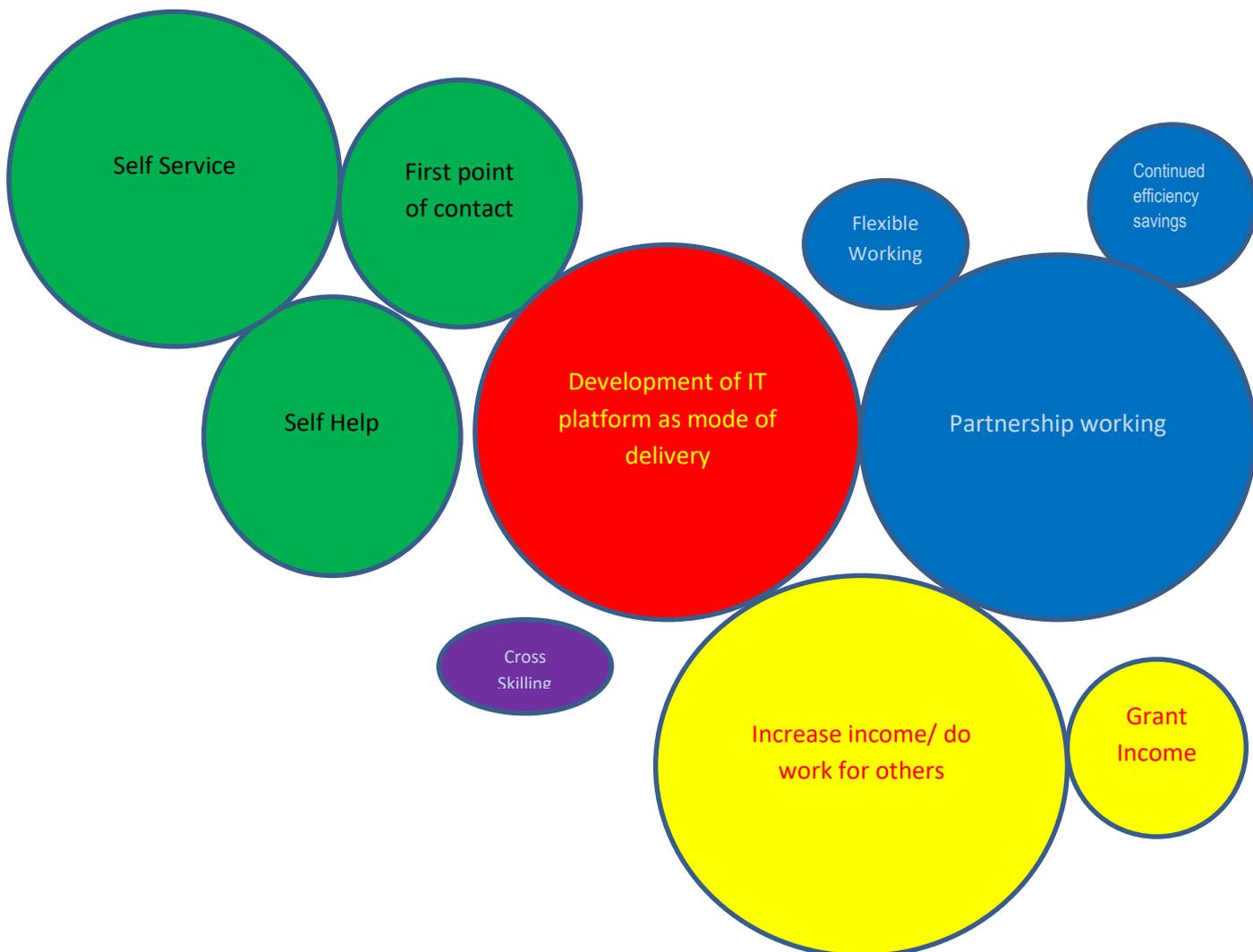
As we move out of the pandemic and back to business as usual, the local government environment remains uncertain, particularly from a financial perspective. Austerity appears to be back, accompanied by rampant inflation and a "cost of living crisis." Historically, both have led to greater demands on regulatory services as businesses seek to shave cost from their activities, which can lead to corners being cut unreasonably. Financial pressure can also lead to more disputes in our communities leading to increases in neighbour disputes. Add to this the ongoing uncertainties over the impact of BREXIT and the direction for UK PLC in terms of its regulatory alignment with the rest of the world, with the threat of abolition of much of the current regulatory playbook, which helps neither regulatory or those we regulate means we have a great deal of uncertainty to deal with. But, in these very uncertain times, Worcestershire Regulatory Services remains the local government solution to local government challenges in the regulatory environment.

2. Business Planning & Savings Realisation

2.1 Picture of the plan

The Business Plan remains a high-level strategic document that outlines the framework within which the service will build and develop. The diagram below shows where we were at the beginning of the last business planning period, in 2020 before the pandemic hit. A number of these have changed due to work undertaken in recent years and the changing landscape outside of Worcestershire.

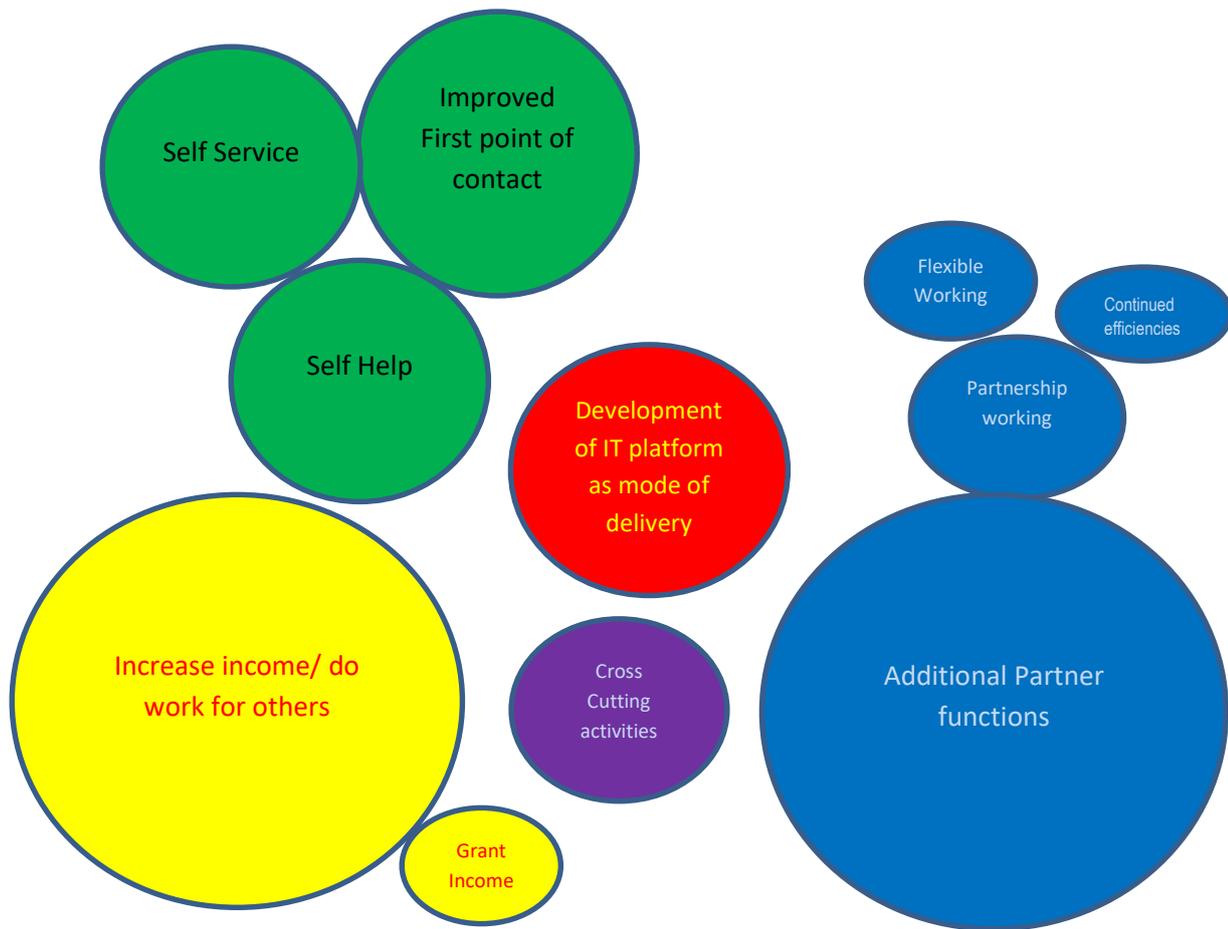
Fig 1: Size of bubble reflects potential contribution and/ or ease of introduction in 2020-2023. Colours indicate work streams



It has become clear that the likelihood of another local authority coming on board with the partnership is low, although we remain hopefully that the County Council may seek to re-engage at some point as they have placed a small number of linked workstreams with us in recent years and we are discharging these well. Grant income has also all but dried up with changes to the way government operates. The LEP has seen its budget cut significantly and the Public Health ring-fenced grant is already heavily committed at county level to a range of project work. The Worcestershire Works Well project supported by Public Health is being re-organised, which may limit our involvement from 2023 onwards. There are few other grant schemes available outside of capital type projects for things like Air Quality available to support our activities. So, in our new model below, these aspects are reduced or removed completely. Cross skilling is taken as far as it can, and the focus now moves to cross team working against cross cutting themes from our Strategic Assessment.

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Fig 2: Size of bubble reflects potential contribution and/ or ease of introduction for 2023 to 2026. Colours indicate work streams



We continue to use our graphic representation of the areas of work where the business will focus its efforts. These are:

- I) **Generating streams of income (grants, work for others, paid-for advice, etc.)**
- II) **On-going implement new ways of working (self-help, first point of contact, self service)**
- III) **Looking at where we can better support the partners with other enforcement work, particularly those activities requiring criminal investigation**

With the delivery of payment automation early in the period covered by this business plan, a significant area of development will be completed but the 4th point below may still be able to bring improvements like live chat, or the use of bots to further enable web-based engagement with customers:

- IV) **Continued development of a suitable digital front door for services.**

Whilst we have substituted cross-skilling with addressing cross-cutting issues, if partners were to add more functions to WRS this could allow further cross skilling and enable further efficiencies to be delivered. Many of the balloons have shrunk as we have made changes in related areas, delivering on the most suitable options, which then makes further changes harder.

2.2 The Financial Picture for Partners

Looking back to the last plan, where we indicated that several partners were set fair as far as finance was concerned, the intervening 3 years has left us with the situation where all the partners have potential future issues with financial holes that need to be filled. It would seem unfair to pick out individual authorities as worst placed than others. Better to simply assume

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that the financial environment, even with the delay to the worst of Government reductions being pushed back to 2025, with high inflation, cost of living pressures and limited ability to increase local taxation, will remain tough for all public bodies.

Inflation is leading to demands for pay increases for staff to help them bridge the gap. The 2022/3 settlement added significantly to the WRS salary bill and, with the private sector apparently willing to pay more for staff, the attractions of roles in the public sector may become more limited. The skills and knowledge of our staff are in demand in both the private sector and from other public bodies, so there is a risk that we will lose the best if better offers become more attractive. This probably applies to many local government professions, so increased salary pressures are likely to continue for the immediate future.

Against this picture of financial constraints, the current model WRS operating model makes offering individual savings difficult. Licensing services are based on full cost recovery and, since efficiencies have already been made in this area, further savings would necessitate a reduction in fees, which would be counterproductive for most partners. The automation project is likely to deliver efficiencies in licensing administration but re-investing these in licensing enforcement to promote a safer, more inclusive night-time economy which can potentially encourage growth, would probably make more sense than taking any limited savings.

The Technical Services team is the heart of our income generation machine. Any reductions in these areas would create a risk for the service's income generation capacity and therefore have an impact on the partners more broadly. The only area that could be considered is the non-statutory planning support being undertaken as this would free up resource that could be redirected into income generation. Having said this, most partners are clear that this support is essential for getting development right, particularly where this has the potential to build the local economy and, in the longer run lead to better local taxations yields with more households and more business rate potential. Hence, even this is probably not viable.

This would leave Community Environmental Health as the focus for any savings required. Currently each partner has the equivalent of somewhere between 3 and 4FTE discharging its Food Hygiene, Infectious Diseases, Health and Safety at Work, Statutory Nuisance, Private Water Supplies, Public Burials, and a range of other smaller functions within this team. This is a very small resource for the volume of work being undertaken. Partners would need to specify carefully what functions they might wish to stop. One area that could be ceased is the commissioned pest control service for people on benefits as again this is not statutory. Wyre Forest have recently come off the framework provision, but Worcester City have decided to come on board, so clearly their remains a desire to support people who may need such services. The WRS business model has enabled those partners wishing to take on such services, to benefit by doing so in an efficient and timely manner utilising the systems and contracts already in place.

To retain the flexibilities developed, the economies of scale and the ability to generate income, it will be important for partners to try to agree any changes to service delivery collectively, in order that a rational approach can be taken should service reductions become necessary. Should partners look at different aspects for reductions, the risk will be that this simply breaks the service model as the partners are unable to agree a vision for the future.

Workforce pressures across the public sector are huge currently. The aging workforce is an issue and the slimming down of services since 2010 has led to little or no investment in a new generation of professional officers in all the professions necessary for local authorities. This must be addressed in the coming years and WRS intends to utilise the developing apprenticeship schemes to deliver at least some new blood into the service going forward. Even though the service is shared, because of the way the Apprenticeship Levy is structured, the service can only access this via the staffing host Bromsgrove DC. We cannot access funds from the other partners in this way currently.

The budget picture at Appendix B demonstrates the pressures that the service will face. Increases in income generation will be essential to meet our financial requirements. Further invest to save roles may be necessary to achieve this as capacity is already at a premium and, whilst our staff are flexible and hard-working, there are only so many hours in the day that we can expect them to work.

3. Income Generation to meet the budget envelope 2023-26

3.1 Current Market for Local Authority Regulatory Services as a potential source of income generation

Nothing has happened since the last iteration of this plan to make it more likely that the private sector would be interested in running WRS as a unit separate from a package of other local authority functions. If anything, the fragility of private sector involvement, with the thinness of the margins available, has become more obvious. It has been clear for some time that the private sector will only take on regulatory services if it is bundled with a wider group of services for delivery. Partners would probably need to agree to bundle several core services with WRS across the county, such as the broad swathe often contained within an Environmental Services directorate to get any interest from the major out-sourcers.

The partners could consider entering this market in some way collectively to offer services to other local authorities. Public bodies can trade with one another with relative ease and avoiding some of the more expensive elements of procurement. In such circumstances, WRS could be part of a broader organisation or be well placed to support any commercial activity that partners choose to undertake. However, the demise of Shropshire's wholly owned company from which it purchased various services including regulatory ones should also be a salutary lesson to local authorities that the private sector is not the right option for all functions. Also, the fact that Publica, the wholly owned vehicle for West Oxfordshire District Council and a number of the Gloucestershire district authorities, has yet to look for work more widely might indicate limitations to this approach.

The sharing of services is a tried and trusted model for local government with Regulatory Services having a long history of using the model dating back into the 1960s. The shared arrangement of the 5 West Yorkshire Metropolitan Borough Councils is probably the longest lasting, having been established in 1986. Three unitary authorities in South Wales have had a fully shared regulatory service for some time now. A number of London Boroughs are using the model for Trading Standards. A number of the unitary authorities in Berkshire have built on the collaboration between Wokingham and West Berkshire for a range of regulatory activities so this now covers many of the Berkshire authorities. Devon and Somerset County Councils have been operating a shared Trading Standards service for some time now, with Torbay and Plymouth Unitary Councils subsequently joining them. Buckinghamshire Council and Surrey County Council have continued to operate their shared Trading Standards service successfully, even after Buckinghamshire has obtained unitary status. Eight of the district councils in Essex are about to enter discussions reminiscent of the conversations that were happening in Worcestershire under the WETT programme in 2009, albeit the involvement of Essex CC in this is not clear from what is said in the local government press and discussions appear to be in their very early stages.

Those authorities not considering these options, particularly district councils, continue to require experienced staffing resource that they struggle to retain themselves, mainly focused in specialist areas such as Air Quality, Contaminated Land and for the wider support of planning consultation. These are all areas where WRS has significant local and even national expertise. WRS is already providing cover activity for these services to several councils so is well placed to continue to bid for a range of opportunities should they arise. At the time of writing, WRS is carrying out work for other districts/organisations in the following functional areas:

- Dog warden services
- Air quality
- Industrial Pollution Control
- Contaminated Land
- Planning Consultation advice
- Gull control
- Private Water Supply sampling and risk assessment
- Database administration

The pandemic did cause a down-turn in the service's income; however, the service has lost few customers. Most have returned as we have come out of pandemic controls and work is returning to normal levels. During previous business plan

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cycles, WRS reached the point where it is turning away work in these areas as its capacity was insufficient. An invest to save business case was made and Members agreed to the provision of an additional post within Technical Services with a view to this being funded by income within 2 years. This was achieved and it may be that further saleable capacity will be needed going forward to continue to build on this approach. The above options are the obvious areas for WRS to focus on in terms of contracted district council activity.

The original post 2016 Business Plan considered that bidding for district council grouped regulatory contracts would be at the heart of what WRS would look for. Members also agreed that the option for someone to join the partnership should also be an option rather than a purely contractual relationship, to ensure member engagement for that authority. Despite this, we have not been successful in attracting new partners or full-service contracts. We have engaged or attempted to engage with the districts in Warwickshire and Gloucestershire that are our near neighbours, but this has never been fruitful beyond the work we do for some of them currently. Given the current financial situation, we might expect some shift in their thinking, however, the devolution agenda in its current form seems likely to push 2-tier areas to consider wider intra-county co-operation rather than reaching out across administrative borders looking for help. It still seems strange that our near neighbours have not considered the WRS model as an option for their own areas, given its transferability and success here.

The County Council's decision to remain engaged with WRS by buying management capacity, support and other functions is welcome. The Trading Standards team's move to being part of Public Health shows recognition of their contribution to this agenda and the level of Public Health ring-fenced grant funding that supports the service also demonstrates this. This remains a positive for WRS income generation, especially in food as together the services can offer a comprehensive package of Primary Authority engagement. Officers will also continue to discuss the potential for County's re-engagement with the partnership more formally as this again would offer broader marketing capability for the shared service with both two tier and unitary councils. Our on-going engagement has led to WRS taking on petroleum licensing for delivery alongside the district's vapour recovery/ permitting provisions as well as the County Council's Safety at Sportsgrounds function.

3.2 Other Public Sector Income

The service will continue to look at the potential for grant money from other public bodies to deliver related work. Pre-pandemic, on-going austerity measures had limited the availability of funding from other public sector bodies and, currently there are limited areas for the service to access grants. This may widen in the future, and may include:

- Local Enterprise Partnerships
- The Police & Crime Commissioner
- Local Authority Public Health

The service needs to rebuild its links with a range of partners in the coming years, to re-establish bonds broken during the pandemic when workloads became so different. Our approach to regulation through the Better Business for All philosophy is essential in supporting sound economic growth within the county and we will strengthen our links with the Worcestershire LEP through our engagement with Worcestershire Business Central, our local Growth Hub and other economic development forums across the County. However, the significant reduction in funding for the LEP may mean it is unable to offer the kind of financial support for WRS projects that has previously been offered, so it is likely that our relationship with the LEP will be as a route to support business, not one that yields significant funding streams.

We have strong links into Public Health through our support for Trading Standards, which falls under the Director of Public Health. Again, the commitments already required for Public Health ring-fenced grant may limit the DPH's ability to support WRS activities, even when they feed into the public health agenda. Although we engage with both community safety and local policing, we have yet to develop formal links with the PCC's office. Previously, ensuring links into district community safety activity was seen as the best way to look for funded opportunities, and this may remain unchanged given the PCC's wider geographical remit covering Herefordshire, Shropshire and the Telford and Wrekin unitary councils.

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Despite these issues, we will continue to bid for support for Health and Well-being project work, supplementing this with a small residue of specific grant income, as long as it is sustainable through cost recovery. There are several schemes like the Healthy Eating Award programme, suspended during Covid that can be refreshed and re-launched. The Triple 5 Award, which was being developed before the pandemic for businesses consistently achieving 4-star and 5-star food hygiene ratings will also incentivise better run businesses to maintain their standards to allow resource to be focused on poorer performing businesses. Hence, the right kind of health and well-being interventions can also provide benefits to statutory areas of work.

As we mentioned earlier, the Worcestershire Works Well programme run by the County Council's Public Health team is going to receive post-Covid re-vamp and we will try to continue to be engaged, although the scheme may seek a sole supplier, so we will have to wait and see what emerges.

Beyond the local, the service will revisit the application of our skill sets to other areas. Work on supporting permit applications to the Environment Agency is something that has been seen positively by several health authorities and the MOD facilities service. We even worked for the Gibraltar government in the past, so even international work may be within our ability to deliver.

3.3 Commercial income generation opportunities

The report commissioned by WRS through the County Council Research and Intelligence team showed that, whilst businesses do spend a significant amount of money with private consultants, most of this was in Health and Safety at Work which is already a well-serviced market. It is probably worth revisiting this piece of work given the time elapsed to see if there have been any changes to business's attitude to paying for advice from local regulators. Whilst the legal advice provided to WRS made it clear that there were risks associated with charging regimes where the advisor might, at some point, must become the enforcer with the same business, there are ways of overcoming these issues.

Business advice for District Council functions remains available free of charge for individual requests, however the service will continue to look to move suitable businesses into Primary Authority relationships where the potential demands are high. Training may be an area for consideration, particularly outside of Worcestershire, to avoid conflict of interest allegations. The service is currently looking at what accreditations may be needed to set up a training centre for several courses related to licensing and environmental health related activities. We know the market is already quite well served so this is only likely to be pursued if we can find a niche offer.

Pre-application advice for licensing is now offered with separation of functions so the person advising does not handle the application when it moves into the formal process. This has created a very small but steady stream of income. Pre-application advice for planning may also be an area that the service could develop alongside the current charging mechanisms used by the partners. Currently the service receives no part of the fee levied by planning colleagues although it can be required to contribute significantly to these processes. Clearly, we would not do anything that might damage the current process so any proposed changes would only be implemented following consultation with planning colleagues.

The service continues to expand its Primary Authority work as a means of recovering cost, but this does have some limitations, especially the fact that it can only be a full cost recovery operation. We became the first service to provide Primary Authority support in the Environmental Permitting area and our first two companies are very pleased with what they have bought into so far. Post-pandemic, we can now look to push this area of work as it is one of our strengths and there is limited overlap with other regulatory functions. However, it still needs to be recognised that, up and down the country, Primary Authority is only delivering income sufficient to support relatively small numbers of posts within services and it will never be a substitute for local authority funds. It should also be recognised the these more lucrative Primary Authority contracts are also the most challenging and problematic and carry the greatest reputational risk.

These factors have been recognised and, whilst the service will seek to develop paid for business advice as part of its income generation strategy, even with a wide range of business types being eligible to have a Primary Authority, it has been

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recognised that this income stream will be limited and that the service must avoid any allegations of conflicts of interest in its dealings with businesses.

3.4 Income Targets

The table below outlines the annual turnover targets that need to be achieved to retain the current workforce capacity.

| Year | Forecast Turnover Income Required |
|---------|-----------------------------------|
| 2022/23 | £372,000* |
| 2023/24 | £524,000* |
| 2024/25 | £607,000** |
| 2025/26 | £687,000** |

*After partners agreed to fund known unavoidable pressures ** Assumes partners cover any additions bar salary increases.

For 2023/4 partners have agreed to fund the increases in costs of previously agreed additional posts, uplifts for increases in partner contributions for hosting and a salary increase of 2%. For 2024/5 and 2025/6, the quoted figures assume that partners at this stage only cover the uplifts in hosting and additional post costs. The salary uplifts for these two years are left out, hence the jump in income requirements for subsequent years. If none of these assumptions are made, the figure for 2024/5 is over £800,000 and by 2025/6, the income requirement to balance the books will be over £900,000.

Until 2020/21, because of the cash standstill budget, the service had to accommodate the costs of inflation, salary increases and incremental spinal point increases for officers. After this date, the speed of increases with pay awards and increased pension contributions meant this strategy could no longer be followed and partners were asked for increased contributions.

With inflation above 10% per annum and likely to stay high for a year or more, it is likely that these shocks to the system will continue, and partners will need to increase payments going forward to some extent. Whilst the service will seek to drive its income generation activities to achieve greater yields, this is unlikely to be able to cover all cost increases in the current climate. The bar chart below at figure 3 identifies the income streams currently identified and the proportion they have contributed in recent years.

Given the absence of leads turning into larger scale relationships, either through contract or partnership, we have decided to use the funding from the Business and Relationships Manager post to support the business in other ways. We are looking to recruit a part-time Communications Officer to work with the management team on both links to members locally but also for marketing what we do outside of the area. The addition of an Intelligence Researcher role to the Intelligence Unit will provide additional capacity to support work locally but also make our Intelligence Unit (with the help of the Trading Standards Intelligence Officer post too,) a saleable commodity at a time when the Food Standards Agency is about to embed intelligence-led operating into the Codes of Practice for Food Standards, Food Hygiene and Animal Feed. The service is already well ahead in this area and the additional capacity can provide paid-for support to help other authorities transition to the new approach.

For bigger pieces of contracted work, a risk assessment will continue to be undertaken, in terms of potential financial yields versus the levels of investment required upfront and the on-going costs of any contract. There may be other factors such as reputation that need to be accommodated in terms of risks of failure during the contract, or customer dissatisfaction arising from poor performance. Consideration will also need to be given for the potential for partnership and the impact this would have on both the baseline income/ performance of the service and the loss of income streams should a customer become a partner.

The service has always looked for full cost recovery being the norm for all of its contracts as there needs to be an element of financial return for the existing partners, which the service will utilise to maintain resilience within the service.

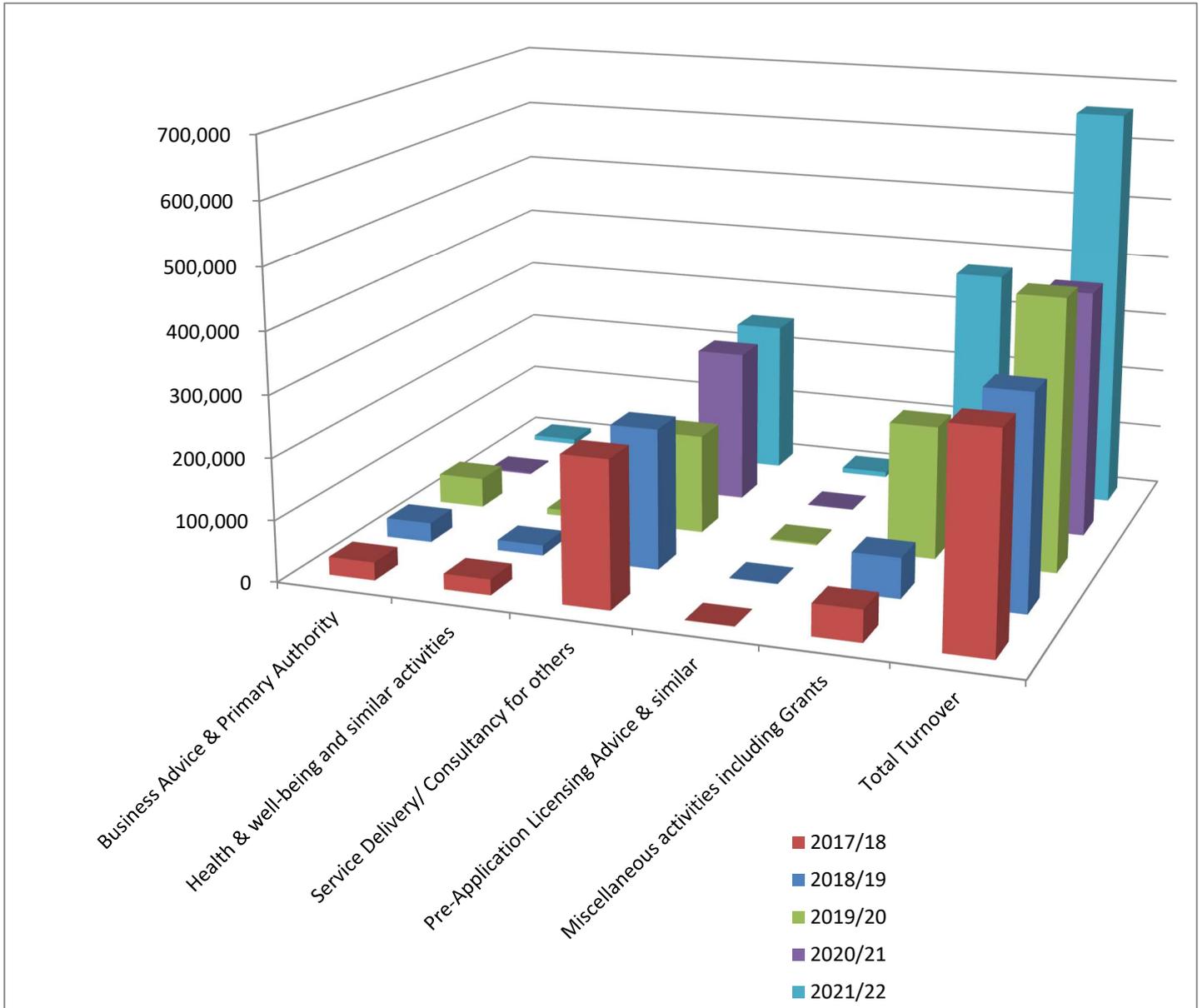


Figure 3: bar chart of income sources over time

3.5 Building on the WRS Platform

The option for widening the partnership under the right circumstances is one way of building on this successful model and the Management Team will work with officers from the WRS Joint Board to consider how this could work whilst seeking out potential interested authorities.

WRS's continued operation alongside our County Council Trading Standards colleagues has maintained the high standard of enforcement practices developed and honed when the service was part of the partnership. Whilst the subject matters being enforced by each of the teams in the organisations may be different, the ability to investigate crime, collate evidence, produce witness statements, and prepare an enforcement file is the same. These are crucial skills in adherence to our Enforcement Policy and in enabling a successful prosecution to achieve our vision, "That Worcestershire is a healthy, safe and fair place to live, where businesses can thrive".

In recent months, the team have been utilising the knowledge and skills we have in this area to support several of our partner authorities in relation to planning enforcement, initially with basic collation of evidence to assist the Planning Officer to make an informed decision in a timely manner, but later to address the significant backlog of casework had been created by COVID

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related restrictions and, in some cases, historically by capacity and recruitment issues. This enabled significant progress with some very complex and difficult cases.

This clearly demonstrates that having enforcement functions under one roof can provide improvements in performance where skill set exist, and they are used with reasonable frequency. One of the issues in some fields is that officers struggle to maintain the knowledge and skill to discharge the enforcement elements of their functions, even assuming this forms part of the training they have undertaken. Partners can, therefore, be confident that building these into the WRS model can be a success. Functions previously mentioned as possibly benefiting from becoming part of the WRS platform have included:

- Enviro-crime and Fly-tipping
- Planning enforcement
- Private Sector Housing
- Building Control
- Emergency Planning
- Land Drainage

The current legal agreement allows partners to add functions to the delivery platform if funding arrangements are agreed. This could also create wider income generation activities for the service and provide partners with efficiency savings in those areas added.

