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Delivering with Less – Environmental Health Services Follow-up Review – **Wrexham County Borough Council**

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The team who delivered the work comprised Katherine Simmons, Ron Price, Alan Hughes and Jeremy Evans under the direction of Huw Rees.

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Summary report

Summary

What we looked at

- 1 In October 2014, the Auditor General published **Delivering with less – the impact on environmental health services and citizens** (see [Appendix 1](#) for a summary of the Council's progress in addressing the Auditor General's recommendations from that report). The fieldwork for our latest review took place between April and June 2019. The review followed up themes and learning identified in our 2014 report. Our review also considered the impact of reductions in local government funding on the Council's environmental health services and the effectiveness of the Council's arrangements for delivering those services.

Why environmental health services are important

- 2 Councils have numerous statutory environmental health duties and citizens value highly many of the environmental health services provided. Furthermore, environmental health services directly impact upon the health, wellbeing and safety of residents and visitors to Wales.
- 3 Environmental health services cover a range of issues, such as food safety, pest control, dog control, housing and reducing the causes and effects of air pollution.

How we approached the review

- 4 We interviewed a selection of officers and the Lead member for environmental health services. We also reviewed relevant documentation.

Overall finding

- 5 Our review sought to answer the question: Is the Council's environmental health service continuing to deliver its statutory obligations with fewer resources?
- 6 Overall, we found that the Council considers that it is meeting its statutory environmental health obligations with reduced resources, but service plans and performance management arrangements need strengthening. We came to this conclusion because:
 - the Council considers that it is delivering its statutory obligations for environmental health services, but it does not clearly state this in its service plan;
 - the resources for environmental health services have reduced since our previous review: the Council has made changes to the way it provides these services to make more effective use of the resources available; and
 - the Council's performance management arrangements need strengthening.

Proposals for Improvement

Exhibit 1: Proposals for Improvement

The table below sets out the proposals for improvement that we have identified following this review.

Proposals for improvement	
The Council needs to:	
Business Planning	
P1	Strengthen business planning by: <ul style="list-style-type: none">ensuring that the impact of and response to increased demand on resource requirements are clearly set out in service plans; andconsider reducing the numbers of plans to a single service plan.
Performance Management	
P2	Strengthen performance management by reviewing the information the Council is using to assess the performance of its environmental health services. Ensuring the information provided supports a full assessment of performance.
Councillor Oversight	
P3	Ensure that councillors have the opportunity to scrutinise and challenge service performance and the impact of budget reductions.

Detailed report

The Council considers that it is meeting its statutory environmental health obligations with reduced resources, but service plans and performance management arrangements need strengthening

The Council considers that it is delivering its statutory obligations for environmental health services, but it does not clearly state this in its service plan

- 7 One of the recommendations from the Auditor General's 2014 report was for councils to identify the statutory and non-statutory duties of council environmental health services. We found evidence that the Council has considered its statutory responsibilities within business planning processes:
- in accordance with the Food Safety Act 1990, the Council produced its annual Food Service Plan for 2018-19 in December 2018.¹ This is a comprehensive document that sets out relevant statutory responsibilities, demands on the service, staff and financial allocations based on estimated requirements and a review of performance against the previous year's plan.
 - beneath the Council's main Public Protection service plan sit three supporting workplans:
 - Environmental Health and Housing five-year plan
 - Food and Farming annual plan
 - Licensing annual plan.
 - both the Environmental Health and Housing and the Food and Farming work plans link activity to statutory requirements. The Environmental Health and Housing work plan also includes an assessment of planned activity against the Wales Heads of Environmental Health Practice Standards.² The Council considers that it will meet the 'required' or 'better' level in all areas of this part of the service.
- 8 The Council has considered its statutory responsibilities and gives an assessment of demand and resource for areas covered by its Food Service Plan. However, it is

¹ Wrexham County Borough Council, **Food Service Plan 2018-2019**, December 2018.

² Developed by the Wales Heads of Environmental Health, the Practice Standards for Environmental Health in Wales are a tool to assist the delivery, development and review of local authority environmental health services in Wales. They set out criteria against which service managers and others can assess their service across the key areas of environmental health responsibility.

less clear in stating the extent to which it can deliver statutory obligations across the service as a whole. The Council should consider whether having two service plans and three work plans, covering different time periods and using different content and formats, is the most effective way of planning and monitoring the delivery of the service.

