



Trading Standards Joint Advisory Board – Supplementary Agenda

Monday, 21 March 2011 at 7.30 pm

Council Chamber, Brent Town Hall, Forty Lane, Wembley, HA9 9HD

Membership:

Members Councillors:	Representing	First alternates Councillors:	Second alternates Councillors:
Jones	LB Brent	Powney	Beswick
Hashmi	LB Brent	Brown	CJ Patel
Baker	LB Brent	BM Patel	HM Patel
Hall	LB Harrow	Dhamarajah	
O'Dell	LB Harrow	Maru	
Ferry	LB Harrow	Mithani	

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The press and public are welcome to attend this meeting

Supplementary Agenda

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Please remember to **SWITCH OFF** your mobile phone during the meeting.

- The meeting room is accessible by lift and seats will be provided for members of the public.
- Toilets are available on the second floor.
- Catering facilities can be found on the first floor near The Paul Daisley Hall.
- A public telephone is located in the foyer on the ground floor, opposite the Porters' Lodge

Agenda Item 4

London Boroughs of Brent and Harrow Trading Standards' Advisory Board

21st March 2011

Report Number 5/10 from the Head of Trading Standards

For information

Title of Report: Trading Standards Savings Review and Budget for 2011-12

1.0 **Summary**

1.1 This report provides Members with details of the savings proposals for Trading Standards, including the impact of 'Wave Two' of Brent Council's Staffing and Structure Review. It also indicates the likely budget for 2011-12.

2.0 **Recommendations**

2.1 That Members consider this report and comment where appropriate.

3.0 **Financial Considerations**

3.1 The report contains details of the significant financial impact as the net result is a reduction of over £400,000 in the Consortium's budget. The detail of this is included in Sections 5, 6 & 7.

4.0 **Staffing Implications**

4.1.1 The report contains details of the significant staffing implications which are discussed in Sections 5, 6 & 7 and will result in the deletion of posts and redundancies.

5.0 **Detail**

5.1 **Background**

5.1.1 Brent & Harrow Trading Standards Consortium currently operates at a cost in the second quartile for London Trading Standards services. That is, around a third of London Trading Standards services are more expensive per head of population and per business than Brent & Harrow. Therefore, around two thirds are less expensive.

5.1.2 The Service successfully prosecutes a high level of cases and it is in the top quartile for the numbers of formal enforcement actions taken by London Trading Standards services. The cases it prosecutes are serious criminal matters, leading in a significant proportion of cases to custodial sentences. They are also matters of serious concern to the local community.

5.1.3 Both Brent & Harrow are subject to serious financial pressures and, for the 2011-12 financial year, both Authorities need to make significant savings. Harrow has indicated that they need to reduce their budget for Trading Standards by around £200,000 per annum. Brent have had a need to reduce costs across the regulatory services, of which Trading Standards are a part, and related in-house environmental services, by around £800,000. In this context, Brent also

require approximately £200,000 in savings from the Trading Standards budget similar to the amount that is being sought by Harrow. This report indicates how this might be achieved in the Consortium context and what would be the consequences.

5.2 Brent's Structure & Staffing Review

5.2.1 Brent was subject to a review in 2009 by Price Waterhouse Coopers which concluded that overall, the Council had too many staff with management responsibilities and with narrow spans of control; too high a proportion of staff in enabling and support functions; and too low a proportion of staff in service delivery roles. A cross-Council programme of change over the last eighteen months has addressed these issues. A first wave which ended in March 2010 removed 50 managerial and supervisory posts. A second wave which ended in October 2010 removed a further 300 posts focused mainly on managerial and support posts.

5.2.2 Current initiatives include another wave of the Staffing and Structure Review which will remove further management capacity totalling more than 100 posts. This has significant impact on Trading Standards. This review forms part of a wider programme of cost reduction (the One Council programme) which addresses *inter alia* property costs, procurement, customer contact, business support, remuneration, income generation and support service costs.

5.3 Brent's Budget Driven Post Reductions

5.3.1 The One Council programme is expected to deliver £21million of revenue budget savings across the Council for 2011-12. The forecast budget shortfall is £16million of which Environment & Neighbourhoods (the organisational home of Trading Standards) needs to find nearly £6million, and the regulatory group of services, with some related street based services, around £800,000 in establishment costs and income.