4. Organisation & Performance

4.1 Introduction

As an intelligence-led service, WRS produces a Strategic Assessment every other year that reviews data from a wide range of sources to identify current trends and emerging threats in our key work areas. The work is undertaken by the WRS Intelligence team who will review all of the data and make recommendations to the management team on key strategic priorities and possible tactical responses that might maximise influence and outcomes. This leads directly into the development of the annual Service Plans that sit below this document.

With the proposed adoption of intelligence principles within the Food Standards Agency's Code of Practice, Environmental Health work programmes are likely to be influenced nationally by use of the intelligence sharing protocols as use of intelligence is embedded in day-to-day operations. We are at the forefront of exploring how the intelligence-led approach can lead to better use of resources following on from its development for the delivery of Trading Standards and Animal Health activity some time ago. This approach will continue to be particularly relevant to try and develop preventive activities to help reduce demand on the service.

4.2 Core Level of Service.

Given the current and foreseeable financial pressures that local government will face for the period of this plan, it is worth reiterating what has been said previously about minimum service levels. In previous plans we have explained why the current professional officer cohort across the teams represents the minimum to deliver what is reasonably expected by customer, businesses, and members. The only exception to this is the areas where significant income is generated, however, we have also explained that this work does subsidise what the partners would otherwise need to put in to achieve their desired service levels. The table below compares the current staffing cohort against the functions identified in the previous plans for Environmental Health.

| Functional Areas | Estimated minimum required for core work | Current staff compliment allocated below Senior Practitioner level |
|--|---|---|
| Food Hygiene and Food Safety/ Infectious Diseases Health and Safety at Work Statutory nuisances and other | 18.5 staff, mix of EHO and Technical Officer grades | 18.4 FTE in Community Environmental Health Team |
| Technical Pollution | 8.9 staff, mix of EHO, Technical Officer grades and a Technical Support Officer | 8.9 FTE including invest to save post delivering this in Technical Pollution team as well as work outside the service in 5 other council areas. |
| Dog Warden Service | 3 Dog Wardens | 3FTE delivering services across the 6 partner districts plus 4 other districts outside Worcestershire. |

This level was being set by identifying the minimum common level of service required and considering any other significant efficiency that could be delivered. The additional resource in Technical Services is supported as an "invest to save" post to increase our ability to generate income. This post has delivered a positive contribution to income generation since its inception. Our three dog wardens continue to deliver for the whole of Worcestershire, Birmingham City out of hours and three districts in Gloucestershire, plus other work so any change in numbers here would be a disbenefit to partners.

4.4 Licensing

Licensing regimes must operate on a cost recovery basis so, as such, are not subject to the same financial pressures as other elements of regulation. However, WRS has sought to increase the efficiency of the licensing processes and it will continue to do this going forward. We have tried to adopt common approaches where possible, across the 6 districts, to streamline processes and, in many areas, particularly around alcohol and gambling, policies are relatively similar already. The new animal activity regime is fully delegated to officers for decision making. The taxi regimes continue to be an area of relative diversity but over time and with the introduction of national standards, we should start to see these become more aligned. The adoption of on-line application processes feeding directly into the Uniform back-office during the early part of 2023/4, will further support efficiency.

Following implementation of the on-line processes, the team manager will look at reviewing how the service operates, to see whether improvements in activities and outcomes can be achieved. Post-pandemic, there is a demand for some quarters for an increased enforcement presence, particularly out of normal working hours, so this will be considered as part of this review. The decision in the Westminster case, which allows a reasonable amount of fee money to be allocated to compliance activities, means that savings can be re-invested in a better compliance regime for partners.

4.5 Cost

The service is already at a point where the partner's total contributions do not cover the cost of maintaining the staffing cohort within the service. This is achieved by income generation and, as has already been indicated, the figure necessary to maintain the current staffing levels is growing with things like salary and pension pressures. Even accepting that two or three FTE could be shaved off the staffing compliment if the 6 partners were to only want the minimum required to deliver their own work at minimum levels, this saving is far exceeded by the income generated by these posts, so it is safe to say that it is income generation that is enabling the partners to operate above the minimum levels required.

4.6 Performance

There are no national indicators anymore, making it difficult for members to benchmark the performance of their service against others. Even CIPFA stopped their collection of statistics on regulatory functions in 2015/16 meaning there are no national comparators for these functions at all beyond what the professional bodies collect from willing volunteers. Since 2018/19 the Association of Chief Trading Standards Officer's Impacts and Outcomes Framework for Trading Standards, a voluntary scheme developed to highlight the impact of local services nationally, as well as providing a set of indicators to demonstrate the value added by services locally. No similar schemes have yet been developed for Licensing or Environmental Health.

The service has operated to a suite of outcome style measures more or less since its inception, which address key areas of member concern. The outcome measures are supplemented with activity data to provide members with reassurance that the service is addressing relevant issues in their areas. The table of PIs for 2023 onwards are outlined in Appendix D. These were developed in consultation with both Management Board and members of the Joint Committee in October 2015 and subject to further consultation with the Board members in October 2019. At the last review members felt that these remained suitable and sufficient for them to be confident in what was being delivered on their behalf.

5. Workforce and workforce planning

5.1 Current Workforce

A structure chart appears as Appendix A. It retains the Trading Standards functions as these are managed under contract. As part of the last business plan, we indicated that we would experiment with 4 FTE as the management team in WRS, to see if this was viable. Having come through the pandemic period, we now know that this is as lean as it could be given the current demands made by the six partners and those other authorities we have as customers. This is far below the 11 envisaged in the original structure used to integrate all the previous operational units (Head of Service, 3 Business Managers and 7 Operational Unit Managers,) and relies on the competence of our Principal Officer cohort to be both first line supervisors and experts in the specific fields that we require of them.

On 1st April 2023, the service will have lost all its Covid related posts, and the workforce establishment will have approximately 69FTE. Of this, 2.5FTE are supported with funding whose calculation is different from the main bulk of WRS funding. These posts cover things like gull control for Worcester City, animal activity licensing (as demand bears no resemblance to the current funding formula,) and an invest to save post for income generation. We also have a number of posts currently funded through income for:

- Piloting planning enforcement on the WRS platform for Redditch and Bromsgrove (3.3FTE)
- Support Home for Ukraine in Redditch, Bromsgrove, Wychavon and Malvern (2.8FTE)

In a number of areas, the service has officers with a regional and national profile who are highly regarded technical experts in their respective fields. This enables WRS to deliver high quality, high value services and to do work for others. Again, losing these key individuals could have a serious impact on the service's ability to deliver, especially in relation to income generation.

5.2 Staff Retention

Managers have identified that staff are critical for the on-going high-performance of WRS and giving the best potential for income generation. Being able to continue to offer opportunities for professional development, our agile working arrangements and the ability to engage with the wider professional environment will help to retain people. Managers will continue to support those willing and able to perform on the bigger stage, marketing the service and its achievements at a regional and national level. Those coming into WRS from other local authorities see how heavy their workloads are but revel in the positive atmosphere and relish the challenges offered by our innovative approach to delivery. They welcome the ability to use their broad skill base on a day-to-day basis enabling them to give of their best.

5.3 Staff Development and succession planning

It remains crucial that the service retains a reasonable training budget, both to ensure the competency of existing staff but also to ensure that we can develop staff for the future. The age profile of the workforce is quickly becoming critical, with recent work with the host authority showing risks with individuals in positions where their skills and knowledge are key, but also the overall age profile being biased towards those over 40 and a significant proportion over 50. With current financial constraints, addressing this is not easy.

The service engaged its first apprentice in Licensing in April 2015. The main Apprenticeship route currently available for local authorities remains the Regulatory Compliance apprenticeship, which is now well established. Whilst this is probably sufficient, along with existing elements of training to fulfil our needs in Licensing, it only gives a first set of steps into the qualification regimes of the other regulatory professions. Trading Standards South-East, the partnership for councils in that region has just had a level 6 Apprenticeship programme approved for Trading Standards, that should be available for an initial cohort of students UK-wide in 2023. They are now in discussion with the Chartered Trading Standards Institute (CTSI,) to ensure the qualification can be matched easily against CTSI's professional qualification framework to minimise the need

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for further work. Unfortunately, we don't appear to be progressing in the same way with Environmental Health and, some of our Technical Services roles don't meet the traditional EHO requirements, so alternatives are being investigated.

The need to focus on income generation clearly remains and, historically there has been some emphasis on developing the commercial acumen of staff. The steps previously taken will be built upon in order that staff can recognise commercial opportunities when they arise. Many staff now understand the value of what they know and do and can see the positives from obtaining some support for the service in this way.

5.4 Staff Appraisal

The service continues to follow the standard pattern of Personal and Professional Development Reviews on an annual basis, with a 6-monthly update, to ensure staff are competent. The new computer and performance management systems enable managers to review the performance of their staff in more detail, allowing individual performance to be scrutinised and assessed. Managers can now see who their best performers are and identify those needing additional support and improvement.

Going forward this will continue to improve performance at both individual and service level, albeit resources are already at a premium. Finding a route to enable managers to draw performance information themselves without having to rely on either the Database Administrator or the Intelligence Officer are key to making this more efficient.

6. Evolution of the Business Model & Risk

The basic premise of the service model since 2016 has been for the service to seek wider business opportunities with other local authorities, either through contracts for small areas of service where WRS is well placed due to its economies of scale, or by offering full engagement with environmental health and or licensing services by way of contract or membership of the partnership. The service has done well on the former due to its reputation in the areas around air quality, contaminated land, and environmental permitting. Other areas like private water supplies have also been helpful for existing customers. Having a strong working relationship with the County Council has also enabled us to maintain the income stream from managing Trading Standards, although our preferred outcome of the service returning to the partnership has not been achieved, and it has allowed us to offer the role of a trusted partner to deliver Safety at Sportsgrounds and Petroleum licensing.

Our Fee-Earner model has stood us in good stead for this purpose for more than 6 years now and, whilst it was resource intensive to create with the support of the Host's Finance Officer, it has allowed us to model changes in our own structures and how these would impact financially, as well as allowing us to accurately calculate the cost of jobs, which can then lead to maximised legitimate cost recovery. We have even devised cost models for the potential of additional partners joining the service to help us calculate what kind of benefits might accrue against the implications for further sharing of delivery.

Where we have not been successful is in attracting new partners or full-service contracts. Although we have engaged or attempted to engage with the districts in Warwickshire and Gloucestershire that are our near neighbours, this has never been fruitful beyond the work we do for some of them currently. Given the current financial situation, we might expect some shift in thinking, however, the devolution agenda in its current form seems likely to push 2-tier areas to consider wider intra-county co-operation rather than reaching out across administrative borders looking for help. It still seems strange that our near neighbours have not considered the WRS model as an option for their own areas given the transferability of the model and its success here.

Hence, the focus for income generation will continue to be on those contractual arrangements that deliver the things we are good at, to those who struggle to maintain the necessary expertise. We have sought to build on these skills and looked to use them creatively outside of enforcement in areas like making permit applications to the Environment Agency for hospital trusts and supporting MOD Facilities with their moves to compliance with the medium sized combustion plant directive for their sites. These have helped to establish the service's credentials in these areas but sadly we have been unable to build on our successes.

The Government's current thinking on regulatory divergence from the EU is something also that we need to consider, given we have built our expertise on regimes derived from EU Directives. Government has yet to announce what a UK based replacement will look like and how wide its applicability will be. If a similar regime is retained, there remains scope for us to work more widely in this area as we will need to fully understand the implications for our enforcement role. We will develop our expertise, and this may be of interest to both businesses and to even more local authorities if the current pressures lead to further shrinkage in EH services. The greater risk is if these forms of regime are abandoned, leaving few if any regulations to control these kinds of business activities. Legislation is making its way through the house to introduce a sunset clause for all EU derived legislation at the end of 2023. We hope this does not impact our regimes adversely.

The new legal agreement requires that the service continue to develop its time recording protocols and approach to the point where there was the possibility of moving to a charging model based on demand addressed rather than the historic investment levels. Whilst there may be logic in this approach there are also risks in creating the potential for a situation where some partners are winners and losers.

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It is in the nature of any partnership that a certain quid pro quo is accepted. The simple fact is that the big issues could hit any of the partners at any time and, with current levels of investment, an individual authority would struggle to respond to large scale pollution or nuisance issues or a large-scale food or health and safety incident. These can only be dealt with under the current model because of the economies of scale achieved. Sharing the risks of these incidents may be more palatable than achieving a more accurate allocation of cost based on demand, which will only deliver small changes in payment but risk more serious damage to relationships.

Rather than focus on this level of financial detail for current functions, we will continue to urge partners to consider additional functions for discharge upon the WRS footprint. Our work with several partners on planning enforcement has demonstrated that having the function discharged by a service that understands the basic principle of law enforcement can deliver benefits to service quality and to pace of achieving outcomes. Asking officers whose training for their professional roles does not including law enforcement is difficult, particularly if the exercise of these powers, compliance with PACE, CPIA and other aspects of the control regime are only addressed occasionally. Far better to place this work with people whose day job is taking statements, gathering evidence to the criminal standard, and preparing reports to submit to legal, and having those officers operating within part of the organisation set up to support these activities.

We have said elsewhere in this plan and in previous ones that there are several obvious potential areas to consider adding to the platform. Deciding on hand-over points between the relevant professionals and those who will enforce is probably the hardest part in any of these areas although with several this is not the case as the whole function could transfer easily. There are existing partnership arrangements on a north/ south basis like Building Control and Land Drainage, which have a regulatory background and could function well within the partnership. There may be other functions like Community Safety or Emergency Planning that either link into wider policing or emergency response/ preparedness, whose ethos would sit well in the partnership even though their deliver elements are not formally linked to regulation. Given the likely position of all local authorities in future years, we would urge partners to consider all options for functions that may benefit.

Beyond this, the main risks faced by the service going forward will be:

- Risk to sustainability of the service if partners cannot maintain core funding with the potential return of austerity,
- Achieving income targets where non-partner local authorities may be reticent about outsourced delivery in these areas and prefer to develop new partnerships along WRS lines with their neighbours
- Retaining our highest quality staff and maintaining the range of competences necessary across the very broad range of functions required
- Changes to partner specifications for service fail to meet customer expectations of what should be offered creating a risk for the service's reputation with both customers and some elected members

The existing service risk register is attached as Appendix C.

Appendices:

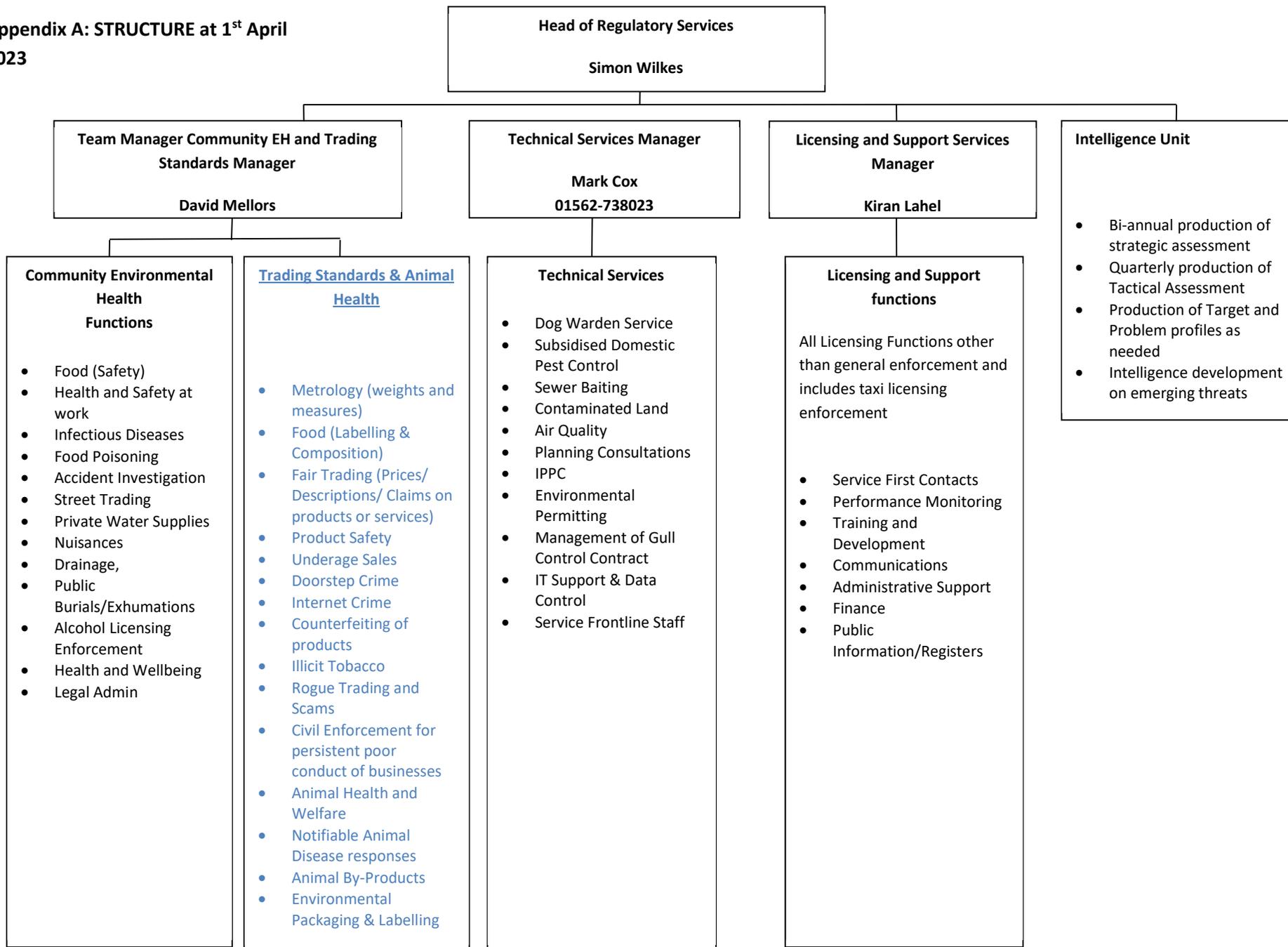
A: Current WRS structure

B: 3 year budgets

C: Risk Register

D: Performance Indicators

Appendix A: STRUCTURE at 1st April 2023



Appendix B: WORCESTERSHIRE REGULATORY SERVICES BUDGET 2023/4 to 2025/6

| Account description | Budget | Budget | Budget |
|--|--------------|--------------|--------------|
| | 2023 / 2024 | 2024 / 2025 | 2025 / 2026 |
| | £000's | £000's | £000's |
| Employees | | | |
| Monthly salaries | 3,364 | 3,449 | 3,531 |
| Training for professional qualifications | 0 | 0 | 0 |
| Medical fees (employees') | 2 | 2 | 2 |
| Employers' liability insurance | 25 | 25 | 25 |
| Employees' professional subscriptions | 2 | 2 | 2 |
| Sub-Total - Employees | 3,393 | 3,478 | 3,560 |
| Premises | | | |
| Rents | 70 | 70 | 70 |
| Room hire | 2 | 2 | 2 |
| Trade Waste | 1 | 1 | 1 |
| Sub-Total - Premises | 73 | 73 | 73 |
| Transport | | | |
| Vehicle repairs/maint'ce | 3 | 3 | 3 |
| Diesel fuel | 8 | 8 | 8 |
| Licences | 1 | 1 | 1 |
| Contract hire of vehicles | 4 | 4 | 4 |
| Vehicle insurances | 5 | 5 | 5 |
| Van Lease | 9 | 9 | 9 |
| Fares & Car Parking | 5 | 5 | 5 |
| Car allowances | 58 | 58 | 58 |
| Sub-Total - Transport | 93 | 93 | 93 |

Supplies & Service

| | | | |
|---|------------|------------|------------|
| Equipment - purchase/maintenance/rental | 30 | 30 | 30 |
| Materials | 9 | 9 | 9 |
| Clothing, uniforms & laundry | 2 | 2 | 2 |
| Training fees | 23 | 23 | 23 |
| General insurances | 19 | 19 | 19 |
| Printing and stationery | 17 | 17 | 17 |
| Books and publications | 2 | 2 | 2 |
| Postage/packaging | 11 | 11 | 11 |
| ICT | 67 | 67 | 67 |
| Telephones | 21 | 21 | 21 |
| Taxi Tests | 22 | 22 | 22 |
| CRB Checks (taxi) | 26 | 26 | 26 |
| Support service recharges | 118 | 121 | 123 |
| Support service recharges - ICT | 67 | 67 | 67 |
| Sub-Total - Supplies & Service | 433 | 435 | 438 |

Contractors

| | | | |
|---|------------|------------|------------|
| Consultants / Contractors' fees/charges/SLA's | 269 | 234 | 234 |
| Advertising (general) | 5 | 5 | 5 |
| Grants and subscriptions | 13 | 13 | 13 |
| Marketing/promotion/publicity | 287 | 252 | 252 |

Sub-Total - Contractors

| | | | |
|--|-------------|-------------|-------------|
| Income | -524 | -529 | -534 |
| Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc | | | |
| Sub-Total - Income | -524 | -529 | -534 |

| | | | |
|--------------------------------------|-------------|-------------|-------------|
| Income | | | |
| From partners for Technical Officers | -143 | -110 | -112 |

| | | | |
|---|-------------|-------------|-------------|
| Funding from Worcs City Council for Pest Control | -8 | -8 | -8 |
| Funding from partners for Increase in Rent | -11 | -11 | -11 |
| Funding from partners for Increase in ICT | -8 | -8 | -8 |
| Funding from partners for Increase in Hosting Charges | -9 | -9 | -11 |
| Sub-Total - Income | -177 | -147 | -151 |

Additional Income

Income to be found due to unavoidable salary pressures

Sub-Total - Income

| | | | |
|------------------------------------|--------------|--------------|--------------|
| | -82 | -160 | -235 |
| DISTRICT PARTNERSHIP BUDGET | 3,494 | 3,494 | 3,495 |

20-21 Partner Percentages

| | |
|--------------------------------|----------------|
| Bromsgrove District Council | 14.52% |
| Malvern Hills District Council | 13.00% |
| Redditch Borough Council | 17.49% |
| Worcester City Council | 16.72% |
| Wychavon District Council | 23.19% |
| Wyre Forest District Council | 15.08% |
| Total | 100.00% |

Additional costs for posts for new or additional activities will be allocated using this formula unless the work is requested by either one partner or a group of partners, in which case the relevant partners will agree a formula for cost allocation.

The table below covers off the additional payments that are likely to flow from the current allocations of additional funding for the additional Technical Officer capacity required for several pieces of work and to cover the salary and pension pressures going forward.

| | Budget | Contribution Pest Control | Contribution Technical Officers | Partner Contribution | Contribution Increase in Rent, ICT & Hosting Charges | Unavoidable Salary Pressures | Total Partner Contribution |
|--------------------------------|---------------|------------------------------|---------------------------------------|-------------------------|--|------------------------------------|-------------------------------|
| | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 |
| Budget 2025 / 26 | £000's | £000's | £000's | £000's | £000's | £000's | £000's |
| Bromsgrove District Council | 508 | | 13 | 521 | 5 | 34 | 560 |
| Malvern Hills District Council | 455 | | 18 | 473 | 4 | 31 | 508 |
| Redditch Borough Council | 613 | | 9 | 621 | 6 | 41 | 668 |
| Worcester City Council | 578 | 8 | 40 | 625 | 5 | 40 | 670 |
| Wychavon District Council | 812 | | 20 | 832 | 7 | 54 | 894 |
| Wyre Forest District Council | 528 | | 11 | 539 | 5 | 35 | 579 |
| Total | 3,494 | 8 | 112 | 3,613 | 31 | 235 | 3,879 |
| | | | | | | | |

Appendix C: Risk Register 2023/4

| Risk Description | Consequences | When is this likely to happen | Current Position | | | Control measures |
|---|---|-------------------------------|------------------|--------|-------------------|--|
| | | | Likelihood | Impact | Matrix RAG Status | |
| Loss of Data through IT failures | Disruption to Service Provision. Inability to produce records and data. | On-going | Low | High | Green | Wyre Forest ICT has effective processes and business continuity plans in place. WFDC upgraded relevant systems including Windows. The service moved to Office 365 during 2021/22, which provides better access to a range of provisions including Microsoft Teams and Power BI. |
| Issues with the WRS database system | Impact on work planning. Self-help may not enable savings required Hidden costs with add-on features | On-going | Low | High | Amber | Current contract due to be re-negotiated in February 2023. Work has commenced on negotiating new contract. The cost of moving systems is prohibitive currently and, whilst the system has its faults, it provides the necessary functionality and will allow the enablement of data transfer from electronic forms. |
| 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 | The pandemic has shown that we were well prepared for the need to maximise working from home and now all staff, including some previously regarded as office based can do this. Touchdown stations remain available in partner council locations. WRS Managers do need to redraft contingency plans in the event of a prolonged IT failure or cyber-attack that will allow services to be maintained. Existing BC Plans need updating and reviewing. |
| Maintain our capacity to achieve service delivery | Disruption to service e.g., Major staff sickness (e.g., flu pandemic) or Unable to recruit or retain suitably qualified staff. | On-going | Low | Medium | Amber | The pandemic response has shown that the service was well-placed to respond to what was required.. Consultants are available to provide short term cover and, whilst this worked well in peacetime to cover peak demand periods, the pandemic has revealed the |

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| | | | | | | |
|------------------------------------|--|----------|-----|------|--------------|---|
| | | | | | | <p>limits to this type of capacity. These pressures will only be resolved in the longer term by local and central government investing in additional capacity and additional training to bring more people into the regulatory professions.</p> <p>Having taken on contracts with additional authorities the demand has increased, and neighbouring authorities have lost the ability to assist with some technical specialisms. This is the double-edged sword of effectively operating as a centre of excellence. Whilst we have good resource of our own, in event of an issue, there are limits to who we can ask for help.</p> <p>Regional and sub-regional groups are in place so can provide shared resources for local authorities if required.</p> <p>Effective training and development processes are in place to ensure recruitment and retention of staff. There is increased training budget pressure, reduced technical knowledge in neighbouring authorities and increased importance in maintaining heightened skills for contractual obligations and commercial edge.</p> <p>Regular inventory and maintenance of equipment is undertaken. In the future, budget for replace may be an issue but would be a relatively small amount for partners to share.</p> |
| Pest contractors cease operations. | <p>Disruption to service.</p> <p>Negative media coverage.</p> <p>Increased public health risks</p> | 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 | The Out of Hours and Kennelling contracts were re-rendered to enhance the existing arrangements and provide resilience however there are increases in numbers of stray dogs, dog disease and contracts are restricted by geographical location. Retendering for additional kennels remains difficult and consideration may be given to creating our own capacity. |
| Hosting support does not deliver necessary financial and HR support to ensure efficient management | Efficiency of management reduced; staffing issues remain unaddressed, and performance suffers | On-going | Low | High | Amber | Issues with the new BDC finance system have mainly been resolved, however some workarounds remain in place due to some unforeseen issues. Development of a self serve recruitment platform has improved recruitment systems. |
| One or more partners continue to be under great financial pressure and may consider alternatives to the partnership to deliver their service | Creates reputational issues for remaining partners and increases the need to manage overheads. Difficulties in delivering highly varied levels of service | On-going | Medium | High | Amber | New legal agreement limits variations in contribution before partners must move to contractual relationship but this is quite high before it kicks in (20%.) Leanness of organisation minimises overheads and focuses resource at the front line. Growth strategy should generate income to support partners in the future but there are limits to this without additional capacity being added to the system. Invest to save capacity has been committed by partners to see if this achieves the necessary outcomes but even this is now fully occupied. |
| Robust arrangements in place in relation to obtaining legal advice and monitoring legislative changes. | Loss of cases is costly and damages reputation. | On-going | Low | Medium | Green | Continued close working with BDC legal team and other partners who don't use BDC for advocacy. Technical and legal training days for staff. Difficulty in keeping informed of Case Law developments. Membership and attendance of Officer Technical Groups outside the County does assist. |
| Service provision complies with Government requirements | Adverse comments following audits e.g., FSA | 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. |

| | | | | | | |
|---|---|----------|-----|------|--------------|--|
| | Intervention by Government bodies i.e., FSA, whilst highly unlikely, is damaging to reputation. | | | | | <p>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.</p> <p>The Service has developed systems that follow the principles of the requirements of bodies like FSA so can show some level of compliance, but service isn't operating to the letter of the current Code. The Code is however currently going through major changes and likely to move to a point where it is closer to the WRS model of operation.</p> <p>Environmental reporting for Local Air Quality Management, Pollution Prevention and Control and Private Water Supply Inspection reports to Defra and DWI have received positive responses with no issues of concern raised by these bodies.</p> |
| Failure to deliver external contract work at the level expected by the business or local authority with whom we have the contract | <p>Damage to reputation, loss of future income streams, financial impact of paying damages</p> <p>Loss of key staff or skills</p> | 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. Ensure contingency plans in place if key staff leave to enable contract delivery, to include contractors, staff development and apprenticeship</p> |

Appendix D; Table of Performance Indicators

| | 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 | % food 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 1-2 star on a national Food Hygiene Rating Scheme assessment (2 stars and below is deemed to be at risk of not producing safe food.) |
| 5 | % of drivers licence renewal applications issued within 5 working days. | 6-monthly | Based on the proportion of drivers licence renewals issued within 5 working days of receipt of application. |
| 6 | % of vehicles found to be defective whilst in service | 6-monthly | Percentage of vehicles stopped during enforcement exercises or identified on routine garage tests that are required to be removed from service for remedial work before being allowed to carry on operating. |
| 7 | % of service requests where customer indicates they feel better equipped to deal with issues themselves in future | Quarterly | Based on questionnaires send out to a significant number of members of the public and businesses who have used the service. |

| | | | |
|----|---|-----------|--|
| 8 | Review of register of complaints and compliments | Quarterly | All are recorded Increasing compliments/ Reduced complaints |
| 9 | Staff sickness absence at public sector average or better | Quarterly | Sickness recorded using host processes. Public sector average 8.75 or better |
| 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 district base revenue budget (16/17 onwards) |
| 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 |

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WRS Board

Date: 16th February 2023

Worcestershire Regulatory Services Service Plan 2023/24

Recommendations

That Members of the Board:

- (i) Approve the WRS service plan for 2023/24
- (ii) They specifically note the level of work to be undertaken by the service this year in relation to the partners' roles as local food authorities.

Report

The Board signs off the service plan for WRS each year. The process helps to make members aware of what the service is proposing for the relevant financial year and provides a sign off that some central government bodies like to see in relation to service delivery plans e.g. the Food Standards Agency.

The plan follows very much the pattern of previous years and has an Executive Summary to pick up the main points. Last year's plan had to continue to accommodate our activities in tackling the global pandemic as well as our day-to-day activities. By the time we move into 2023/4, all our involvement with pandemic related activities will formally have ceased.

Throughout the pandemic, the service continued to shape its work around the long-standing strategic priorities for local authority regulatory services provided by BEIS, as these provide a framework that allows WRS to have a golden thread back to the priorities of the six partners and to link to the requirements of the various national bodies that oversee our work.

Whilst we have retained these for this purpose, the focus of this year's plan has shifted somewhat to the tactical priorities identified in the service's Strategic Assessment. This two-yearly piece of work reviews the full data and intelligence picture, looks at emerging threats and makes a number of recommendations as to the areas that need to be addressed. These are listed below.