The resources for environmental health services have reduced since our previous review, the Council has made changes to the way it provides these services to make more effective use of the resources available

- 9 The numbers of staff working in the Council's environmental health services have reduced since our previous review in 2014. There has been a reduction of 3.7 full time equivalent officers (from 29.15 in 2014 to 25.49 in 2018), including three qualified Environmental Health Officers.
- 10 Internal Audit raised the impact of reduced staff on the Council's performance in relation to food hygiene inspections in its Food Safety audit, which reported in December 2017. In addition, the Food Standards Agency's follow-up report, in September 2018³, made similar references. The Council has experienced difficulties in recruiting to specialised Environmental Health roles when staff have moved on.
- 11 The budget for environmental health services has decreased from £1.18 million in 2013-14 to £1.08 million in 2018-19. Revenue outturn between 2013-14 and 2017-2018 has experienced a real-term decrease of 13%. Whilst there has been a decrease in budget, there has also been consistent underspends against the budget for environmental health services. This is partly due to the budget being based on a full staff compliment at the top of the pay scale. Early in each financial year the service reviews its budget to identify any overprovision and the additional funding becomes redistributable by the Head of Service.
- 12 Although it is too early to assess impact in some areas, the Council has acted to improve the efficiency and effectiveness of environmental health services. This includes:
 - in 2016 the Council restructured environmental health services to a 'Public Protection' model. This removed some of the division between trading standards and environmental health. Three teams now undertake environmental health functions: Food and Farming, Environmental Health and Housing, and Trading Standards and Licensing. Responsibility for

³ Food Standards Agency, **Report on the Food Law Enforcement Services – Wrexham County Borough Council 6th – 10th February 2017, Updated Action Plan, September 2018.**

contaminated land now sits within the Planning team (and is not included in this review).

- as part of the re-structuring of the Food and Farming Team, all Food Hygiene Officers are now multi-skilled and authorised to carry out Food Standards inspections. The Trading Standards Officers working within the team are undertaking a conversion course which will allow them to undertake food hygiene inspections on completion of the course. This will provide the service with greater resilience in the future.
- the Council ceased providing a Pest Control service in 2015 and the Dog Warden Service is now delivered by a contractor.
- the Council participates in the Primary Authority Scheme, with several partnerships now in place providing income to the Council.⁴
- the Council has reviewed and either introduced or increased fees and charges to generate more income. Examples of increased charges include pre-application licensing advice and the stray dog service.
- the Council has sought to use digital solutions to make the service more efficient. The Council has begun to roll out agile working within the service. The Council is also using digital platforms to improve customer service with the use of the Noise App to send noise recordings directly to officers. In April 2016 the Public Protection service transferred its premises data to a new database. This raised some data collection and input issues and updating of the database is an ongoing process. However, once fully established this database will help to reduce the administrative processes allowing more time to undertake inspections.

The Council's performance management arrangements need strengthening

- 13 One of the recommendations in our 2014 national report was to identify, collect and analyse financial, performance and demand/need data on environmental health services (**Recommendation 5, Appendix 1**). The Public Protection service plan includes both performance indicators and service actions. Quarterly targets and performance data have been included for some indicators, but there are some missing targets and the performance data is incomplete for service actions.

⁴ The Primary Authority Scheme was launched in 2009 to improve the enforcement of regulation by local authorities. It offers businesses an opportunity to form a legally recognised partnership with a local authority (the primary authority). Through these partnerships, the primary authority provides advice for other local authorities to consider when carrying out inspections or dealing with non-compliance. This makes it easier for businesses to receive assured, consistent regulatory advice that makes complying with environmental health, trading standards, licensing and fire safety regulations simpler. Source: Food Standards Agency website.

- 14 Officers within the Public Protection service highlighted that they regularly discuss service performance and the impact/response to increased demand on the service through team meetings and directly with the Head of Service. However, while there is data setting out potential demand there is no discussion of the impact of this on resourcing within either the Public Protection service plan or the supporting service workplans.
- 15 Some environmental health indicators support delivery of the Wrexham Council Plan 2018-2022. These include: the percentage of private rented sector rented properties in the county borough registered with Rent Smart Wales, and the percentage of homes in multiple occupation that have been issued with mandatory and additional licensing scheme licences. However, performance against these indicators is not included in the main service plan.
- 16 The Council is confident that it is meeting its statutory obligations. However, in its wider service performance measures, performance in some areas has been variable. For example:
- The Food Standards Agency follow-up visit in September 2018 found that 'there is a shortfall in food hygiene and food standards interventions completed in accordance with the frequencies prescribed within the Food Law Code of Practice'.⁵
 - The percentage of Food Hygiene establishments which are 'broadly compliant' with food hygiene standards was 98.82% in 2016-17 (the Council was first in Wales) and was 90.31% (the Council was 21st in Wales) in 2017-18, demonstrating a marked fall in performance. Although the Public Protection Service Plan 2018-19 suggests that this position has improved.
 - The service has a target of issuing 90% of licences for Houses in Multiple Occupancy within three months upon receipt. It achieved 78% in quarter one of 2018-19, 100% in quarter two, 56% in Quarter three and 92% in quarter four. There is no commentary within the plan setting out why performance was below target within quarter one and three.
- 17 Councillor oversight of service performance to assess the impact of budget reductions is mixed. The Executive Board member responsible for Environmental Health Services endorsed the annual Food Service Plan 2018-19 on behalf of the Council and meets regularly with the Chief Officer and Head of Service. The service has been subject to internal audit review. Internal Audit presents these reports to the Council's Audit Committee. The two most recent audits were in relation to the Licensing Service (February 2019) and Food Hygiene (December 2017).
- 18 The Homes and Environment Scrutiny Committee considered licensing of Houses in Multiple Occupation in the Private Rented Sector in December 2017. However,