5.4 Brent's Proposals

5.4.1 Amongst a wider set of changes Brent is presently consulting on a set of proposals which will reduce the establishment by 32 management and supervisory posts within the Environment & Neighbourhood Department, and which will deliver the target cost reductions.

5.4.2 **Appendix 1** shows the current organisational structure of the Environment & Protection Division. **Appendix 2** shows the proposed organisational structure. Key features are:

- I. A significant reduction in the numbers of management posts;
- II. A significant reduction in the numbers of staff engaged in service development and support roles;
- III. An increase in the number of senior professional roles to ensure continuing capacity for service delivery.

5.4.3 All three of these elements of change are in line with the principles identified by the Price Waterhouse Coopers 2009 review.

5.5 Specific Savings Proposals

- 5.5.1 It is proposed that, instead of a dedicated Head of Service for Trading Standards there should be a Head of Service for all the services regulating business activity, including food safety, standards and hygiene, as well as health and safety enforcement. This reduces the cost of the Head of Service by half saving £46,450 per annum for the Consortium.
- 5.5.2 It is also proposed to delete one of the three Assistant Head of Service posts with a saving of £63,902 per annum.
- 5.5.3 The move of Trading Standards from their office in Willesden Green to a main, municipal portfolio office in Wembley will mean that 0.25 fte can be released from the post of Lab & IT Manager to give savings of £12,993 per annum.
- 5.5.4 The move to Brent house should also lead to a reduction in accommodation costs in the future.

5.6 Service Development & Support Costs

- 5.6.1 Rationalisation and centralisation of service development and support costs in line with the principles of the corporate business support review is expected to lead to further substantial savings.
- 5.6.2 The present establishment in Trading Standards for these functions comprises a Service Development Officer costing £56,686 per annum, a Senior Customer Services Officer costing £48,446 per annum and two Customer Services Officers costing together £70,422. The total cost of these posts is £175,554 per annum.
- 5.6.3 Within the proposed centralised service development and support function the following costs would be incurred for the Trading Standards Consortium:
- i. 0.2 fte Service Improvement Manager costing £12,046 per annum.
 - ii. 0.5 fte Service Improvement Officer costing £24,223 per annum.
 - iii. 1.5 fte Business Support Officers costing £52,817 per annum.
- 5.6.4 The total cost of service development and support would be £89,085 per annum, a saving of £86,469 per annum for the consortium.
- 5.6.5 *Summary of Cost Savings from Central, Service Development & Support Costs*

Head of Service	£46,450
Assistant Head of Service	£63,902
Lab & IT Manager	£12,993
Service Development & Support	£86,469
Total	£209,814

5.6.6 At the 2010-11 budget division (51.7% Brent, 48.3% Harrow) this will deliver £101,340 for Harrow and £108,474 for Brent.

6.0 Further Savings Proposals

6.1 *Proceeds of Crime Act*

6.1.1 Over recent years a modest but sporadic income has been derived from confiscations under the Proceeds of Crime Act (POCA), an aspect of work in which the Consortium has developed considerable expertise. There are now a number of cases in progress and it is proposed (as suggested by Councillor O'Dell at the Joint Advisory Board recently) that some recognition of anticipated income from this source could now be built into budgets. The identification of a particular sum is problematic given the very long lead time of these cases but it is proposed that £50,000 could be budgeted for 2011-12 with some confidence, i.e. £25,000 for each borough.

6.1.2 It is hoped that in future years, the amount of income derived from POCA that can be re-invested into the Trading Standards budget could be increased. However, as the amount that can be recovered from the POCA incentivisation scheme is uncertain, then it would be misconceived to suggest that the contribution to the Trading Standards budget can be increased year on year from this source. Nevertheless, as part of this process, a pragmatic approach should be taken by carrying out a review during the annual budget setting exercise to decide what funds can be invested into the forthcoming years' Trading Standards budget. It is important that if POCA is to be used as a means of subsidising the Trading Standards budget, then a considered long term approach should be taken so as to ensure that there is a contingency fund to counteract the erratic nature of the income and to provide stability for the Service as well as a level of job security for these much sought after and highly trained Accredited Financial Investigators (for further information see Section 8.1.1 below).