- Supporting a safe and vibrant night-time economy
- Promoting the responsible sale, breeding, and ownership of dogs
- Promoting safe and clean communities
- Supporting commercial businesses to operate safely and responsibly
- Supporting industry to operate safely and responsibly

Whilst the last two are best described as business as usual for a regulatory service, the other three are cross cutting in nature and will need to be

Agenda Item 6

addressed by various staff within the three teams to deliver outcome for our communities.

A range of high-level activities against the 5 tactical priorities are identified within the plan so that members will be aware of the general focus of the workload. Below this will sit a number of plans, either team based or cross cutting that will be used to drive the actual business activities.

The plan has been devised in the face of on-going financial uncertainty with inflation staying high and money being tight across the public sector. Both businesses and households are feeling the pinch, and this has led in the past to increases in work for regulatory services as businesses may take more risks to survive and households seek to reduce expenditure on what may be essential products.

Working with businesses and other partners is a key theme for both generating income to mitigate financial risk but also to ensure that outcomes are delivered that match the priorities of partners and stakeholders. Delivery for other local authorities also remains a key income generation strategy, supported by limited work for the private sector and any specific grant monies that we feel are worthwhile pursuing. We have retained most of our client-base post pandemic and we hope we will be able to identify new ones, although over time this does get harder. We do however remain hopeful that this strategy will remain fruitful.

We will continue to use intelligence to drive the business forward and the embedding of this approach and its associated processes will continue.

The Risk Register has been updated to reflect the current position in areas like IT provision and development, staffing levels, and our reliance on contractual relationships for income. The threat from cyber-attack has become more real in recent years as the devastating consequences have been felt by colleagues in other local authorities elsewhere in the country. We will work closely with our ICT host, Wyre Forest DC, to limit the risk of this. Our teams have for many years been using mobile and flexible work activities which has yielded efficiencies but our reliance on ICT provision to deliver this does increase our vulnerability to disruption.

As with previous years, members are asked to pay particular attention to the provisions for food hygiene delivery in the coming year. This is to meet one of the recommendations of the auditors from the Food Standards Agency who visited the service in May 2017. They were keen that members have a better understanding of the demand in this service area when they authorised the plan for this and future years.

Members are asked to note the proposed numbers of inspections and similar activities proposed for the new financial year that will be undertaken to discharge the statutory duties of the 6 partners in relation to food control. We will keep the board updated on progress as the year goes forward.

Financial Implications

None

Sustainability

NA

Contact Points

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Background Papers

Service Plan 2020/21 including Risk Register

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Service Plan

2023/24

Worcestershire Regulatory Services Vision

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

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EXECUTIVE SUMMARY

The plan broadly follows previous years, outlining how the service will operate over the following 12 months to deliver on both national and local priorities, some of which are highlighted in the plan, and indicating at a high-level what activities the service will carry out to achieve or address those priorities and how success will be measured. The Service will enter 2023/24 with a total agreed budget from the district partners of £3.753M made up of a base budget of £3.494M plus additional costs for various additional posts, increases in pay and hosting support charges. This includes a budgetary uplift to cover the pay increase on each spinal point, the cost of increased pension contributions by the employer and increases for hosting costs reflected by the large inflationary pressures faced.

Plans for 2023/24 are based on the most recent Strategic Assessment for the service, which identifies several cross-cutting priorities. These feature a number of areas that create the most issues for us and our partners. Addressing these via relevant control strategies will be an important modification to the way we have worked previously, allowing all relevant elements of the service to focus on problem solving and work with partners, including the Trading Standards team to address them. Uncertainty over what the world will look like post-Covid has been replaced by concerns over what the economy will look like as inflation continues to create pressures driven by a range of international issues including the war in Ukraine. Government has provided a financial settlement for the next two years that the District Councils network and others in the sector say will still mean local authorities making difficult decisions on service provisions, so the financial uncertainty that local government has faced since before the pandemic will continue for the foreseeable future.

The service will also continue to pursue work for other local authorities. We have already been successful with one or two new contracts and have retained the dog related contract with the north Gloucestershire districts. It will be interesting to see whether the focus of devolution on county footprints and the focus on these geographies of the wider “Levelling Up” approach will lead to fewer bodies looking beyond such boundaries for support. So far, many of the remaining 2-tier areas do not appear to have shown an interest in the agenda, so currently there is limited risk from this.

In making decisions regarding service delivery, the service will continue to risk assess what it does considering the economic impacts and impacts on health and well-being. Whilst risk will remain a key criterion against which we deploy resources, intelligence will be a major contributor, especially in relation to issues which cut across our teams. By gathering data and understanding issues, rather than simply rushing out to deal with problems, we will focus resources on where they deliver the best outcomes, with better long-term solutions. This was a key part of our response to the pandemic and will remain at the heart of service delivery moving forward.

Simon Wilkes
Head of Worcestershire Regulatory Services

Peter Carpenter
Interim Executive Director of Resources Bromsgrove District and Redditch Borough Councils

1. INTRODUCTION

This is the thirteenth formal annual service plan to be produced by Worcestershire Regulatory Services and follows a similar format to the previous plans with an Executive Summary and details in appendices that follow on from the main commentary. The financial information covers the three-year accounting period 2023/24, 2024/25, and 2025/26 however the operational detail reflects the planned activities that the service will undertake in 2023/24.

2022/23 was another very busy year for WRS. It is the first for some time, where workloads have really felt like the influence of the pandemic was fully waning and we were moving into the realities of our business-as-usual work. In the early part of the year, we continued to have some limited commitments and, throughout the year we have had to have capacity available to support the Local Outbreak Response Team in case of a surge in cases. However, beyond this much service activity has been reflective of pre-pandemic activities, with the usual forms of demand being addressed.

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

It is probably too early to say whether the pandemic experience will lead to more local authorities seeking our support. The agendas for Devolution and Levelling-up focus, in two-tier areas on county footprints with the higher tier empowered to consider what is best for their areas. In recent months we have seen Devolution deals delivered to multi-county arrangements like the East Midlands and single county areas like Cornwall, so it seems likely that any local deal would be similar. However, it is worth noting that a significant number of 2-tier areas do not appear to be engaging significantly with this agenda for various reasons, so it seems unlikely to impact us significant in the coming year or so. Government has also been clear that re-organisation from the top down is not on the cards, which may mean more chance for us to service authorities struggling to maintain their own specialist services however, some areas may see unitary as the only way forward due to the financial situation and others may become more focused on co-operation within their county boundaries in two tier areas. Time will tell.

One thing that didn't change during the pandemic was the need to investigate breaches of the law and a number of cases were put through to council legal departments. Full details of activity will be reported in the Annual Report to be produced at the end of May 2023 and reported to the Board in June.

The coming year is likely to be dominated by:

- The end of the Food Standards Agency's Road map and the restoration of normal food related activity, although a new Code of Practice operating model is likely to be brought forward for 2024/5.

- Embarking on our programmes of work to tackle cross cutting issues,
- Seeking new, and maintaining existing, income streams to help support local delivery,
- The further development of the WRS website to better enable public interaction, and the finalisation of the automation project allowing for wider service elements,
- Continuing to develop and review practical procedures to maintain resilience and the benefits from service elements such as Legal Support and the Intel Unit that provide operational support to both WRS and Trading Standards functions

The focus on income generation will be to target areas of greatest benefit in terms of economies of scale, the required resource intensity and income reward. It is important that only those opportunities meriting our focus are pursued as the scoping and drafting of tender documents are time consuming and onerous.

For existing partners, managers will continue to identify any changes that can be made to service delivery to either improve marginal efficiency or improve service. This is particularly relevant for areas of high demand such as planning referrals and areas of significant officer resource, such as long-standing complaints or enforcement action. This will require close working relationships to support and assist partner colleagues to ensure that we are all working as effectively as possible together. We will also continue to work with colleagues from various districts to see what functions might reasonably be added to the WRS platform to improve delivery and possibly deliver some savings through economies of scale. Such changes may not cover all partners, but all of them need to agree if other partners wish to add functions to what WRS delivers on their behalf. We will also continue to engage with the County Council around its relationship with the partnership.

The look of the website was significantly improved as it was rebuilt on an updated version of the software platform on which it operates, and the completion of our automation project in the early part of 2023/4 will increase its functionality further, including the taking of on-line payments.

2. STRATEGIC ASSESSMENT AND PRIORITIES

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

1. support economic growth, especially in small businesses, by ensuring a fair, responsible and competitive trading environment
2. protect the environment for future generations including tackling the threats and impacts of climate change
3. improve quality of life and wellbeing by ensuring clean and safe neighbourhoods
4. help people to live healthier lives by preventing ill health and harm and promoting public health
5. ensure a safe, healthy and sustainable food chain for the benefit of consumers and the rural economy

All our partners have priorities around supporting economic growth, protecting the environment, residents, neighbourhoods, and improving health and well-being in communities. While all our work meets one or more of the above aims, we know we are delivering what partners want.

Our Strategic Assessment, the key document that helps us determine priorities, has demonstrated that these 5 priorities also remain at the heart of what the data is saying we should focus on. It looks at a broad swathe of local, regional, and national data to help identify the key issues to be tackled over a 2-year period, with an annual sense check to ensure the environment has not changed significantly. Analysis for this purpose focussed on the six functions which generated a higher level of complaints and notifications and/or a higher level of proactive activity. This led to thirty-four analytical assessments and the recommendation for five tactical priorities to be adopted by the service during the coming year.

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

The night-time economy is cross-cutting and was referenced within several analytical assessments. Pubs, clubs, restaurants, and takeaways were all prominent within the analysis of alcohol licensing, food safety and nuisance due to breaches of the public nuisance objective, the non-payment of annual fees, and/or poor hygiene standards and practices. Night-time economy hotspots such as Worcester City Centre were also connected to taxi licensing issues (over-ranking etc.), whilst persistent offenders were a significant factor influencing the rate of complaints in prominent neighbourhoods. In addition, PESTELO analysis (seen in appendix B of this plan,) has outlined a potential increase in offences at smaller businesses due to financial pressures, and the continued prominence of third-party platforms such as Deliveroo, Just Eat, and Uber Eats.

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

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

- **Promoting safe and clean communities**

Whilst domestic nuisance activity is significantly influenced by dogs, noise from audio-visual equipment and smoke caused by the burning of domestic and garden waste were prominent nuisances.

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

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

- **Supporting industry to operate safely and responsibly**

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

Page 78 The five recommended tactical priorities can be aligned to one or more of the priorities outlined by our strategic partners in their corporate plans or strategies. Whilst the language varies, key priorities generally relate to economic growth that works for all, health and well-being, safer and stronger communities, and a maintained or improved environment.

Whilst the overall Council financial settlements for 2023/4 are slightly better than anticipated, our finance colleagues tell us they will be faced with a challenging financial situation for the foreseeable future. In the past, from a WRS perspective, this was addressed through transforming how things are done and generating income. We will look to support partners with this and encourage partners to consider what other enforcement related functions they might wish to consider operating under the WRS banner, where we might create economies of scale to assist with delivery and potentially reduce long term costs. Should further financial pressure be directed at savings from the existing WRS budget, we will need to prioritise what is delivered, to whom and how. To assist in this decision making, the service will continue to use 3 key criteria to consider when making decision on service provision:

- a) Are vulnerable people impacted?
- b) Are there Health and Well Being issues involved?
- c) Is there a positive/negative impact on economic activity?

We will also continue to develop our use of intelligence to support this. There remains a risk that demand which can no longer be met by WRS is simply re-directed to partners in other ways e.g., via other forms of complaint. At this stage, with the reductions we have seen so far, the risk of district partners facing challenges relating to whether they are meeting their statutory obligations are low and the position remains defensible.

3. PURPOSES

Following its Systems Thinking work, WRS adopted 3 purposes to underpin service delivery and provide a common thread to run through all its functions.

1. Help me resolve my problem and stop it from happening to anyone else,
2. I want to assume everything is ok
3. Help me trade well and ensure my competitors do the same.

These purposes are expressed in terms that a customer (member of the public or a business,) might use, provide a focus for staff and were agreed by the previous Joint Committee. These purposes, combined with the priority outcomes encapsulate the Service's contribution to the wider community agenda, reflecting as they do the broad themes relevant to all partners.

4. FINANCE

A summary of the budget position for 2023/24 is shown at Appendix C, along with the proposed budgets for the following two years. A more detailed breakdown will be available to the Joint Board in its regular financial reports. Income levels are difficult to estimate but we have set ourselves income targets going forward to maintain a greater resilience than would otherwise be possible.

5. AUDIT ARRANGEMENTS

The Internal Audit Service will be provided under the current arrangement by Worcester City Council to the Host Authority. An audit was agreed for quarter 3 and 4 of 2022/3 but the departure of the officer who would have worked with us on it means, at the time of writing, this work has yet to be undertaken.

Where broad and in-depth scrutiny of the service is requested, member Authorities are requested by the legal agreement liaise about requests from their Overview and Scrutiny Committees and should use reasonable endeavours to agree joint scrutiny arrangements with a view to avoiding duplication of effort. Historically, WRS developed good working relationships with several of the partners' Overview and Scrutiny Committees, leading to the positive re-enforcement of performance in those areas.

The service's ability to provide bespoke support to individual partners is highlighted by the work done with the licensing enforcement programme undertaken before Christmas in Worcester city centre. Whilst the service could not support this kind of activity for all partners at the same time, we do hope to be able to offer this type of work more widely when it can be scheduled. Engaging with partners in this way and with projects like the redevelopment of town and city centres helps to build and maintain relationships with partner colleagues and helps to highlight the important role of regulation when looking at wider, long term policy development. Being able to support the work with Ukrainian refugees has also shown the ability of the service to be flexible with resource, however, this capacity was originally created during the pandemic, so when the various funding streams come to an end this capacity may no longer be available unless it is funded.

6. ACTIVITIES & OUTCOME MEASURES

The service's IT system allows accurate reporting on activities. The service has continued to work with members to demonstrate the service's performance and the service's current core performance indicators are listed as Appendix D. 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 2023/24. The non-business customer satisfaction figures improved in the run up to the pandemic, but we have struggled to maintain them at the levels we would like since then. The sheer demand for nuisance and other complaint work has at times, simply outstripped supply, so customers were less happy with how long it took us to get to them and to resolve issues where we could. The need to continue with the Food Roadmap work has exacerbated this as we have not been able to switch this work off, which we might otherwise do during the summer period. Expectations of what can be delivered remain very high in some cases and often are beyond what the law can deliver. No one is entitled to silence all the time at their home. We will continue to try to better understand the issues customers present and look to improve performance during the coming year.

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

We believe that activity data combined with the core performance indicators will give Members the confidence that the Service continues to perform well, given the current financial constraints, and it continues to contribute to the wider local agenda. The approach is very much in line with Government thinking in terms of reducing burdens on and supporting local businesses, whilst tackling rogues who would ignore their responsibilities and criminals who use business as a model for generating criminal assets. It also addresses the significant demand that comes into the service as complaints/ service requests, covering a wide range of issues and concerns from residents, visitors, businesses and the other departments of partner authorities within Worcestershire.

| | OUTCOME | WHAT WE WILL DO | PURPOSE | NATIONAL PRIORITY | MEASURES |
|---|--|---|--|-------------------|---|
| 1 | Supporting a safe and vibrant night-time economy | <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>Help me to solve my problem and stop it from happening to anyone else</p> <p>I want to assume everything is ok.</p> <p>Help me trade well and ensure my competitors do the same</p> | 1,3,4,5 | <p>% of licensed businesses subject to allegations of not upholding the 4 licensing objectives</p> <p>Vehicles requiring work or taken off the road following intervention (Number and % of the total fleet.)</p> <p>% of service requests where resolution is achieved to customers satisfaction</p> |
| 2 | Promoting the responsible sale, breeding, and ownership of dogs | <p>Provide businesses with advice and assistance using a range of channels.</p> <p>Conduct risk based/ intelligence-led interventions with businesses, targeting resources towards potentially non-compliant businesses.</p> <p>Ensuring that dog-related nuisance and similar issues are tackled</p> | <p>I want to assume everything is ok.</p> <p>Help me trade well and ensure my competitors do the same</p> <p>Help me to solve my problem and stop it from happening to anyone else</p> | 1, 2, 3, 4 | <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>Hackney Carriage and Private Hire Drivers Licence applications are processed in a timely manner</p> <p>Consumers able to make informed choices on where to eat or purchase food through published food hygiene ratings.</p> <p>Implement and promote the FHRS and publish hygiene ratings and accrediting those which improve health and wellbeing of their workforce.</p> <p>Incentivise maintaining star ratings through the Healthy Eating Award and Triple 5 Award</p> | | | signing up for the Healthy Eating Award |
| 5 | <p>Supporting industry to operate safely and responsibly</p> | <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>Provide businesses with advice and assistance</p> <p>Controlling environmental emissions leading to reduced environmental damage and better health</p> | <p>I want to assume everything is ok</p> <p>Help me to solve my problem and stop it from happening to anyone else</p> <p>Help me trade well and ensure my competitors do the same</p> | 1 2, 4, 5 | <p>% permitted businesses broadly compliant at first visit/ inspection</p> <p>% of service requests where resolution is achieved to customers satisfaction</p> |
| 6 | <p>Addressing Corporate issues</p> | <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>I want to assume everything is ok</p> <p>Help me to solve my problem and stop it from happening to anyone else</p> <p>Help me trade well and</p> | NR | <p>% of service requests where resolution is achieved to customers satisfaction</p> <p>% of service requests where resolution is achieved to business satisfaction</p> |

| | | | | | |
|---|---|---|--|-----------|---|
| | | Maintain links with county-wide TCG & take part in partner exercises to test plans, as appropriate | ensure my competitors do the same | | Business Continuity plans are maintained, reviewed and updated on a regular basis |
| 7 | 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> | All officers must be able to undertake a range of activities that address our strategic and tactical priorities focusing on ensuring that the three purposes are met by/ for customers | NR | <p>Staff sickness and absence at public sector national average or better</p> <p>% of staff who enjoy working for WRS</p> |

6A: FOOD SERVICE DELIVERY

Page 84 Following their audit of WRS, the Food Standards Agency asked us to ensure that members were clearly sighted on the volume of food work planned for in the coming year. The Agency had no significant concerns regarding what the service was doing, but they felt that members should be more aware of what the service intended to deliver each year so that, when approving the service plan, members were also giving their approval to the level of commitment in relation to food law enforcement.

The period for re-starting food law work and returning to a post pandemic normality ends on 31st March 2023. Currently, we are anticipating some backlog work will roll into 2023/4 but after this is completed, there is then an expectation that services will have returned to normal. The service normally commits 8-12 FTE between October and March to deliver the bulk of the food work programme each year, so an annualised equivalent of 4-6 FTE posts. Hopefully, with the end of pandemic support funding we will once again be returning to this level of commitment.

The table below is our best estimate currently of where we will be in terms of visits due and what we will be able to discharge with current resource based on the assumption that most visits can be delivered from September onwards. Some work will be undertaken in the first half of the year, but this will be limited due to commitments in nuisance, and members will see this in the levels from the Activity Data reports at quarterly Board meetings. We can never give a definitive picture at this point as visits will be undertaken till year-end and the results can influence what falls due next year.

| Element of Food plan | Visits that we will aim to complete |
|---|--|
| Estimated number of Food Hygiene visits scheduled for 2023/24 (based on the Food Hygiene rating system.) | 1742 of which approximately 175 will be in the higher risk categories and the remainder in categories C and D |
| Estimated number of premises scheduled for alternative approaches to inspection during 2023/24 | 500 |
| Estimated number of new registrations/ unrated premises that will require inspection during 2023/24 | 800, of which about one-third will be low risk and can be dealt with by questionnaires |
| Estimated number of overdue premises assessed as requiring a visit during 2023/24 | 350 from previous years plus those previously identified on the system that would otherwise have been picked up during 2022/23 |

These figures should give members a reasonable picture of the volume of pro-active food hygiene related activity that should take place during 2023/24.

7. PERFORMANCE REPORTING

Performance against outcomes will be reported to the WRS Board, quarterly, six-monthly, or annually, depending on the individual measure. The IT platform enables the collection and analysis of data which is both accurate and robust and recent improvements in data extraction have increased the frequency with which several measures can be reported. The service's ability to provide activity data has continued to improve as the benefits of the IT platform have been implemented. Use of time recording to give a better understanding of how much it costs to undertake specific activities is continuing to be refined. Members participated in a session in October 2019 with officers, part of which was to consider the suite of current measures and it was agreed that no changes were required currently. These are listed as appendix D.

8. STRUCTURE

The WRS team's functions and management structure remain as follows:

- 1) The Community Environmental Health team provides Food Hygiene, Health and Safety at Work, Public Health and Nuisance functions using three teams. Three teams operate on a geographical split covering Redditch/ Bromsgrove, Wychavon/Malvern Hills, Worcester City/ Wyre Forest. The teams rotate around the three geographical areas on a quarterly basis so officers experience and become familiar with the whole county. The geographical teams are organised to reflect the balance of demand across the County. The legal support role also sits in this team as most of the casework emanates from here.

- 2) The Technical Services team provides all environmental health support around planning matters, delivers IPPC inspection, Air Quality and Contaminated Land Regime work, manages the pest control contracts and directly delivers the Dog Wardens service. The internal IT support and system management roles, due to the complex technical nature of the work and the in-house first-contact team of Duty Officers also sit within this team.
- 3) The Licensing and Support Services unit delivers all WRS licensing administration and licensing enforcement, along with the wider in-house clerical/ administrative support that is required.

We are in the process of reallocating the funding for the Business and Relationships Manager role to other roles within the service, boosting intelligence capacity and looking to generate some permanent communications capacity. The arrangement of 3 Team Managers and the Head of Service has successfully provided the necessary management cover and support in recent years, as well as promoting income generation in many areas of the service, although the pandemic stretched this to breaking point.

The Trading Standards element has been retained in the structure chart as, since October 2016, the Community EH Manager and the Head of Regulatory Services have been providing management support to the Trading Standards team. This will continue into 2023/24 with the County Council being happy with the arrangement and the funding situation meaning it is unlikely that further resource can be made available soon.

The support of management across the Trading Standard functions by WRS provides additional benefits with cross team working and knowledge, especially in areas of income generation and business support, to the benefit of both WRS partners and the County Council. The County Council asked the service to deliver the Safety at Sports Ground function several years ago and this will continue through 2023/24. WRS will also continue to deliver the petroleum licensing function for the County Council alongside the petrol vapour recovery work of the Environmental Permitting team.

9. TRAINING AND DEVELOPMENT

Changes to the legal framework occur reasonably frequently and the increased income generation work requires highly competent individuals. To maintain the competence of its staff, meet contractual obligations and ensure that the partner's statutory duties are correctly discharged, the service must maintain a training budget for its staff. Over the life of WRS this has been massively reduced reflecting the financial realities that the service faces and the service uses various approaches to ensure the money is spent wisely. Developing staff to ensure there are opportunities to plan succession is also essential.

In recent years, there has been a focus on enabling staff to work across the Environmental Health professional areas. Few officers only remain competent for one of the professional disciplines. This paid dividends in the pandemic response as it allowed us to move people into either directly servicing the pandemic response or to backfill that capacity in high demand areas like nuisance.

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

In pursuit of this, a competency framework for Technical Officers was developed and it will continue to be used with the aim of identifying training needs and developing the competency of officers more widely. Broader competencies will allow a wider range of people to deliver technical work and enable the service to tender for such contracts outside of the existing Partnership arrangements.

The size of the officer cohort in the service makes buying in trainers to deliver technical training to our teams economically viable for the service. A lot of aspects of professional practice and process are common across the enforcement professions so we can continue to offer this as an option to colleagues within Trading Standards and some of our neighbours where we have spaces available on the courses that we arrange. On-line and virtual training is now offered on several platforms, helping to manage costs and allowing officers to maintain competence.

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10. BUSINESS CONTINUITY

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

Business continuity plans for the service were developed and have been shared with the relevant Emergency Planning teams in the partner authorities. If the impact of the on-going financial constraints is that partners require reductions that are not currently envisaged, this will threaten our ability to maintain the full range of interventions across these functions whilst responding to large scale events and delivering contractual obligations. Priorities have therefore been established as part of the Business Continuity Planning process so the service is clear what will stop and what will continue in event of an emergency and how the service would respond to incidents such as the potential destruction of our office base or at least it temporarily being out of action. Additional consideration is required where reductions are suggested to ensure the impact on income generation is understood and this item is included in the current Risk Register. Cyber security is the major consideration currently with a number of high-profile attacks on local authorities that have caused chaos for the delivery of services and have resulted in the complete loss of a

lot of data. We are working closely with Wyre Forest's IT team to ensure we limit the threat and are giving wider thought to contingency measures. Recent incidents suggest that temporarily we may need to return to full paper recording for a period before digital resource can be restored!

Despite Trading Standards returning to County Council control, the Community Environmental Health team and the Trading Standards and Animal Health unit will continue to work closely together to ensure that, in event of an emergency or capacity shortage, officers can support each other when necessary. Having the teams managed by the same Manager on a day-to-day basis, together under one roof and in one office space will continue to allow both teams to utilise pairs of hands, extra eyes and ears and boots on the ground, to tackle any incident or alteration to work demands that may require additional resource or a different workforce allocation. In event of a significant issue like an animal disease outbreak, the County Council has previously agreed that any support required from WRS staff will be paid for. The Trading Standards team has also engaged significantly more with Licensing as it has developed its work on illicit tobacco as a number of these premises are licensed.

11. LOCAL ENTERPRISE PARTNERSHIPS

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

12. OTHER PARTNERSHIPS

The service continues to need to work closely with a range of partners to deliver what is required against a number of agendas. The importance of the six local authority partners is recognised and we will continue to maintain our existing interfaces with other elements of these organisations

With the County Council having taken back direct control of Trading Standards functions, it has been essential to retain the strong links between both groups of staff. This is facilitated by the current co-location of teams, with Trading Standards and Animal Health continuing to occupy a section at Wyre Forest House for the foreseeable future. This is particularly relevant for the two Intelligence Officer posts that are split between the two organisations.

Customer demand will have a significant impact on the nature of our interactions with partners as we move the service forward. Close partnership working with a range of professional and community groups is essential to ensure deliver of the outcomes required by partners. Key partners for engagement include:

- West Mercia Police & West Mercia Police and Crime Commissioner
- The Environment Agency
- The Health and Safety Executive
- 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
- Citizens Advice Consumer Service, local Citizens Advice Bureaux and other 3rd sector organisations
- County Council Public Health team
- Regional Regulatory Partnerships and National Bodies (CIEH, MJAC, CEnEHMB, CEnTSA, CTSI, ACTSO, NTSB,).

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

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

13. CONSULTATION & ENGAGEMENT

We will address national consultation on legislative change through the relevant professional channels. We will continue to engage local members in relation to local policy issues, especially around licensing matters. For general engagement with the wider community of elected members, we will provide several Member Newsletters per year covering the various activities that the service undertakes across the County. We will try to make this information specific to districts where it is relevant, to reassure members that our activities are seeking to protect

everyone and support businesses across the whole of Worcestershire. It is hoped that the Activity Data reports that will continue to be provided to the WRS Board will provide elected members on the Board with sufficient information to also feedback to the wider membership in their respective authorities.

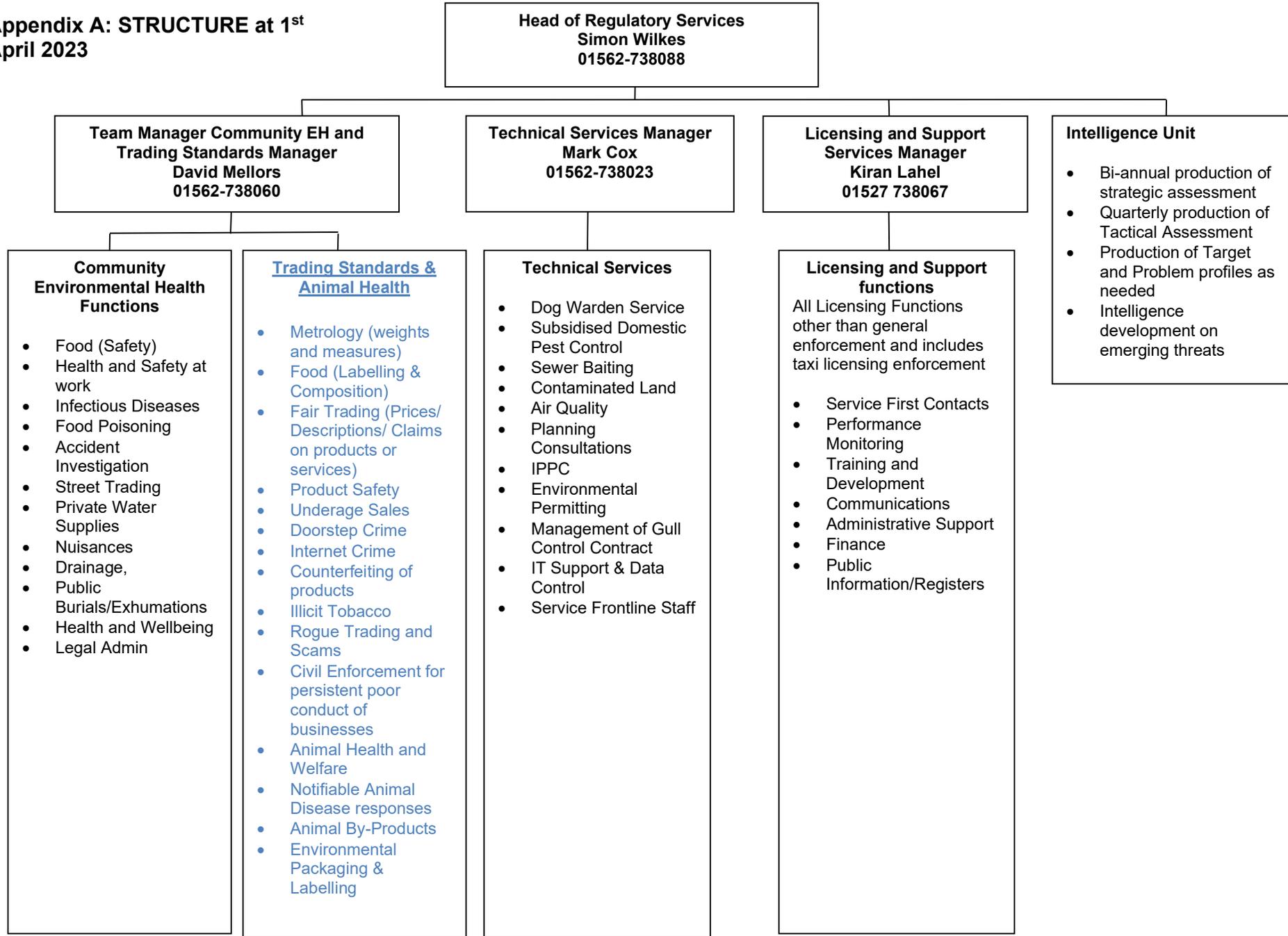
In terms of business engagement, we will continue to work with colleagues at Worcestershire LEP and Worcestershire Business Central on engaging with our business customers to improve our ability to address their needs. The approach outlined in our business charter will provide the basis for our interactions with the business community.

