



# TRADING STANDARDS

2008 - 2009  
Work Plan

## Key Targets

The annual 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 and joint compliance visits during 2008/2009. 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 2008/2009, the Service will produce 13,300 units of output work for Harrow, 16,100 units for Brent and 619 from Customer Services: - a total of 30,019 units. Both borough totals reflect a full establishment based on the new structure with a complement of 33 staff. 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	1 unit
Enterprise Act investigations	150 units
Trader Enquiries (including HA work)	5.25 units
Announced Primary High Risk Inspections	3.0 units
Announced Primary Medium Risk Inspections	2.0 units
Announced 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 units (depending on complexity)
Financial Investigations under Proceeds of Crime	> 70 units (depending on complexity)
Civil reports and action	8 units
Prosecutions completed (Magistrates Court)	35 units
Prosecutions completed (Crown Court)	70 units
Formal Cautions	7 units
Letters of Warning	2 units
Projects completed	119 units
Approved Trader Scheme Membership	3.5 units per member
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
Exhibitions & Displays	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 Assistant Enforcement Officer 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.

Inspections of trade premises are carried out in line with the 'Hampton Principle', namely, *"No inspection should take place without a reason"*. This purpose behind this principle is to reduce burden on businesses by conducting inspections based on risk and, whenever possible, by making joint visits with other regulators. A Statutory Code of Practice for Regulators has been published by the Department for Business Enterprise & Regulatory Reform and every local authority is expected to abide by this code.

Based on the above, our aim for 2008-09 is to inspect all high risk premises, but unlike previous years visits to medium and low risk premises will not be made unless they are the subject of a complaint or part of a project that the Service is conducting. At 1 March 2008, there were 9389 premises in the consortium area liable for inspection (5584 in Brent and 3805 in Harrow). Of these 248 (2.6%) are high-risk premises (143 in Brent and 105 in Harrow), and 4600 (49.0%) are medium risk premises (2647 in Brent and 1953 in Harrow).

	TOTAL PREMISES	HIGH RISK	MEDIUM RISK	LOW RISK
Brent	5584 (59.5 %)	143	2647	2794
Harrow	3805 (40.5 %)	105	1953	1747
Consortium	9389 (100%)	248 (2.6%)	4600 (49.0%)	4541 (48.4%)

The work of the Trading Standards Service is divided into three distinct functional teams: -

1. Customer Services Team
2. Harrow Enforcement Team, and
3. Brent Enforcement Team

For 2008/2009 each of the three individual teams will aim to complete the following work:-

#### **CUSTOMER SERVICES TEAM 2008/2009**

Requests for action (non criminal)	535(343 B, 146H)	535
Talks to external Bodies/Organisations (general)		12      84
	<b>Total</b>	<b>619</b>

#### **Customer Services Projects**

##### Lead

1. Scams – press releases
2. Customer satisfaction surveys – analysis/recommendations/action plan.

## HARROW ENFORCEMENT TEAM 2008/2009

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	800	2800
Civil Investigations	108	702
Trader Enquiries (including HA work)	148	777
Enterprise Act Investigations	3	450
Announced Primary High Risk Insp.	105	315
Announced Primary Medium Risk Insp	107	214
Announced Primary Low Risk Insp	51	25.5
Announced Secondary High Risk Inspections	20	30
Announced Secondary Medium Risk Inspections	16	16
Test Purchase Visits	250	750
Home Authority Referrals	127	222.25
Average Quantity Visits	15	78.75
Criminal Reports of Infringement	60	3500
Financial Investigations under Proceeds of Crime	3	210
Civil Reports and Action	12	96
Prosecutions completed	30	1225
Formal Cautions	10	70
Letter of Warning	10	20
Projects completed	5	595
Approved Trader Scheme	150	525
Verification Visits	10	35
Multi-Agency Operations	5	105
Mileage checks (each car)	20	40
Web sites (per check)	20	40
Publications (per check)	20	40
Alternative enforcement action	2*	100
Exhibitions & Displays	12	168
Electric Blanket Safety Work	2	91
Child Car Seat Safety Work	1	42
Talks to external Bodies/Organisations	5	17.5
<b>Total</b>		<b>13300</b>

### Harrow Projects

#### Lead

- 1 Internet Shopping
- 2 Charity Shops – Safety of Goods

#### Contribution to North West London/ London Wide Projects

- 1 Safety of electrical goods
- 2. Metrology - Sales by non- prescribed measures
- 3. Metrology - Weighing Equipment for Medical Purposes

1 Assistant Head of Service (0.5)

Met & Safety:- 1 Team Leader  
 2 SEO/EO  
 1 AEO (0.5)

Fair Trading:- 1 Team Leader  
 3 SEO/EO  
 1 Civil Advisor  
 1 AEO (0.5)

= 13300 units



<u>Category</u>	<u>Time taken for investigation (in days)</u>	<u>Minimum number of units</u>
1	2.5	17.5
2	5	35
3	7.5	52.5
4	10	70
5	15	105
6	> 16	@ 7 units per day

The criteria for assessing each category is detailed below:-

### **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 solicitor's 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 Regulations, and
- d) "Code of Practice Guidance" advice is given, and
- e) Details of the above are recorded on an Average Quantity inspection form.

## Enforcement Priorities

The grid below shows how the Service prioritises its work, based on the hazard that a particular type of trading 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.