6.2 *Civil Advice*

6.2.1 A Consumer Advisor is employed for each borough. The provision of advice on civil matters is a discretionary service for Councils, and it is suggested that in the present financial circumstances that, although popular with residents, this is not a priority. Each borough would save £41,767 by deleting their respective post of Consumer Advisor and thus ending the provision of this service.

6.3 *Vacant posts*

6.3.1 There are two vacant Assistant Enforcement Officer posts in the establishment, one for each borough team. If these posts were to be deleted there would be no severance costs incurred. Each post would save £35,211 per annum and have less of an effect on work output than deleting an Enforcement Officer. This will leave one Assistant Enforcement Officer in each Borough team.

6.4 Summary of Savings Proposals

Item	Total	Brent	Harrow
Central and support costs	209,814	108,474	101,340
POCA	50,000	25,000	25,000
Consumer Advisor	83,534	41,767	41,767
Assistant EO	70,422	35,211	35,211
Total		210,452	203,318

6.4.1 These savings proposals result in a Trading Standards budget for 2011-12 of £1,301,000, a reduction of 24%, with contributions of £625,000 from Harrow and £676,000 from Brent.

7.0 Risks

7.1.1 Full year savings for the posts that are currently vacant will be achievable. However, other posts are subject to a 90 day consultation period which ends on 22nd April. Notice periods of up to 12 weeks mean that full year savings for those posts for 2011-12 will not be achievable.

7.1.2 Posts that are not currently vacant will incur redundancy costs. As per the Consortium agreement these costs will be met by each Borough.

8.0 Future Savings Options

8.1.1 it is envisaged that there will be further requirements to find savings and efficiencies over the next few years as part of the Government's austerity measures. Therefore, the options for savings for future years beyond 2011-12 are highlighted below for further consideration by Members

8.1.2 **POCA:** - To achieve increased income from this source, a detailed business plan needs to be developed by training further Accredited Financial Investigators to market these services to our respective councils and to other Local Authorities for an hourly fee and/or a percentage of the total monies recovered.

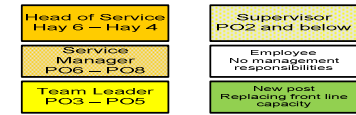
8.1.3 **Computer Forensics:** - Over the years, the forensic examination of digital equipment has played a major part in trading standards investigations and is likely to increase as a result of the growth in internet shopping, which provides an even greater opportunity for criminals and scamsters to deceive unsuspecting consumers. To avoid the expense of external forensic examinations, it is suggested that an in-house expert is trained in order to save costs and also to maximise income by offering this service to other regulators. This is a key advantage of the consortium where the scale of activities and the types of investigations conducted allows us the opportunity to develop this type of specific expertise.

- 8.1.4 Working in partnership to provide joint services allows for greater efficiencies and budget savings due to economies of scale. The opportunity to realise further savings can be achieved by finding another partner for the Consortium, which could ensure additional saving for each authority of up to £50,000 per annum.
- 8.1.5 The Service provides “Home Authority” advice to a number of large businesses. The new “Primary Authority” scheme creates a statutory relationship for which the Local Authority regulator can charge the business for advice and assistance.
- 8.1.6 A metrology partnership consisting of six Councils already exists to provide specialist weights and measures functions in North East London. A similar Service spearheaded by Brent & Harrow Trading Standards could be formed to provide weights and measures functions in North West London which could generate much needed income from Authorities with limited capacity to undertake this much needed, specialist statutory function.