For members of the public, we will continue to survey customers who have used the service to look at how we dealt with their issues, not only from a satisfaction point of view, but also to see if they feel better equipped to deal with future problems. We will look at ways of making this more efficient using digital channels, but previous experience showed a drastic fall in responses when this was used as the only route for getting feedback. For now, we will have to continue with a mixed model of paper surveys and digital feedback. Helping people to help themselves is at the heart of model of public service engagement we are pursuing, and it is essential we move people down this route and reduce the expectation that we will always do it for them. This idea is now developing further with all partners signing up to the “digital first” concept that, where possible, initial contact with partners will always be via a digital channel rather than necessarily requiring either telephony or face-to-face interactions. The new format of the WRS website is being tailored to suit the various digital devices used to access services on-line. The new system for on-line application and making complaints on-line that are directly entered into our back-office system will also improve efficiency in this area.

14. RISK & GOVERNANCE

The current arrangements came into force on 1st April 2016 following the departure of the county Council from the formal partnership. The original legal agreement indicated that partners would pursue the shared services model for a period of at least 10 years. The 2016 agreement re-iterated this, but it contains no formal end date. The Legal Officers from the six partner councils are of the view that review is not required and that the current agreement can, in theory continue in perpetuity. Officer members of the Board will need to keep a watching brief on the service and perhaps look at reviews every few years to ensure the service is continuing to deliver. A copy of the current Risk Register is appended at Appendix E and has been reviewed and updated for this plan. The number of commercial contracts and obligations increasing creates some risk, particularly where sub-contractors or skilled technical staff are involved. This revised document recognises the wider geographical area that the service now covers and level of technical expertise that must be maintained. The good news is that the pandemic has confirmed our preparedness for a number of the eventualities identified and we have been able to continue to function well in most work areas throughout.

**Appendix A: STRUCTURE at 1st
April 2023**



Appendix B: Operating Environment Horizon Scanning PESTELO assessment

5.1 Political

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

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

5.2 Economical

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

As the UK seeks post Brexit trade deals, particularly with countries outside the EU, food and drinks manufactures are seeking to export a greater volume of food and drink products. A greater volume of exports will result in a higher number of requests for export health certificates which are issued by local authorities to confirm that goods meet health requirements of the destination country.

The pandemic, referenced throughout this assessment, continues to pose additional financial uncertainty for businesses and consumers. The implementation of restrictions (such as national lockdowns), and the varying of those restrictions at various times or within different regions, meant that business sectors had to close and/or could only operate under certain conditions. The travel sector, for example has faced ongoing uncertainty due to border closures and countries

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

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

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

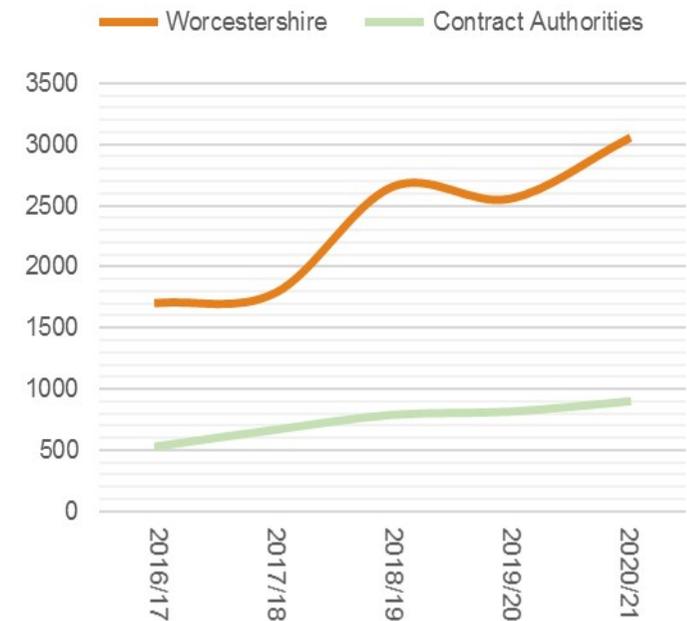
having differing travel requirements. The hospitality and events industries were largely required cease trading or change their method of operation to trade outdoors or offer delivery services. Whilst businesses have been able to access financial support (e.g., the job retention scheme or business rates relief), this has failed to cover the full financial obligations of businesses and the level of support as varied per sector. Although many businesses will continue to trade, some will be forced to close or enter administration.

From a consumer perspective, the cost of living has continued to rise with inflation at its highest rate for ten years⁴. The rate of inflation impacts upon the cost of goods and services with, for example, household energy, petrol, used car, hotel, clothing, household goods, and raw material prices becoming more expensive in the past twelve months. In addition, the Food and Drink Federation has recently warned that consumers will inevitably face higher food and drink prices if manufacturers are forced to absorb the cost of proposed Government policies during the few years⁵. Their report entitled “Eating into household budgets: The Government’s recipe for food price inflation” states that the price of shopping per household could increase by more than £160 per year.

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

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

Any developments, whether commercial or residential, could impact upon the volume of planning enquiries received by WRS. Over a five-year period, there has been a 76% increase in the volume of planning enquiries referred to the service by planning departments. Whilst most cases have been received from Worcestershire authorities, approximately 1 in 5 enquiries has been undertaken on behalf of contract authorities including



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

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

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

Gloucester City Council, Tewkesbury Borough Council, and Mendip District Council. Approximately 90% of planning enquiries have been consultations, whilst 50% have related to contaminated land. Planning authorities are required to consider air quality, contaminated land, and nuisance.

5.3 Social

As outlined previously, there has been a well-documented increase in the number of households purchasing dogs during COVID restrictions. The price of certain breeds was reported to have double during the initial lockdown with dogs, on average, costing around £1,900. This led to a significant increase in the number of breeders, particularly unlicensed breeders, as people sought to supplement lost income and/or expand existing hobbies. The Dogs Trust are now reporting, however, that owners are reconsidering owning pet as their circumstances have changed following the easing of restrictions. This has resulted in a 35% increase in calls from people looking to 'give up' their dog⁷. Where dogs become unwanted pets, this could lead to an increase in the number of stray dogs and/or the number of complaints about noise from barking dogs left unattended. In addition, the Dogs Trust also state there has been a 66% increase in puppies requiring assistance from their puppy pilot scheme which rehabilitates and rehomes dogs that have been seized (and quarantined) after being illegally imported into the country⁸. There has also been an increase in breeders offering to mutilate (ear cropping) puppies to follow a social media trend.

Towards the end of 2020, following an increase in the level of complaints, WRS commenced an intelligence gathering operation targeting illegal breeding. Analysis undertaken for the operation, which considered information provided by the public and adverts listed on prominent selling sites, identified eleven targets located across the county. It also identified that illegal breeding was likely to be more prominent in Kidderminster, Stourport-on-Severn, Worcester, and Evesham. The service has since commenced several investigations and is undertaking a proactive communications strategy to advise the public and prospective licence holders.

A study commissioned for the Department for Food, Environment and Rural Affairs (Defra) has found that, whilst diets are slowly changing, UK consumers are not meeting the standards required for a healthy diet. There have been reductions in salt,

sugar, and red and processed meat consumption, but consumption of fruit, vegetables, and fibre, has shown little or no change⁹. The study also found that, although consumers continue to buy food from large supermarkets, other forms of retailer (e.g., mini supermarkets) and the online grocery market (vegetable boxes, Hello Fresh etc.) have increased in popularity. In terms of the 'out-of-home environment', there has been significant growth in the proportion of individuals eating out on a regular basis, whilst digital technology has contributed towards the expansion of online food delivery platforms such as Deliveroo, Just Eat, and Uber Eats. As a final consideration, the study found that there has been an increase in the sale of ethical and sustainable products over the last ten years, including the consumption of plant-based meals. In addition, whilst consumers are concerned about food provenance and safety, this is dependent on the food group, and other factors such as price, availability, and quality. There are, however, more people choosing to adopt specific diets such as vegan or flexitarian.

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

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

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

The Licensed Private Hire Car Association have stated that more than half of the licensed taxi drivers in the UK have not returned to the trade since the pandemic. The shortage has prompted concerns of the safety of women, students, and night-time workers struggling to get home¹⁰. Several councils have responded by cutting the cost of a licence, whilst the Department for Transport has stated it plans to revise taxi licensing guidelines in 2022.

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

5.4 Technological

The development of technology continues to play a significant role in modern society, with the UK previously identified as one of the most cyber-dependant economies of G20 member nations. Technology is increasingly used, therefore, to commit criminal offences. This poses a threat to local authorities who are often ill-equipped to investigate such matters; particularly where the offence relates to social media platforms like Facebook and Instagram. This was emphasised several years ago when Government, as part of a wider strategy, created the National Trading Standards eCrime Team to monitor and investigate

During July 2020, an intelligence product was commissioned to assess whether unregistered food businesses were operating via social media. The analysis, which focussed primarily on public Facebook groups, found that it was realistic that platforms were being used to advertise food products or services, but it was highly unlikely that businesses were unregistered. It also outlined those unregistered businesses were more likely to be connected to low risk activities such as the sale sweets or cakes.

consumer and business frauds. Whilst the use of technology has not been significantly referenced previously, the most prominent offences enabled by technology relate to unlicensed or

unregistered dog breeding, scrap metal, food, and taxi services advertising via websites or "buy and sell groups". Facebook has also become a prominent place to report stray dogs, app-based private hire booking systems are becoming increasingly popular, and technology has been used during the pandemic to circulate ant-COVID rhetoric.

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

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

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

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

pandemic¹³, whilst the most prominent platforms included the major supermarket chains¹⁴. As outlined above, there has also been significant expansion of online food delivery platforms such as Deliveroo, Just Eat, and Uber Eats.

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

5.5 Environmental

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

The AQMAs in Worcestershire include:

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

An interactive map of these areas is available via the WRS website. Visit [worcsregservices.gov.uk](https://www.worcsregservices.gov.uk), and search for air quality management areas.

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

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

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

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

5.6 Legal

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

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

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

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

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

¹⁶https://www.globalcitizen.org/en/content/climate-change-extreme-weather-uk-britain-future/?utm_source=paidsearch&utm_medium=ukgrant&utm_campaign=genericbrandname&gclid=EAlalQobChMI99u8zezl9AIVDevTCh06ugSYEAAAYASAAEgLSJ_D_BwE

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

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

revoked by a different authority¹⁹. The bill would mandate local licensing authorities to record taxi licence refusals, revocations, and suspensions on a national database, which other authorities would be required to consult and seeks to build on previous legislation which led to the development of the NR3 Taxi Sanctions database hosted by NAFN.

5.7 Organisational

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

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

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

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

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

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

| Account description | Budget 2023 / 2024 £000's | Budget 2024 / 2025 £000's | Budget 2025 / 2026 £000's |
|--|---------------------------------|---------------------------------|---------------------------------|
| Employees | | | |
| Monthly salaries | 3,364 | 3,449 | 3,531 |
| Training for professional qualifications | 0 | 0 | 0 |
| Medical fees (employees') | 2 | 2 | 2 |
| Employers' liability insurance | 25 | 25 | 25 |
| Employees' professional subscriptions | 2 | 2 | 2 |
| Sub-Total - Employees | 3,393 | 3,478 | 3,560 |
| Premises | | | |
| Rents | 70 | 70 | 70 |
| Room hire | 2 | 2 | 2 |
| Trade Waste | 1 | 1 | 1 |
| Sub-Total - Premises | 73 | 73 | 73 |
| Transport | | | |
| Vehicle repairs/maint'ce | 3 | 3 | 3 |
| Diesel fuel | 8 | 8 | 8 |
| Licences | 1 | 1 | 1 |
| Contract hire of vehicles | 4 | 4 | 4 |
| Vehicle insurances | 5 | 5 | 5 |
| Van Lease | 9 | 9 | 9 |
| Fares & Car Parking | 5 | 5 | 5 |
| Car allowances | 58 | 58 | 58 |
| Sub-Total - Transport | 93 | 93 | 93 |
| Supplies & Service | | | |
| Equipment - purchase/maintenance/rental | 30 | 30 | 30 |
| Materials | 9 | 9 | 9 |

| | | | |
|---|-------------|-------------|-------------|
| Clothing, uniforms & laundry | 2 | 2 | 2 |
| Training fees | 23 | 23 | 23 |
| General insurances | 19 | 19 | 19 |
| Printing and stationery | 17 | 17 | 17 |
| Books and publications | 2 | 2 | 2 |
| Postage/packaging | 11 | 11 | 11 |
| ICT | 67 | 67 | 67 |
| Telephones | 21 | 21 | 21 |
| Taxi Tests | 22 | 22 | 22 |
| CRB Checks (taxi) | 26 | 26 | 26 |
| Support service recharges | 118 | 121 | 123 |
| Support service recharges - ICT | 67 | 67 | 67 |
| Sub-Total - Supplies & Service | 433 | 435 | 438 |
| Contractors | | | |
| Consultants / Contractors' fees/charges/SLA's | 269 | 234 | 234 |
| Advertising (general) | 5 | 5 | 5 |
| Grants and subscriptions | 13 | 13 | 13 |
| Marketing/promotion/publicity | 287 | 252 | 252 |
| Sub-Total - Contractors | | | |
| Income | -524 | -529 | -534 |
| Grants / Primary Authority / Food Training / Contaminated Land / Stray Dogs / Ad Hoc | | | |
| Sub-Total - Income | -524 | -529 | -534 |
| Income | | | |
| From partners for Technical Officers | -143 | -110 | -112 |
| Funding from Worcs City Council for Pest Control | -8 | -8 | -8 |
| Funding from partners for Increase in Rent | -11 | -11 | -11 |
| Funding from partners for Increase in ICT | -8 | -8 | -8 |
| Funding from partners for Increase in Hosting Charges | -9 | -9 | -11 |

| | | | |
|---|----------------|--------------|--------------|
| Sub-Total - Income | -177 | -147 | -151 |
| Additional Income | | | |
| Income to be found due to unavoidable salary pressures | -82 | -160 | -235 |
| Sub-Total - Income | | | |
| DISTRICT PARTNERSHIP BUDGET | 3,494 | 3,494 | 3,495 |
| 20-21 Partner Percentages | | | |
| Bromsgrove District Council | 14.52% | | |
| Malvern Hills District Council | 13.00% | | |
| Redditch Borough Council | 17.49% | | |
| Worcester City Council | 16.72% | | |
| Wychavon District Council | 23.19% | | |
| Wyre Forest District Council | 15.08% | | |
| Total | 100.00% | | |

Additional costs for posts for new or additional activities will be allocated using this formula unless the work is requested by either one partner or a group of partners, in which case the relevant partners will agree a formula for cost allocation.

The table below covers off the additional payments that are likely to flow from the current allocations of additional funding for the additional Technical Officer capacity required for several pieces of work and to cover the salary and pension pressures going forward.

| | Budget | Contribution on Pest Control | Contribution on Technical Officers | Partner Contribution | Contribution on Increase in Rent, ICT & Hosting Charges | Unavoidable Salary Pressures | Total Partner Contribution |
|--------------------------------|--------------|------------------------------|------------------------------------|----------------------|---|------------------------------|----------------------------|
| | 2023 / 2024 | 2023 / 2024 | 2023 / 2024 | 2023 / 2024 | 2023 / 2024 | 2023 / 2024 | 2023 / 2024 |
| Budget 2023 / 24 | £000's | £000's | £000's | £000's | £000's | £000's | £000's |
| Bromsgrove District Council | 508 | | 12 | 521 | 4 | 12 | 537 |
| Malvern Hills District Council | 455 | | 18 | 473 | 3 | 11 | 487 |
| Redditch Borough Council | 613 | | 8 | 621 | 5 | 14 | 640 |
| Worcester City Council | 578 | 8 | 75 | 660 | 4 | 14 | 678 |
| Wychavon District Council | 812 | | 19 | 831 | 6 | 19 | 856 |
| Wyre Forest District Council | 528 | | 11 | 539 | 4 | 12 | 555 |
| Total | 3,494 | 8 | 143 | 3,644 | 27 | 82 | 3,753 |
| | | | | | | | |
| | Budget | Contribution on Pest Control | Contribution on Technical Officers | Partner Contribution | Contribution on Increase in Rent, ICT & Hosting Charges | Unavoidable Salary Pressures | Total Partner Contribution |
| | 2024 / 2025 | 2024 / 2025 | 2024 / 2025 | 2024 / 2025 | 2024 / 2025 | 2024 / 2025 | 2024 / 2025 |
| Budget 2024 / 25 | £000's | £000's | £000's | £000's | £000's | £000's | £000's |
| Bromsgrove District Council | 508 | | 13 | 521 | 4 | 23 | 548 |
| Malvern Hills District Council | 455 | | 18 | 473 | 4 | 21 | 498 |

| | | | | | | | |
|---------------------------------------|------------------------|---|---|--------------------------------------|--|--|--|
| Redditch Borough Council | 613 | | 9 | 621 | 5 | 28 | 654 |
| Worcester City Council | 578 | 8 | 40 | 625 | 5 | 27 | 657 |
| Wychavon District Council | 812 | | 20 | 832 | 7 | 37 | 876 |
| Wyre Forest District Council | 528 | | 11 | 539 | 4 | 24 | 567 |
| Total | 3,494 | 8 | 110 | 3,611 | 29 | 160 | 3,800 |
| | | | | | | | |
| | Budget | Contributi on Pest Control | Contributi on Technical Officers | Partner Contributi on | Contributi on Increase in Rent, ICT & Hosting Charges | Unavoidab le Salary Pressures | Total Partner Contributi on |
| | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 | 2025 / 2026 |
| Budget 2025 / 26 | £000's | £000's | £000's | £000's | £000's | £000's | £000's |
| Bromsgrove District Council | 508 | | 13 | 521 | 5 | 34 | 560 |
| Malvern Hills District Council | 455 | | 18 | 473 | 4 | 31 | 508 |
| Redditch Borough Council | 613 | | 9 | 621 | 6 | 41 | 668 |
| Worcester City Council | 578 | 8 | 40 | 625 | 5 | 40 | 670 |
| Wychavon District Council | 812 | | 20 | 832 | 7 | 54 | 894 |
| Wyre Forest District Council | 528 | | 11 | 539 | 5 | 35 | 579 |
| Total | 3,494 | 8 | 112 | 3,613 | 31 | 235 | 3,879 |
| | | | | | | | |

Appendix D: 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 |

Appendix E: Risk Register 2023/4

| Risk Description | Consequences | When is this likely to happen | Current Position | | | Control measures |
|---|--|-------------------------------|------------------|--------|-------------------|---|
| | | | Likelihood | Impact | Matrix RAG Status | |
| Loss of Data through IT failures | Disruption to Service Provision. Inability to produce records and data. | On-going | Low | High | Green | Wyre Forest ICT has effective processes and business continuity plans in place. WFDC upgraded relevant systems including Windows. The service moved to Office 365 during 2021/22, which provides better access to a range of provisions including Microsoft Teams and Power BI. |
| Issues with the WRS database system | Impact on work planning. Self-help may not enable savings required | On-going | Low | High | Amber | Current contract due to be re-negotiated in February 2023. Work has commenced on negotiating new contract. The cost of moving systems is prohibitive currently and, whilst the system has its faults, it provides the necessary functionality and will allow the enablement of data transfer from electronic forms. |
| 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 | The pandemic has shown that we were well prepared for the need to maximise working from home and now all staff, including some previously regarded as office based can do this. Touchdown stations remain available in partner council locations. WRS Managers do need to redraft contingency plans in the event of a prolonged IT failure or cyber-attack that will allow services to be maintained. |
| Maintain our capacity to achieve service delivery | Disruption to service e.g., Major staff sickness (e.g., flu pandemic) or Unable to recruit or retain suitably qualified staff. | On-going | Low | Medium | Amber | The pandemic response has shown that the service was well-placed to respond to what was required.. Consultants are available to provide short term cover and, whilst this worked well in peacetime to cover peak demand periods, the pandemic has revealed the limits to this type of capacity. These pressures will only be resolved in the longer term by local and central government investing in additional capacity |

| | | | | | | |
|--|--|----------|-----|------|--------------|---|
| | | | | | | <p>and additional training to bring more people into the regulatory professions.</p> <p>Having taken on contracts with additional authorities the demand has increased, and neighbouring authorities have lost the ability to assist with some technical specialisms. This is the double-edged sword of effectively operating as a centre of excellence. Whilst we have good resource of our own, in event of an issue, there are limits to who we can ask for help. Regional and sub-regional groups are in place so can provide shared resources for local authorities if required.</p> <p>Effective training and development processes are in place to ensure recruitment and retention of staff. There is increased training budget pressure, reduced technical knowledge in neighbouring authorities and increased importance in maintaining heightened skills for contractual obligations and commercial edge.</p> <p>Regular inventory and maintenance of equipment is undertaken. In the future, budget for replace may be an issue but would be a relatively small amount for partners to share.</p> |
| Pest contractors cease operations. | Disruption to service. Negative media coverage. Increased public health risks | On-going | Low | High | 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 | The Out of Hours and Kennelling contracts were re-tendered to enhance the existing arrangements and provide resilience however there are increases in numbers of stray dogs, dog disease and contracts are restricted by geographical location. Retendering for additional kennels remains difficult and consideration may be given to creating our own capacity. |
| Hosting support does not deliver necessary financial and HR | Efficiency of management reduced; staffing issues remain unaddressed, | On-going | Low | High | Amber | Issues with the new BDC finance system have mainly been resolved, however some workarounds remain in |

| | | | | | | |
|--|---|----------|--------|--------|--------------|---|
| support to ensure efficient management | and performance suffers | | | | | place due to some unforeseen issues. |
| One or more partners continue to be under great financial pressure and may consider alternatives to the partnership to deliver their service | Creates reputational issues for remaining partners and increases the need to manage overheads. Difficulties in delivering highly varied levels of service | On-going | Medium | High | Amber | New legal agreement limits variations in contribution before partners must move to contractual relationship but this is quite high before it kicks in (20%.) Leanness of organisation minimises overheads and focuses resource at the front line. Growth strategy should generate income to support partners in the future but there are limits to this without additional capacity being added to the system. Invest to save capacity has been committed by partners to see if this achieves the necessary outcomes but even this is now fully occupied. |
| Robust arrangements in place in relation to obtaining legal advice and monitoring legislative changes. | Loss of cases is costly and damages reputation. | On-going | Low | Medium | Green | Continued close working with BDC legal team and other partners who don't use BDC for advocacy. Technical and legal training days for staff. Difficulty in keeping informed of Case Law developments. Membership and attendance of Officer Technical Groups outside the County does assist. |
| Service provision complies with Government requirements | Adverse comments following audits e.g., FSA Intervention by Government bodies i.e., FSA, whilst highly unlikely, is damaging to reputation. | On-going | Low | High | Amber | Limited detail of what 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 has developed systems that follow the principles of the requirements of bodies like FSA so can show some level of compliance, but service isn't operating to the letter of the current Code. The Code is however currently going through major changes and likely to move to a point where it is closer to the WRS model of operation. Environmental reporting for Local Air Quality |

| | | | | | | |
|---|---|----------|-----|------|--------------|--|
| | | | | | | Management, Pollution Prevention and Control and Private Water Supply Inspection reports to Defra and DWI have received positive responses with no issues of concern raised by these bodies. |
| Failure to deliver external contract work at the level expected by the business or local authority with whom we have the contract | Damage to reputation, loss of future income streams, financial impact of paying damages | On-going | Low | High | Green | Ensure contract negotiations are clear on performance criteria and these are clearly recorded in the final documentation. Monthly reviews against performance criteria. Select staff to ensure competence of those undertaking work outside Worcestershire. Maintain strong links with the customer's monitoring staff. Intervene early with corrective action |

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WRS Board

Date: 16th February 2023

Title: Activity and Performance Data Quarter 3 2022/3

Recommendation

That the Board notes the Report and that Members use the contents of the activity data in their own reporting back to fellow members of the partner authorities.

Background

The detail of the report focuses on the third quarter of 2022/23, but the actual data allows comparison with previous quarters and previous years.

Contribution to Priorities

Board members have asked the service to provide data on activity levels to help reassure local members that WRS continues to address a range of issues in each partner area and more broadly across the county.

Report

Activity Data

Numbers of stray dogs appears to be starting to plateau at the end of Q3, but still at significantly higher numbers than either of the previous two years. This is continuing to create pressure on our kennelling contractors and also with the re-homing charities that we work with. Many of you will have seen the recent press coverage about the issues with dog welfare and the sad discovery of a number of dead animals.

Reports of food safety issues remained relatively low during quarter 3. The number of food safety cases recorded by WRS during the year to date represents a reduction of 28% compared to 2021/ 22, but an increase of 7% compared to 2020/ 21 when there were significant covid controls in place. Generally, a high proportion of food safety cases are enquiries, such as requests for business advice or export health certificates.

Based on the 381 complaints recorded, 74% have related to issues with products purchased from food businesses, whilst 26% have related to poor

hygiene standards and practices.

A good number of food interventions were completed during quarter 3, although not quite the numbers achieved in the same period last year. Of the 1,287 interventions conducted at businesses included in the Food Hygiene Rating Scheme (FHRS), 55 were rated as non-compliant (0, 1 or 2) with most of these ratings issued to takeaways, restaurants, and small retailers.

Quarter 3 saw health and safety work remain at anticipated rates. The number of health and safety cases recorded by WRS during the year to date is a reduction of 17% compared to 2021/ 22, but an increase of 14% compared to 2020/ 21. Approximately 41% of cases have been reports of accidents, with 43% relating to injuries where a worker was incapacitated for more than seven days and 31% relating to injuries to members of the public. The remaining cases were either accidents where major injuries were sustained or dangerous occurrences. Sadly, two fatalities are included in these figures. Slips, trips, and falls continues to be the prominent cause of accidents.

In terms of both case numbers and complaints/ enquiries, the workload in licensing during quarter 3 was relatively flat or fell slightly. The number of licensing cases recorded by WRS during the year to date is an increase of 0.6% compared to 2021/ 22, but an increase of 25% compared to 2020/ 21. It should be noted, however, that there were significantly fewer licensing applications recorded two years ago due to COVID restrictions and the closure of many hospitality premises. Approximately 68% of cases have been applications and registrations; with 29% relating to temporary events, 28% relating to private hire or hackney carriage vehicle licences, and 15% relating to driver licences.

In general terms, WRS receives a higher number of enquiries about licensing matters than complaints about licensed or unlicensed activity. Based on the 400 complaints recorded, 39% have related to taxi licensing, 26% to alcohol licensing, and 20% to animal licensing.

During quarter 3 remained well below the peak in the summer of 2021. The number of planning enquiries completed by WRS during quarter three is a reduction of 14% compared to the previous quarter, and lower than previous years. Approximately 90% of enquiries were consultations, whilst 45% continued to relate to contaminated land. Just under a quarter of planning enquiries were completed, on a contractual basis, on behalf of other local authorities.

Members will see that the fall in nuisance complaints through quarter 3 mirrors previous seasonal patterns, although there was a small up-tick in the run up to Christmas, but too small to impact the overall trend. The number of pollution cases recorded by WRS during the year to date is a reduction of 11% compared to 2021/ 22, but a reduction of 12% compared to 2020/ 21. Again, it needs to be noted that the increased number of cases two years ago coincides with COVID 19 restrictions and a greater number

of residents being at home. Approximately 71% of cases related to noise nuisances, with noise from domestic properties (e.g., dog barking or noise from audio visual equipment) the most prominent sources. A further 11% of cases related to smoke nuisances.

The number of public health cases recorded by WRS during the year to date is a reduction of 34% compared to 2021 22, but a reduction of 37% compared to 2020 21. Approximately 65% of cases have related to pest control; whether enquiries about domestic treatments and sewer baiting, or complaints about pest control issues caused by the activity of neighbouring residents or businesses. A further 23% of cases have been complaints relating to accumulations at domestic properties which can also include pest control issues.

Of the 548 domestic treatments undertaken, approximately 58% have been due to issues with rats, 17% have been due to issues with wasps, and 34% have been due to pests at properties within the Wychavon district.

Performance

Quarter 3 is another more limited reporting period. The non-business customer measure at 57.9%, has improved slightly but remains below where we want it to be. This probably reflects the reduced demand for nuisance work during the period, improving the service's ability to respond in a timely fashion. Having reviewed the data, the speed of addressing the issue and whether the overall outcome meets expectations still need improvement. The latter may need clear conversations at the beginning of the process as to the potential likelihood of being able to achieve the change someone wants to see. Numbers who felt better equipped to deal with future issues was also up slightly at 54.9%.

It should also be noted that we have again been trialing alternative electronic means for getting satisfaction survey data, and as with previous attempt this has led to a drop in the number of responses. Our experience previously is that this tends to lead to lower reported satisfaction as those dissatisfied seem more likely to respond by whatever means.

Business customer satisfaction remains good at 98.2%.

Overall numbers of compliant and non-compliant food businesses were at 98.2% and 1.8% respectively. This remains good and on a par with previous years.

The ratio of compliments to complaints remains good at 72 to 24. The low rate of responses mentioned above has clearly had some impact on compliment numbers as often these were picked up in the positive responses in the satisfaction surveys. Hence, the ratio of compliments to complaints is currently nearer to 3:1 than nearer to 4 to 1.

Staff sickness has increased from 1.79 days per FTE to 2.44 days per FTE cumulative for the year. This is half a day per FTE less than the same point last year (2.94). The current levels are still higher than the previous year to that (1.65,) but lower than the figures for 2019/20 (3.82,) and 2018/19 (3.26) at the same point in the year.

