# Worcestershire Regulatory Services

Supporting and protecting you

# **ANNUAL REPORT**

2024/25

Making Worcestershire a healthy, safe and a fair place to live where legitimate businesses can thrive

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#### **INTRODUCTION**

This Annual Report has been produced for the Joint Board in accordance with clause 11.1 of Part 1 of the Worcestershire Shared Services Partnership Agreement. The report covers the progress and performance of Worcestershire Regulatory Services (WRS) for the period 1<sup>st</sup> of April 2024 up to the 31<sup>st</sup> of March 2025 and reports operational activity by the relevant service elements for the financial year. The report summarises key performance data for WRS and provides a summary of the financial position. The report also meets the requirement of the Regulators Code, which requires local authorities to publish a summary of their regulatory activities on an annual basis.

The year 2024/5 continued to show that we are now beyond the pandemic period and a new normal level of activity has been established. Demand remained high, although another indifferent Summer meant that nuisance levels were lower than previous years. However, public expectation around how local authority activity could influence the local environment remains high and often exceeds what the law can deliver. Work continued with the development of work to support air quality action plans which progress through relevant member forums at the partners. The Food Standards Agency continued to take an interest in the service and progress on increasing the volume of food visits being undertaken to our lower risk business cohort.

Our key strategic priorities, which had been in place for 2-years shaped our tactical approach to the key cross cutting issues identified in the strategic assessment, which were:

- Supporting a safe and vibrant night-time economy
- Promoting the responsible sale, breeding, and ownership of dogs
- Promoting safe and clean communities

The team continued to support legitimate businesses and residents, particularly the vulnerable, where we were able and at the same time, we tackled those who broke the law, ignored best practice, or adversely impact the local environment and the ability of others to enjoy it. Central to this approach remained the availability of accurate data and intelligence sharing. Our intelligence and performance unit coordinated, and analysed intelligence obtained by WRS officers and external agencies, helping managers to target WRS resources more effectively and to forge links with other enforcement agencies and partners to share intelligence and target enforcement action. This is becoming more and more embedded at the heart of what we do.

Simon Wilkes Head of Regulatory Services Bob Watson S151 Officer and Deputy CEO Bromsgrove DC/ Redditch BC

# 1. PERFORMANCE, PERFORMANCE-MANAGEMENT & AUDIT

Performance reporting remains underpinned by the IDOX UNIform management information system, providing Joint Board members with a clear picture of the work being undertaken by WRS. Our key performance measures previously agreed with the Board, continue to focus on a range of outputs and outcomes that should give confidence in the service. Previous year's results appear in brackets in the relevant box, with most recent previous year first, providing a comparative view of performance over time. Members are reminded that the recent past is coloured by the pandemic so figures from 2020/21 to at least 2022/3 are likely to be difficult to compare with earlier years.

	Measure	Figure	Commentary
1	% of service requests where resolution is achieved to non- business customers satisfaction	<b>56.7%,</b> (60.4, 59.2, 61.6, 74, 69.5, 63.0. 75.4, 78.9, 78.2, 77.4)	Based on an average score for 6 questions relating to the interaction of the service with non-business customers. 60.9% found their contact with WRS helpful, up from 63.5% last year but below the previous year's 65.8/ 63.5% respectively. 75.6% found the information and advice provided easy to use, slightly above the 71.7/72% from the previous two years. As with last year, 56.3% felt that the length of time to address their problem was satisfactory, slightly down on the last 2-years (57.7%) but better than the 54.5% in the year previous to these. Only 56.3% of responded felt that the speed of first response was good, down on the 66.9% and 65.1% in the last 2-years respectively. However, only in 38.7% of cases were officers able to resolve the issues to the satisfaction of those who responded to the survey, which will always lead to worse figures. Managers will continue to look at how to improve performance in a number of these areas and continue to try to manage public expectations around what is achievable with nuisance issues as many of these will never be resolved to the satisfaction of the complainant. Response rates were worse this year than previous with only 104 responses, compared to 161 and 138 in the previous 2-years, neither of which is good. Literally hundreds of requests for responses (over 700,) a mix of digital and paper questionnaires were sent out, but it is very difficult to get replies.

2	% of service requests where resolution is achieved to business customers satisfaction	<b>97.1%,</b> (94.6, 98.1, 98.2 98.4, 97.4, 97.2, 97.7, 97.1 97.9, 97)	Based on an average score for 9 questions relating to the interaction of the service with business customers. This year saw fewer numbers of returns than previous years, (246 compared to 271 and 352 the previous two years). This is out of 3360 who were asked for a response. Of those who responded, 96.6% (95%/ 98.3%/ 97.7% last 3-years,) felt that their business had been treated fairly and 97.5% (96%/ 98.6%/ 98.5% last 3-years,) of customers felt staff were polite in their dealings with them and informative. Some 98.5% (94.1%, 98.3, 98.7% last 3-years,) of customers found the information and advice we provided easy to understand and 97.7% (93.8%, 97.9/ 98.1% last 3-years,) found their interaction with us helpful. 94.9% (91.2%/ 96%/ 96.7% last 3-years,) were happy with the speed of our responses and, of those who made enquiries rather than being visited, 96.5% (92.5%/ 96.3%/ 97.3% last 3-years,) were satisfied with the response. Last year we were a little puzzled by the results, all of which were slightly lower than in previous years but with no obvious reason behind that such as a change to management practice and approach, or the information provided. On the face of it, this does appear to have been a blip, and results are back to previous levels.
3	% Food businesses broadly compliant at first assessment/ inspection	Bromsgrove <b>99.2%</b> (99.4, 99.3, 99.3, 98.4, 97.1, 97.2,) Malvern Hills <b>98%</b> (98.2, 97.8, 98.4, 98.6, 98.1, 97.2,) Redditch <b>97.7%</b> (98.2, 97.1, 97.5, 97.6, 95.6, 96.0,) Worcester City <b>99.2%</b> (99.2, 99.0, 98.4, 98.4, 97.5, 98.0,) Wychavon <b>98.3%</b> (98.2, 97.6, 98.2, 99.2, 98.0, 97.4,) Wyre Forest <b>97.6%</b> (97.8, 98.5, 98.6, 98.2, 98.1, 97.7,) Worcestershire <b>98.4%</b> (98.5, 98.3, 98.5, 98.5, 97.5, 97.3,)	The figures demonstrate the high levels of compliance generally of our food businesses. They are mainly well-run and responsive to any issues in relation to hygiene and protecting the health of customers. The wider interaction with lower risk businesses allowed for by the additional resource allocated by the partners has had no appreciable impact on the figures, suggesting that these premises too show good compliance levels.

4	% of food businesses scoring 0,1 or 2 at 1 <sup>st</sup> April each year	Bromsgrove <b>0.8%</b> (0.6, 0.7, 0.7, 1.4, 2.9, 3.6, 1.3,) Malvern Hills <b>2.0%</b> (1.8, 2.2, 1.6, 1.6, 1.9, 2.8, 3.0,) Redditch <b>2.3%</b> (1.8, 2.9, 2.5, 2.4, 4.4, 5.1, 3.3,) Worcester City <b>0.8%</b> (0.8, 1.0, 1.6, 1.6, 2.5, 2.2, 2.0,) Wychavon <b>1.7%</b> (1.2, 2.4, 1.8, 0.8, 2.0, 3.0, 2.2,) Wyre Forest <b>2.4%</b> (2.2, 1.5, 1.4, 1.8, 1.9, 2.4, 2.8,) Worcestershire <b>1.6%</b> (1.5, 1.7, 1.5, 1.5, 2.7, 2.7, 2.4,)	Food premises scoring 2 or below on the Food Hygiene Rating System are deemed to be at risk of not producing safe food and are subject to further intervention until such time as they meet requirements or face formal action. There are only small numbers of these in each district.
5	% of drivers licence renewal applications issued within 5 working days of receipt of a complete application	<b>97.5%</b> (96.8, 97.5, 97.6, 96.9, 75.2, 91.4,)	This measure was introduced in 2017/18 and looks at how quickly driver licenses are renewed. This is one of the licensing processes where generally no additional paperwork is required before someone is re-licensed so generally this is one where the WRS team is in most control over timescales. This measure is like that achieved in previous years.
6	% of vehicles found to be defective whilst in service	<ul> <li>54 vehicles, 3.3%</li> <li>Of 1647 vehicles on the road county-wide</li> <li>(4.2%, 5.4, 4%, 0.39%, 3.6%, 2.8%, 2.2%, 2.4%)</li> <li>NB: Figure in bold is from 2020/21 when council garages and others used for testing vehicles were closed for much of the year and no proactive enforcement monitoring took place.</li> </ul>	This figure is lower than the last 3 year's (70, 84 and 59 respectively,) so a welcome improvement. Focusing on the percentage is probably better as total number of vehicles can vary slightly year to year. Previous to this year, rates appeared to be slightly higher than in previous years and is probably a reflection of the wider impacts of the cost-of-living on members of the trade. The overall result is probably a useful reminder to members that taxi vehicles travel a great deal further each year than domestic vehicles and therefore require significantly more upkeep to keep them in a good and safe condition. This will create financial pressures within the trade, but the safety of the travelling public must remain paramount for the local licensing authority.