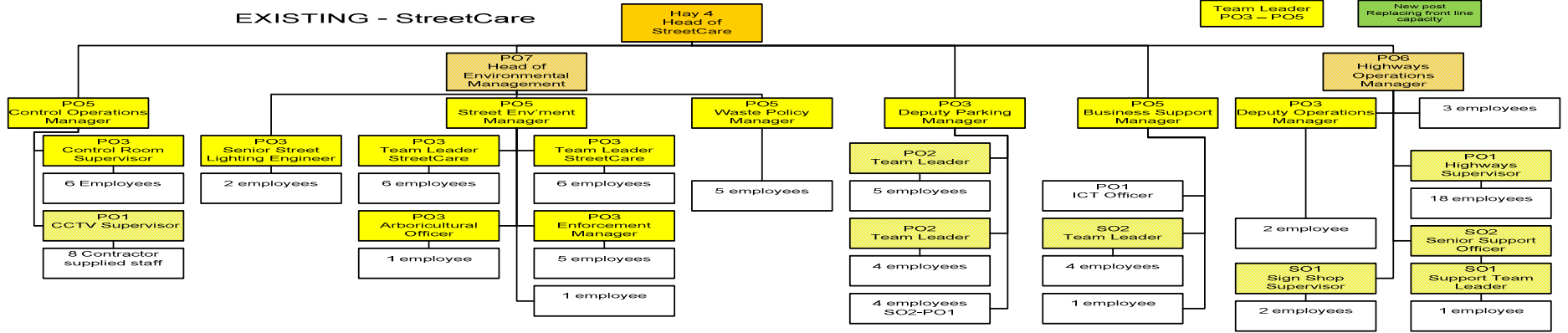
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HEAD OF TRADING STANDARDS

Environment & Protection

KEY

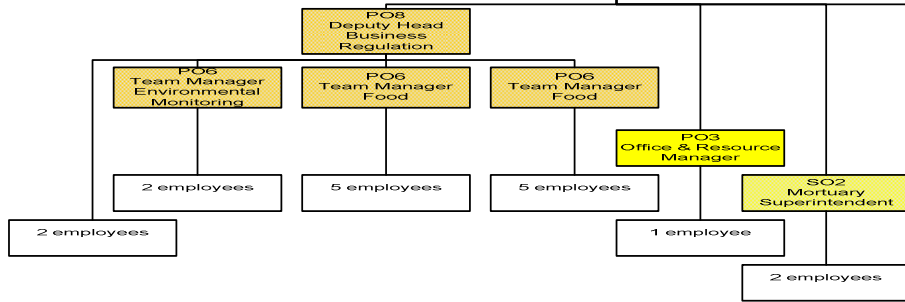


EXISTING - StreetCare



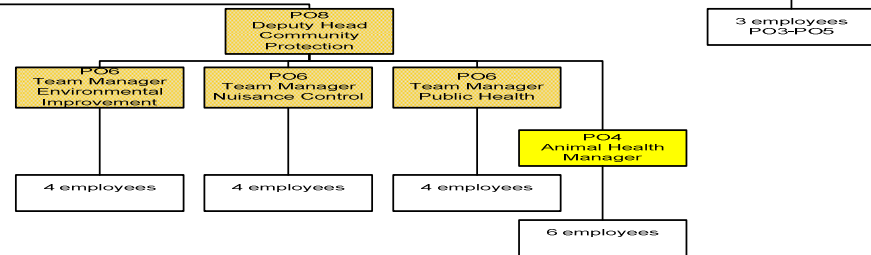
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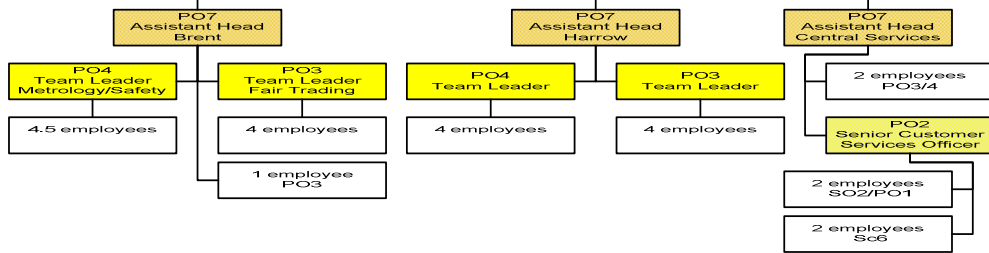
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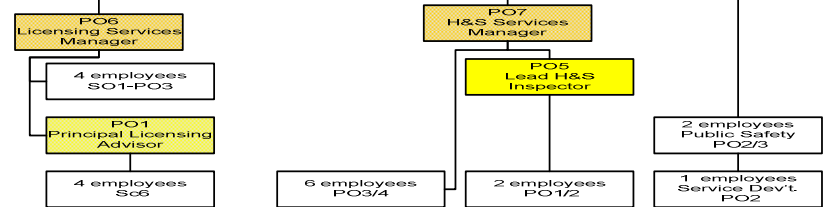
EXISTING Trading Standards