Contact Points

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Background Papers

Appendix A: Activity Report (separate document)
Appendix B: Performance indicators Table

Appendix B: Performance indicator table

Table of PIs 2022/3

| Indicator | Reporting period | Q1 | Q2 | Q3 | Q4/ Outrun |
|---|------------------------------------|------|--|------|------------|
| 1. % of service requests where resolution is achieved to customers satisfaction | Quarterly NB: fig is cumulative | 55.6 | 54.1 | 57.9 | |
| 2. % of service requests where resolution is achieved to business satisfaction | Quarterly NB: fig is cumulative | 98.7 | 98.6 | 98.2 | |
| 3. % businesses broadly compliant at first assessment/ inspection | Annually | 98.4 | Bromsgrove 99.2% Malvern Hills 97.9% Redditch 97.0% Worcester City 98.9% Wychavon 97.6% Wyre Forest 98.4% Worcestershire 98.2% | 98.2 | |
| 4. % of food businesses scoring 0,1 or 2 at 1 st April each year | Annually | 1.6 | Bromsgrove 0.8% Malvern Hills 2.1% Redditch 3.0% Worcester City 1.1% Wychavon 2.4% Wyre Forest 1.6% Worcestershire 1.8% | 1.8 | |
| 5 % of drivers licence renewal applications issued within 5 working days of receipt of a complete application | 6-monthly | NA | 98% | NA | |
| 6 % of vehicles found to be defective whilst in service Number of vehicles found to be defective by district and the percentage this represents of the | 6-monthly | NA | 37 = 2.37% of 1562 vehicles on the road county-wide BDC 3 MHDC 1 RBC 25 WC 2 | NA | |

Agenda Item 7

| fleet county-wide | | | WDC 1 WFDC 4 | | |
|---|---------------------------------------|-------------------|---|-------------------|--|
| 7 % of service requests where customer indicates they feel better equipped to deal with issues themselves in future | Quarterly NB: fig is cumulative | 46.7 | 45.9 | 54.9 | |
| 8 Review of register of complaints/compliments | Quarterly NB: fig is cumulative | 8/23 | 19/37 | 24/72 | |
| 9 Annual staff sickness absence at public sector average or better | Quarterly NB: figure is cumulative | 0.90 days per FTE | 1.79 date per FTE | 2.44 days per FTE | |
| 10 % of staff who enjoy working for WRS | Annually | NA | NA | NA | |
| 11 % of licensed businesses subject to allegations of not upholding the 4 licensing objectives | 6-monthly | NA | Bromsgrove 2.2% Malvern Hills 1.3% Redditch 1.3% Worcester City 2.8% Wychavon 3.8% Wyre Forest 3.5% Worcestershire 2.7% | NA | |
| 12 Rate of noise complaint per 1000 head of population | 6-monthly | NA | Bromsgrove 0.97 Malvern Hills 0.76 Redditch 0.91 Worcester City 1.14 Wychavon 0.69 Wyre Forest 1.04 Worcestershire 0.91 | NA | |
| 13 Total income expressed as a % of district base revenue | 6-monthly | NA | £232,520, which is 7.7% as a proportion of the 2016/17 revenue budget figure (£3,017,000) | NA | |

Agenda Item 7

| | | | | | |
|--|----------|----|----|----|--|
| budget (16/17) | | | | | |
| 14 Cost of regulatory services per head of population (Calculation will offset income against revenue budget) | Annually | NA | NA | NA | |

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Worcestershire
Regulatory Services
Supporting and protecting you

Activity Report | 2022-23



Bromsgrove
District Council
www.bromsgrove.gov.uk



Malvern
Hills
District
Council
www.malvern hills.gov.uk



REDDITCH BOROUGH COUNCIL
making
a
difference
www.redditchbc.gov.uk



Worcester
CITY COUNCIL



WYCHAVON
DISTRICT COUNCIL
good services, good value



Wyre Forest
District Council

Foreword

Welcome to the third activity report for 2022/3. It follows the format you will all now be familiar with and covers the period 1st October to 31st December 2022, but the graphs and tables allow comparison with the data in previous quarters and years.

Stray dog numbers appeared to plateau during quarter 3, but at levels well above those previously experienced. We have also seen some very sad stories of maltreatment and even the dumping of dead animals, which can be heartbreaking at times.

Progress continued with the final year of the FSA's Food Recovery programme with a significant number of interventions in Q3, lower than the same period last year but much higher than the previous year when visit programmes were suspended by the Agency. Food complaints remained relatively low this quarter compared to the same quarter last year. This is now feeling very much like the system returning to normality working. Activity on Health and Safety at Work follows a similar pattern to previous years but at a slightly elevated level. Numbers for Q3 were close to last years but remain above those from the year before. We continue to have a number of fatalities on the service's books.

Licensing work remained on an even keel through the quarter, at levels close to what would be anticipated. Information requests were down, possibly reflecting the lower levels of demand for planning responses, to which that area is often linked.

Resolution and nuisance complaints followed their usual seasonal downward trend, although there was a flurry of activity in the run up to Christmas, but too small to influence the overall figures. We hope this follows through in Q4, to enable continued progress with the food programme as we move towards year-end.

We hope the report demonstrates the volume of work staff are undertaking and that some of the stories behind the numbers highlight the difficulties staff sometimes face. If you have further queries, please feel free to contact myself and the Team Managers.



Simon Wilkes
Head of Regulatory Services

Quarter One

The Community Environmental Health Team were kept incredibly busy throughout quarter one across the whole range of environmental health work.

Tragically we received a report in respect of a fatality at a white-collar boxing event which we are investigating in close collaboration with the Coroner's Office. Additional ongoing health and safety investigations include an accident involving a vehicle hitting an employee on private land in Kinver, whereby we had to detain the vehicle for examination, and a prosecution file has been submitted to Legal Services in respect of a serious forklift truck incident at a major retailer.

Your Officers resolved a significant private water supply issue in Timberhonger, providing support to the UK Security Health Authority in providing notices to residents on elevated Arsenic levels. Officers worked hard with landlord to resolve the issue, getting the water tested and implementing a regime for regular testing.

The Team attended, and in some cases chaired, Safety Advisory Groups throughout the period to ensure public safety including those convened for the Commonwealth Games Queens Baton Relay throughout the County.

In nuisance work, WRS worked with a car wash in Pershore in meeting its undertaking in respect of works to resolve a noise problem. We were also able to provide expertise in advising a local business in preventing light nuisance to residents where a film company was using their premises to film at night. We continued to receive a significant number of complaints concerning pubs having live music events in their gardens, often where they were fundamentally unsuitable for such events due to the proximity of neighbouring residential premises. We adopted a proactive intelligence-led approach to monitoring various large-scale events planned through the summer and served abatement notices in respect of noise from fans in Evesham, a cockerel crowing at a café in Bromsgrove, noise from barking at kennels and odour nuisance in Ombersley linked with a Planning enforcement notice. Another cockerel case made the national press, appearing in "The Sun", where we had been able to intervene and resolve the case.

A landowner in Worcester was served with a notice in respect of controlling rats and a Simple Caution was issued in respect of a long-running nuisance case involving barking dogs in Worcester. We also dealt with disturbance from a warehouse rave, carried out a BS4142 noise assessment on an industrial company in Evesham and investigated smoke nuisance from a business directed to burn tomato plants by The Animal and Plant Health Authority in Throckmorton.

A sad case involved the case of a deceased gentleman who had been resting with a Worcestershire Funeral Director for several months. We were contacted as conditions were getting very difficult for the staff and, for the dignity of the deceased, a funeral was needed. The situation was that money could not be released from the Estate and the daughter was abroad and unable to act. Your Officer intervened under the Public Health (Control of Diseases) Act 1984, and we were able to make the appropriate arrangements.

In food safety work, we were able to deliver 729 Inspections of which 185 were "first time" as we continued to focus on the Food Standards Agency Post Pandemic Recovery Programme which commenced in August 2021 and runs to March 2023.

Private Water Supplies and Drainage

Our private water supplies specialist, who holds Drinking Water Inspectorate accreditation for water sampling, is currently undertaking sampling for a neighbouring local authority as part of our income generation work. Your Officers have been liaising with Seven Trent Water regarding several problems with odour from sewage pumping stations, including some which are yet to be adopted as part of major new housing developments. We are also in the process of obtaining a warrant to access premises in Redditch where it is suspected that sewage is leaking from their system into a neighbouring basement, where the occupier has refused us access.

Infection Control

The team continue to liaise with Public Health to ensure preparedness for any Covid-19 seasonal surge which may increase demand on the service to deal with outbreaks and potentially public health funerals.

Nuisance

The team is currently dealing with appeal against a noise abatement notice served on premises in Wyre Forest relating to noise from dogs barking at a kennels. The hearing, in the Magistrates Court, will be heard in December. We are also working with licensing colleagues to investigate whether there is breach of a Noise Abatement Notice served for excessive barking from kennels located in Wychavon, which resulted in a residents meeting being arranged to explore the issues involved.

Notice under the Prevention of Damage by Pests Act has been served on premises at Rose Hill, Worcester, in relation to a rat infestation. Should action not be taken by the owner to put things right, then remedial works can be carried out by the service in default.

Several complaints have been received concerning smoke/odour from newly installed log burners at domestic premises around the county. It is believed that these may be driven by the rise in fuel costs, and the situation is being monitored to establish if this is going to become an increasing problem.

Food Safety

184 new food registrations were received between July and September and the sector remains very volatile, with 390 premises having closed over the same period. Your officers made a total of 535 food safety interventions during the period and two Appeals were received challenging the Food Hygiene Rating Score (FHRS) awarded, one of which was upheld by your Food Lead. In income generation work, 21 Food Export Certificates were issued and 9 FHRS re-rating requests were received.

Two Hygiene Emergency Prohibition Orders were served during the quarter and ratified by magistrates, one on a food producer in Bromsgrove for production in an unsuitable and hidden food room and one on a business in Malvern for generally dirty conditions and another hidden food preparation room. Prosecution files are in preparation for these cases. Two other enforcement files for serious non-compliances are being prepared, relating to businesses in Malvern Hills and Redditch districts.

Your officers are spending considerable time in supporting businesses with allergen compliance, particularly in respect of cross contamination risks in kitchens, which continues to present challenges to many food businesses across the county and falls to Environmental Health to deal as a food safety matter. There is also joint activity with Trading Standards on wider aspects of allergen controls.

The ongoing financial crisis is impacting on businesses and where they receive a poor FHR score, there are signs of an increase in requests for re-rating visits. If a food premises gets a FHR Level 0 (the lowest) they are automatically removed from platforms such as “Just Eat”.

Businesses scoring Level 0 to Level 2 continue to attract press interest as they are published on the national website. Reports of officer visits are also releasable under the Brand Standard and do not require a Freedom of Information request. These two factors are assisting us in ensuring that improvements are made as poor ratings affect trade. The Food Lead can refuse to re-rate premises with serious contraventions for up to three months during which time they must demonstrate that they are able to comply over a reasonable period. For other businesses the average revisit is made within two weeks.

WRS continues to play an active role in national activities related to food safety. Your Food Lead is now Chair of the Primary Authority Expert Panel for the Hospitality sector which is supported by BEIS. The Food Standards Agency is also beginning to reach out to local authorities about a review of The Food Law Code of Practice into how interventions are done, but it is unlikely there will be major changes to the current ways of working until 2024. WRS continues to blaze the trail in respect of the use of intelligence to drive its intervention programmes.

Health and Safety

The team is being kept very busy with some complex and challenging health and safety accident investigations, some of which have involved fatalities and close liaison with West Mercia Police. More details of these can be shared once they have progressed through the legal process.

WRS officers have also been instrumental in the process of ensuring that the professional Worcester Warriors Premiership rugby team could fulfil their home fixtures by working with the safety officer at the club to maintain the General Safety Certificate for Sixways as the club unfortunately passed into Administration. This Safety at Sports Grounds work is carried out on a contract basis by WRS on behalf of Worcestershire County Council who have the legal responsibility for issuing safety certificates. Our ongoing work secures events being held safely at Sixways Stadium.

It is worth noting that all the work described in this section is carried out by a single multi-disciplinary Community Environmental Health team, with professional officers supported by their line managers balancing all of these competing demands across an extensive and challenging range of subject areas.

In Quarter 3 we have chosen to highlight some of the intelligence-led health and safety investigations that we are currently conducting on your behalf. These are often complex and very resource intensive. Partners have not funded a health and safety programme of inspections for some years, but the intelligence-led approach adopted by WRS provides for a robust and efficient targeting of resources and interventions to ensure that Partners continue to meet their statutory obligations.

During the reporting period WRS received a report of a work-related accident from the management of a local warehouse. The injured employee was closing an electrically powered roller shutter door. As the door descended it came into contact with a roll of industrial cling film which had inadvertently been propped up in the door channel by another member of staff. This caused a loop of cable to come out of its housing which became entangled around the arm of the door operator who simultaneously pressed the upward travel door control. This caused the cable loop to tighten, lifting the operator from the floor. He consequently sustained an arm injury. The company were subsequently served with three Improvement Notices under the Health and Safety at Work etc Act, which were complied with within the set timescales. More rigorous and frequent safety checks were introduced, and key employees were provided with refresher health and safety training.

A further tragic incident gave rise to the death of a nine-year-old boy at a four-by-four off roading centre which came to the attention of WRS inspectors following notification from the local police. On this occasion the father of the boy was attempting to drive his Land Rover up a steep hill when its engine is believed to have stalled. The car, which contained two adults in the front and three children in the rear then began to slide down the incline. As it did so it became unstable, apparently hitting a tree and rolling several times. It is believed that the boy was thrown from the vehicle sustaining fatal injuries. The accident is currently being investigated by the police (who retain primacy) with support from WRS Officers.

Your Officers continue to work with the Coroner's Office and West Mercia Police in respect of a fatality during a white-collar boxing event. Informations have been laid for the prosecution of a well-known retail chain in respect of a nasty injury involving a forklift truck in collision with a member of the public, and investigations continue into a serious accident involving an escalator at a popular county shopping centre.

In other work, the service was subject to an appeal in respect of a noise abatement notice served on the operators of Northwood Farm. A full day trial took place with the appellants employing a barrister. This was a challenging case, but WRS were successful, the notice being upheld by the Court.

Officers have noted an unusually high volume of service requests in respect of nuisance for the time of year, with spikes before and after Christmas. A high proportion of these relate to barking dog complaints, including several from kennels/boarding establishments. Notice has also been served in relation to motocross events being held at land near Feckenham. Breaches of the Notice are being investigated with a view to further formal action being taken.

With regards to our events work, WRS Officers presented the Safety at Sports Ground Annual Review to October's Worcestershire County Council Planning and Regulatory Committee. Officers have issued a Special Safety Certificate for Six Ways' Firework Display and conducted checks of the food vendors attending Worcester's Victorian Fayre. WRS facilitated Safety Advisory Groups for Bromsgrove Sporting Football Club and The Three Counties Agricultural Showground and Officers have attended counter terrorism training.

In the seemingly less glamorous but equally important world of public health, your Officers dealt with a bed bug problem at rented premises in Worcester, the tenant inadvertently importing them within second-hand furniture that he was re-selling. The pests subsequently made their way into the neighbouring private house, believed to be through the party wall through a vent in the chimney flue. The team has seen an upturn in requests for public health funerals, the number of rodent complaints being received is increasing, and Officers have received several service requests in respect of septic tanks.

Together with the Food Safety Information Report accompanying this briefing, Members will appreciate the breadth of work currently being carried out by your Community Environmental Health Team.

Quarter One

The first quarter of every year always sees a steady increase in applications and this quarter has been no different with an increase in TENs applications leading the way as usual this time of year closely followed by taxi licensing.

The team are out doing more visits than ever before in all areas of licensing and this has illustrated where more resource have been allocated and more so in certain areas rather than others. These compliance visits will continue throughout the remainder of the year. Caravan licensing inspections have reached the second phase of the project with the majority of less contentious sites across Wychavon and Worcester City now being visited. There have been scheduled Taxi checks undertaken across the County and some in partnership with the County Council and officers are still finding problems with vehicles. The team will be looking to do more communication activities with the trade on the back of this. Animal licensing inspections have also peaked with officers now looking at the interim inspections that are required to be undertaken within the duration of a licence.

Within Taxi Licensing the Taxi Standards work has continued and the team are working with various suppliers to agree a provider for the 'Competency Certificate' whereby new drivers will undertake a suite of training as required under the new guidance.

Licensing officers have also commenced their annual training sessions for Members across all districts with more training to be provided later in the once the Taxi Standards have been implemented.

The increase in summer events have seen the licensing team dealing with an increase in TENs applications and therefore we have increased capacity in the team to deal with these and cover the teams annual leave over the summer. You will see all other applications have started to slowly dip as they have done so in previous years around this time and this usually starts to increase again around the end of Quarter 3.

The Licensing team successfully implemented the Taxi Standards across all six districts with all new drivers from the 1st September 2022 now undertaking the new competency certificate delivered by Worcestershire County Council. There were mop up sessions held for applicants that were already in the system and had not completed the various elements required by each district prior to this date.

Phase 3 of the Caravan project commenced and these are the more problematic sites where officers have not had a lot of historic contact with the site owners so they will be visited by officers to ensure compliance. The project has flagged some very well run sites across the two districts but also some very contentious ones where planning colleagues have required involvement. The long term aim is to have all officers trained in doing inspections so any issues can be dealt with quickly and efficiently.

Animal Licensing inspections continue with an increase in unregulated activity and complaints taking up more officer time. With the regulations now being in implementation since 2018 there is a lot of work being undertaken by managers across the Country in liaison with external stakeholders to re-look at the legislation, guidance and the wider ramifications of its introductions with a view to making changes. With this in mind the focus of the team has now been on how officers can streamline the process. There continues to be intelligence led project work on Illegal dog breeding and work with the intelligence team has continued to develop this since the spike during covid. The team also had their first appeal lodged at the First-Tier Tribunal against a refusal of an Animal Activity Licence.

Quarter 2 saw an increase in the number of sub committees being held with officers preparing reports and information with a very unusual high number of 11 sub committees in Worcester City alone just for this quarter. There have been a number of complex and contentious premises reviews in the north and officers have been preparing reports and information for committee members to consider.

Licensing applications continue on an upward trajectory this quarter compared to the same time pre-covid levels so the team remain busy especially processing TEN applications and answering queries around the Licensing Act and Taxi applications. Alongside the processing of applications the team have been working on numerous projects outlined below, Committee work and enforcement activity across the County.

The caravan project that commenced earlier this year has now come to an end with all three phases now complete. All sites that required inspections across Worcester City and Wychavon have now been inspected and any advice provided will be followed up by officers. Overall site owners have been very co-operative and engaged well with the team.

As part of the teams licensing review strategy there has been a full review of the Animal Licensing Process and a project group will be set up next year to look at how improvements can be made to incorporate all the lessons learnt from Operation Lisbon which looked at illegal dog breeding cases but also taking into account that the current animal licensing legislation and guidance implemented in 2018 is being reviewed nationally therefore the team would like to be at the forefront of those conversations sharing learning and advising on best practice.

Once again officers supported the Victoria Fayre with both environmental health and Worcester city colleagues which involved the team carrying out licensing and enforcement related activity over the whole three days and supporting the event organisers as and where the teams skillset was required.

Enforcement activity has continued across the County using a combination of both complaint and intelligence data to deploy resource accordingly. This has included joint taxi enforcement with West Mercia in both Redditch and Worcester City looking at both driver etiquette and vehicle checks. Officers have also worked with civil enforcement officers in Worcester City in the night time economy carrying out taxi enforcement.

As part of the WRS strategic priorities workstreams the Night Time Economy (NTE) project has commenced and the team are assessing the work areas that have fallen out of a NTE priorities workshop and these will be looked at in more detail next quarter.

Quarter One

Information Management

Quarter one is particularly busy for our Information Management and Database Administration team with the preparation and submission of most of the service's government returns. Much of the day to day activity has been focused on increasing security and resilience of our systems. This has included include regular updates and patches to our main back office system, facilitating the recall of all laptops and mobiles for security updates, and promotion of cyber security awareness for all staff. In addition the team continues to help to support the income generation target of the service by delivering paid for services to Bromsgrove and Redditch Council's Planning Department, Worcestershire County Council Trading Standards and Tewkesbury Borough Council's Environmental Health & Licensing teams.

COVID Advisors

With no COVID restrictions in place the work of supporting the public and businesses with COVID recovery was continued through the first quarter of this year. This supporting Environmental Health colleagues providing advice and guidance to businesses through low level food hygiene inspections where compliance had been adversely impacted by the pandemic and to residents affected by nuisance where businesses had sought to change their operating methods to comply with restrictions or adapt to public demands post COVID. On the 20th April COVID advisors assisted with the Vaccine pop up clinic in Worcester where there was an uptake of 90 vaccinations, and also at further clinics in Worcester on the 7th May with an uptake of 71 Vaccinations and 28th May with an uptake of 12 vaccinations.

With COVID funding due to come to an end, a process of diversification was undertaken to enable the team to utilise their skills in engagement and contribute towards the service's income generation targets by providing meaningful assistance to our Partner authorities with the Homes for Ukraine scheme. Advisors, have been carrying out safeguarding checks for the guests arriving from Ukraine for Bromsgrove and Redditch during this period.

Enforcement Team

During quarter one of this year, we have been utilising former contact tracing staff with enforcement skills and knowledge to complement our existing service provision and enable us to widen it by assisting Bromsgrove, Malvern Hills, Redditch, and Wychavon Planning Enforcement teams. For Bromsgrove and Redditch, we have been delivering the vast majority of the service delivery deploying a range of investigative and enforcement tools to assist with COVID-backlogs and skills, knowledge and experience shortages. The work is exceptionally varied, ranging from unauthorised changes of use to breaches of permitted development rights and for Redditch and Bromsgrove areas will continue for the rest of the year.

Information Management and Database Administration

In addition to our normal workload, we worked with Wyre Forest IT to plan and then re-equip our office in keeping with our agile working approach. Most desks now have a simplified and more efficient docking system for laptops, which just requires single cable to connect. This move to mainly using laptops will reduce the duplication of devices and licences we use to reduce costs. We have continued to support the WRS budget with providing support services to Bromsgrove and Redditch Development Control, Worcestershire Trading Standards and Tewkesbury Borough Council's Environmental Health and Licensing teams.

The WRS website is continually developed to support our self-service options and has included accessibility checks. During this last quarter we have been running our annual website review, where our webpage content is reviewed and updated where necessary. This is a key component of our ability to enable self-service and provide appropriate advice and resources with the aim of reducing customer demand on our phone line and email traffic. As you would expect, over the quarter we have taken part in various activities designed to increase the security and resilience of the computer system we use and activity reduce our vulnerability to cyber attacks. These activities include regular updates and patches to our main back office system, record retention and deletion, and cyber security awareness for all staff.

Former COVID Advisors

From the 6th July the remainder of the COVID Advisors joined in the efforts to help assist with the Homes for Ukraine Scheme and support our Partner Authority colleagues. Three part time Advisors assisted with Safeguarding and welfare checks for the scheme in Redditch and Bromsgrove areas and two full time Advisors assisted with property checks for the scheme in Wychavon and Malvern Hills areas. With currently 75 hosts in Bromsgrove, 46 in Redditch, 180 in Wychavon and 140 in Malvern (and with more being added each week) our District colleagues have been under pressure and on a cost recovery basis we have been supporting the work to ensure the impact on wider service delivery has been minimised. The team have enjoyed being able to support the scheme but there have been some complex and challenging cases, which is understandable given the on going situation in Ukraine and the uncertainties for both hosts and visitors.

Dog Warden Service

During the last quarter, the dog warden service has sadly seen more strays being picked up in poor condition and needing more veterinary care. It is likely the cost of living crisis is already having an impact on the ability of the wider public to care for their dogs, as evidenced in the dogs we are seizing. We have picked up numerous welfare dogs, some with broken legs, open wounds, sores, sarcoptic mange, infected ears and eyes and an awful lot with matted fur. It is assumed that the increased cost of veterinary and grooming care with reductions in disposable income means dog owners are struggling financially and can no longer afford to get them the care needed. Wider impacts of the cost of living crisis may also be being seen with an increase in requests for assistance in rehoming/handing over dogs that are no longer wanted due to domestic violence, hardship and owners needing to rehome their dogs in emergency situations where they are having to seek refuge and cannot take their pets with them.

Information Technology

As well as our day to day work, we have been involved in additional work and testing with our host IT as we prepare to upgrade most of our servers we use for our back office systems, with the intention to increase the resilience and efficiency of these systems which are used to support all aspects of the work our service undertakes. This work is due to be completed in the next quarter.

We have continued to provide Uniform support functions and development for other local authorities. We currently do this for Bromsgrove and Redditch Council's Planning department, and for Tewkesbury Borough Council's Environmental Health and Licensing departments. This contributes towards income supporting the WRS budget, together with the work we do on behalf of Worcestershire County Council's Trading Standards.

Over the quarter we have taken part in various activities designed to increase the security and resilience of the computer system we use. These activities include regular updates and patches to our main back office system, record retention and deletion, and cyber security awareness for all staff.

We have been working with our host IT, as they prepare to move to a new web-based telephone system. This is due to be implemented in the next quarter.

Planning Enforcement

The planning enforcement team have been busy investigating suspected breaches of planning control throughout Redditch and Bromsgrove, 65 cases were referred to WRS between July and September. Officers have encountered a range of issues from unlawful advertisements to buildings without planning permission. We work closely with our partners across the two Councils and have investigated referrals made by the Housing Team, Councillors and members of the public.

A number of the cases passed to us require further enforcement action to bring them into compliance. It is important to note that enforcement action is discretionary and will only be deployed in cases where it is expedient and in the public interest to do so. Where we serve enforcement notices on behalf of the Planning Authority, landowners may choose to appeal the notice and as such any required action is held in abeyance. This can be frustrating as it appears no action is being taken however, the appeal process ensures a robust and transparent system is in place for all.

Former COVID Advisors (now support for Homes for Ukraine work)

The remaining Officers continue to support Bromsgrove, Malvern Hills, Redditch and Wychavon with the Homes for Ukraine work. The officers continue to support with the safeguarding and welfare checks, helping with the rematching/rehoming process where some host and guest pairings are coming to the end of their sponsorship or in the event of relationship breakdown. The Officers assisting in Bromsgrove and Redditch are also providing a lot of aftercare when the guests become independent moving into a private rental accommodation such as helping set up bills and finding local schools etc. With the large number of hosts across the four authorities with more being added each week, the workload is considerable but rewarding.

On 22nd December DLUHC announced that the £350 "thank you" payments will be extended from 12 months to 2 years, which means our officers through the partner authorities will be able to continue to support guests who are not yet ready to move into independent accommodation, enabling them to stay in sponsorship longer with an existing host or a new host. The current support arrangements for Bromsgrove and Redditch has now been extended till April 2024 with the Malvern and Wychavon arrangements due to end with this financial year.

Air Quality

No update available.

Contaminated Land

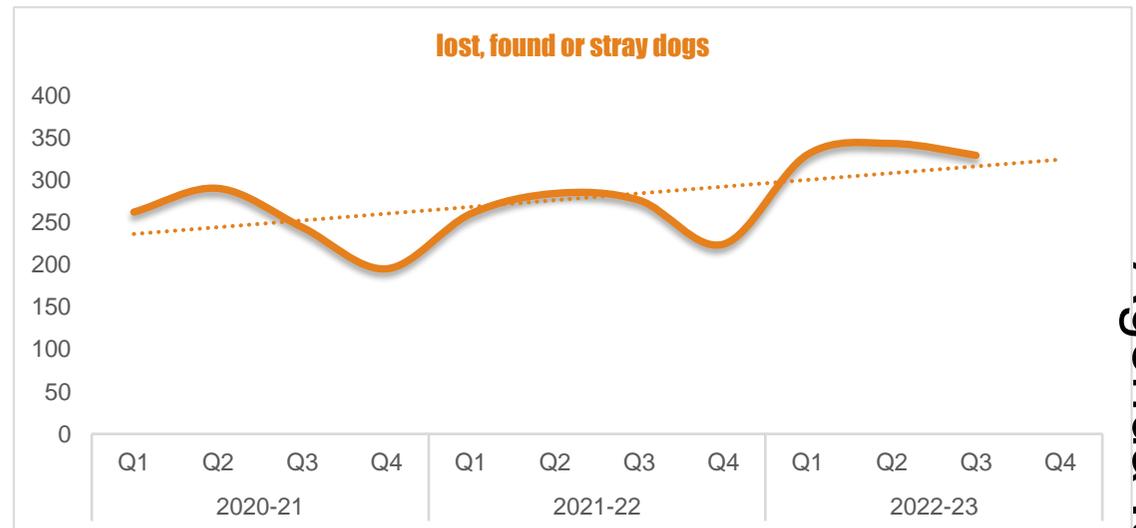
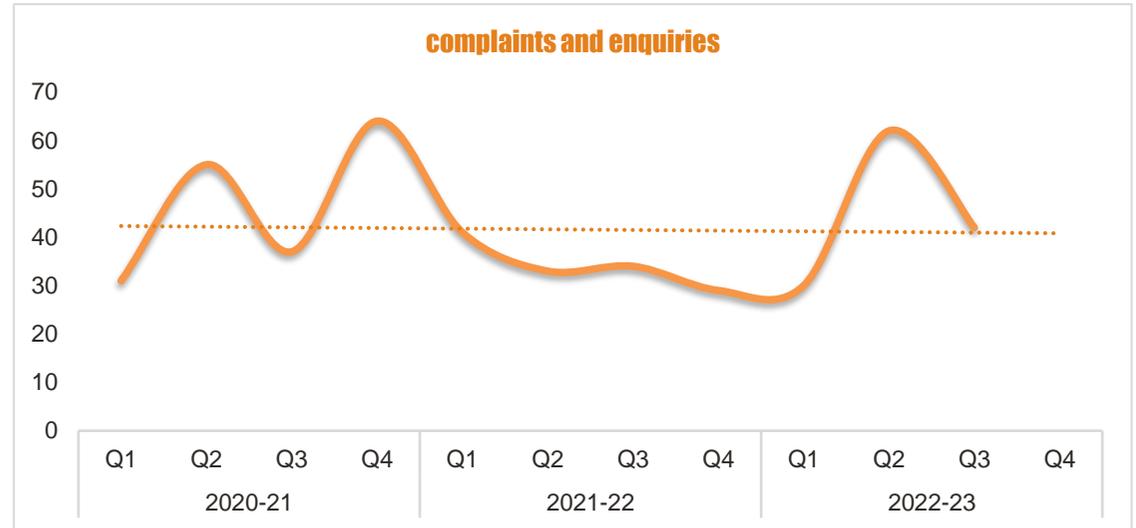
No update available.

Dog Control

The chart (top right) shows the number of complaints and enquiries recorded by WRS over a three year period relating to dog control. Types of cases recorded under this category include fouling and persistent straying, dangerous dogs and welfare. The chart (bottom right) shows the number of dogs recorded by WRS as lost, found or seen straying.

The number of stray or lost dogs recorded by WRS during the year to date is an increase of 22% compared to 2021-22, but an increase of 26% compared to 2020-21. Approximately 70% of cases related to 'contained' stray dogs; which means that a dog was found and held by, for example, a member of the public. Overall, 64% of contained strays were reunited with their owners, however, figures vary significantly between local authorities.

In general terms, WRS receives a relatively low number of dog control complaints. Based on the 71 complaints recorded, 43 have related to fouling and persistent straying, 17 have related to dangerous dogs, and 11 have related to welfare concerns.