7	% of service requests where customer indicates they feel better equipped to deal with issues themselves in future	<b>53.4%</b> (56.6, 57.0, 58.5, 58.8, 68.2, 58.1, 59, 72.5, 73.8, 76.8, 74.2)	This focuses on non-business customers. It is a specific question asked to members of the public in the questionnaire to test if the information and support provided to them by WRS is likely to help them deal with their own problems in the future. The measure has been lowered for a number of years, reflecting the lower performance overall on non-business customer satisfaction.
8	Review of register of complaints and compliments	<b>22 complaints</b> (26, 28, 25, 42, 44, 27, 25, 31, 17, 24, 47, 70) <b>69 compliments</b> (121, 116, 134, 161, 163, 128, 138, 103, 51, 57, 36, 24)	This is our longest running performance indicator in this format, hence the long list of previous year's figures. This year's figures are like previous years. Complaints related to issues with responses to nuisance problems and some in relation to turnaround of licenses, with one related to a change in policy. This is also the first year where the work on planning and enviro-crime for Redditch and Bromsgrove features in the figures.
9	Staff sickness absence at public sector average or better	<b>4.31 days per FTE</b> (3.07, 2.93, 5.2, 1.9, 4.4, 4.12, 12.45, 5.95, 2.3, 3.9, 7.7, 9.5)	Sickness in the team was slightly above last year and several previous years, still well below the recent peak year at 5.2, although above the average for the last 6 years (3.60 days/FTE.) 53.7% of this year's sickness was classed as long-term (absence for a period exceeding 28 days,) and driven by a small number of people dealing with serious health conditions. Short term sickness accounts for just under 2-days per FTE.
10	% of staff who are satisfied with working for WRS	<b>90.5%</b> 94, 92, 97.5%, 93.5%, 98%, 88%, (NB: Annual figures for 2017/18 and before, 80%, 85%, 77%, 82%)	63 responses were received from the staff cohort, which currently numbers around 85. As ever, some did not respond to all the questions. This score for this measure is based on those who scored 5/10 or better for the question in the staff survey which asked, are you satisfied with working with WRS (score is from 0 to 10.) Some 74.6% (47/63,) scored this question at 8/10 or higher. Due to current time constraints, we have yet to do more detailed analysis of broader staff comments, but it is good to know that many are happy working for the service.
11	% of licensed businesses subject to allegations of not upholding the 4 licensing objectives	Bromsgrove <b>6.8%</b> (9.9, 7.2, 5.9, 5.4, 6.8, 8.7, 6.73,) Malvern Hills <b>5.1%</b>	Linked to the Crime & Disorder agenda and introduced following discussions with elected members, this measure is now in its tenth year, although only eight years results

		(5.8, 4.1, 5.1, 3.5, 5.7, 4.8, 4.94,) Redditch <b>5.2%</b> (8.7 8.1, 9.5, 8.3, 8.5, 7.1 8.65,) Worcester City <b>6.7%</b> (13.8, 8.5, 10.0, 5.7, 8.8, 8.1, 8.19,) Wychavon <b>4.3%</b> (6.2, 8.2, 6.3, 3.7, 4.2, 4.0, 4.97,) Wyre Forest <b>8.3%</b> (9.1, 9.4, 9.1, 5.1, 8.5, 7.0, 8.29,) <b>Worcestershire 6.0%</b> (8.8, 7.6, 7.5, 5.0, 6.8, 6.4, 6.78,)	appear in the table. This year all figures are at average or below, so significantly better than last year. We previously explained to members that, after pandemic lockdowns where hospitality premises were closed for long periods, the general tolerance of noise and similar activities from this type of premise seemed to have reduced, so as these businesses sought other activities and uses of their outside spaces to increase revenue, this made residents living in the vicinity unhappy. This situation appeared to be improving before last year's results, however perhaps we can assume that last year was a blip in the figures. Only time will tell. The weather last year for most of the summer and autumn was relatively poor, which may help explain the figures too. It should be noted that this only records the level of accusations of breaches, and we can confirm that there has not been an increase any kind of formal action. It still shows that 90% plus of premises across the County are well run and controlled by their operators, and we know from interactions with Police and Trading Standards colleagues that concerns tend to be limited to smaller numbers of premises.
12	Rate of noise complaint per 1000 head of population	Bromsgrove <b>1.93</b> (2.19, 2.26, 2.25, 2.56, 1.96, 2.7, 2.82, 3.0, 2.7, 3.1) Malvern Hills <b>1.62</b> (1.91, 1.93, 2.29, 2.45, 2.07, 2.2, 2.39, 3.0, 2.3, 3.9) Redditch <b>1.89</b> (2.45, 3.09, 3.61, 3.67, 2.97, 3.2, 3.61, 4.1, 3.7, 3.5) Worcester City <b>2.03</b> (2.86, 3.40, 3.47, 3.1, 2.78, 3.2, 3.13, 4.2, 4.0, 2.9) Wychavon <b>1.75</b> (2.04, 2.07, 2.45, 2.08, 2.01, 2.1, 2.46, 2.7, 2.6, 2.5) Wyre Forest <b>2.04</b>	The rate for all districts this year are reporting their lowest figures since the indicator was introduced. We know that last year saw a poor weather for a significant part of the year, which undoubtedly contributed to this. These figures are probably the best example so far of external impacts for the work of the service. Domestic noise represents more than half of complaints and, as we have illuded to in Activity Data Reports, noise from dogs and from audio devices remain key drivers of this. With commercial premises it tends to be a small number of these that certain residents have concerns about, and things like a change of DPS in a pub and the business looking at more diverse ways of bringing in revenue can lead to friction with the local community.

		(2.29, 2.75, 2.65, 2.71, 2.37, 2.6, 3.23, 3.4, 3.0, 3.0) Worcestershire <b>1.89</b> (2.33, 2.57, 2.9, 2.74, 2.35, 2.7, 2.93, 3.4, 3.1, 3.8)	1,128 noise cases were received during 2024/25 (315 fewer than the previous year), with 702 cases (or 62%) relating to noise from domestic properties.
13	Total Income	£668,806, which is 22.17% as a proportion of the 2016/17 revenue budget figure (£3,017,000) and 16.23% of the current net revenue budget of £4,119,000	This figure does not include the income for work derived from partners like the Homes 4 Ukraine work or other work for the six partners. This is purely money raised from outside of the partnership.
14	Cost of regulatory services per head of population.	Based on outrun cost of £4,064.802 against the County's most recent population estimate of 613680 in 2023, the service cost is: <b>£6.62 per head</b>	This is the amount spent by the partners following the off- setting of cost with income, then divided by the most recent mid-year estimate the County Council provides on the population estimates pages of its website. It is difficult to benchmark this figure with other authorities as WRS functions are not all of those reported in the relevant part of the RO return to DLUHC.

The WRS management team is committed to driving performance forward so that a high standard of service delivery can be maintained. As can be seen from the figures above, the continuing challenge for the service is to improve the perception of non-business customers have of our performance, so this will be an on-going key task going forward. Management team meetings are used to review performance against the service plan and to highlight any issues of concern. Principal Officers (first line managers) attend these wider management meetings to ensure a two-way flow of information between management and staff. Separately, the Head of Service and Team Managers meet weekly to ensure everything is kept under review. Teams have their own detailed plans that sit below the service plan signed off by Joint Board. Progress against this is monitored by Team Managers and Principal Officers. The Management team also looks to the strategic direction of the service and ensures that the operational and financial resources available to partners are used in the most efficient manner to achieve both their individual strategic aims together with WRS priorities.