Hay 5 Head of Trading Standards



Hay 5 Head of Health, Safety & Licensing

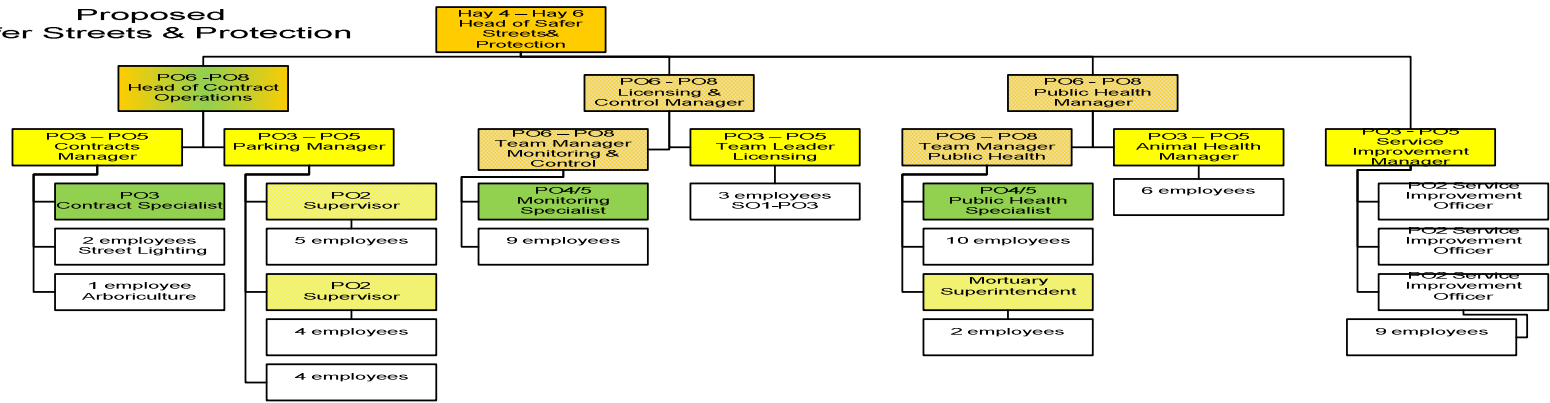
EXISTING Health, Safety & Licensing



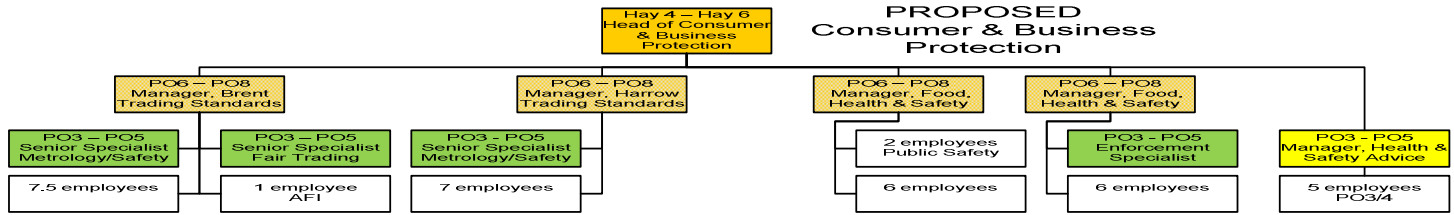
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Environment & Protection