Environmental Permitting

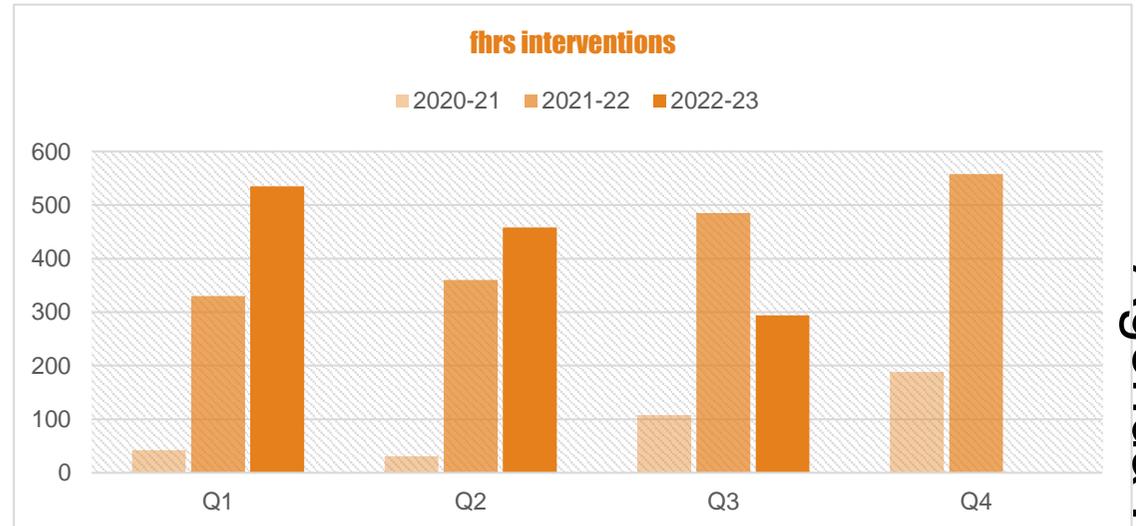
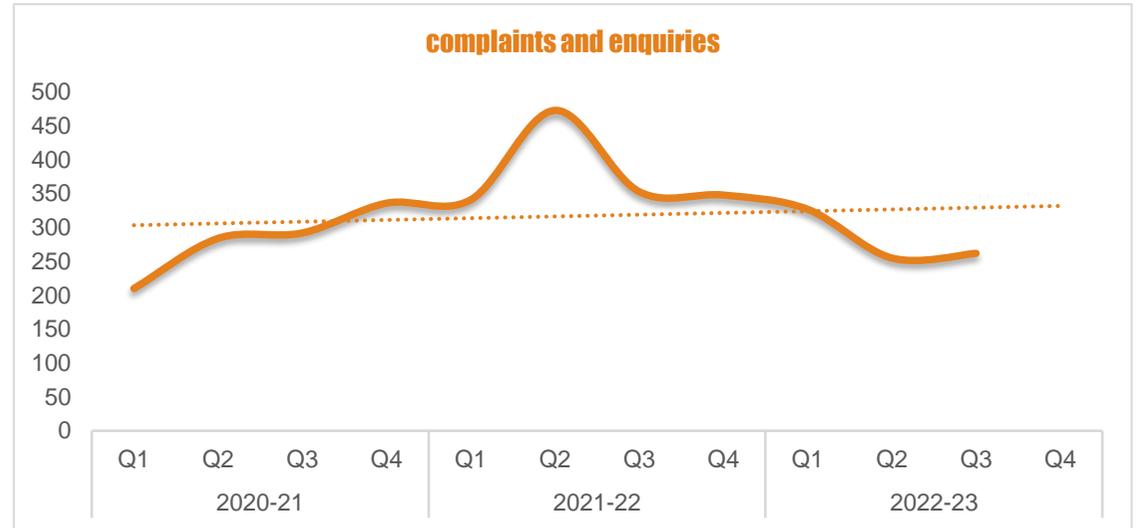
No update available.

Food Safety

The chart (top right) shows the number of complaints and enquiries recorded by WRS over a three year period relating to food safety. Types of cases recorded under this category include complaints about food products, hygiene of premises complaints and requests for business advice. The chart (bottom right) shows the number of interventions conducted by WRS at premises included in the Food Hygiene Rating Scheme, commonly known as FHRS.

The number of food safety cases recorded by WRS during the year to date is a reduction of 28% compared to 2021-22, but an increase of 7% compared to 2020-21. In general terms, a higher proportion of food safety cases are enquiries such as requests for business advice or export health certificates. Based on the 381 complaints recorded, 74% have related to issues with products purchased from food businesses, whilst 26% have related to poor hygiene standards and practices.

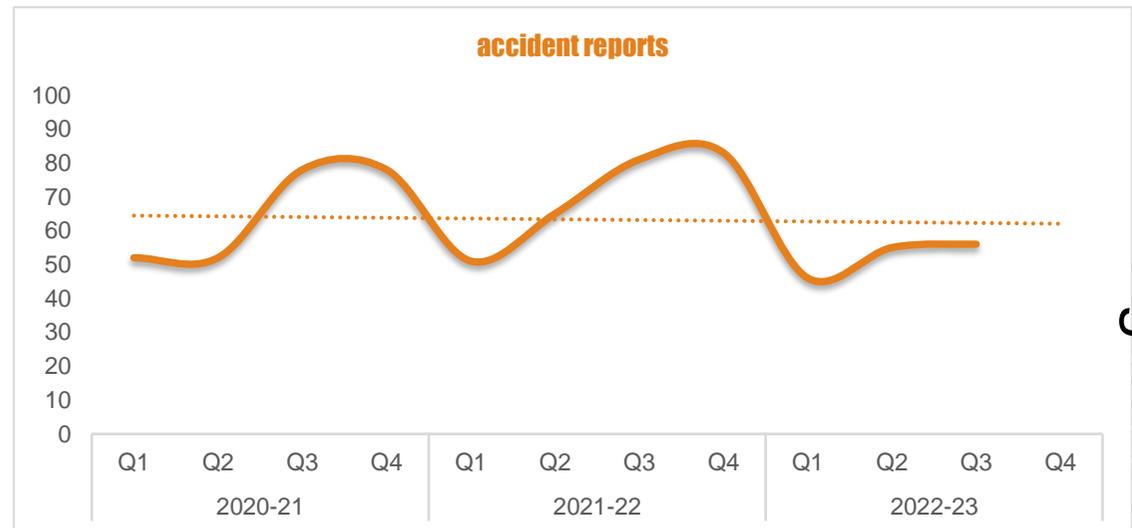
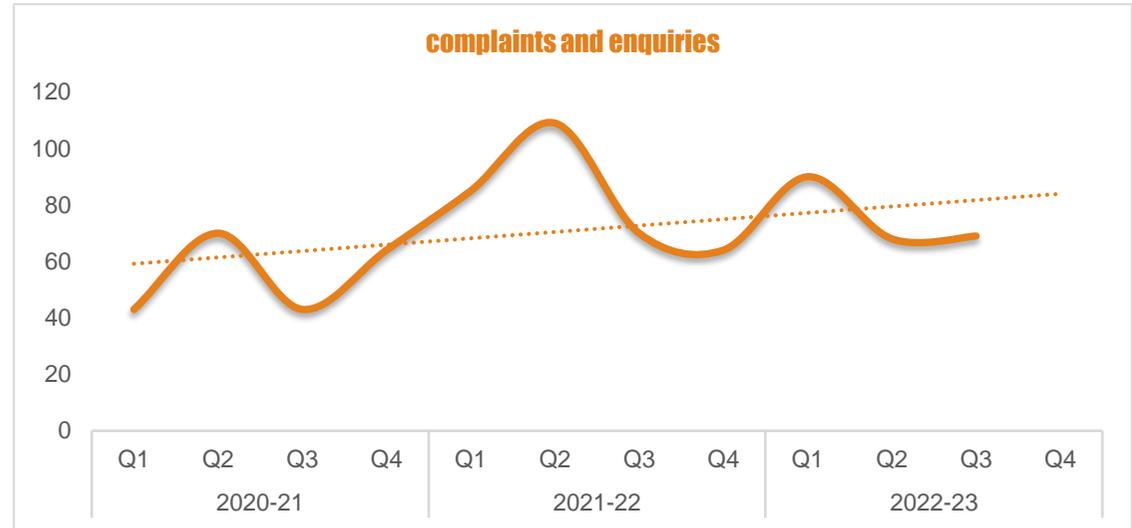
Of the 1,287 interventions conducted at businesses included in the Food Hygiene Rating Scheme (FHRS), 55 were rated as non-compliant (0, 1 or 2) with most of these ratings issued to takeaways, restaurants, and small retailers.



Health and Safety

The chart (top right) shows the number of complaints and enquiries recorded by WRS over a three year period relating to health and safety at work. This includes requests for business advice. The chart (bottom right) shows the number of notifications received by WRS relating to accidents.

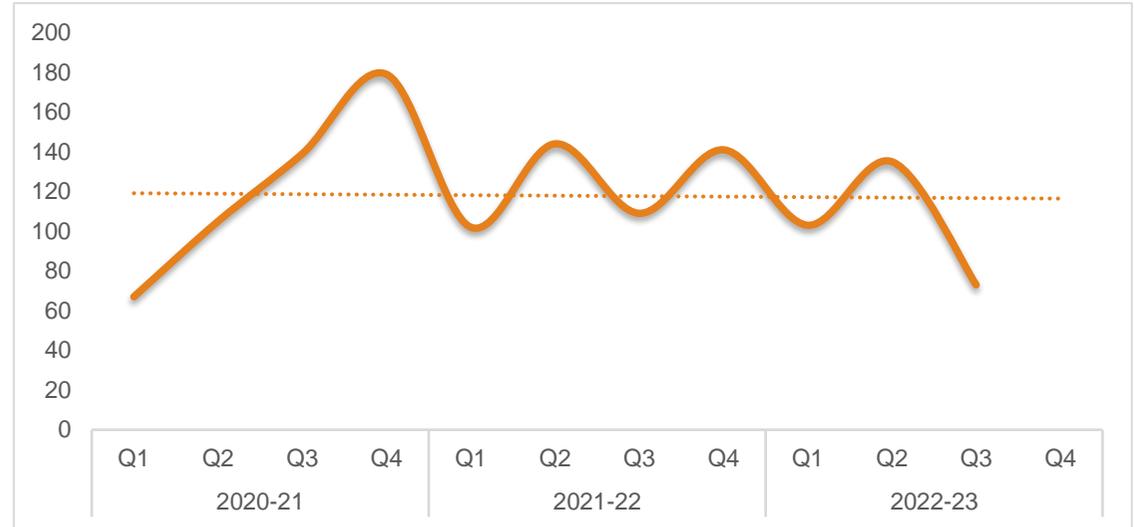
The number of health and safety cases recorded by WRS during the year to date is a reduction of 17% compared to 2021-22, but an increase of 14% compared to 2020-21. Approximately 41% of cases have been reports of accidents, with 43% relating to injuries where a worker was incapacitated for more than seven days and 31% relating to injuries to members of the public. The remaining cases were either accidents where major injuries were sustained, dangerous occurrences, and two fatalities. Slips, trips, and falls continues to be the prominent cause of accidents.



Information Requests

The chart (right) shows the number of information requests recorded by WRS over a three year period. Information requests can relate to either the following;

- Environmental Information Requests
- Freedom of Information Requests
- Requests for information under the Data Protection Act 2018 and General Data Protection Regulation (GDPR)



Licensing

The chart (top right) shows the number complaints and enquiries recorded by WRS over a three year period relating to licensing. The chart (bottom right) shows the number of licensing applications.

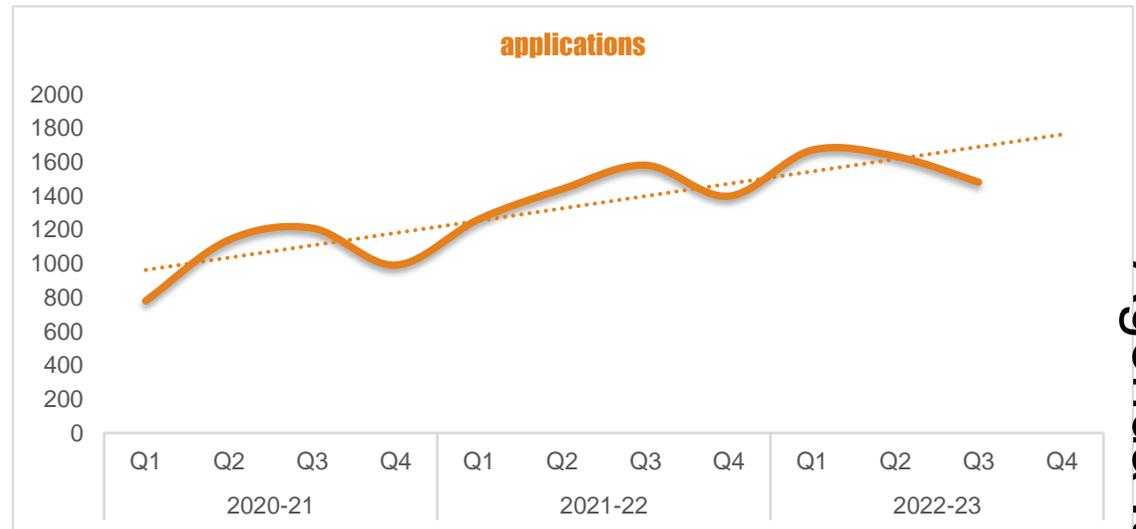
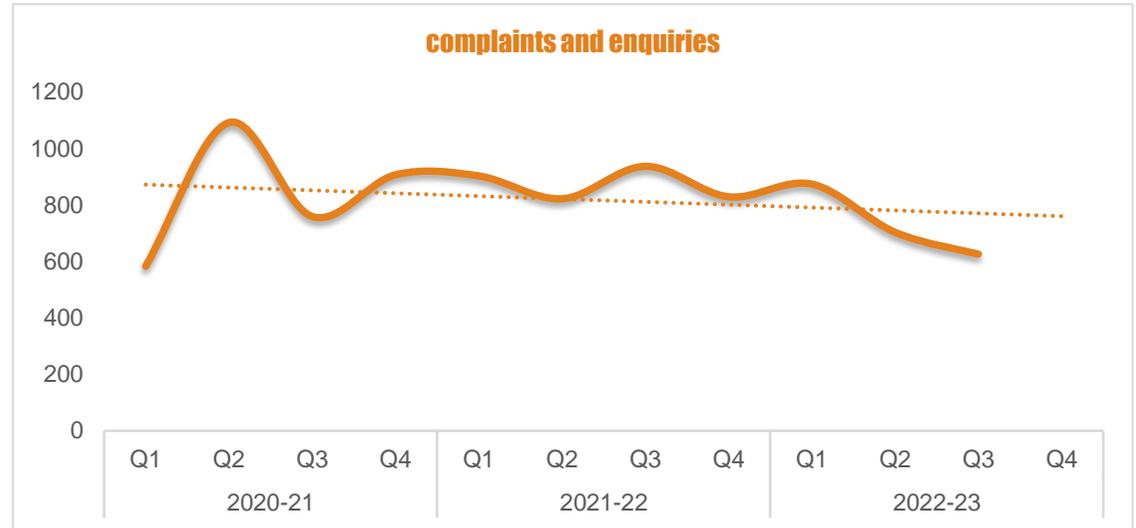
Licensing complaints, enquiries and applications relate to the following;

- Alcohol and entertainment (including gambling)
- Animals
- Caravans
- Scrap metal
- Sex establishments
- Skin piercing
- Street trading
- Taxis

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The number of licensing cases recorded by WRS during the year to date is an increase of 0.6% compared to 2021-22, but an increase of 25% compared to 2020-21. It should be noted, however, that there were significantly fewer licensing applications recorded two years ago due to COVID restrictions and the closure of many hospitality premises. Approximately 68% of cases have been applications and registrations; with 29% relating to temporary events, 28% relating to private hire or hackney carriage vehicle licences, and 15% relating to driver licences.

In general terms, WRS receives a higher number of enquiries about licensing matters than complaints about licensed or unlicensed activity. Based on the 400 complaints recorded, 39% have related to taxi licensing, 26% to alcohol licensing, and 20% to animal licensing.

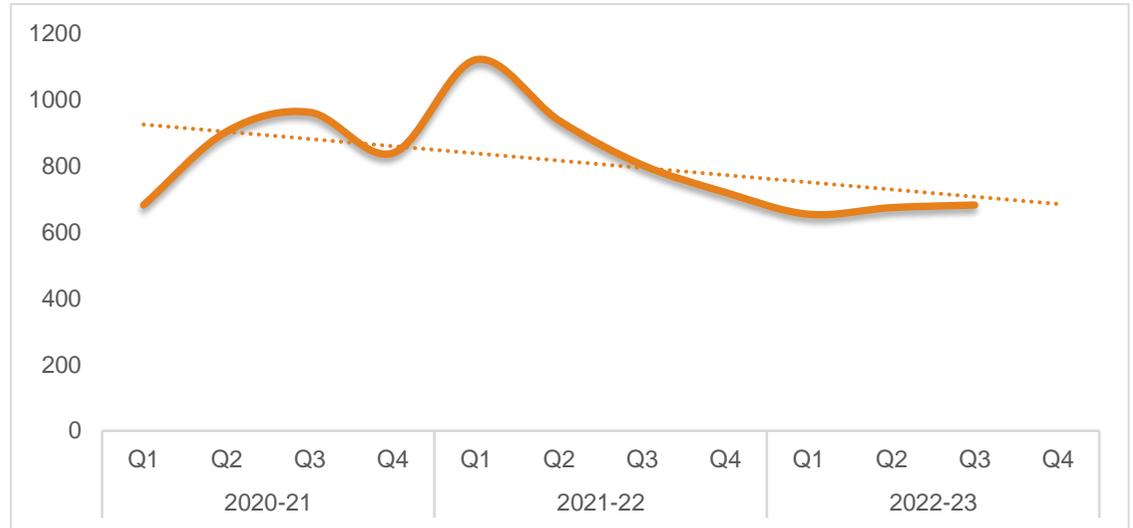


Planning

The chart (right) shows the number of planning enquiries completed by WRS over a three year period. The majority of these requests are consultations but can also include requests to discharge conditions.

Planning requests relate to the following;

- Air Quality
- Contaminated Land
- Environmental Permitting
- Food
- Health and Safety
- Nuisance / Noise
- Private Water Supplies



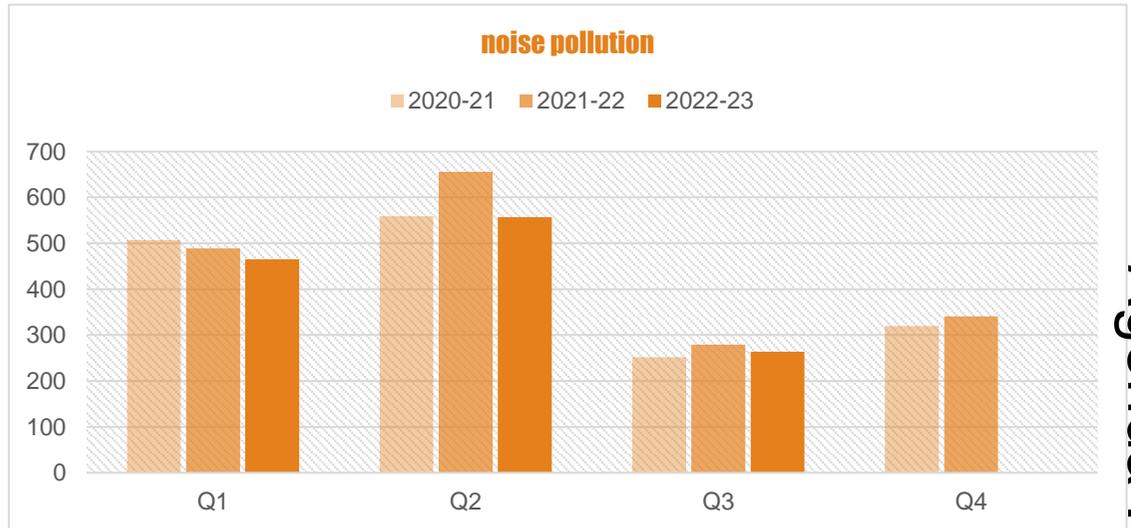
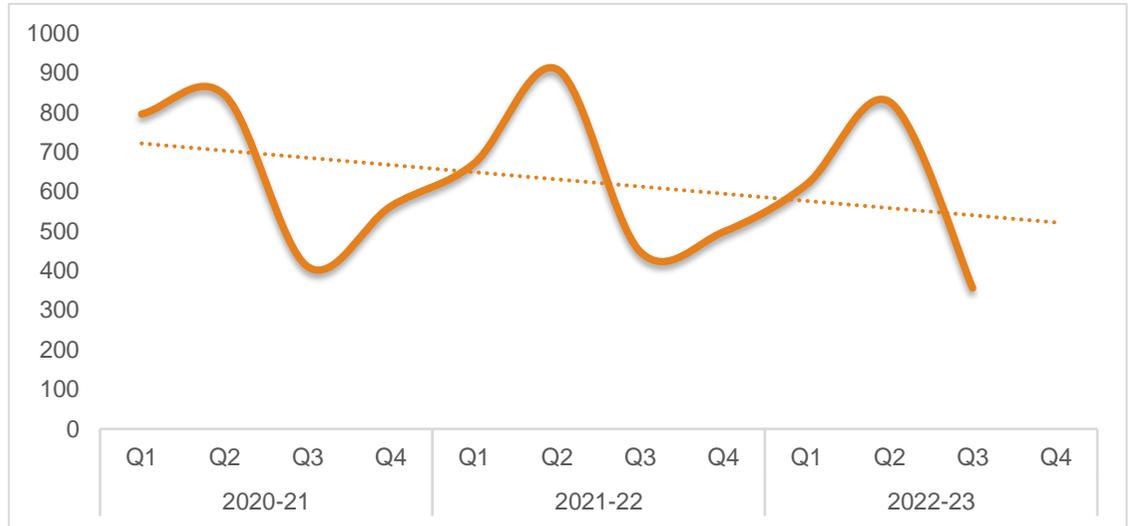
The number of planning enquiries completed by WRS during the year to date is a reduction of 30% compared to 2021-22, but a reduction of 21% compared to 2020-21. Approximately 90% of enquiries have been consultations, whilst 54% have related to contaminated land. Around 15% of enquiries have been completed, on a contractual basis, on behalf of other local authorities.

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Pollution

The chart (right) shows the number of complaints and enquiries recorded by WRS over a three year period relating to pollution. Types of cases recorded under this category include contamination incidents, air pollution (smoke, fumes and gases), light pollution and noise pollution. The chart (bottom right) shows the number of complaints and enquiries relating to noise pollution.

The number of pollution cases recorded by WRS during the year to date is a reduction of 11% compared to 2021-22, but a reduction of 12% compared to 2020-21. It should be noted, however, that the increased number of cases two years ago coincides with COVID-19 restrictions and a greater number of residents being at home. It also should be noted that totals are in line with seasonal variations. Approximately 71% of cases related to noise nuisances, with noise from domestic properties (such as from dog barking or noise from audio-visual equipment) the most prominent sources. A further 11% of cases related to smoke nuisances and issues such as the burning of domestic or commercial waste.

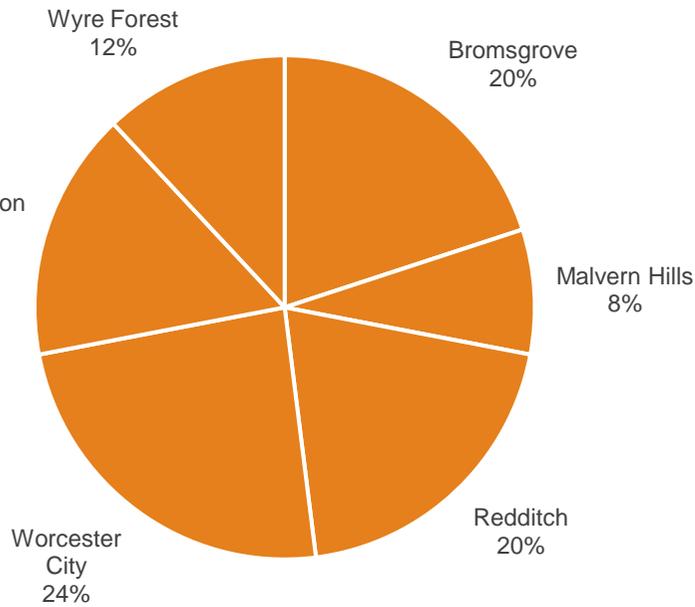


Noise

The table (right) shows the top 25 wards in Worcestershire with the highest case rate for noise pollution cases. It also shows the relative population and the number of cases recorded. The chart (below) shows the top 25 wards by district.

Note: Data shown on this page represents the 'year to date' and will continue to increase each quarter until the end of year report is published.

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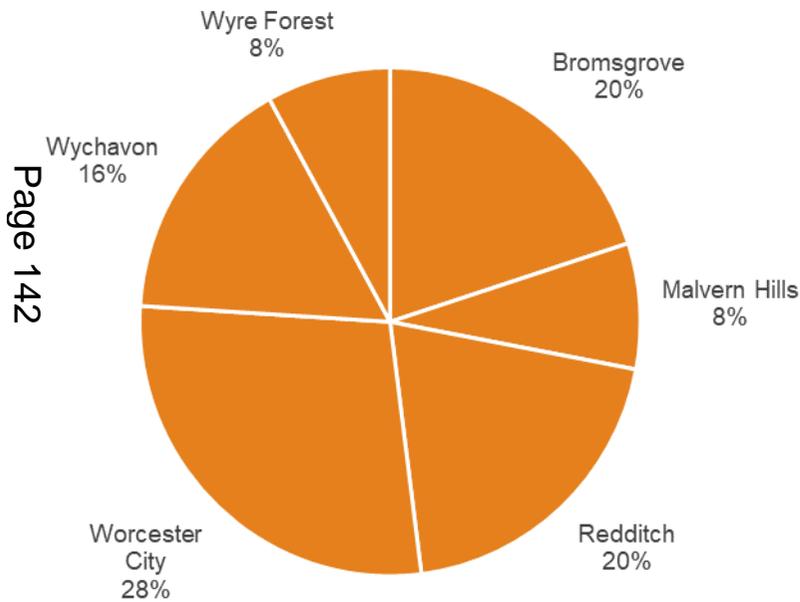


| Ward | Total | Population | Rate |
|------------------------------|-------|------------|------|
| Marlbrook | 15 | 2,878 | 5.21 |
| Perryfields | 6 | 1,557 | 3.85 |
| Rainbow Hill | 18 | 5,418 | 3.32 |
| Lickhill | 8 | 2,409 | 3.32 |
| Church Hill | 25 | 7,991 | 3.13 |
| Arboretum | 19 | 6,130 | 3.10 |
| Headless Cross And Oakenshaw | 25 | 8,282 | 3.02 |
| Teme Valley | 6 | 2,059 | 2.91 |
| Cathedral | 34 | 11,760 | 2.89 |
| Ombersley | 7 | 2,459 | 2.85 |
| Warndon | 15 | 5,661 | 2.65 |
| Gorse Hill | 15 | 5,764 | 2.60 |
| Greenlands | 24 | 9,462 | 2.54 |
| Lodge Park | 14 | 5,619 | 2.49 |
| Honeybourne And Pebworth | 7 | 2,844 | 2.46 |
| Lowes Hill | 7 | 2,854 | 2.45 |
| Morton | 6 | 2,495 | 2.40 |
| Catshill North | 7 | 2,912 | 2.40 |
| Droitwich South West | 12 | 4,994 | 2.40 |
| Abbey | 16 | 6,719 | 2.38 |
| Bedwardine | 19 | 8,107 | 2.34 |
| Foley Park And Hoobrook | 25 | 10,689 | 2.34 |
| Droitwich Central | 6 | 2,621 | 2.29 |
| Aggborough And Spennells | 20 | 8,774 | 2.28 |
| Alvechurch South | 7 | 3,105 | 2.25 |

Noise (2021-22)

The table (right) shows the top 25 wards in Worcestershire with the highest case rate for noise pollution cases. It also shows the relative population and the number of cases recorded. The chart (below) shows the top 25 wards by district.

Note: Data shown on this page represents the 'year to date' and will continue to increase each quarter until the end of year report is published.



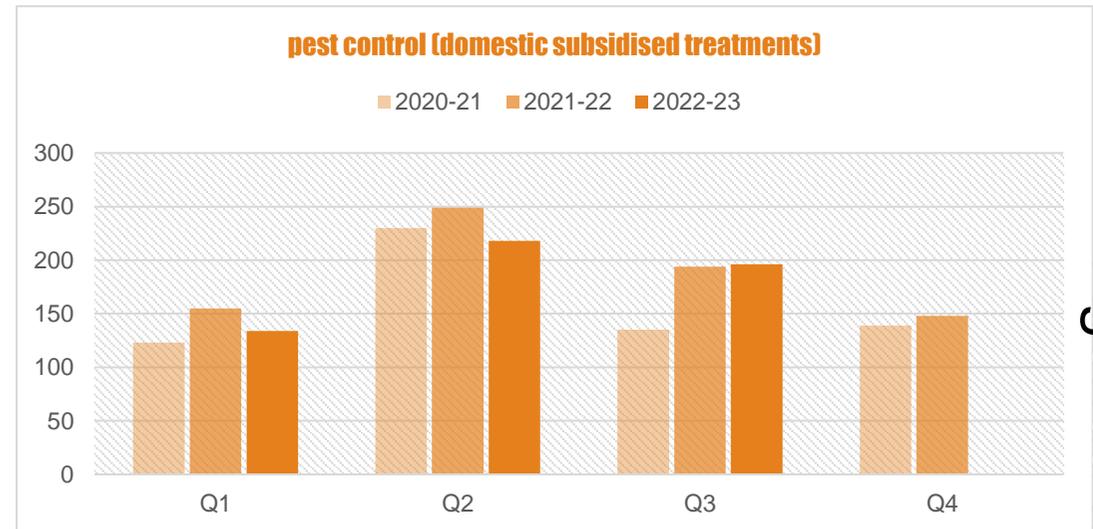
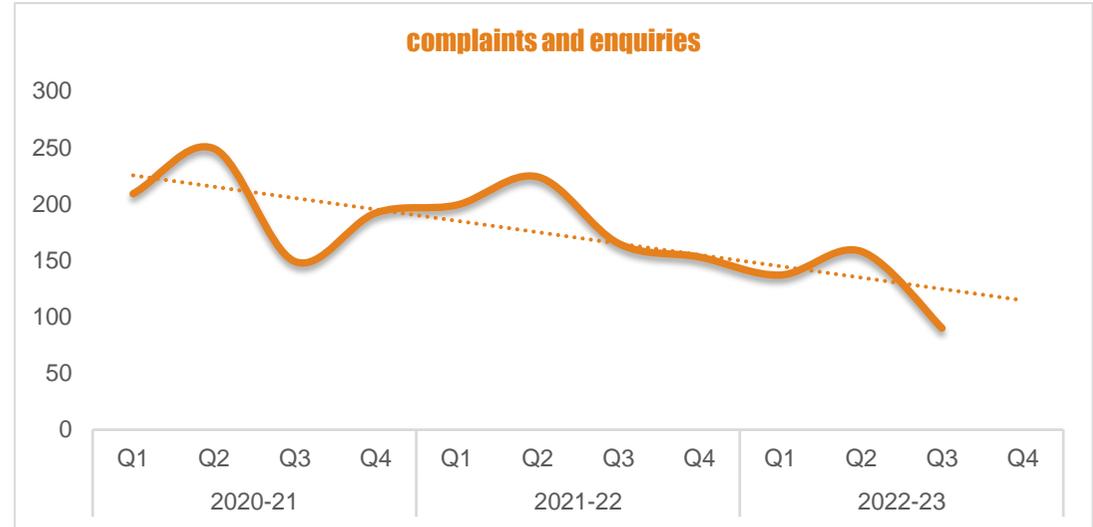
| Ward | Total | Population | Rate |
|------------------------------|-------|------------|------|
| Eckington | 22 | 2,669 | 8.24 |
| Sanders Park | 22 | 3,651 | 6.03 |
| Norton | 20 | 3,707 | 5.40 |
| Marlbrook | 14 | 2,890 | 4.84 |
| Bedwardine | 36 | 8,167 | 4.41 |
| Harvington And Norton | 12 | 2,756 | 4.35 |
| Pinvin | 13 | 3,105 | 4.19 |
| Arboretum | 25 | 6,233 | 4.01 |
| Batchley And Brockhill | 34 | 8,783 | 3.87 |
| Rainbow Hill | 21 | 5,511 | 3.81 |
| Cathedral | 43 | 11,763 | 3.66 |
| Greenlands | 33 | 9,329 | 3.54 |
| Headless Cross And Oakenshaw | 28 | 8,295 | 3.38 |
| Perryfields | 5 | 1,501 | 3.33 |
| Winyates | 27 | 8,184 | 3.30 |
| Claines | 26 | 8,076 | 3.22 |
| Warndon | 18 | 5,669 | 3.18 |
| Link | 20 | 6,438 | 3.11 |
| Drakes Broughton | 8 | 2,577 | 3.10 |
| Church Hill | 25 | 8,062 | 3.10 |
| Avoncroft | 10 | 3,300 | 3.03 |
| Mitton | 30 | 10,047 | 2.99 |
| Gorse Hill | 17 | 5,839 | 2.91 |
| Wyre Forest Rural | 26 | 9,106 | 2.86 |
| Priory | 13 | 4,636 | 2.80 |

Public Health

The chart (top right) shows the number of complaints and enquiries recorded by WRS over a three year period relating to public health. Types of cases recorded under this category include accumulations, public burials and pest control. The chart (bottom right) shows the number of subsidised pest control treatments have been carried out by contractors at domestic properties in four Worcestershire Districts (Bromsgrove, Malvern Hills, Redditch and Wychavon). Worcester City and Wyre Forest do not offer a subsidised pest control service.