Whilst our Uniform IT platform is a little old and clunky, it operates reasonably well across functions and continued refinement ensures our ability to report to Joint Board on our performance measures in an accurate way. Consideration was given to replacement of the system some time ago but, in the current financial climate, this is cost-prohibitive when we have a system in place that does the job, albeit has its limitations. The process of Local Government Reorganisation probably reinforces this decision. The service also subscribes to the national IDB intelligence database, enabling it to share intelligence with other local authorities in the region and nationally so that common issues and individual entities active across local authority borders can be identified and work to deal with them co-ordinated. MHCLG has been looking to encourage the broader use of the system, especially at district council level, and has been funding access for district council Housing Standards teams to help them better engage with colleagues in Trading Standards services where enforcement responsibility for estate agency, tenant fees and energy efficiency of buildings sits.

There are a wide range of bodies to which the service must report data (e.g., Food Standards Agency, Department of the Environment, Food and Rural Affairs, Health and Safety Executive, Department for Business, Innovation and Skills, Gambling Commission etc.). All statutory reports are submitted to ensure that WRS continues to meet its partner's statutory obligations. It was hoped that the central bodies would accept a single data return for all partners, but it now appears that all Departments except for the Health and Safety Executive continue to require individual returns for each partner. WRS provides these as necessary.

A short summary of activity data is included at Appendix 4 to avoid duplication with the wider and more detailed set of activity data that is provided in the final Activity Data Report for 2023/4, which members will receive at the same meeting where this Annual Report is presented.

There was no engagement with Internal Audit beyond support for the implementation of the automation project that utilises the Victoria Forms product to allow the submission of on-line service requests and license applications that are automatically put into the back-office Uniform database to reduce inputting.

# **2.0 SERVICE DELIVERY HIGHLIGHTS**

#### COMMUNITY ENVIRONMENTAL HEALTH

**Food Safety:** The routine food hygiene intervention programme commenced with support from contractors while the recruitment process for the 5 new food safety officers agreed by the Board commenced to support this work. This was a key priority as we not only have our 2024-2025 businesses to inspect but also some 600 existing and new premises outstanding from 2023-2024. The latter have been risk assessed to ensure that we focus resources on the highest risk businesses.

Interviews for the recruitment of five new officers were successful. Three additional Regulatory Support Officers (RSO) joined us in September. They come from diverse backgrounds, including travel, retail and teaching. One is also a fluent Chinese speaker. As WRS continue to lead the way in developing this RSO role our Principal Officer (Food) developed a specific training programme to ensure they were 'competent' to deal with low-risk premises as required by the Food Law Code of Practice. Job offers were also made for two Technical Officer posts in food safety, and another to fill the vacancy in noise/pollution work.

We continued as ever to undertake routine inspections completing 3513 interventions during the year, of which 1978 were inspection and 1235 information and intelligence gathering activities. The inspection programme resulted in only 3 appeals against the Food Hygiene Rating System score given by officers and 55 premises requires a paid-for re-rating visit once any remedial work had been done. Compliance continued to be very high, with over 90% of premises achieving Food Hygiene Rating System (FHRS) scores for of Level 4-5. Level 3 is considered to demonstrate that premises are broadly compliant with the law, so these premises exceed the statutory requirements. As always officers continued to find poor premises where more formal action is required. Whilst numbers have remained small, there did appear to be a slightly upwards trend in premises dropping in their FHRS rating slightly, although few dropped below the Level 3, where they were making safe food.

Failure to have a documented system, poor cleaning, lack of training and inadequate pest control were the main reasons where conditions were sufficiently poor to give a low rating.

On food cases, Worcestershire has several growers who supply the major sandwich producers who were identified as a possible source in relation to the Food Standards Agency's continuing national E Coli investigation. All the Worcestershire businesses involved co-operated fully in providing the information requested.

Officers investigated complaints that chocolate Easter eggs at a major retailer that were found to have been nibbled by mice. This resulted a file being submitted to Wyre Forest and the case is currently going through the Court process as this is not the first time this retail chain has had this issue in one of its outlets.

We were also involved in several national initiatives including a traceability exercise on imported meat products led by the National Food Crime Unit. We worked closely with Trading Standards colleagues at the County Council on the latter as it often involved poor labelling. It is a legal requirement that food is labelled in English. In one case officers had to use an interpreter as none of the items found could be identified. The operation led to food being removed from the market.

One persistently non-compliant premises (a bakery in Malvern) where the food business operator has shown reluctance over an extended period to make the serious improvements needed is currently going through the formal legal process. A prosecution file was submitted for consideration by Malvern Hills District Council Legal team.

Outside of our own work, the aggregator businesses like Just Eat, Deliveroo etc, are now removing businesses with very poor scores from their platforms. Consequently, those poor performers wishing to partner with them tend to improve quickly and often pay for a re-rating. Getting a good FHRS score is a key driver to compliance. Anecdotally, officers feel they are seeing early signs that numbers of new premises may be on an upward trend, particularly with more mobile and homebased traders registering with us. Many members will no doubt have seen the apparently never-ending number of coffee shop openings, although we may now be at saturation point as several have also closed. Feedback suggests that the business closures reported appear to be mostly down to increased costs of staff, food, and energy.

The final quarter of the year was mainly focussed on completing food inspections, where the level of compliance continued to be high. The service also had a flurry of over 100 food related complaints, although none were particularly serious.

Food officers dealt with 3 FSA Alerts on various imported foods which had missed customs checks and a written warning was issued regarding future conduct to a pub in Wyre Forest in relation to a clostridium perfringens food poisoning outbreak. Officers also continued to work with the hospital facilities in Redditch and Kidderminster to improve their Food Safety Management Systems.

Finally, the service signed up "The Beefy Boys" burger restaurant chain as a Primary Authority.

Officers also dealt with over 500 food service requests, complaints and enquiries about food premises, and issued 112 Export Certificates.

**CEH:** Nuisance: Although this year was relatively quiet for numbers of nuisance complaints due to the poor weather, there are still some good stories outlined in the district sections below.

In statutory nuisance case work, an Abatement Notice was served on a Droitwich public house in May under the Environmental Protection Act for noise from outdoor music events, and a noisy cockerel was put before the courts! The pub agreed to stop holding out-door music events following their pre-trial review hearing for their appeal of Abatement Notice.

Since 2012 and changes to the law on who is responsible for controls on sewers, the local authority role has focused on private sewers. One such case required "works in default" action following the failure to comply with a notice issued by the service to resolve an ongoing drainage issue. Following quotations, budgetary approval was given for major works in Barnt Green. An old septic tank system and soakaway at a residential property had failed and was giving rise to discharges of sewage across the property and into the road. A specification was drawn up and quotes obtained to carry out remedial works including the installation of a modern packaged sewage treatment plant with consented discharge into the highway drainage system, avoiding the need for a new soakaway which would have been costly and disruptive and prone to future failure.

Major investigations in Quarter 2 last year included noise from the refurbishment of a Sainsburys supermarket in Worcester with numerous complaints of nighttime disturbance whilst floors were being dug up. Site meetings were held with the local Councillor and members of Sainsburys senior management and compromise reached on permissible activities at specific hours

Evidence of breaches of a noise abatement notice was established during an ongoing investigation into loud music from a residential address in Worcester. A prosecution file was subsequently prepared for submission to the City Council's legal team.

An appeal in respect of a Noise Abatement Notice served on a public house in Droitwich for excessively loud music impacting on an elderly neighbour was received and the court date awaited.

A licence review was instigated in relation to a public house in Worcester following ongoing noise complaints concerning loud music and late-night noise from customers on the premises. Members found our Environmental Health Officer's arguments persuasive and agreed that the controls recommended be applied to the license to reduce the impact of noise to those living next to the pub.

Following the investigation of alleged breaches of a noise abatement notice served on an occupier of a housing association house in Worcester, officers provided evidence and witness statements to the association who used the evidence to seek eviction of the tenant through the County Court process.

An investigation was carried out into alleged smoke nuisance from solid fuel heating appliances emanating from moored narrow boats in a marina in Worcester. Whilst no statutory nuisance was witnessed, the type of appliances and fuel being used were checked and verified to meet Smoke Control Area requirements, and the marina management company were considering a voluntary grant to support owners switching to alternative heating sources where viable.

Work was done in relation to another alleged smoke nuisance, this time emanating from a farm in a Wychavon village, where it appeared that waste was being imported to the site and burned. Whilst no smoke nuisance has been witnessed to date, officers have been in liaison with colleagues from the Environment Agency and Planning Enforcement colleagues to consider other potential means of regulating activities on the site.