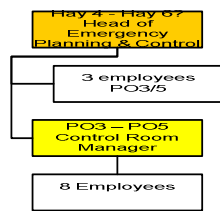
Proposed Safer Streets & Protection



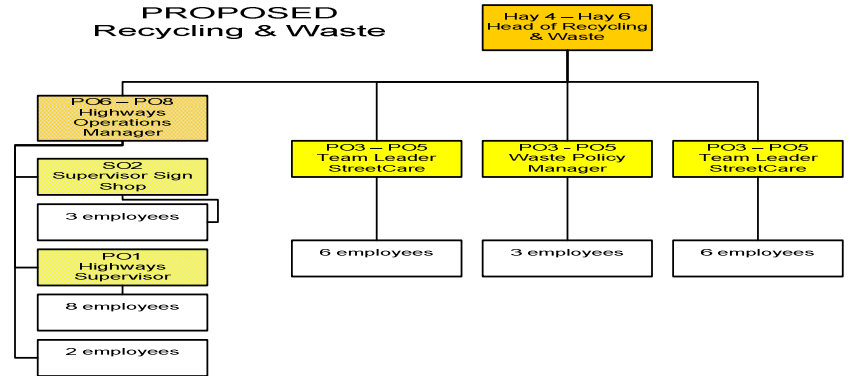
PROPOSED Consumer & Business Protection



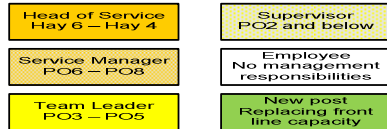
PROPOSED Emergency Planning & Control



PROPOSED Recycling & Waste



KEY



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Agenda Item 5

London Boroughs of Brent and Harrow Trading Standards Advisory Board

21st March 2011

Report Number 06/10 from the Head of Trading Standards

For information

Title of Report: **Trading Standards Draft Work Plan for 2011/2012**

1.0 Summary

1.1 This report provides Members with information concerning the Trading Standards Work Plan for 2011/2012.

2.0 Recommendations

2.1 That Members consider the Work Plan and comment where appropriate.

3.0 Financial Considerations

3.1 There are no financial considerations arising from this report, the work plan reflects the amount of work that can be achieved with the budget provided for the Service for 2011/2012. The Consortium budget is covered in report 05/10.

4.0 Staffing Implications

4.1 There are no staffing implications arising from this report. The staffing implications of the Consortium budget are covered in report 05/10.

5.0 Detail

5.1 Each year, the Service produces a Work Plan, which details the work the Service is due to undertake for the financial year ahead.

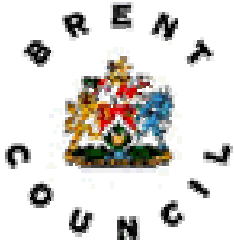
5.2 At the moment, the Service is undergoing a restructure as part of Wave 2 of Brent Council's structure and staffing review. The consultation on the restructuring lasts until 22nd April and so this Plan is a draft that is liable to change when the results of the consultation are announced, sometime after 22nd April.

5.3 Whatever the result of the consultation, the Service will have a reduced workforce next year although all effort has been made to make the requisite savings while protecting front line staff. However, the full effect of reducing the number of back office staff by over 50% will not be known until it happens. It may well be that some of our enforcement staff's time is spent completing tasks that were previously done for them. This will obviously have an impact on the work that they will be able to produce.

5.4 The Plan is directly linked to the budget and reflects the outputs achievable with the available resources.

5.2 A copy of the Work Plan for the year 2011/2012 is attached as an Appendix to this report.

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TRADING STANDARDS

2011 - 2012
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 during 2011/2012. 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.

The general enforcement priorities are listed later in this document, however, the main priorities of the Consortium will be:-

1. Consumer Protection & Business Advice.

- a) Investigation of consumer complaints
- b) Business compliance through inspections, Home/Primary Authority advice and enforcement
- c) Creating a fair trading environment for sustainable & thriving local businesses

2 Underage Sales

- a) Conducting underage test purchasing exercises
- b) Responsible Trader Scheme to ensure business compliance
- c) Improving public health and reducing crime/anti social behaviour

3. Large Scale Cases Involving Consumer Fraud

- a) Counterfeiting
- b) Car clocking
- c) Importing / wholesaling of unsafe goods
- d) Scams & Rogue Traders

4. Doorstep Crime

- a) Proactive partnership working
- b) Rapid responses to consumer requests for assistance

We will continue to work in partnership with colleagues within both Councils and from other enforcement agencies whenever the opportunity arises. We will also liaise and work in partnership with the regional Trading Standards groups to which we belong. Such relationships will become increasingly important as the Olympics draw nearer.