The number of public health cases recorded by WRS during the year to date is a reduction of 34% compared to 2021-22, but a reduction of 37% compared to 2020-21. Approximately 65% of cases have related to pest control; whether enquiries about domestic treatments and sewer baiting, or complaints about pest control issues caused by the activity of neighbouring residents or businesses. A further 23% of cases have been complaints relating to accumulations at domestic properties which can also include pest control issues.

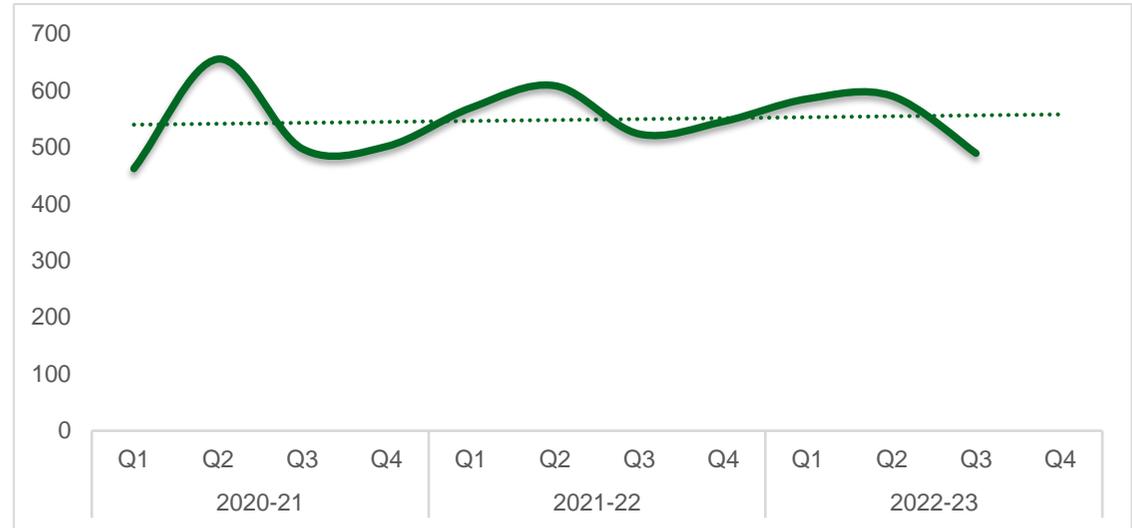
Of the 548 domestic treatments undertaken, approximately 58% have been due to issues with rats, 17% have been due to issues with wasps, and 34% have been due to pests at properties within the Wychavon district.



Bromsgrove

The data on this page relates to Environmental Health and Licensing cases (complaints, enquiries, applications and notifications) where the subject and/or enquirer were located within the Bromsgrove district.

Note: The chart (below) shows the number of cases recorded against each of the main functions undertaken by WRS. The figure for the current year is a cumulative total based on each of the reporting periods. This figure will continue to increase until the end of year report is published.



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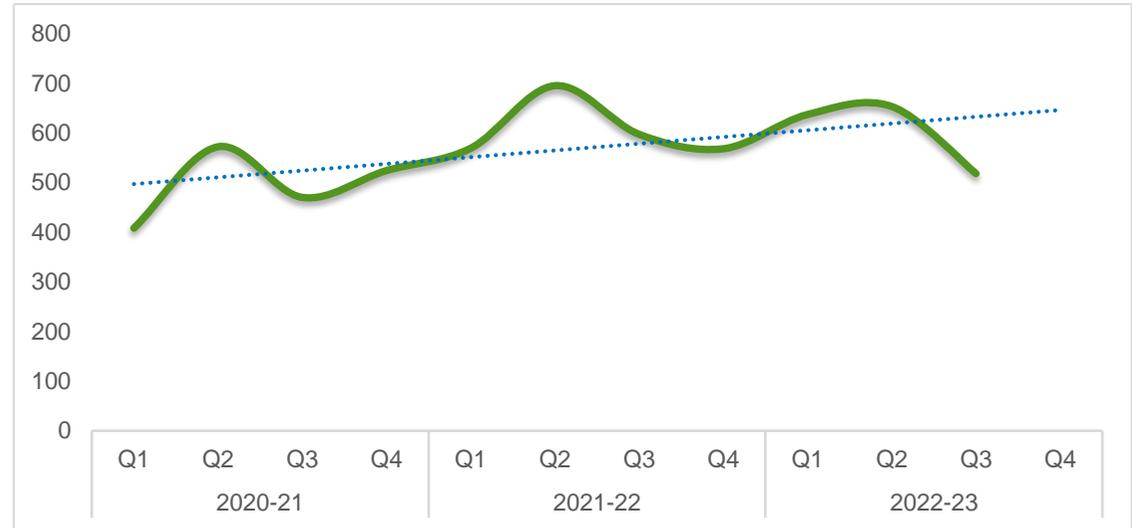


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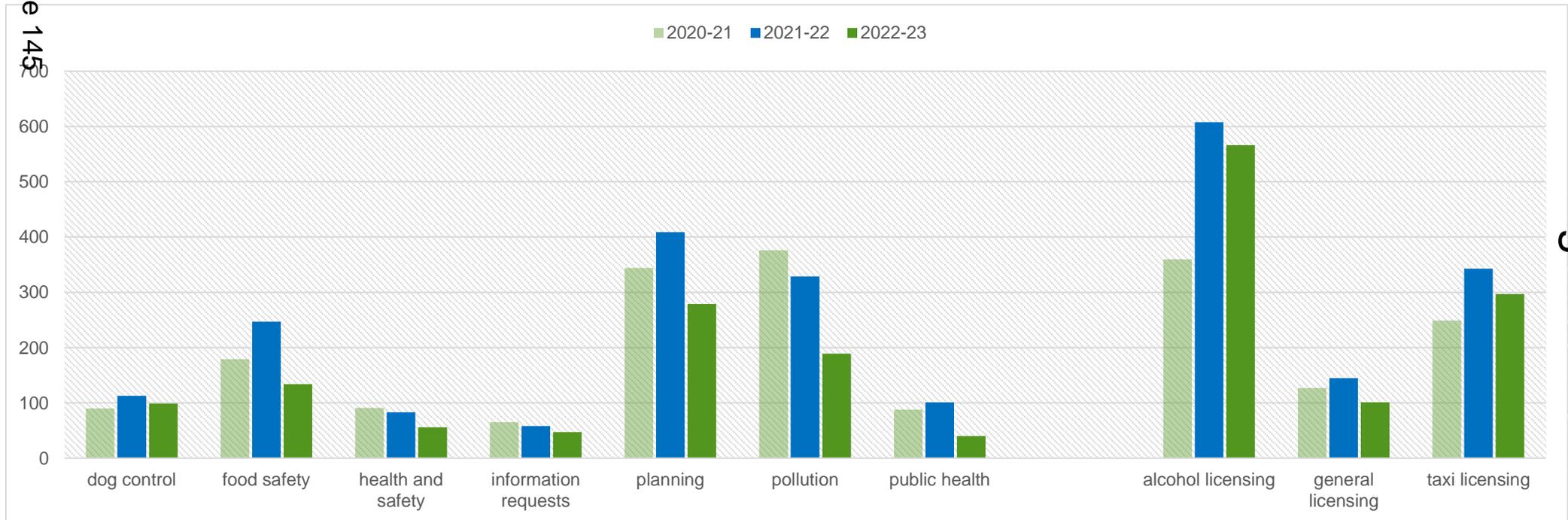
Malvern Hills

The data on this page relates to Environmental Health and Licensing cases (complaints, enquiries, applications and notifications) where the subject and/or enquirer were located within the Malvern Hills district.

Note: The chart (below) shows the number of cases recorded against each of the main functions undertaken by WRS. The figure for the current year is a cumulative total based on each of the reporting periods. This figure will continue to increase until the end of year report is published.



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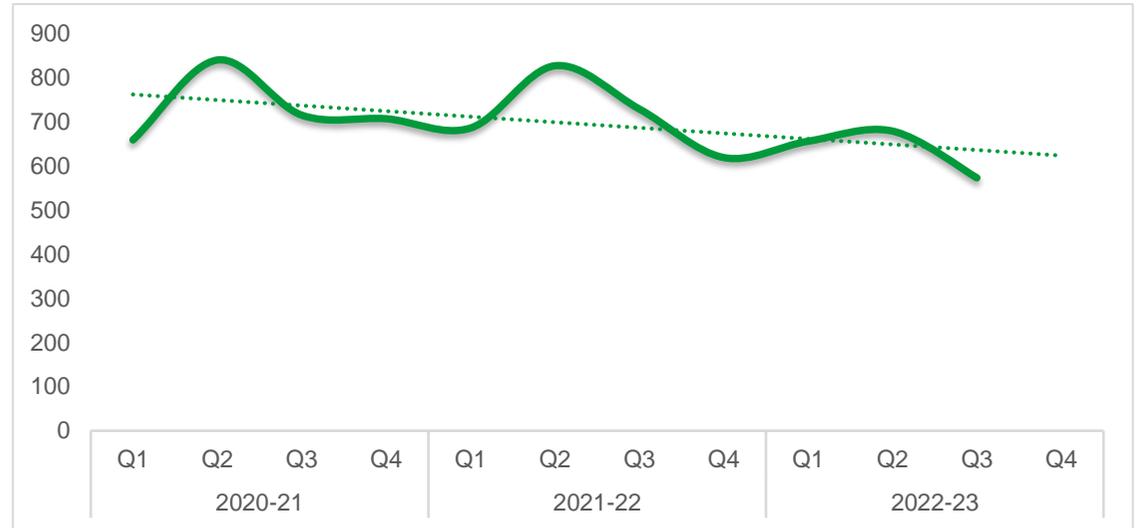


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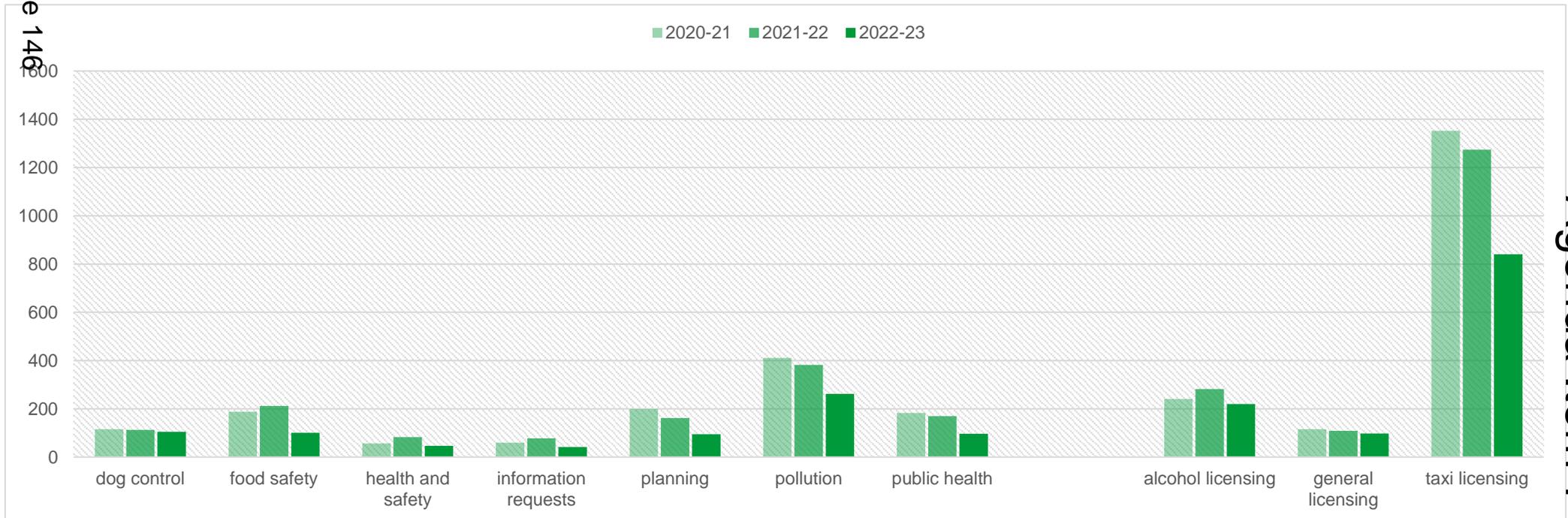
Redditch

The data on this page relates to Environmental Health and Licensing cases (complaints, enquiries, applications and notifications) where the subject and/or enquirer were located within the Redditch district.

Note: The chart (below) shows the number of cases recorded against each of the main functions undertaken by WRS. The figure for the current year is a cumulative total based on each of the reporting periods. This figure will continue to increase until the end of year report is published.



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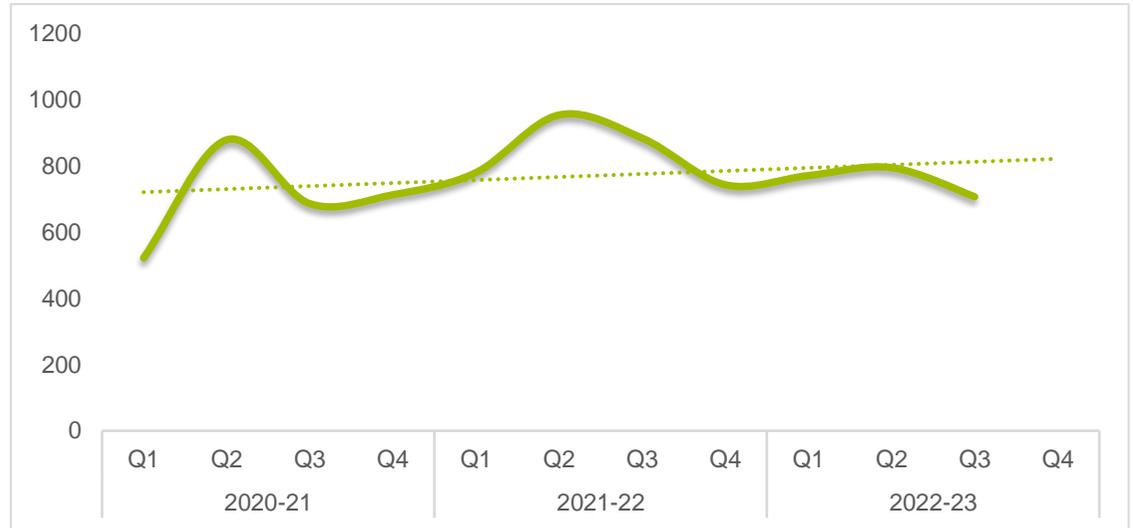


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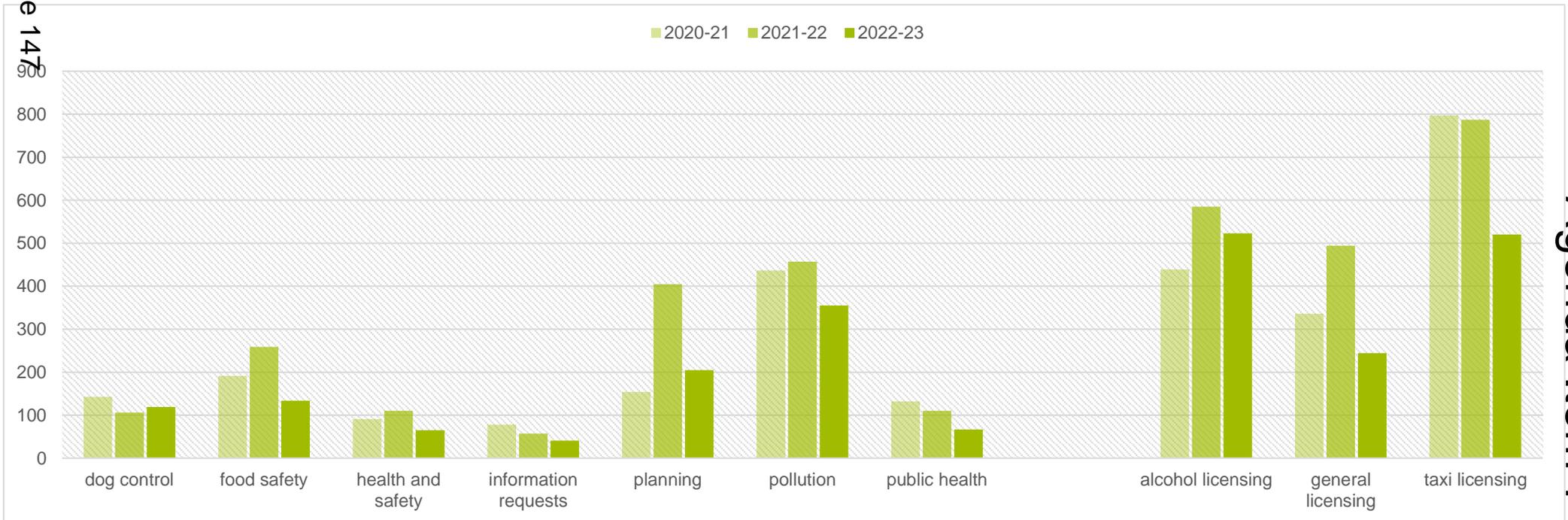
Worcester City

The data on this page relates to Environmental Health and Licensing cases (complaints, enquiries, applications and notifications) where the subject and/or enquirer were located within the Worcester City district.

Note: The chart (below) shows the number of cases recorded against each of the main functions undertaken by WRS. The figure for the current year is a cumulative total based on each of the reporting periods. This figure will continue to increase until the end of year report is published.



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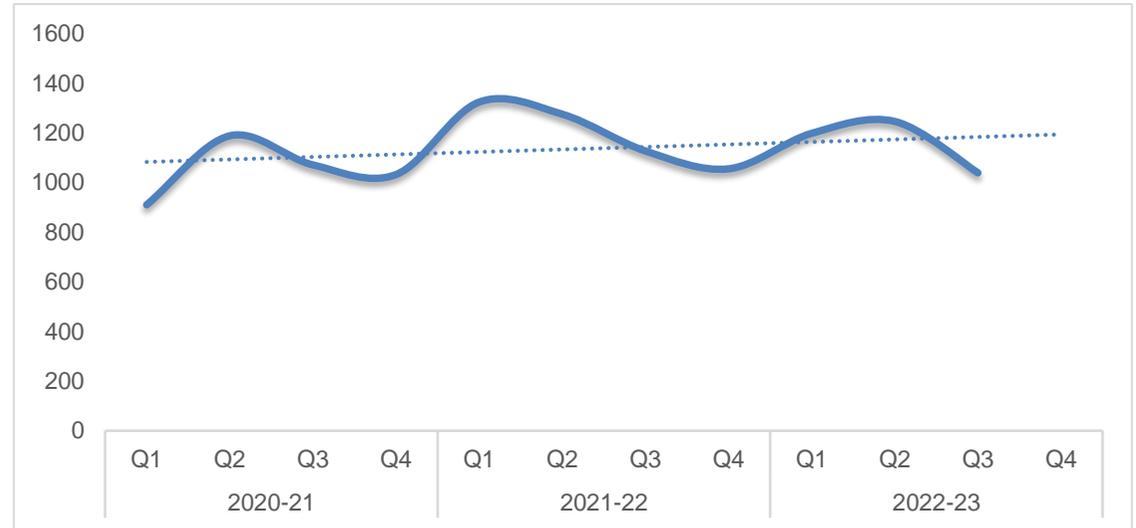


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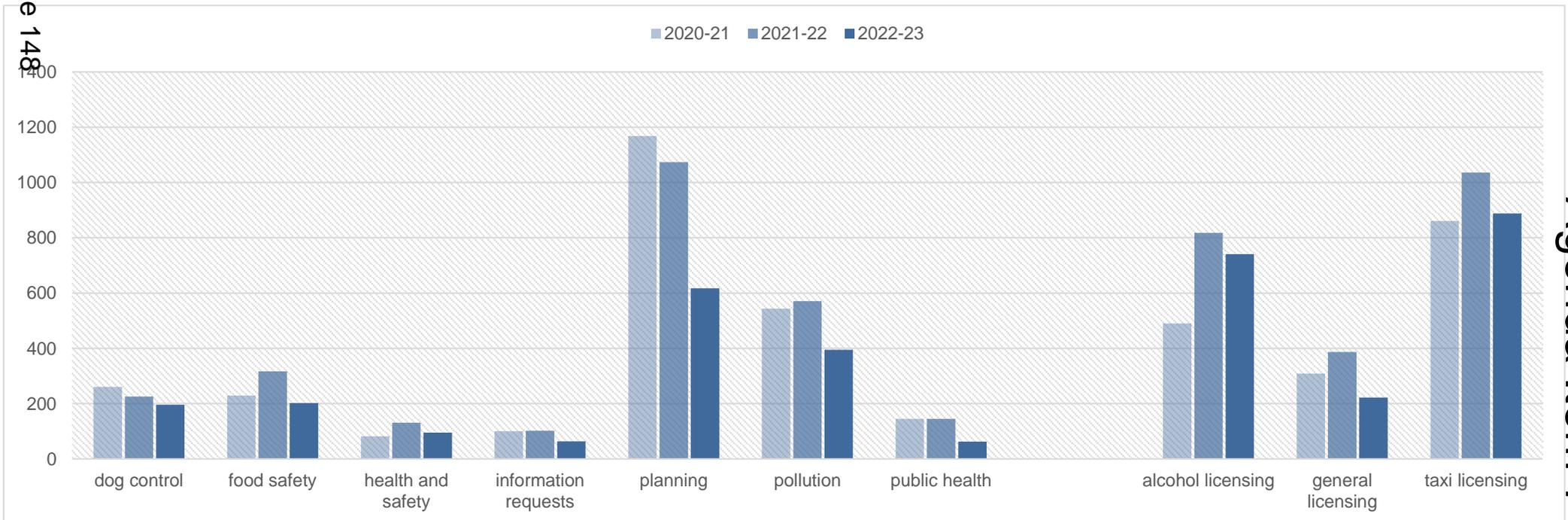
Wychavon

The data on this page relates to Environmental Health and Licensing cases (complaints, enquiries, applications and notifications) where the subject and/or enquirer were located within the Wychavon district.

Note: The chart (below) shows the number of cases recorded against each of the main functions undertaken by WRS. The figure for the current year is a cumulative total based on each of the reporting periods. This figure will continue to increase until the end of year report is published.



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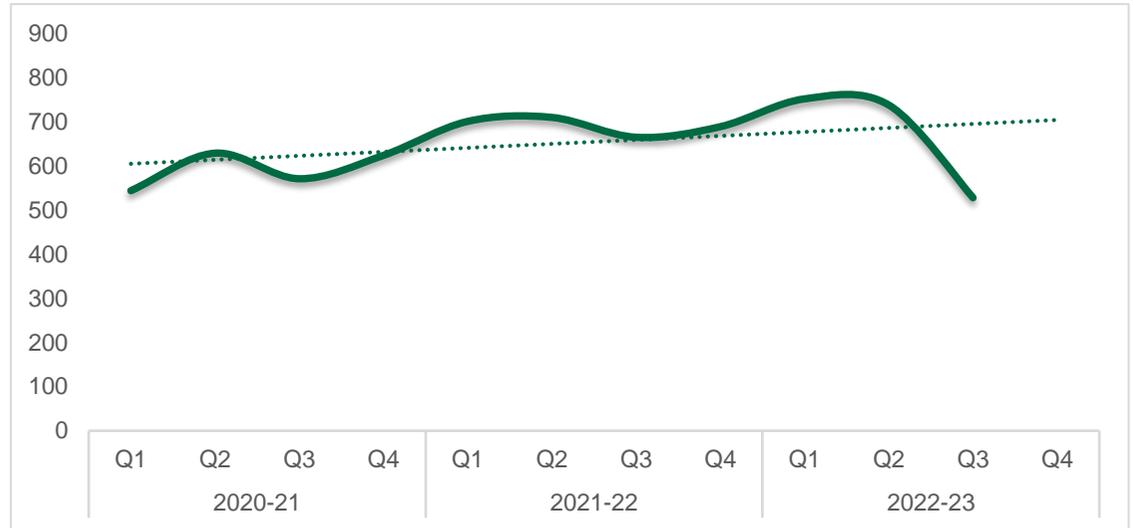


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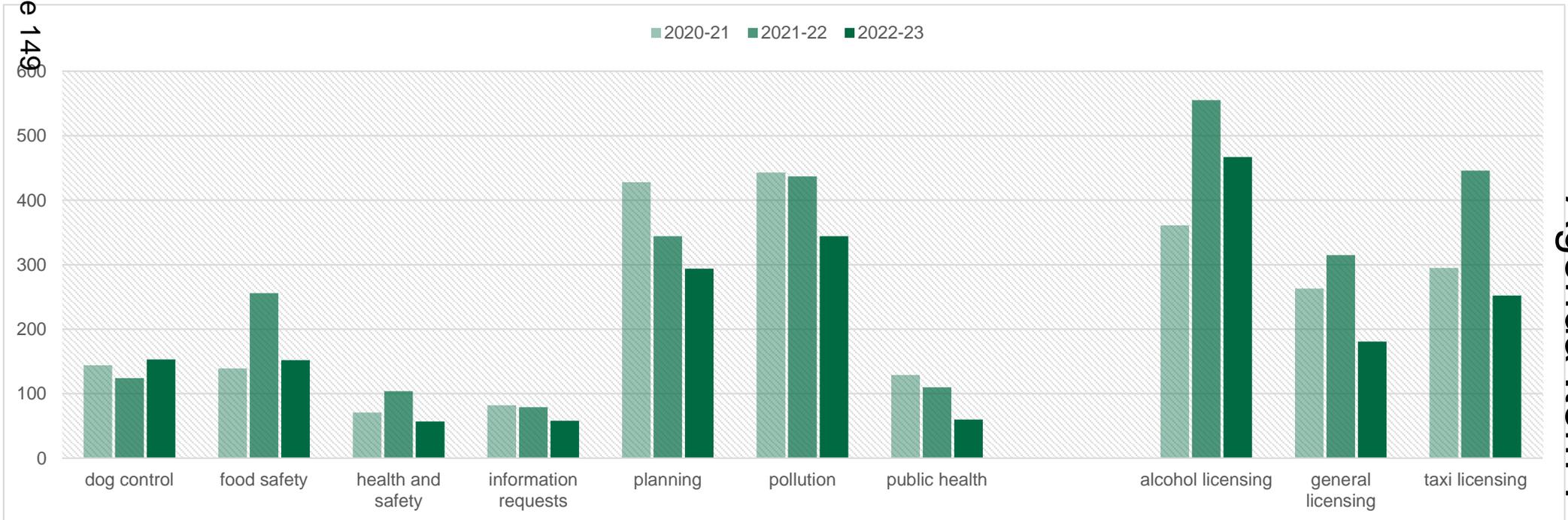
Wyre Forest

The data on this page relates to Environmental Health and Licensing cases (complaints, enquiries, applications and notifications) where the subject and/or enquirer were located within the Wyre Forest district.

Note: The chart (below) shows the number of cases recorded against each of the main functions undertaken by WRS. The figure for the current year is a cumulative total based on each of the reporting periods. This figure will continue to increase until the end of year report is published.



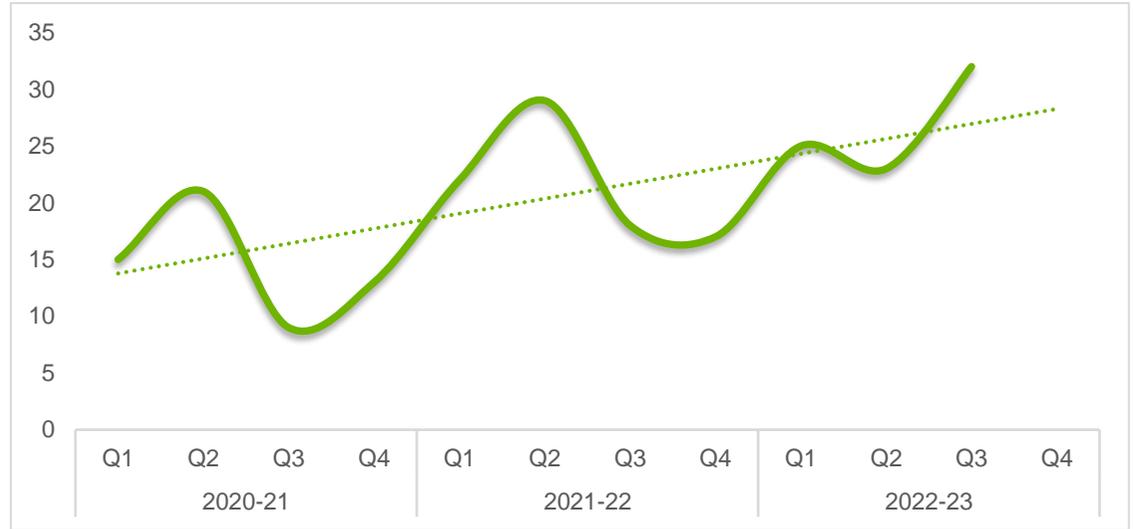
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Agenda Item 7

Cheltenham

The dog control work undertaken for Cheltenham Borough Council is part of a contract with two other Gloucestershire authorities to deliver the collection, kennelling, returning of dogs to owners and rehoming of stray dog functions. The contract was recently renewed and has been highly successful in reducing stray dog numbers for Cheltenham Borough Council as well as utilising existing WRS resource and expertise. Such arrangements enable economies of scale to be realised and the continued retention of valuable assets to the benefit of Partner Authorities. As with other Gloucestershire and Worcestershire authorities, the numbers of stray dogs are reducing annually, however, this is being closely monitored as there have been recent increases in the number of abandoned strays due to the cost of living crisis and post-COVID behaviour changes.