Several cases of bed bug infestations, which were proving difficult to eradicate, were identified by officers this quarter. The service has identified an increasing trend of infestations where it appears that limited household cleaning combined with potential resistance to currently permitted pesticides can lead to long term infestations persisting despite multiple costly pest control visits and treatments.

**CEH: Health and Safety:** Complex health and safety investigations continued through the year, with Officers attending the inquest into the death of a participant in a charity boxing event in Worcester, and a dog sledging accident in Wychavon with investigations being concluded. Officers continued to assist the Worcestershire Coroner regarding another workplace death.

A considerable amount of officer time during the summer was spent working with the UK Health Security Agency (UKHSA) in an investigation into a Cryptosporidium outbreak at a farm in Wychavon, which received extensive media coverage. The number of reported cases ran into the hundreds and is said to be the largest known outbreak of its type. As this is also a working farm, officers had to work closely with the Health & Safety Executive on enforcement issues as it is not a council-enforced business. Later in the year, preparations began for the new year when farms open to the public and UKHSA provided advice for distribution to businesses.

Other cases this year included issues with safety at a soft-play centre and the risks created by stray golf balls from a course or range.

The Ministry of Justice and the Ministry of Housing, Communities and Local Government (formerly the Department for Levelling Up, Housing and Communities) wrote to local authorities last May, asking them to visit funeral directors trading in their areas. This was in response to the situation in Hull, concerning Legacy Independent Funeral Directors. The purpose of this initiative was to restore public confidence in the funeral sector. WRS agreed to participate in this initiative on behalf of the Partner authorities, and our Funeral Directors Project began in Q3 with a visit to the premises of a local representative of a national trade body for officers to familiarise themselves with best practice in the funeral industry. A programme of visits across the county was then planned and implemented. No adverse findings were identified, and this has been fed back to the MoJ.

Safety Advisory Group working continued, including Safety at Sportsgrounds work for Worcestershire County Council, with ongoing engagement with Bromsgrove Sporting, Sixways stadium and Kidderminster Harriers Football club. Worcester Racecourse also has a regulated stand, and the end of season Safety Group meeting was chaired by WRS Lead Officer. As we moved towards the Spring, preparations began for the festival season that generally kicks off the first Bank Holiday weekend in May.

#### **LICENSING**

#### Licensing General:

The workload over the year has shown its usual established pattern, but the team remained busy shaping policy matters that have required significant input before putting the documents before members. A spike in work over the summer driven by applications and queries relating to both Taxi Licensing and the Licensing Act meant the team was stretched due to summer leave, making July to September a challenging quarter for officers.

The team worked with Technical Services colleagues in the duty team and the Intelligence team on introducing a new triage process for calls and queries. By prioritising interventions, this should enable the more serious matters to be picked up first and, where something doesn't lend itself to a direct intervention, the resident can be thanked for the information and how it will be used going forward can be explained.

Licensing remains the service with the highest volume of calls and queries to the Duty Officer desk. Part of this work will also involve improving the knowledge and skills of the Duty Officers so the number of enquiries passed to licensing specialists can be reduced. Both teams continue working together to establish a set of processes that the Duty Officers can use to enable them to efficiently navigate through the questions/queries they receive daily. To aid prioritisation, the intelligence team have highlighted which areas of licensing create the largest numbers of queries.

Policy reviews made up a significant amount of work this year as the statutory periods came up on the calendar. Gambling Policy and the Statement of Licensing Policy were just two areas, and as with many policies, consultations had to be posted on each individual district website to facilitate replies, and hard copies were also offered, kindly collected for collation by our district colleagues before passing them back to the team for review.

Member Training is always a big feature for officers in early June, and this took place across all districts, with officers providing training to new and established members of the six Licensing committees. A new interactive format was welcomed by members and this allowed different scenarios to be played out through role play and videos, which allowed a multitude of different questions to be raised by councillors, to get themselves ready for the role at hearings.

Alongside operational and day to day work the team continued to strive for efficiencies, with work continuing to implement Victoria forms for the automation of licensing applications. Several procurement projects commenced including making the DBS process for taxi drivers more efficient and, the procurement of veterinary services for animal licensing inspections both of which will be implemented in 25/26.

**Taxis**: A review of the Taxi Standards that were implemented by all district councils in 2022 highlighted the need to make safeguarding training for all taxi drivers mandatory. As part of the initial changes to policy, a mandatory requirement for all new drivers to undertake a competency certificate was introduced. This is provided via a thorough training session looking at all aspects that are required for a taxi driver to do their role in a way that ensures the relevant protections for customers including equalities, safeguarding, communication, driver conduct and various other responsibilities. The feedback from drivers who have done the training so far has remained positive and valuable, but it will take time to put the whole driver cohort through this process.

Following these positive outcomes, officers have moved to presenting reports to all district councils recommending that all existing drivers now undertake safeguarding training and that refresher training every three years also be included in policies. After the consultation process, officers moved to take the revisions through to adoption. Worcester City and Wyre Forest Licensing Committees were the first to approve the new revisions and training for their drivers was scheduled to commence early in 2025. Other council policies continue to move forward, and an implementation date has been agreed for all districts.

Enforcement work continued across the team including evening work on taxi ranks. The team are now working on Operation Rome looking at taxi matters in several districts, particularly issues with ranks. If successful, the team will look to deploy it across all the districts where over ranking and out of area vehicles have given rise to concerns.

Alcohol/ Entertainment and Gambling: Enforcement work continued across the team including officers investigating suspended premises licences. Intelligence suggests that premises that have not paid their annual fee may also be liable to be non-compliance in other areas of regulatory control, so they are generally worthy of an intervention. And a sharp reminder that unlicensed activity is a crime can result in prompt payment!

The introduction of on-line applications/ notifications and payment for Temporary Event Notices (TENs) via Victoria forms seems to have reduced the number of queries being received regarding these matters as the more detailed FAQs linked to the on-line application process are answering a lot of the questions that applicants have. We hope we will see similar once other forms of application are automated in this way. Queries on TENS invariably focus on periods or events where people look to do things away from standard licensed premises such as at Halloween, Bonfire Night and Christmas.

Preliminary meetings were held for events including summer music festivals, and officers worked with event organisers for a previously controversial bank holiday event in Wychavon. A farm in Bromsgrove was one of several venues which held music events under temporary event notices which were monitored over the summer using both noise monitoring equipment and personal visits by members of the CEH and Licensing teams.

Officers provided evidence at a Licence application hearing, having made representations concerning premises in Wyre Forest which included proposals for outdoor music events until 0100 hours. As a result, the applicant amended their application for outdoor music to end by 2200 hours and agreed to several additional noise control conditions.

As they do every year, several of the WRS teams supported the City Council with colleagues from across the city with the annual Victorian Christmas Fayre. This is an event that several of the teams get involved in and enjoy working with partners to ensure the event goes off safely for all concerned.

Animal-related Activity: During the pandemic, it was clear that dog ownership had increased significantly, so an operation commenced to look at how much illegal dog breeding across Worcestershire was being done to service this expanded market. The results brought to light the significant numbers of people who were operating unlicensed and illegally selling dogs across the County. This led to teams across WRS including Licensing, the Intelligence unit and the Dog Warden service working together to educate those involved and monitor complaints, to reduce this number in the long term. Earlier this a year a second operation commenced through the Intelligence team. They confirmed the scale of the market for dogs across Worcestershire, identifying over £4M of advertising in a 6-month period, as well as finding a number of potential illegal dog breeders across the County. Although overall numbers had reduced since the first operation, probably reflected by the fall in dog ownership post-pandemic, the numbers were still a problem. Follow-up work has been on-going with a view to regularising activity if possible and reasonable, warning letters to lesser operators, or enforcement action being taken.

The number of Animal licensing inspections increased over the year as officers achieved their competencies. A programme of interim inspections went ahead, which did identify that some of our license holders were not managing to maintain the high standards identified at the initial point of licensing. This was quite surprising as people in these businesses tend to be very proactive about the welfare of animals they have.

It is important to note how this area of licensing has developed since the introduction of the new regime in 2018. Whilst the proactive work involved has resulted in positive outcomes for businesses and the service, when officers first looked at the regime and assessed the likely resourcing implications, no one was able to anticipate either the training that would latterly be expected for officers to be deemed competent, or the amount of time that interventions would take up, or that the

regime itself would require significant resources to get right. This is an area where, in better times, partners might consider increasing resourcing commitments and fees in line with this.

Honeybourne visitor attraction All Things Wild had an interim licensing visit for its Zoo license where no concerns were raised by the team or the vet present for the visit. The Zoo was pleased with the outcome, and they continue to follow and adhere to policies and guidance as required.