For 2011/2012, the Service will produce 9,800 units of work for Harrow and 11,200 units for Brent: - a total of 21,000 units. Both borough totals reflect a full establishment based on a complement of 18 FTE staff in the Borough teams, excluding support functions.

The main activities of the Service will be based on units of work set out in the table on the following page. Each unit equates to 1 hour's work and each day equates to 7 units. Based on 260 working days available during the year –

- Less - 9 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 (AEO) will be expected to contribute 350 units to their respective team's target. This is reduced from 700 in previous years to reflect the fact that their role will consist far more in supporting Enforcement Officers now that there is only one AEO per Borough rather than two. Similarly the contribution from each Assistant Heads of Service is reduced from 700 to 350 units each. This is to reflect the increased time they will spend on management functions due to the deletion of one of the Assistant Head posts and the Head of Service, who will be responsible for three other teams.

Inspections of trade premises are carried out in line with the 'Hampton Principle', namely, *"No inspection should take place without a reason"*. The purpose behind this principle is to reduce the 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 is to inspect high risk premises; 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. On 11th March 2011 there were 10,102 premises in the consortium area liable for inspection, of these 153 (1.5%) are high-risk premises.

	Total number of premises	High Risk	Medium Risk	Low Risk
Brent	5,998 (59.4 %)	88	2,904	3,006
Harrow	4,104 (40.6 %)	65	2101	1,938
Consortium	10,102	153 (1.5%)	5,005 (49.5%)	4,944 (48.9%)

Allocation of units for different activities

Activity	Number of units
Requests for action (criminal) completed	3.5
Requests for action (non criminal) completed	1
Trader Enquiries (including HA work)	5.25
Enterprise Act Complaints completed	14
Announced Primary High Risk Inspections	3
Announced Primary Medium Risk Inspections	2
Announced Primary Low Risk Inspections	0.5
Announced Secondary High Risk Inspections	1.5
Announced Secondary Medium Risk Inspections	1
Alternative Enforcement Action	0.25
Underage Test Purchase Visits	3
Home Authority Referrals	1.75
Average Quantity Visits	5.25
Criminal reports of Infringement	≥ 7 (depending on complexity)
Financial Investigations under Proceeds of Crime	≥ 25 (depending on complexity)
Enterprise Act investigations	≥ 40 (depending on complexity)
Prosecutions completed (Magistrates Court)	35
Prosecutions completed (Crown Court)	70
Simple Cautions	7
Letters of Warning	2
Projects completed	≥ 20 (depending on complexity)
Approved Trader Scheme audits	3.5
Verification Visits	3.5
Doorstep Crime Multi-agency Operations	21
Doorstep Crime Rapid response actions	14
Local Partnership Working	≥ 7 (depending on work involved)
Mileage checks (each car)	2
Web sites (per check)	2
Exhibitions & Displays	14
Electric Blanket Safety Work	42
Talks to external Bodies/Organisations	3.5
Press Releases issued	2

Harrow Enforcement Team 2011/2012

The following staff contribute directly to Harrow's work:-

- Service Manager
- 2 x Enforcement Specialists
- 4 x (Senior) Enforcement Officer
- Assistant Enforcement Officer
- Financial Investigator (0.5)

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	648	2268
Requests for action (non criminal)	-	-
Trader Enquiries (including HA work)	84	441
Enterprise Act complaints	2	28
Announced Primary High Risk Inspection	65	195
Announced Primary Medium Risk Inspection	115	230
Announced Primary Low Risk Inspection	48	24
Announced Secondary High Risk Inspection	12	18
Announced Secondary Medium Risk Inspection	80	80
Test Purchase Visits	190	570
Home Authority Referrals	60	105
Average Quantity Visits	8	42
Criminal Reports of Infringement	54	3510
Financial Investigations under Proceeds of Crime	6	360
Enterprise Act Reports	2	160
Prosecutions completed – Crown Court	2	140
Prosecutions completed – Magistrates' Court	11	385
Simple Cautions	12	84
Letters of Warning	25	50
Projects completed	1	40
Approved Trader Scheme audits	80	280
Verification Visits	2	7
Doorstep Crime Multi-Agency Operations	8	168
Doorstep Crime Rapid response actions	8	112
Local Partnership Working	15	150
Mileage checks (each car)	60	120
Web sites (per check)	60	120
Electric Blanket Safety Work	1 day	46
Exhibitions & Displays	1	14
Talks to external Bodies/Organisations	6	21
Press Releases issued	16	32
Total		9,800

