



# TRADING STANDARDS

2007-2008  
Work Plan

## Key Targets

The work programme is part of an ongoing review that has led to a change in policy with greater balance placed on a number of competing priorities as detailed below, including a programme of risk based inspections of trade premises during 2007/2008. The work programme also takes account of the corporate strategies of both councils and addresses the national agenda as well as the concerns of local consumers and businesses.

For 2007/2008, the Service will produce 11,552 units of output work for Harrow, 14,350 units for Brent and 1192 from Customer Services: - a total of 27,094 units. Both borough totals reflect a full establishment based on the new structure for 2007/2008 with a complement of 32 staff, but excluding one Enforcement Officer for Harrow and one for Brent who will be appointed once the pension liability arising from the restructuring has been cleared. The main activities of the Service are based on the following average units of work:-

Requests for action (criminal) completed	3.5 units
Civil Investigations	6.5 units
Requests for action (non criminal) completed	0.5 units
Enterprise Act investigations	150 units
Trader Enquiries (including HA work)	5.25 units
Announced Comprehensive Primary High Risk Inspections	3.0 units
Announced Comprehensive Primary Medium Risk Inspections	2.0 units
Announced Comprehensive Primary Low Risk Inspections	0.5 units
Announced Secondary High Risk Inspections	1.5 units
Announced Secondary Medium Risk Inspections	1.0 units
Test Purchase Visits	3.0 units
Home Authority Referrals	1.75 units
Average Quantity Visits	5.25 units
Criminal reports of Infringement	17.5 - 560 units (depending on complexity)
Civil reports and action	8 units
Prosecutions completed	31.5 units
Formal Cautions	7 units
Letters of Warning	2 units
Projects completed	119 units
Verification Visits	3.5 units
Multi-agency Operations	21 units
Mileage checks (each car)	2 units
Web sites (per check)	2 units
Publications (per check)	2 units
Safety Lab tests (per batch)	3.5 units
Alternative enforcement action	50% of normal units
Mobile Display Unit Visits	14 units
Electric Blanket Safety Work	126 units (91-H 2days, 35-B 1day)
Child Car Seat Safety Work	84 units (42 - 1day each)
Talks to external Bodies/Organisations	3.5 units

Each unit equates to 1 hour's work and each day equates to 7 units. Based on 260 working days that are available during the year –

- Less - 8 days bank holidays
- Less - 30 days annual leave
- Less - 6 days briefing sessions
- Less - 4 days training
- Less - 12 days meetings

A total of 200 days @ 7 hrs per day = 1400 hrs for enforcement work is available per officer per year. Each Enforcement Officer is therefore expected to produce a minimum of 1400

units of work per annum. Each Technical Assistant is expected to contribute 700 units of work to their respective team's targets. Service Development and IT Officers contribute 350 units to each borough. Customer Services contribute in dealing with requests for action (non criminal).

Ideally the Service should visit all high-risk premises once a year, all medium risk premises every 2 years and all low risk premises every 5 years. At 1 February 2007, there are 8756 premises in the consortium liable for inspection (5204 in Brent and 3552 in Harrow). Of these 280 (3.2%) are high-risk premises (145 in Brent and 135 in Harrow), and 4289 (49.0%) are medium risk premises (2494 in Brent and 1795 in Harrow). The Service should therefore aim to inspect 1392 high and medium risk premises each year in Brent and 1033 high and medium risk premises in Harrow.

	TOTAL PREMISES	HIGH RISK	MEDIUM RISK	LOW RISK	OTHERS
Brent	5204 (59.4 %)	145	2494	2544	21
Harrow	3552 (40.6 %)	135	1795	1580	42
Consortium	8756 (100%)	280(3.2%)	4289 (49.0%)	4124(47.1%)	63(0.7)