**Other Licensing:** At the beginning of April, Government announced that the Pavement Licencing Scheme that was originally introduced during the covid pandemic under the Business and Planning Act 2020 was to be made permanent as of the 31st of March 2024 using provisions made in the Levelling Up and Regeneration Act 2023. The team had to respond to this, putting together new pavement licensing policies based on the revised legislation for each district council and presenting the new policies to all licensing committees. These meetings were followed by a consultation process for each district on its revisions ahead of implementation. All of these are now in place and approved by the six councils.

#### **TECHNICAL SERVICES**

**General Air Quality Work:** This continued at pace, with officers submitting the 6 Annual Status Reports for all Districts required by the Ministry. Various forms of engagement took place with member forums in a number of the partner councils.

Steering group meetings with key stakeholders were held through the year for Bromsgrove District Council and Wyre Forest District Council to produce their Air Quality Action Plans. This work was followed by detailed source apportionment, modelling, quantification and feasibility study assessment of the measures together which came together in a final report. Consultation of the draft Action plans led to minor amendments before being adopted by the respective Councils.

Likewise in Worcester City, the Air Quality Action Plan was successfully taken through Worcester City Council's Committee processes, where several of the council committees take an interest. This continued the air quality work that was previously undertaken. The final version of the Worcester Air Quality Action Plan was approved by Environment Committee in November 2024.

The Contaminated Land Inspection Strategy for Redditch Borough Council was finalised this year. This updated strategy both reviewed and replaced the document from 2001, taking account of changes in the Contaminated Land Statutory Guidance, national policy, council policy, and set out the Council's strategic approach to review and assessment of contaminated land. It was approved in November 2024. This Strategy was the first in a refresh programme for all the District Council's strategies, with the one for Malvern Hills commenced in mid-2024 with adoption in January 2025. Work then commenced on the revision of the Bromsgrove's Inspection Strategy.

Through the year Officers were often asked to comment on the whole range of planning applications, large and small, including residential developments, commercial, infrastructure projects, solar farms, industrial processes, extensions, change of use, conversion of buildings and any other development where contamination may be a relevant consideration. These work areas often involve officers reviewing complex reports provided in support of planning applications and the discharge of planning condition requests.

A number of interesting planning cases were of note for the team during the year including:

- The demolition and redevelopment of Bromsgrove Fire Station, due to historic land contamination and the future use included residential development.
- The demolition and redevelopment of an old farm near Pinvin in Wychavon for various uses including residential development. The team also provided support to planning officers on several solar farms and battery storage facilities with scoping consultations and/or Environmental Information Requests across the Districts.
- a complex planning application at the Roxel Group site, near Stourport.

Routine Industrial Permitting work including inspection of large industrial processes, foundries and casting through to cement processing and petrol stations continued through the year. The focus of this regime is on activities which, by their very nature are likely to cause pollution unless they are controlled and monitored correctly. Generally, there is good compliance in these areas, but the service has in recent years taken several cases to court following pollution incidents or near misses. This year, a significant amount of time was spent dealing with a packaging firm in Pershore to upgrade their existing abatement technology, as well as dealing with a foundry in Droitwich Spa to improve their solvent management plan.

**Behaviour Change Project:** This initiative began this year with a behaviour change survey jointly developed with Worcestershire CC Public Health. Once the results were assessed, work began to pick up pace, starting with lots of contact with schools, some of which led to visits by the officer delivering the project. Over the year, some 126 schools were either contacted or visited either to ask for responses to our surveys on behaviour change to influence Air Quality, or to introduce them to our wider work including our general AQ work as well as the Real Time Air Quality Portal. Some 338 responses were received from schools and their staff, and a survey with HoW college reached 741 students and staff.

More recently, our officer took the AQ behaviour change project to four school assemblies at Waseley Hills High School in Rubery, which is near to the Gunne Line air quality monitor. There was a great turnout, with participation from students in Years 7 to 12, more than 100 students per session!

**Dog related work:** It has been a very busy year for this area of the service. During September, with the commencement of new contracts with Birmingham, North Somerset and a temporary contract with Solihull, and following the departure of one Dog Warden, officers went out to recruitment to bring in replacement capacity to address the work.

Unfortunately, the new contracts brought a significant number of dogs where euthanasia was the only option as the number of dogs exhibiting aggressive behaviour went up dramatically. This was partly due to higher numbers of Pitbull and XL Bully type dogs, both banned breeds, coming into our care. In quarter 3 alone, some 34 of this type of dog were seized on behalf of the authorities we support, although only 10 of these were from Worcestershire. The heightened levels of aggression in some of the stray dogs led to an increased number being euthanised using a dart gun to minimise the risk to wardens, staff at kennels, the vets and the public.

As well as the larger bull breeds, we also saw an increase in the number of puppies and dogs with significant welfare support needs. This included dogs that are underweight, and those that suffer with sores, injuries and fur loss. Officers attempted to meet the identified best method of caring for each dog, which sometimes meant looking to alternative forms of boarding outside of our contracted kennels, such as fostering.

Overall, stray numbers were at the highest for some years, mainly driven by the new contracts. Whilst we recognise the requirement to euthanise banned breed dogs if unclaimed or not covered by relevant exemption certificates, it is distressing for both the wardens and the staff at our kennelling partners. Our officers have been provided with counselling support to help with this.

**ICT team:** The team took part in various cyber security awareness activities designed to increase the security and resilience of the computer system we use. As part of this they facilitated the introduction of the new Mimecast e-mail security system with Wyre Forest DC ICT colleagues.

They also worked to enhance service delivery, with these activities including regular updates and patches to our main back-office system, record retention and deletions. PAT testing was organised for all electrical equipment located in our offices and for remote working equipment, which we are obliged to complete every 2 years. The team also contributed to service-wide projects including the Automation Project and introduction of Taxi digital Identity records.

At the beginning of the financial year the team was pivotal in delivering the statutory returns required for the six partners in several areas including the food law returns for the Food Standards Agency.

Later in the year, the team continued its work with the Host's IT service and back-office support company to completely refresh our Database address gazetteer to include regular updates going forward and increased the time our back-office database system is available.

The team have continued to contribute to the service budget with income generation activity in supporting the County Council's Trading Standards team; Bromsgrove and Redditch Planning team; and Tewkesbury Borough Council's Environmental Health and Licensing teams with their respective databases and associated digital documents.

#### **BDC/ RBC SPECIFIC ACTIVITIES**

**Homes for Ukraine:** In April, Government announced a continuation of the scheme, so the two-remaining former COVID Advisors are continuing to assist with the scheme, along with a Principal Officer managing the scheme in Bromsgrove and Redditch. Throughout Q1 significant effort was dedicated to school and college registrations, the support officers working with education officers to take Ukrainian guest through the registration process, applications, references, and have even accompanied several students to college open evenings. They have also supported parents with worries about school documentation, attended school meetings and helped rectify any issues that arose.

In April the team had a meeting with an external Mental Health team to discuss some complex issues and best ways to deal with them, and in May they with met with the wider Redditch Council Housing Team to build relationships and discuss the best approach to support our guests on the scheme. As usual team have continued to support guests move from their hosts to independent living, either in Social Housing or Private Rented Accommodation. This support consists of financial advice, help setting up utilities, sourcing furniture and household goods, and help getting children into schools / colleges mentioned above. There were 2 new arrivals in Bromsgrove and 10 new arrivals in Redditch.

In July we successfully recruited another part time Homes for Ukraine support worker into the team. As well as the usual routine support given to existing guests, hosts, and new arrivals, significant time and effort was dedicated to school and college registrations. Specifically on-going support was provided to three Students trying to get

into college and university, with liaison between them and the education authorities. Other support was provided to Ukrainian guests who wanted to improve their job prospects, liaising with the job centre to access available free courses, and getting employment advice for two young Male guests, plus helping with CVs. Two new young mothers have arrived in recent months, needing help and advice such on childcare, medical support, healthy starts scheme, visas and passports. Officers attended Bromsgrove and Redditch welcome refugees support groups, and the Ukrainian Pop-up café hosted in the Bromsgrove Methodist church.