Brent Enforcement Team 2011/2012

The following staff contribute directly to Brent's work:-

- Service Manager
- 2 x Senior Specialist
- 5 x (Senior) Enforcement Officer
- Assistant Enforcement Officer
- Financial Investigator (0.5)

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	780	2730
Requests for action (non criminal)	-	-
Trader Enquiries (including HA work)	120	630
Enterprise Act Complaints completed	2	28
Announced Primary High Risk Insp.	75	225
Announced Primary Medium Risk Insp	100	200
Announced Primary Low Risk Insp	50	25
Announced Secondary High Risk Inspections	6	9
Announced Secondary Medium Risk Inspections	30	30
Test Purchase Visits	180	540
Home Authority Referrals	80	140
Average Quantity Visits	16	84
Criminal Reports of Infringement	63	4095
Financial Investigations under Proceeds of Crime	7	420
Enterprise Act Reports	2	160
Prosecutions completed – Crown Court	5	350
Prosecutions completed – Magistrates' Court	15	525
Simple Cautions	10	70
Letters of Warning	30	60
Projects completed	1	40
Approved Trader Scheme audits	80	280
Verification Visits	2	7
Doorstep Crime Multi-Agency Operations	6	126
Doorstep Crime Rapid response actions	6	84
Local Partnership Working	10	100
Mileage checks (each car)	45	90
Web sites (per check)	45	90
Exhibitions & Displays	-	-
Talks to external Bodies/Organisations	4	14
Press Releases issued	24	48
	Total	11,200

Infringement Reports

The units allocated for infringement reports are based on the complexity of the investigation, both in terms of legislation being enforced and length of time taken to fully investigate/report each individual case (as shown below).

<u>Category</u>	<u>Time taken for investigation (in days)</u>	<u>Minimum number of units</u>
0	1	7
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 0

Very brief report, unlikely to involve an interview. No other witnesses and resulting in no further action or a letter of warning.

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

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

- c) Interviews - multiple interviews requiring preparation or single interview of an extremely complex and demanding nature.
- d) Statements - several witness statements from non Trading Standards Officers required.
- e) Evidence - large quantities of evidence involved or smaller quantities of evidence of a diverse nature requiring considerable analysis.
- f) Report - large and complicated report required to fully explain the investigation and the nature of the offences.
- g) 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 priorities below are based on the hazard that a particular type of trading activity poses to the local community, the impact that the activity will have on local consumers and the likelihood of the activity occurring. The greater the hazard, impact and likelihood of an activity, the more resource this Service will put into combating this type of crime. Lower priority is given to those activities that are less likely to occur and have little hazard or impact. However, all complaints concerning breaches of the law are investigated and vulnerable customers are treated as a higher priority.

High Priority

Underage Sales – knives	Underage Sales – alcohol
Doorstep Crime	Underage Sales – tobacco
Unsafe Goods	Clocked Cars
Most Complained About Traders	Counterfeit Goods
Underage Sales – fireworks	Proceeds of Crime
Car Clamping	Misleading Claims
Distance Selling	Internet Fraud/Scams

Medium Priority

Storage of Fireworks	Copyright
Misleading Prices	Weights and Measures
Underage Sales – butane	Price Marking
Furniture and Furnishings	Un-roadworthy Cars
Underage Sales – spray paints	Video Recordings – Unclassified DVDs
Package Travel	Underage Sales – DVDs / games
Harassment of Debtors	Business Names
Consumer Credit	Bogus Colleges
Essential Packaging	Hallmarking
Energy Performance Certificates	Incorrectly Labelled Goods (safety)

Low Priority

Energy Labelling of Goods	Restrictive Notices
Misleading Descriptions (low value goods)	Underage Sales – lottery
Property Misdescriptions	Estate Agents
Mock Auctions	Timeshares
Road Traffic – Overloaded Vehicles	Underage Sales – crossbows
Metrication	Motorcycle Exhaust Silencers

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