**For 2007/2008 the Service aims to complete the following work:-**

**HARROW TEAM 2007/8**

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	822	2877
Civil Investigations	108	702
Trader Enquiries (including HA work)	145	761.25
Enterprise Act Investigations	3	450
Announced Comprehensive Primary High Risk Insp.	103	309
Announced Comprehensive Primary Medium Risk Insp	300	600
Announced Comprehensive Primary Low Risk Insp	10	5
Announced Secondary High Risk Inspections	32	48
Announced Secondary Medium Risk Inspections	51	51
Test Purchase Visits	250	750
Home Authority Referrals	128	224
Average Quantity Visits	15	78.75
Criminal Reports of Infringement	50	2684
Civil Reports and Action	12	96
Prosecutions completed	28	882
Formal Cautions	10	70
Letter of Warning	10	20
Projects completed	2	238
Verification Visits	10	35
Multi-Agency Operations	5	105
Mileage checks (each car)	25	50
Web sites (per check)	20	40
Publications (per check)	20	40
Safety Lab tests (per batch)	0	0
Alternative enforcement action	2*	100
Mobile Display Unit Visits	12	168
Electric Blanket Safety Work	2	91
Child Car Seat Safety Work	1	42

Talks to external Bodies/Organisations	5	35
	Total	<u>11552</u>

### Harrow Projects

#### Lead

1

2

#### Contribution to North West London Projects

1

#### Contribution to London-wide Projects

1

\* Alt enf action :-

In addition, Harrow will carry out test purchasing of age restricted goods on a minimum of twenty occasions.

1 Team Leader			
Met & Safety:-	1 STSO	Fair Trading:-	2 SEO
	1 TSO (vacant)		2 EO
	2 EO		1 Civil Advisor
	1 AEO (0.5)		1 AEO (0.5)
			= 11550 units

### **CUSTOMER SERVICES 2007/8**

Requests for action (non criminal)	2300(1400 B, 900H)	1150
Talks to external Bodies/Organisations (general)	6	42
Work Experience students	Maximum of 4 p.a.	
Initial contacts by Telephone/personal visits	38,300	<u>1192</u>

### Customer Services Projects

#### Lead

1. Scams – press releases

2. Customer satisfaction surveys – analysis/recommendations/action plan.

### **BRENT TEAM 2007/8**

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	1100	3850
Civil Investigations	108	702
Trader Enquiries (including HA work)	136	714
Enterprise Act Investigations	2	300
Announced Comprehensive Primary High Risk Insp.	152	456
Announced Comprehensive Primary Medium Risk Insp	300	600
Announced Comprehensive Primary Low Risk Insp	20	10
Announced Secondary High Risk Inspections	20	30
Announced Secondary Medium Risk Inspections	50	50
Test Purchase Visits	250	750
Home Authority Referrals	300	525

Average Quantity Visits	45	236.25
Criminal Reports of Infringement	60	3578.25
Civil Reports and Action	12	96
Prosecutions completed	34	1071
Formal Cautions	12	84
Letter of Warning	10	20
Projects completed	3	357
Verification Visits	25	87.5
Multi-Agency Operations	10	210
Mileage checks (each car)	30	60
Web sites (per check)	30	60
Publications (per check)	30	60
Safety Lab tests (per batch)		
Alternative enforcement action	2*	100
Mobile Display Unit Visits	13	182
Electric Blanket Safety Work	1	35
Child Car Seat Safety Work	2days	84
Talks to external Bodies/Organisations	6	42
		<hr/>
	Total	14350

Brent Projects

Lead

- 1
- 2
- 3

Contribution to North West London Projects

- 1
- 2

Contribution to London-wide Projects

- 1

\*Alt enf action :-

In addition, Brent will carry out test purchasing of age restricted goods on a minimum of twenty occasions.

1 Team Leader

Met & Safety:-	1 STSO 0.5 TSO	Fair Trading:-	2 SEO 2 EO +1EO(vacant) 1 Civil Advisor 1AEO (0.5)	= 14350 units
	2.5 EO 1 AEO (0.5)			

\*Infringement reports will be based on the following categories:

Category	No. of Reports		No. of Days Each	No. of Units Each	Total Units	
	Harrow	Brent			Harrow	Brent
1	15	7	2.5	17.5	262.5	122.5
2	9	21	5	35	315	735
3	8	16	7.5	52.5	420	840
4	10	8	10	70	700	560
5	6	6	15	105	630	630
6	2	2	more than 15	7 per day	356.5	691
TOTALS	50	60			2684	3578.5

The criteria for each category will be:-

#### Category 1

Very few background enquiries required, small amounts of correspondence (largely standard letters), few difficulties encountered, straight-forward and routine, investigation usually completed the same day. Investigation does not normally involve outside witnesses. Straight-forward interview.