September saw an increase in demand for hosts with three new arrivals in Redditch, with a further 4 arriving during the next few months due to the ongoing war in Ukraine and the onset of the colder months and the continuation of blackouts in Ukrainian towns and cities. Significant time and effort continued to be dedicated to school registrations with the closing date for secondary school places being 31st October 2024 for September 2025. Officers continued to explore different ways to try and attract new hosts to the scheme. During November the team contacted all previous hosts, parish councils, women's institute, church groups and the refugee support group charities to raise awareness. With the support of Bromsgrove and Redditch Comms team, officers started the "What it means to me" campaign to raise awareness of the need for more hosts and to encourage people to apply. Both the RBC and BDC websites were updated with information and other media was used to promote the cause, including an interview with Free Radio and a news article written by Support Worker Tetiana Ponomar appeared in the Redditch Standard. Social media posts were put on Redditch Matters Instagram page.

Important updates regarding immigration status card replacements, the Ukraine Permission Extension scheme, changes for those sponsoring/hosting close family members and changes to sponsor monthly thank you payments meant the team has been inundated with questions from both hosts and guests during the Autumn. Older forms of immigration status cards needed to be replaced by 31st December 2024, and several Ministerial announcements indicating reductions in support to those sponsoring/hosting close family members under the scheme created some concerns.

In December a Breakfast with Santa event was held which 14 children attended.

**Enviro-crime/ Planning enforcement:** Information gathered on fly tips for the past 6 months in the Bromsgrove and Redditch areas, has enabled the identification of specific hot spot areas for such activity. Overt cameras with associated signage are specifically targeting these areas and have been successful in capturing offenders. These incidents remain under investigation. The continued focus on these specific areas using our intelligence-led approach is being reviewed every month to ensure continued best use of resources to try and slow down the prolific tipping in these areas. The team have been busy preparing enforcement files since delivering these service areas commenced. Once the required supporting mechanisms were put in place by early December 2024, we have been able to commence the service of Fixed Penalty Notices (FPNs) as an alternative to prosecution, with the majority of the 7 served in 2024/25 being paid. Where FPNs have not been paid or are not appropriate, prosecution files are being prepared, and seven Community Protection Notices (CPNs) were served prior to 2024/25. With the natural lag of time from commencement of investigation to service a FPNs, CPNs or prosecutions, we are anticipating a significant increase in 2025/26.

#### OUT OF AREA WORK AND INCOME GENERATION

Although contract work on contaminated land for Solihull Metropolitan Borough Council (SMBC) came to an end during April 2024, we continued to offer contracted support to Gloucester City Council, East Staffordshire Borough Council and North Warwickshire Borough Council, as well as the six Worcestershire districts. This has included sites as far away as Uttoxeter and Burton upon Trent.

We have continued income generation work with Bromsgrove and Redditch Planning, supporting Worcestershire CC Trading Standards, and Tewkesbury Borough Council's Environmental Health and Licensing.

As with Worcestershire, this contracted work has led to our involvement in several interesting planning cases, some of which required technical sign-off of conditions, including:

- the demolition and redevelopment of a fuel depot in Gloucester City for various uses including residential development,
- a large new housing development at Hill Farm, Hempsted Lane, Gloucester,
- a site at Bakers Quay, Gloucester where planning consent was granted back in 2014 when the site was still being investigated/assessed and a remedial strategy agreed.

On contracted permitting work, there were no significant issues in 2024/5 apart from continuing complaints against a large manufacturing facility in the Gloucester area. Also, as part of our contract work, we assisted in dealing with minor issues involving Permali in Gloucester, in liaison with Gloucester City representatives.

# **3.0 FINANCIAL MANAGEMENT**

Quarterly financial monitoring reports are provided to managers and finances are regularly considered by officers from the partners ahead of each Joint Board meeting. Bromsgrove DC operates a robust ordering and authorisation process to ensure the transparency and accuracy of costing. This year saw an underspend at year end of just under £60,000. This was wholly down to excellent work on income generation across the service but particularly in the Technical Services division and with dog related activity where our expertise is recognised in the region. The draft outrun budget for 2024/5 is included as Appendix 3. The outrun position is subject to final audit, although the budget is at a level that does not require a specific audit of the WRS accounts. Hence, this will be done as part of the overall audit of Bromsgrove District Council's accounts.

From 2016/17 until 2020/21, the main financial operating assumption was a cash standstill budget, with increasing income targets set to balance the budget each year. The pandemic period saw WRS reshape itself and take on further work funded by partners or by the County Council. Post-pandemic, partners have recognised that the service's ability to increase income is more limited and have agreed to fund the recent pay increases and necessary uplifts in pension and national insurance contributions. Members recognised that the income generation progress could not deliver the level of increase expected, especially in the current climate. This situation is unlikely to change in the immediate future with pay increases likely to be at similar levels to recent year's level and prices continuing to increase. Should it be necessary, the service's reserve may help partners to buffer some financial impacts were the financial model for the service to become difficult to maintain, allowing partners time to determine the way forward for the delivery of these functions. 2023/4 was the first year that officers have had to ask members to exercise this ability.

# 4.0 WORKFORCE PLANNNG AND HUMAN RESOURCES MANAGEMENT

#### 4.1 Structures, Turnover and Training

The WRS structure has now been in place since October 2015 with Simon Wilkes as the Head of Service with a team of four Manager posts looking after different areas of the service. David Mellors as Community Environmental Health and Trading Standards Manager covering all the responsibilities of his Community

Environmental Health team, (Food Safety, Health and Safety and Statutory Nuisance, with some other minor areas,) and the Trading Standards remit (Weights and Measures, Food and Agricultural Standards, Product Safety, Fair Trading, Animal Health) on a contractual basis since the County's departure from the partnership in 2016. Mark Cox continues to head up the Technical Services Team covering Technical Pollution (managing Planning, IPPC, Contaminated Land, Air Quality), Dog Wardens, Pest Control, Information Management & Database administration and more recently the first contact team of Duty Officers. Technical Services also includes the new Planning enforcement and Enviro-crime enforcement added by Bromsgrove and Redditch. Kiran Lahel heads up the Licensing and Support Services Team, with the Licensing team servicing all six district council Licensing committees as those decisions around policy remain with to the six partners, either for practical reasons or because the law (Licensing Act 2003, Gambling Act 2005,) requires it.

Staff turnover remains low, although we are starting to see older members of staff taking flexible retirement and several reducing their hours to allow them to commit to other activities away from the workplace. We have not seen any further losses to better paid roles with national public bodies, but as we have said in previous years, the fact is that WRS continues to provide a solid platform for professional development shows that we retain our reputation for excellence. Previous new recruits have settled in, and their diverse backgrounds have brought a new dynamic to some of our income generation, whilst the new cohort of food officers recruited last year are now making a meaningful contribution to the work programme. We do need to recognise the risks that our aging workforce presents and to start to look at how we bring new blood into the service. The absence of apprentice type training routes has hampered this for Environmental Health, but we are now seeing the development of such courses which would allow the service to access levy funding for the training if we can establish dedicated training posts on the establishment. This is something we need to actively address in the coming years.

Maintaining competence remains central to our ability to deliver income and, helpfully more training is now being delivered in bite-sized chunks via Teams, making it easier and cheaper to hold onto relevance competencies. However, there will always be a need to undertake some face-to-face training, particularly where a course has to run over an extended period to embed new knowledge within the officer's understanding. As ever, we will look to use our usual PDR approach this year with a main one and a 6-month review to help identify what individuals need.

#### 4.2 Staff Survey

63 of our staff cohort responded to the survey. As ever, some did not respond to all the questions. The satisfaction score is based on those who scored 5/10 or better for the question in the staff survey which asked, are you satisfied with working with WRS (score is from 0 to 10.) The figure obtained, of 90.5% is slightly lower than last year and remains good. Some 74.6% of staff who responded scored working for WRS at 8 or better out of 10, which again is good news. Due to current time constraints, we have yet to do more detailed analysis of broader staff comments, but it is good to know that many are happy working for the service.

#### 4.3 Staff Sickness

During 2024/5 staff sickness reached 4.31 days per FTE, above last year's 3.07 but still well below the recent peak year at 5.2, although above the average for the last 6 years (3.60 days/FTE.) Some 53.7% of this year's sickness was classed as long-term (absence for a period exceeding 28 days,) and driven by a small number of

people dealing with serious health conditions. Short term sickness accounts for just under 2-days per FTE, which may be regarded as good for an aging workforce likely to be susceptible to a range of health conditions seen in older adults.