⁵ Food Standards Agency, **Report on the Food Law Enforcement Services – Wrexham County Borough Council 6th – 10th February 2017, Updated Action Plan, September 2018.**

there has been no other recent consideration of environmental health services by overview and scrutiny. For example, we would expect scrutiny committees to have the opportunity to scrutinise the Internal Audit reports, service plans and supporting service workplans, and reports of delivery against plans. Although the Council includes some environmental health performance indicators in its self-evaluation 'Focused on our Performance', the Public Protection service plan is not reported to any Council committee for discussion or scrutiny.

Appendix 1

As part of his 'delivering with less' series of Local Government Improvement Studies the Auditor General published his report – **Delivering with less – the impact on environmental health services and citizens**, in October 2014. The report contained six recommendations. **Table 1** summarises the Council's progress in addressing these recommendations.

Table 1: a summary of the Council's progress in addressing the Auditor General's recommendations, 'Delivering with less: The impact on environmental health services and citizens (October 2014)

Recommendation	Wales Audit Office Commentary
<p>R1 Revise the best practice standards to:</p> <ul style="list-style-type: none"> • align the work of environmental health with national strategic priorities; • identify the wider contribution of environmental health in delivering strategic priorities of the Welsh Government; and • identify the benefit and impact of environmental health services on protecting citizens. 	<p>Wales Heads of Environmental Health have addressed this recommendation by revising the standards.</p> <p>The Council has included an assessment of planned activity against the Practice Standards within its Environmental Health and Housing work plan.</p>
<p>R2 Provide scrutiny chairs and members with the necessary skills and support to effectively scrutinise and challenge service performance, savings plans and the impact of budget reductions.</p>	<p>Training workshops have been held for councillors in relation to Licensing and Houses in Multiple Occupation over the last two years.</p> <p>Further work is needed to ensure that opportunity is given for councillors to scrutinise and challenge service performance and the impact of budget reductions.</p>
<p>R3 Improve engagement with local residents over planned budget cuts and changes in services by:</p> <ul style="list-style-type: none"> • consulting with residents on planned changes in services and • using the findings to shape decisions; • outlining which services are to be cut and how these cuts will impact on residents; and • setting out plans for increasing charges or changing standards of service. 	<p>The Council has developed the 'Difficult Decisions' public consultation process in which all the Council's proposed service cuts/savings are shared with service users.</p>

Recommendation	Wales Audit Office Commentary
<p>R4 Improve efficiency and value for money by:</p> <ul style="list-style-type: none"> • identifying the statutory and non-statutory duties of council environmental health services; • agreeing environmental health priorities for the future and the role of councils in delivering these; • determining an 'acceptable standard of performance' for environmental health services (upper and lower) and publicise these to citizens; • improving efficiency and maintaining performance to the agreed level through: <ul style="list-style-type: none"> – collaborating and/or integrating with others to reduce cost and/or improve quality; – outsourcing where services can be delivered more cost effectively to agreed standards; – introducing and/or increasing charges and focusing on income-generation activity; – using grants strategically to maximise impact and return; and – reducing activities to focus on core statutory and strategic priorities. 	<p>The Council has begun addressing most aspects of this recommendation as outlined in paragraphs 1, 2 and 6.</p>

Recommendation	Wales Audit Office Commentary
<p>R5 Improve strategic planning by:</p> <ul style="list-style-type: none"> • identifying, collecting and analysing financial, performance and demand/need data on environmental health services; • analysing collected data to inform and understand the relationship between 'cost: benefit: impact' and use this intelligence to underpin decisions on the future of council environmental health services; and • agree how digital information can be used to plan and develop environmental health services in the future. 	<p>The Council's work to address this recommendation is ongoing, see paragraphs 7-12.</p> <p>The Council has begun exploring how to use digital information and digital platforms to develop environmental health services eg through the all-Wales procurement of the TASCMI database system. However, we found that the Council has further work to do to address all aspects of this recommendation.</p>

Wales Audit Office
24 Cathedral Road
Cardiff CF11 9LJ

Tel: 029 2032 0500

Fax: 029 2032 0600

Textphone.: 029 2032 0660

E-mail: info@audit.wales

Website: www.audit.wales

Swyddfa Archwilio Cymru
24 Heol y Gadeirlan
Caerdydd CF11 9LJ

Ffôn: 029 2032 0500

Ffacs: 029 2032 0600

Ffôn testun: 029 2032 0660

E-bost: post@archwilio.cymru

Gwefan: www.archwilio.cymru