#### Category 2

Usually one or two non Trading Standards witnesses. Some research and correspondence may be required. May involve seized or purchased evidence. Evidence straightforward to catalogue and analyse. Minor difficulties may be encountered during investigation. A simple supply chain may be documented and records usually one step back from the retailer. Usually one taped interview. Does not require substantial resources of officer time.

#### Category 3

Will contain the elements of a category 2 report plus one element from the criteria listed under category 4.

#### Category 4

This level of investigation will contain the elements of a category 2 report plus at least two of the following elements:-

- a) large teams of officers necessary over a shorter time scale or smaller teams of officers spending significant amounts of time on background enquiries or observations.
- b) Interviews - multiple interviews requiring preparation or single interview of an extremely complex and demanding nature.
- c) Statements - several witness statements from non Trading Standards Officers required.
- d) Evidence - large quantities of evidence involved or smaller quantities of evidence of a diverse nature requiring considerable analysis.
- e) Report - large and complicated report required to fully explain the investigation and the nature of the offences.
- f) Other enquiries - significant problems encountered during investigation, large amount of non standard correspondence required (for example solicitors letters). High profile investigation attracting media attention during the investigative process. Major financial impact (e.g. goods seized of high value, suspension notice especially of high value items).

#### Category 5

This level of investigation will contain the elements of a category 2 report plus at least three elements from the list under category 4.

#### Category 6

Will contain the elements of a category 2 report plus at least four elements from the list under category 4 including criterion (a).

#### **Notes for Guidance**

- 1 All work must be meaningful and necessary.
- 2 Officers should make it clear in their reports what work they have carried out.

- 3 Recognition will be deducted for work which is not completed to a satisfactory standard or that which is put in late (without good reason), so as to leave the Department open to criticism for “abuse of process”.
- 4 Recognition will not be awarded in lieu of work which has not yet been completed

\*Each Average Quantity visit to an importer/packer will be on the basis that the following is carried out:-

- a) The metrology control system is inspected and
- b) Records and documents are checked and
- c) Reference tests are carried out on a random sampling basis in accordance with the Packaged Goods Regs and
- d) “Code of Practice Guidance” advice is given and

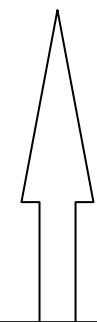
details of the above are recorded on an A.Q. inspection form.

### Enforcement Priorities

The grid below shows how the Service prioritises its work, based on the hazard a particular type of activity poses to the local community and the impact that the activity will have on the local consumers. Therefore, the bigger the hazard and impact, the more resource this Service will put into combating this type of crime. Conversely, certain types of legislation, if not complied with, have very little detrimental effect on the community at large with little or no hazard or impact, and therefore less resources are committed.

However, all complaints concerning breaches of the law are investigated and vulnerable customers are treated as a higher priority.

high

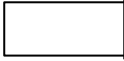


impact

<p>Misleading Prices, Clocked Cars Supermarkets/petrol sites Goods not correctly packed to AQ Inaccurate weights and measures Price Marking, VRA, Hallmarking' Control of pollution Restrictive notice, Consumer Credit, TDA (Low value goods) Energy Efficiency Regs,</p>	<p>Age restricted sales (alcohol, knives, butane, fireworks, tobacco) Enterprise Act Unsafe Goods, Storage of fireworks (Harrow) Counterfeit Goods, un-roadworthy cars Package Travel, Mock Auctions Property Misdemeanors Intox Subs Supply Trade Descriptions Act (high value goods)</p>
<p>Broadcasting Act, Estate Agents Act Education Reform Act, UA Lottery Unsolicited goods Development of Tourism Act Incorrectly labelled goods (safety) Energy Act, Motorcycle Noise Act Trading Stamps Act, Crossbows Act</p>	<p>UATP Spray paints Business Names Act Road traffic (overloading) Administration of Justice Act Furniture and furnishings Accommodation Agencies Act</p>

high

low



Hazard