#### **5.0 ACCOMMODATION**

WRS remains located at Wyre Forest House, Finepoint Way, Kidderminster. The use of flexible and mobile working is generally now the norm, with staff frequently using home as their start and finish point for work in the field. Office based activity will remain important for team performance, identity, and morale so officers will continue to operate to a flexible pattern that facilitates this and provides face to face liaison with managers and colleagues or for meetings. The touch down points retained in each of the councils have provided an excellent venue for licensing appointments and these will be maintained on an appointment only basis, providing a useful balance between availability for the trade and efficiency of service delivery. Taxi drivers/ operators can be told what they will need over the telephone, ensuring that officer face-to-face time can be used more effectively to ensure complete applications are made and that paperwork has been completed correctly.

These work patterns enable staff to strike a better work/life balance which is essential for good morale, whilst maintaining the team ethos, having an organisation with which the staff identify and belong to, and giving the opportunity to share ideas and issues with other team members. Despite what those who evangelise about the benefits of virtual contact say, it does not build the kinds of trusting, working relationships necessary for the work that we do, so whilst we will be making more use of systems like Teams, it will not wholly replace face to face interaction between staff members.

#### 6.0 BUSINESS TRANSFORMATION (SERVICE DELIVERY OPERATING MODEL)

The Intelligence Operating Model is now the way we deliver our activities. The model of a Strategic Assessment for longer term priorities and Tactical Assessments for adjusting resource allocation to address emergent threats has long been the operating model in core policing and other law enforcement organisations, not only nationally but internationally too. WRS continues to lead in the wider regulatory environment, using what we learnt with our Trading Standards colleagues on how this model can support our activities.

The revised Strategic Assessment that will help inform delivery until 2028 now, recommended that the focus of activity should be around the following tactical priorities:

- Supporting a safe and vibrant night-time economy
- Promoting the responsible breeding, sale and ownership of dogs.
- Supporting safe, clean and healthy communities

Historically the two other priorities, supporting commercial businesses to operate safely and responsibly and supporting industry to operate safely and responsibly have really only captured business-as-usual activities, like food inspection, environmental permitting work and similar activities, so as this work will continue anyway, it won't be highlighted and project related work will focus on the three priorities above.

Other intelligence products review our data and intelligence to support Team Managers and Principal Officers in determining activities to respond to the intelligence picture current at that time. Subject and problem profiles will provide a more in-depth look at issues or the entities creating them to support managers in their decision making. The top three priorities are cross cutting aspects of our work, and a Team Manager will take responsibility for each one, ensuring that work is done across the three teams that can contribute to related outcomes.

#### 7.0 RISK MANAGEMENT

WRS continues to develop its approach to risk and business continuity. The development of policy, delivery of service priorities and the management of its services for six partners attract risk. In reviewing its service risks and the effects of management strategies and policies WRS seeks to:

- Identify, assess, and manage risk,
- Safeguard the services assets and equipment,

Risk Management becomes must be considered as part of our management process so that, where appropriate; risks are avoided, reduced, transferred, or retained and managed. The WRS risk register was developed so it could be integrated with the partners' individual risk registers. It is maintained and reviewed periodically, with the current version attached at Appendix 2. This was reviewed ahead of the creation of the 2024/5 service plan. Many of the generic risks and mitigation served us well during the pandemic and remain relevant. Flexible work patterns can create their own risks around feelings of isolation, lack of team identity and loss of belonging to the organisation and basic things like risk of muscular-skeletal injury because people spend long hours working at desks that are not ideal. So, whilst the service will continue to make more use of virtual meetings, they will never fully replace face to face interaction, nor will they lead to the abandonment of a physical location for the service.

Cyber-attack is seen as a growing risk and the service continues to work with our ICT host, Wyre Forest DC and Bromsgrove DC to limit this and help to ensure we have good business continuity measures in place. Team Managers continue to work on tailoring business continuity plans to meet the needs of their diverse service areas. Understanding what functions or activities need to be restored quickly is key to this, followed by exercising plans to ensure everyone understands what needs to be done and where to find what is necessary to continue with activity.

The return to a more traditional approach to food law enforcement and the inspection at low-risk premises currently favoured by the Food Standards Agency has led to the service including a specific line in the register to highlight the Agency's demand for "to the letter" compliance with the Local Authority Code of Practice on Food Law Enforcement. Whilst we will continue to shape what we do with intelligence, options around food to vary activity are somewhat more limited. The introduction of the revised version of the Local Authority Code has been delayed until at least 2027, so there are unlikely to be changes to their position in the intervening period. It should be noted that there has always been a line in the register relating to the behaviour of government departments and arms-length bodies and policy change but give the Agency's approach, they now merit separate mention.

Concerns remain around public expectation of what is deliverable in law, particularly in relation to nuisance issues. The law is old and effectively what is a statutory nuisance is a matter of opinion rather than being based on any specific statutory levels of, for example noise. This is difficult for members of the public to accept but the service will look to improve its performance in the eyes of our non-business customers.

Finally, a line has been added relating to local government re-organisation. Whilst this is not relevant looking backwards, it is to the service's and the partner's future.

### 8.0 EQUALITY & DIVERSITY

The news in recent years has featured stories about public bodies being accused of not addressing equality and diversity. The Metropolitan Police and Greater London Fire and Rescue Service have been subject to damning headlines that many of us in the public sector would want to avoid. WRS operates in line with the host Authority's adopted Equality Standard for Local Government as a framework to help embed equality and diversity into everyday aspects of its work. The professional bodies for regulators like the Association of Chief Trading Standards Officers are trying support the leaders of our regulatory services to encourage diversity. This is something that we will take on board at WRS and do our best to move forward in an inclusive way.

# 9.0 THE NEXT STEPS

The pandemic is behind us, and we are now back onto a business-as-usual footing. Local government re-organisation creates a question mark in the medium term for all local authority functions in Worcestershire and other 2-tier areas going forward. This may create threats to our income generation activities if new authorities create economies of scale like our own but these are unlikely to emerge before the process of re-organisation is completed in 2028. In the meantime, our work needs to continue so we will:

- Continue to deliver the WRS Business Plan and our annual operational service plans,
- Maintain existing income streams,
- Following our philosophy of continuous improvement, continue to review operations to improve marginal efficiencies,
- Continue the process of channel shift by increasing the customer's ability to use self-help, do transactions on-line and monitor progress of work.
- Continue to work closely with County Council Trading Standards colleagues and other partner agencies by maintaining links that support both WRS and other services to the benefit of local people.
- Continue to engage with partners to see if any other services could sit well on the WRS platform.
- Support partners with the preparation of business cases for LGR.

There are likely to be further proposed changes to the legislative framework in the coming year as Government continues to modernise some aspects of regulation. We will respond to consultations on behalf of the partners in relation to any proposed changes and, where we can, work with other colleagues in the region to help amplify the thinking of local authority officers across our area.



			Cur	rrent Positio	n	
Risk Description	Consequences	When is this likely to happen	Likelihood	Impact	Matrix RAG Status	Control measures
Loss of Data through IT failures or Cyber Incident	Disruption to Service Provision. Inability to produce records and data.	On-going	Low	High	Amber	Cyber-attacks are a growing threat. Wyre Forest ICT has effective processes and business continuity plans in place. WFDC upgraded relevant systems including Windows. The service moved to Office 365 during 2021/22, which provides better access to a range of provisions including Microsoft Teams and Power BI. Cyber security training is delivered regularly and risks identified are tackled.
Issues with the WRS database system	Impact on work planning. Self-help may not enable savings required	On-going	Low	High	Amber	New contract in place. The system provides the necessary functionality and will allow the enablement of data transfer from electronic forms which is currently in development. Complexities might arise with potential new service areas not currently catered for within the database or where existing partner databases have to be maintained in addition.
Effective and efficient Business Continuity arrangements in place	Disruption to service if e.g., Major Power failures or other reasons that access to Wyre Forest House is not possible.	On-going	Very Low	Medium	Amber/ Red	The pandemic has shown that we were well prepared for the need to maximise working from home and now all staff, including some previously regarded as office based can do this. Touchdown stations remain available in partner council locations. WRS Managers do need to redraft contingency plans in the event of a prolonged IT failure or cyber-attack that will allow services to be maintained. This is the greatest risk facing local authorities currently and is one we all need to move forward with.
Maintain our capacity to achieve service delivery	Disruption to service e.g., Major staff sickness (e.g., flu pandemic) or Unable to recruit or retain suitably qualified staff.	On-going	Low	Medium	Amber	The pandemic response has shown that the service was well-placed to respond to what was required. Consultants are available to provide short term cover and, whilst this worked well in peacetime to cover peak demand periods, the pandemic has revealed the