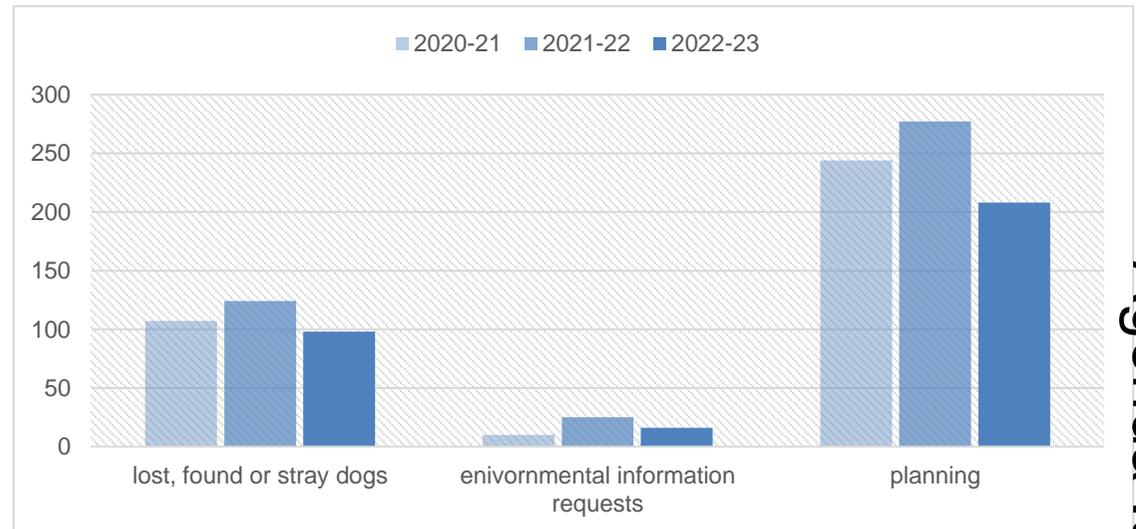
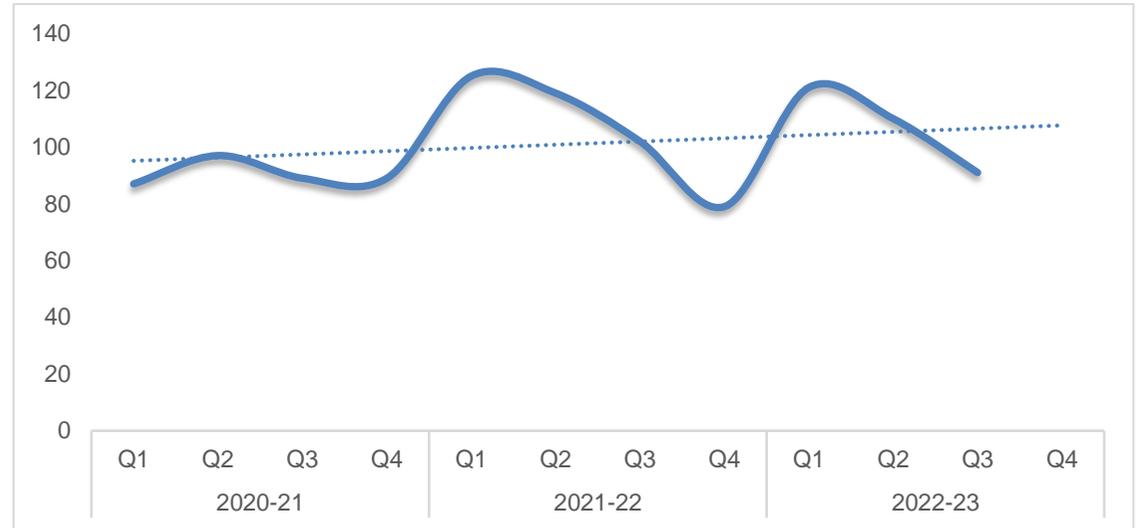


Gloucester City

The dog control work undertaken for Gloucester City Council is part of a contract with two other Gloucestershire authorities to deliver the collection, kennelling, returning of dogs to owners and rehoming of stray dog functions. The contract was recently renewed and has been highly successful in reducing stray dog numbers for Gloucester City Council as well as utilising existing WRS resource and expertise. Such arrangements enable economies of scale to be realised and the continued retention of valuable assets to the benefit of Partner Authorities. As with other Gloucestershire and Worcestershire authorities, the numbers of stray dogs are reducing annually, however, this is being closely monitored as there have been recent increases in the number of abandoned strays due to the cost of living crisis and post-COVID behaviour changes.

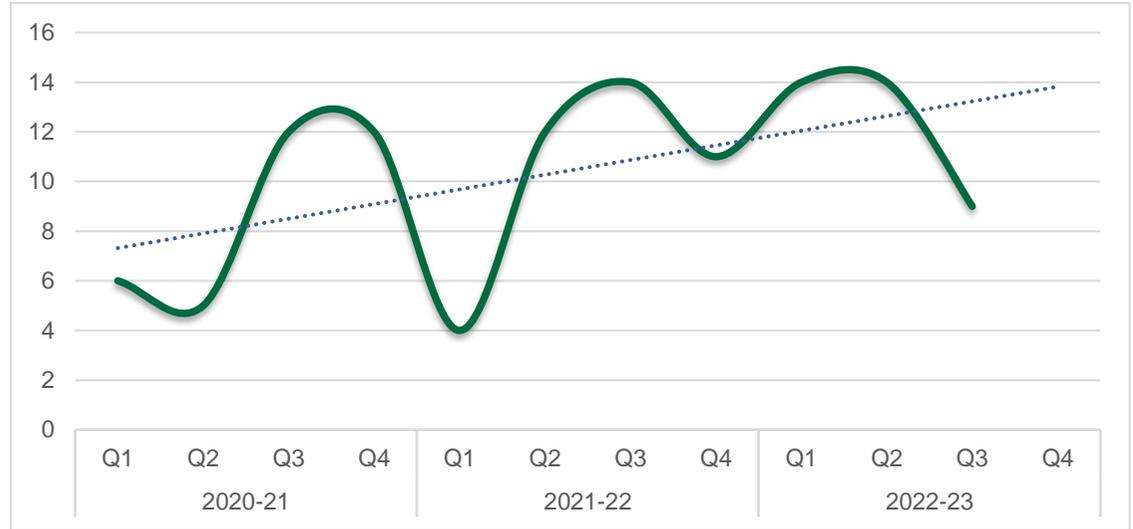
In addition to dog control activity, the service continues to deal with environmental information requests and planning enquiries.

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South Gloucestershire

South Gloucestershire, being located on the outskirts of Bristol, was subject to significant contaminative industries and activities historically. Pressures on brownfield development recently have presented the authority with a large volume of planning applications on significantly contaminated and complex sites. For a number of years now WRS has been asked to assist with this work focusing on the complex sites, so whilst numbers of referrals remain low, when presented they tend to be time consuming and complex. Work demand is dependant on resource availability at South Gloucestershire Council and, as a consequence, WRS is retained to undertake repeat work for them when this becomes an issue.

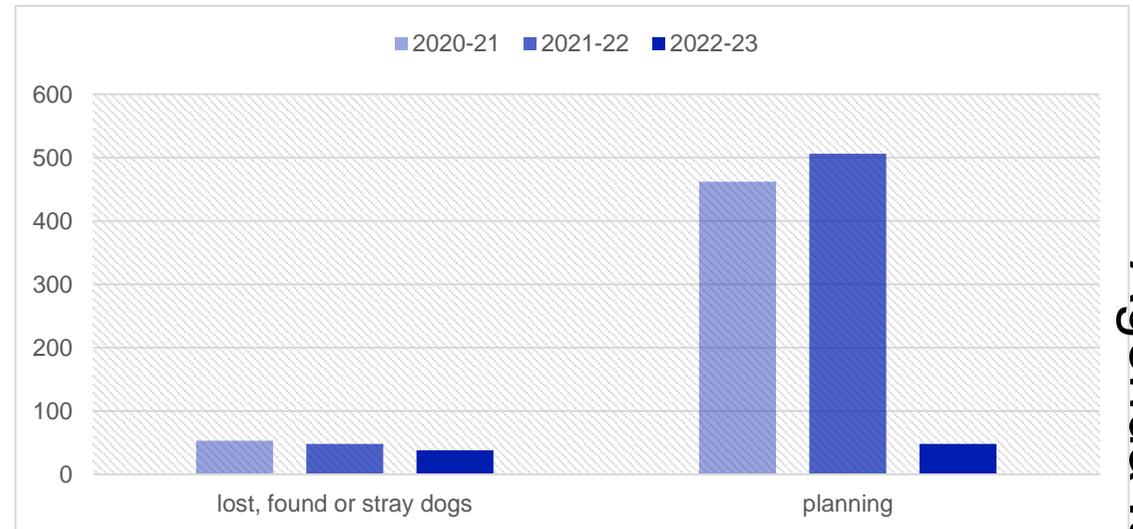
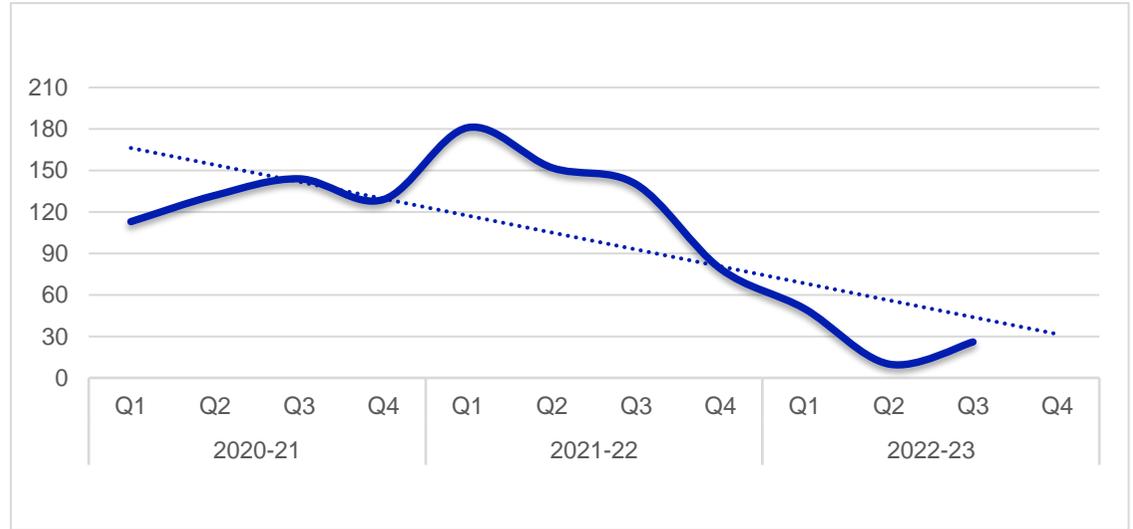


Tewkesbury

The dog control work undertaken for Tewkesbury Borough Council is part of a contract with two other Gloucestershire authorities to deliver the collection, kennelling, returning of dogs to owners and rehoming of stray dog functions. The contract was recently renewed and has been highly successful in reducing stray dog numbers for Tewkesbury Borough Council as well as utilising existing WRS resource and expertise. Such arrangements enable economies of scale to be realised and the continued retention of valuable assets to the benefit of Partner Authorities. As with other Gloucestershire and Worcestershire authorities, the numbers of stray dogs are reducing annually, however, this is being closely monitored as there have been recent increases in the number of abandoned strays due to the cost of living crisis and post-COVID behaviour changes.

In addition to dog control activity, the service continues to deal with planning enquiries.

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Worcestershire Regulatory Services

Supporting and protecting you

WRS Board: 16 February 2023

Food interventions: Post pandemic recovery programme and next steps

| | |
|-----------------------|--|
| Recommendation | That the Board notes the Report and that members use the contents of the information provided in their own reporting back to fellow members of the partner authorities. |
| Background | <p>Members will be aware that the six district councils are responsible for delivering official food safety controls and related activities in most food establishments in Worcestershire to ensure that businesses are complying with the relevant requirements of food law and to enforce those requirements where necessary. WRS undertakes these activities on behalf of all six local authorities. These control activities include inspections, audits, surveillance, sampling and other types of interventions such as projects and questionnaires. Prior to the pandemic, Local Authorities were expected to undertake all official controls and related activities prescribed in specific legislation and those contained within specific FSA guidance and Codes of Practice.</p> <p>At the beginning of the pandemic response, the FSA suspended the routine food hygiene intervention programme in recognition of the challenges local regulatory services faced in protecting our communities from COVID-19. The suspension also reflected the changing business landscape, with many food businesses closing or changing operations due to the Covid control regime.</p> <p>At its Board Meeting 26 May 2021, the FSA set out its plan for the recovery of local authority (LA) programmed food interventions and related activities. The plan described two phases running from 1 July 2021 to April 2023 and beyond. It focussed on re-starting the regulatory delivery system in line with the Food Law Codes of Practice for the highest risk establishments while providing greater flexibility for lower risk establishments. The plan also set out arrangements for monitoring LA delivery during the recovery period. This report describes the progress WRS is making in implementing the recovery plan locally.</p> |
| Report | <p>We are now in the final phase of the two-year FSA Recovery programme introduced post pandemic . Every Local Authority had a long list of overdue inspections. The timeline and action set out by FSA is as below together with WRS outcomes.</p> <p>We have regularly provided quarterly progress reports to the FSA on behalf of Partners .</p> <p>The total of overdue interventions across the county at the start of the 2022-23 financial year was over 3,500 existing registered businesses. During any year we also expect to deal with 700-900 new businesses. As we have always had a high level of FHRS compliance, the numbers with Category A and B (low Food Hygiene Rating Scheme: FHRS) scores were <5% of our total. Officers have, therefore, been able to conduct a wide range of visits across all FHRS ratings.</p> |



In reading this report members should note that:

- Business compliance rates remain high with some 98% of business still scoring FHRs Levels 3 to 5 meaning that they are deemed generally compliant.
- Food inspection reports left by officers with the food business operator are not subject to Freedom of information requests but are freely releasable on request under the FHRs Brand Standard (www.food.gov.uk/brandstandard) The local press frequently reports on poorly performing businesses which we believe assists in driving up standards generally.
- Where a business changes hands the previous rating immediately ceases.

Current Competent Officer Status

Inspections of high-risk premises (restaurants, cafes, pubs, schools, care homes, retail, mobiles) always requires a physical presence. Each inspection takes approximately two to three hours to complete allowing for travel time and the detailed recording of visits which is required to fulfil both FSA reporting and internal intelligence gathering requirements.

Resources available to carry out increasingly complex food work will always remain an issue when the demand across the whole of the Environmental Health Service is taken into account (especially nuisance complaints which seem to rise each year). Food inspectors have specific (high level) competency requirements under the FSA Food Law Code of Practice. On any one day we are unlikely to have more than 6 competent officers available. During 2022-23 we have been able to continue with some backfill during the latter stages of Covid support funding. However, the pool of competent contractors is much reduced, and we can no longer rely on immediate availability even if we are able to backfill.

Regulatory Support Officers (RSO)

To support our Environmental Health Practitioners who undertake wider duties (i.e. nuisance, public health, health and safety) we piloted a dedicated food RSO role to the service early in 2022. Most were former Covid advisers. We now have one person left to support CEH team. This has proved to be a high value role enabling WRS to undertake the low risk food visits, sampling and FHRs sticker compliance checks that we would lack time to undertake on a regular basis.

Changing Landscape

Covid brought major challenges to food businesses, although many were able to diversify and survive. Now businesses face an economic crisis with staff shortages, increased fuel costs and inflationary food costs of up to 20%, all in a declining market. Premises are adapting by reducing opening hours, changing from restaurant to takeaway, changing menus and suppliers. There are signs of increasing closures of businesses although currently the numbers are being replaced by new premises registrations.

Intelligence led

We no longer base our food intervention programmes on inspection dates set in the national Food Law Code of Practice which are automatically generated by our IT system. Instead, we record and consider intelligence through Tactical Assessment programmes. This opens up many options including sectoral approaches (e.g. geographical, new premises, ethnics, bakeries, small retail), specific projects (e.g. sampling, FHRs sticker checks, arising from complaints). The FSA is now considering a similar model as part of its ABC Review and in November they visited WRS to see how our system worked.

Inspections

Between April 2022 and the end of January 2023 WRS completed 1788 inspections. Whilst the data below indicates we continue to have high levels of compliance officers report that they are increasingly finding more premises with major non-compliances, particularly in the independent sector. As we enter 2023, we still need to complete over 600 interventions (including new premises) to meet the FSA Recovery Plan. About half of these are in the High-Risk category and we should be close to achieving this by end of March.

There is no doubt the majority of Food Business Operators value the personal contact of visits not only to provide them with support but to help ensure a level playing field across the sector. Resource constraints have reduced the supportive action we can give but we do offer a paid for advisory service of up to two hours, and the focus of our routine inspections is to provide support and advice to business unless circumstances are such that a more formal approach is needed to address serious non-compliance.

| Visits carried out with FHRs rating | | | |
|--|----------------------------|----------------------------|--------------------------------|
| FHRs | 20/21 Full Year | 21/22 Full Year | 22/23 To end Jan 23 |
| 0 | 2 | 5 | 5 |
| 1 | 13 | 58 | 35 |
| 2 | 2 | 30 | 24 |
| 3 | 18 | 166 | 116 |
| 4 | 39 | 322 | 247 |
| 5 | 514 | 1500 | 1361 |
| Total | 588 | 2081 | 1788 |

47 Hygiene Improvement Notices have been served on 25 premises in the previous three-years. The breakdown of these by food hygiene rating is outlined below. As might be expected, most relate to lower scoring businesses but even better run businesses can make mistakes.

| Food Notices Served by FHRs | | | |
|------------------------------------|------------------------|------------------------|-------------------------------|
| Notices Served | 20/21 Full year | 21/22 Full year | 22/23 To end of Jan 23 |
| L5 | 0 | 1 | 1 |
| L4 | 1 | 2 | 0 |
| L3 | 7 | 4 | 1 |
| L2 | 0 | 1 | 1 |
| L1 | 1 | 5 | 12 |
| L0 | 0 | 4 | 6 |
| Totals: | 9 | 17 | 21 |

Food Hygiene Rating Scheme (FHRS)

The continuing importance of FHRS to the majority of businesses must not be underestimated. Bonuses are paid by some companies to managers who maintain Level 5 standards, for others it can ensure contracts or being accepted to operate at events. Inevitably, with the current pressures on hospitality, some food business operators are becoming more 'aggressive' when they get a reduced FHRS Score.

The outcome is more appeals and more re-rating requests. Re-ratings are only done for a fee (£165 rising to £178 from 1 April) and operators have been known to put considerable pressure on officers for immediate responses. For FHRS Level 4/Level 3 officers are authorised carry out the process, for Level 2-Level 0 there is a specific process undertaken through the Food Lead Officer. The revisit period can be up to three months if the premises has such a poor history that WRS feel it must prove it can now manage food safety effectively. Below is a snapshot of the FHRS ratings on 1 February 2023 for our 6066 food premises:

| FHRS | Bromsgrove | Malvern Hills | Redditch | Worcester | Wychavon | Wyre Forest |
|----------------|-------------------|----------------------|-----------------|------------------|-----------------|--------------------|
| L5 | 740 | 680 | 428 | 771 | 952 | 596 |
| L4 | 116 | 112 | 70 | 96 | 156 | 125 |
| L3 | 42 | 37 | 58 | 43 | 95 | 62 |
| L2 | 2 | 4 | 6 | 3 | 9 | 7 |
| L1 | 4 | 8 | 5 | 4 | 11 | 3 |
| L0 | 1 | 0 | 1 | 0 | 1 | 1 |
| Unrated | 83 | 101 | 211 | 126 | 179 | 117 |
| Total | 988 | 942 | 779 | 1043 | 1403 | 911 |

There are also indicators from RSO visits that many businesses who get a reduced score do not remove the former higher FHRS sticker (they cannot be removed at the time of inspection because of the appeal period). We are implementing a new system which will enable us to carry out periodic checks. It could be an offence under the Consumer Protection from Unfair Trading Regulations 2008 to display an incorrect FHRS score, but to date advisory action has always led to compliance.

Poor performing businesses

Whilst the number of poor premises remains well below 5%, the time spent on these businesses is high, in some cases amounting to up to the equivalent of three weeks work to resolve issues (i.e. some 100 hours per premises). If the decision is made to prosecute then it can be further months of work to bring a case to the courts. Your Officers currently have four prosecutions pending with a Simple Caution having been issued to a Malvern food business in mid-January.

The common areas of non-compliance are food safety paperwork (having no food safety management system will immediately reduce FHRS to a Level 1- Level 2 maximum), poor cleaning, pest control, allergen safety and lack of staff training.

We operate a Food Lead review process in respect of premises where three consecutive poor FHRS scores have been issued i.e. Level 0- Level 3. For these premises, visits will be more frequent to ensure that standards improve. If they do not, they will either be informally interviewed or sent a letter from the Food Safety Lead. In most cases where these systems have been used, improvement has been made and maintained.

Enforcement Powers

There are several options available for enforcement, which can be found in the WRS Enforcement Policy endorsed by Members and available at the website. All businesses are left a written compliance report. The next steps for escalation include service of Hygiene Improvement Notices [HIN] and formal closure through a Hygiene Emergency Prohibition Notice [HEPN]. HINs can be issued by officers, HEPN must subsequently be approved by a court Order. We are also now responsible for recovering costs awarded by the Magistrates for such actions, which presents its own difficulties.

Many of the public ask why poor premises are not closed more often. The simple answer is that the FSA Food Law Code of Practice has very specific requirements for closure which set a very high bar and are not often met. Prosecution is the option of last resort in this graded enforcement approach. Unfortunately, we have had cause to pursue this latter course of action with four businesses in the past year (several cases are still *sub judice* so premises cannot be listed here by name but include a public house, a food manufacturer, a bakery and an ethnic restaurant).

New Premises

Despite the financial climate we continue to receive some 30 new food registrations per week across all sectors. On current registration numbers will be slightly down on the Covid years of 2020-early 2022. We continue to prioritise rating visits to this sector (unless we have intelligence to the contrary, we operate a policy of two months to achieve this which we feel is an appropriate time to allow the business to establish its operations).

There seems to be an emerging pattern of more businesses opening/re-opening without registering (which is free) with WRS (can easily be done online). We are currently finding 3-4 a week, some of which are businesses that have been closed for a period and then re-opened

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under new management. It is impossible with limited resources to make physical checks on all, but we are looking to improve monitoring systems for the coming year. A table of new registrations by type is outlined below:

| New Food Registrations by Premise Type | | | |
|---|------------------------|------------------------|----------------------------|
| Premise Type | 20/21 Full year | 21/22 Full year | 22/23 To end Jan 23 |
| Caring Premises | 10 | 24 | 16 |
| Distributors/Transporters | 9 | 12 | 7 |
| Hotel/Guest House | 12 | 5 | 6 |
| Importers/Exporters (EU) | 4 | 16 | 7 |
| Manufacturers and Packers | 19 | 22 | 10 |
| Mobile Food Unit | 75 | 86 | 64 |
| Primary Producers | 7 | 3 | 3 |
| Pub/Club | 88 | 59 | 53 |
| Restaurant/Cafe/Canteen | 106 | 137 | 157 |
| Restaurants and Caterers – Other | 24 | 14 | 9 |
| Retailer – Other | 383 | 212 | 117 |
| School/College | 24 | 27 | 22 |
| Small Retailer | 61 | 63 | 41 |
| Supermarket/Hypermarket | 3 | 1 | 7 |
| Takeaway | 71 | 114 | 70 |
| Total | 896 | 795 | 589 |

This can be compared with those that have ceased trading.

| Food Premises closed by Premise Type | | | |
|---|--------------------------------|--------------------------------|------------------------------------|
| Premise Type | 20/21 Full year | 21/22 Full year | 22/23 To end Jan 23 |
| Caring Premises | 8 | 32 | 49 |
| Distributors/Transporters | 6 | 8 | 15 |
| Hotel/Guest House | 12 | 25 | 19 |
| Importers/Exporters (EU) | 0 | 9 | 4 |
| Manufacturers and Packers | 7 | 23 | 12 |
| Mobile Food Unit | 36 | 57 | 105 |
| Primary Producers | 2 | 4 | 15 |
| Pub/Club | 73 | 74 | 79 |
| Restaurant/Cafe/Canteen | 70 | 122 | 122 |
| Restaurants and Caterers - Other | 16 | 29 | 63 |
| Retailer – Other | 55 | 165 | 231 |
| School/College | 16 | 25 | 26 |
| Small Retailer | 30 | 55 | 85 |
| Supermarket/Hypermarket | 0 | 3 | 4 |
| Takeaway | 50 | 96 | 81 |
| Total | 381 | 727 | 910 |

Service Requests

The table below outlines volumes of requests for service in the previous 3 years. As members will see, the volume of complaints about premises is roughly the same as the level of requests from the business community for support.

| Service Requests | 20/21 Full Year | 21/22 Full Year | 22/23 To end Jan 23 |
|---|--------------------------------|--------------------------------|------------------------------------|
| Food - Alert (FSA Notification Only) | 6 | 28 | 8 |
| Food - Business Re-Rating Request | 16 | 72 | 48 |
| Food – Complaint | 401 | 533 | 308 |
| Food Project for WRS | 3 | 3 | 1 |
| Food – Enquiry | 542 | 698 | 387 |
| Food - Export Health Certificates | 74 | 98 | 72 |
| Food - Hygiene of Premises Complaint | 96 | 111 | 115 |
| FHRS Appeal | - | 8 | 9 |
| Totals: | 1138 | 1551 | 948 |

Food Sampling

We use our Regulatory Support Officers to assist in undertaking sampling. The majority of our samples are environmental e.g. surfaces, tea towels, sponges (the latter two produce consistently unsatisfactory results). During the run up to Christmas we also sampled pates, again with some Unsatisfactory results. In every case the business is advised of the outcome and appropriate advice given. Your team will be carrying out further sampling before the end

of March after which full analysis of the results will be available.

| Sampling | | | |
|--------------------------|--------------------------------|--------------------------------|------------------------------------|
| District | 20/21 Full Year | 21/22 Full Year | 22/23 To end Jan 23 |
| Bromsgrove | 0 | 43 | 13 |
| Malvern | 5 | 26 | 30 |
| Redditch | 5 | 14 | 13 |
| Worcester | 8 | 21 | 11 |
| Wychavon | 27 | 11 | 19 |
| Wyre Forest | 4 | 47 | 17 |
| Primary Authority | 0 | 1 | 0 |
| Totals: | 49 | 162 | 103 |

Low Risk Premises

Although not a priority in the FSA Recovery Programme your team continue to send out self-assessment questionnaires to low risk retail, cakemakers, community centres, sports clubs, wet bars, etc which make up some 30% of our registered businesses. Our RSO has also been able to make visits to premises some of which have not seen an officer for over 5 years. A common non-compliance in small retail premises has been sale of food past its "Use By Date". Again, we follow an advisory option in the first instance.

Interventions due 2023-24

1740 premises are listed, with an additional 750 New Premises plus any outstanding inspections from previous years. This continues to represent a very challenging area of our work in terms of significant demand and draw on resources.

Additional Food Work

Primary Authority (PA) Partnerships

We continue to offer Primary Authority Partnerships to several food businesses for which we recover costs. Our current partners, set up under the Enterprise Act and approved by the Secretary of State in BEIS, are with Aspens Food Services (over 450 mainly educational outlets), Alimenti Food Science (a small consultancy), Kelsius (providing food safety monitoring equipment internationally), Mindful Chef (on line food orders working out of Redditch), Servest (over 600 catering outlets), Venture Events (wedding and events operator with c 10 premises) and My E Chef (provides food safety management systems for small businesses).

In each case we are legally required to work with the business to ensure they comply with the law, holding regular meetings and providing advice on their systems.

The role of PA is likely to become more important under the FSA national review. Your Food Safety Lead currently chairs a national panel of Local Authorities for the Hospitality and Catering Sector. This is a new role which BEIS wish to develop as part of their relationship with local authorities.

Export Certificates

WRS continues to offer a paid for export certificate service, primarily to two companies (Microferm in Malvern and Dawn Foods in Wychavon) with whom we have a close working relationship. We have only experienced difficulties on two occasions to date, and these were with regard to imports into Turkey).

Allergens

Without doubt one of the biggest challenges for businesses and food officers remains achieving allergen compliance. As previously reported the major issue is not with larger businesses but with smaller independents who are still struggling to comply. Whilst many businesses constantly change suppliers due to costs, they do not update their allergen records. Our work in this area is done jointly with Trading Standards. We are currently reviewing how we advise businesses to achieve better compliance.

Conclusions

In common with all local authorities, the backlog of interventions across Worcestershire following the pandemic remains very challenging in terms of numbers, but Members can be assured that we have a very high base of 98% broadly compliant operations (i.e. businesses scoring 3 or more on the Food Hygiene Rating Scheme or FHRS.)

The prioritisation and initial inspection of new food businesses is a key concern given the numbers involved and the resource required.

We also face difficulties in recruiting new officers and contractor resource. It is anticipated that recent changes to the Codes of Practice in England and Northern Ireland, which widens the baseline qualifications that demonstrate competence and the implementation of an activity-based competency framework, will also help ease the situation. To this end we have been piloting a new role within the team of Regulatory Support Officer, whose purpose is to review and visit low risk premises and make verification visits, escalating issues to a food competent Environmental Health Officer where there are any significant concerns relating to food safety. RSOs have been trained in house and check lists have been provided. This model reflects that used during the pandemic by engaging Covid Advisors, who have successfully conducted visits and escalated serious issues to the dedicated enforcement team for action.

That said, this report shows that we continue to make good progress in our recovery plan, interventions being risk-based, and intelligence led, focusing resources where they add greatest value in providing safeguards for consumers and securing compliance. The focus continues to be on those businesses scoring lowest on FHRS and those found to be persistently non-compliant.

The Board agreed that an additional £25,000 from the 2020/21 underspend be carried forward to support the recovery plan and enable us to provide the resource to fulfil its requirements. It is intended that this spend will be made in the first half of 2023/24 to complete the plan. Food competent agency EHOs are in short supply and £25,000 buys around 17 weeks of competent officer time. As all local authorities continue to seek the same scarce resource to implement their plans, prices may become inflated further.

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WRS Board: 16th February 2023

Update on progress of the automation project

Recommendation **Members are asked to note the report.**

Introduction At the first meeting of 2022/23, members agreed to create a reserve of £150,000 from last year's underspend to fund the implementation of automation of data entry for customers, enabling a range of services to be addressed by the client entering data in forms on the WRS website, which would then upload directly into our IDOX Uniform back-office system. This includes the automation of payments for Licensing, so our host authority Bromsgrove District Council will collect fees for the 6 partners and pass money back to the other 5. Officers agreed to provide a short progress report at each Board meeting between then and the actual implementation of the project.

Report Progress on selecting a final suitable system has been concluded. The wider management team and IT support team met and evaluated all three potential providers. The capability of the products was reviewed, and we considered what was shown in both demonstrations and discussions alongside feedback from multiple local authority users of the various systems.

As a result of these discussions the decision was made to procure through the Government portal framework and direct award to Victoria Forms.

Victoria Forms are a well-known established organisation with a wealth of expertise in this field and have experience of producing a similar set up in another well know regulatory shared partnership. Out of all the potential providers Victoria Forms met the specification to the highest level and the management team are confident that they can deliver the outcomes required within our proposed timescales.

A list of the priority forms (based on submission volumes, complexity and value that can be gained by improving submissions) were provided to the supplier and work has already commenced. An initial project meeting was held in January and the first test form has already been produced for initial checking and testing by the team.

Alongside the wider automation project officers have also been discussing the implementation of electronic ID Cards in the taxi trade for both safeguarding and enforcement measures. As there is

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only one supplier on the market for this technology the procurement process has been followed and discussions have taken place with the development team to discuss the design, objective and testing requirements for the ID cards before a roll out date is agreed.

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