Pest contractors cease operations.	Disruption to service. Negative media coverage.	On-going	Low	High	Green	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. Having taken on contracts with additional authorities the demand has increased, and neighbouring authorities have lost the ability to assist with some technical specialisms. This is the double-edged sword of effectively operating as a centre of excellence. Whilst we have good resource of our own, in event of an issue, there are limits to who we can ask for help but it does mean that we are better resourced and qualified than would be possible if we didn't provide such services for income. Regional and sub-regional groups are in place so can provide shared resources for local authorities if required. 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. 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. The Pest control framework contract has multiple pest control suppliers so the loss of one allows work to be
	Increased public health risks					moved to the others. This should limit or eliminate risk, although the unlikely loss of multiple companies might create capacity issues.
Effective and efficient contract arrangement for dog control	Disruption to service if no kennels available. Negative media coverage.	On-going	Low	High	Amber	There have been significant increases in numbers of stray dogs, dog disease, breed and behavioural complexities and supplier contracts are restricted by distance. Retendering for conventional contracts in

	Increased public health risks					kennelling and support services remains difficult and consideration may be given to creating our own capacity. Contractual obligations provide additional pressure. The current kennelling contracts are to be extended until April 2025.
Hosting support does not deliver necessary financial and HR support to ensure efficient management	Efficiency of management reduced; staffing issues remain unaddressed, and performance suffers	On-going	Low	High	Amber	Issues with the new BDC finance system have mainly been resolved, however some workarounds remain in place due to some unforeseen issues. We need to improve communication with our hosts to ensure the needs of the shared service do not get missed during any significant changes to systems or processes.
One or more partners continue to be under great financial pressure and may consider alternatives to the partnership to deliver their service	Creates reputational issues for remaining partners and increases the need to manage overheads. Difficulties in delivering highly varied levels of service	On-going	Medium	High	Amber	New legal agreement limits variations in contribution before partners must move to contractual relationship but this is quite high before it kicks in (20%.) Leanness of organisation minimises overheads and focuses resource at the front line. Growth strategy should generate income to support partners in the future but there are limits to this without additional capacity being added to the system. Invest to save capacity has been committed by partners to see if this achieves the necessary outcomes but even this is now fully occupied.
Robust arrangements in place in relation to obtaining legal advice and monitoring legislative changes.	Loss of cases is costly and damages reputation.	On-going	Low	Medium	Green	Continued close working with BDC legal team and other partners who don't use BDC for advocacy. Technical and legal training days for staff. Difficulty in keeping informed of Case Law developments. Membership and attendance of Officer Technical Groups outside the County does assist.
Service provision complies with Government requirements, New performance regimes are introduced that the service is not staffed to address	Intervention by Government bodies Other national bodies seek to introduce similar frameworks to the FSA Code to get what they regard as suitable minimum levels of service.	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

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

						The partners are looking to make a significant investment in resources to address most of the Agency's concerns, but it will not allow full compliance with the Code. Having said this, there is limited risk in the variations that will remain in place and full compliance with the code would require a full redesign of operations within Community EH and further financial investment.
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
Local government Re- organisation	Ensuring the statutory regulatory functions are accommodated in any new unitary arrangements to meet the requirements of the new structure	On-going	High	Medium/ Low	Green/ Amber	There is little for officers to do before any decisions on structures and timetable are made. The structuring of the shared service means that integration of these elements into one authority would be relatively straight-forward should a decision be take on a unitary county model and, in the eventuality of multiple unitary authorities being the chosen model, the option to retain shared arrangement would remain, although it seems unlikely given previous re-organisations elsewhere.

# Appendix 3: Detailed out-turn for Regulatory Services 2024/25

	Full Year Budget 24-25	Committed Expenditure Apr - Mar 25	Variance
Direct Expenditure Employees	£'000	£'000	£'000
Salary	4,179	3,783	-396
Agency Staff	0	519	519
Employee Insurance	21	33	13
Sub-Total - Employees	4,200	4,335	136
Premises			
Rent / Hire of Premise	79	78	-1
Cleaning	1	0	-0
Utilities	0	0	0
Sub-Total - Premises	80	79	-1
Transport			
Vehicle Hire	13	4	-8
Vehicle Fuel	8	7	-1
Road Fund Tax	1	1	-0
Vehicle Insurance	5	7	2
Vehicle Maintenance	3	2	-1
Car Allowances	62	49	-14

Sub-Total - Transport	92	69	-22
Supplies and Services			
Furniture & Equipment	44	53	8
Clothes, uniforms and laundry	2	2	0
Printing & Photocopying	17	11	-6
Postage	11	14	1
ICT	79	143	3
Telephones	40	31	-9
Training & Seminars	34	19	-15
Insurance	16	12	-4
Third Party Payments	203	203	0
Sub-Total - Supplies & Service	445	488	42
Contractors			
Dog Warden	121	379	258
Pest Control	73	82	10
Taxi / Alcohol / & Other Licensing	72	56	-16
Other contractors/consultants	3	32	29
Water Safety	5	6	1
Food Safety	1	0	-1
Environmental Protection	12	35	23
Grants / Subscriptions	13	14	2
Advertising, Publicity and Promotion	6	2	-3
Sub-Total	304	606	302

#### Income

Training Courses / Bereavement / Works in Default / Sewer Baiting etc	-1001	-1,513	-512
Sub-Total	-1001	-1,513	-512
Net Position	4,119	4,064	-55

The data on this page outlines the number of Environmental Health and Licensing cases (complaints, enquiries, applications, and notifications) received by WRS where the subject or enquirer were in the Bromsgrove district.

Note: The chart below provides a breakdown of cases by the primary functions undertaken by the service. The recent increase in cases can be attributed to the additional functions (enviro-crime and planning enforcement) now being delivered by the service. The figures for the current year are cumulative and will continue to increase until the end of year report is published in April 2025. The Y axis on this chart has also been standardised so the level of demand received against each function can be broadly compared to other districts.



#### 1400 1200 1000 800 2022-23 600 2023-24 2024-25 400 200 0 Dog Control Food Safety Health & Planning Planning Pollution Public Health Alcohol Information General Taxi Safety Requests Enforcement Licensing Licensing Licensing & Envirocrime

#### **Bromsgrove District Council**

The data on this page outlines the number of Environmental Health and Licensing cases (complaints, enquiries, applications, and notifications) received by WRS where the subject or enquirer were located in the Malvern Hills district.

Note: The chart below provides a breakdown of cases by the primary functions undertaken by the service. The figures for the current year are cumulative and will continue to increase until the end of year report is published in April 2025. The Y axis on this chart has also been standardised so the level of demand received against each function can be broadly compared to other districts.





#### **Malvern Hills District Council**

The data on this page outlines the number of Environmental Health and Licensing cases (complaints, enquiries, applications, and notifications) received by WRS where the subject or enquirer were located in the Redditch district.

Note: The chart below provides a breakdown of cases by the primary functions undertaken by the service. The recent increase in cases can be attributed to the additional functions (enviro-crime and planning enforcement) now being delivered by the service. The figures for the current year are cumulative and will continue to increase until the end of year report is published in April 2025. The Y axis on this chart has also been standardised so the level of demand received against each function can be broadly compared to other districts.





#### **Redditch Borough Council**

The data on this page outlines the number of Environmental Health and Licensing cases (complaints, enquiries, applications, and notifications) received by WRS where the subject or enquirer were located in the Worcester City district.

Note: The chart below provides a breakdown of cases by the primary functions undertaken by the service. The figures for the current year are cumulative and will continue to increase until the end of year report is published in April 2025. The Y axis on this chart has also been standardised so the level of demand received against each function can be broadly compared to other districts.





Worcester City Council

The data on this page outlines the number of Environmental Health and Licensing cases (complaints, enquiries, applications, and notifications) received by WRS where the subject or enquirer were located in the Wychavon district.

Note: The chart below provides a breakdown of cases by the primary functions undertaken by the service. The figures for the current year are cumulative and will continue to increase untill the end of year report is published in April 2025. The Y axis on this chart has also been standardised so the level of demand received against each function can be broadly compared to other districts.





Wychavon District Council

The data on this page outlines the number of Environmental Health and Licensing cases (complaints, enquiries, applications, and notifications) received by WRS where the subject or enquirer were located in the Wyre Forest district.

Note: The chart below provides a breakdown of cases by the primary functions undertaken by the service. The figures for the current year are cumulative and will continue to increase until the end of year report is published in April 2025. The Y axis on this chart has also been standardised so the level of demand received against each function can be broadly compared to other districts.





**Wyre Forest District Council**