



Trading Standards Joint Advisory Board

Thursday 22 March 2012 at 7.30 pm
Harrow Civic Centre

Membership:

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

For further information contact:

(LB Brent) Toby Howes, Senior Democratic Services Officer
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(LB Harrow) Mark Doherty, Democratic Services Officer,
(020) 8416 8050 mark.doherty@harrow.gov.uk

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The press and public are welcome to attend this meeting

Agenda

Introductions, if appropriate.

Election of Chair for the meeting (from amongst the Brent members)

Apologies for absence and clarification of alternate members

Item	Page
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1	Election of Chair	
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2	Declarations of personal and prejudicial interests	
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Members are invited to declare at this stage of the meeting, any relevant financial or other interest in the items on this agenda.

3	Minutes of the previous meeting held on 28 November 2011	1 - 4
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4	Matters arising	
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5	Trading Standards Budget for 2012/13	5 - 8
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This report provides Members with the latest information concerning the Trading Standards budget for 2012/13, together with the implications on service delivery.

6	Trading Standards Work Plan for 2012/13	9 - 22
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This report provides Members with information concerning the Trading Standards work plan for 2012/13.

7	Any other urgent business	
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Notice of items to be raised under this heading must be given in writing to the Democratic Services Manager (London Borough of Brent) or his representative before the meeting in accordance with the constitutions of both councils.



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

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LONDON BOROUGH OF BRENT

MINUTES OF THE TRADING STANDARDS JOINT ADVISORY BOARD Monday 28 November 2011 at 7.30 pm

PRESENT: Councillors Jones (LB Brent), Hashmi (LB Brent), Baker (LB Brent) and Ferry (LB Harrow) and Mithani (LB Harrow alternate for Hall).

Councillor Maru (LB Harrow) was in attendance.

Apologies were received from Councillors Hall (LB Harrow) and O'Dell (LB Harrow)

Officers in attendance were: Nagendar Bilon (Head of Consumer and Business Protection), Hashith Shah (Service Manager, Trading Standards), Simon Legg (Service Manager, Trading Standards), Simon Martin (Service Manager, Trading Standards), Michael Read, (Assistant Director, LB Brent), Finlay Flett (Head of Community Safety Services, LB Harrow)

1. **Election of Chair**

RESOLVED:

that Councillor Lesley Jones be elected as Chair for this meeting.

2. **Declarations of personal and prejudicial interests**

None declared.

3. **Minutes of the previous meeting**

RESOLVED:-

that the minutes of the previous meeting held on 9 June 2011 be approved as an accurate record of the meeting.

4. **Half Yearly Report: Six Monthly Report on the Operation of the Service**

Nagendar Bilon, Head of Consumer and Business Protection introduced the report that updated members on the restructuring of the Service and its performance over the first six months of the financial year. He advised Members that the restructuring of the service resulted in the deletion of seven front line posts from the previous establishment of twenty-nine and the transfer of three administrative staff to a

central Business Support Team. He continued that following consultation with the staff, the new Trading Standards structure was finalised in May 2011 and the Service was incorporated into the new Consumer and Business Protection Unit based within the Environment and Neighbourhoods Department in Brent House, Wembley. He drew members' attention to the staffing table set out in the report which showed the changes and the new structure.

In setting the background to the restructuring, Nagendar Bilon informed Members that it resulted from the Government's financial pressures on both Brent & Harrow Councils to make significant savings in response to reduction in funding for public services. In view of this, both Brent and Harrow Councils reduced their budget for Trading Standards by £200,000 each which resulted in an overall contribution of £1,291,000 for this financial year, i.e. £676K and £625K for Brent and Harrow respectively.

Whilst the restructure and the move from Willesden Green to Wembley took place with little disruption to customers, it had invariably had an impact on the Unit's ability to provide certain services to users. He continued that as a result of the deletion of the Civil Advisor posts, the Unit was no longer able to provide help and assistance to consumers regarding their disputes about defective goods and services which, in the main, affected the more vulnerable members of the public. In addition, there had also been an overall reduction in the units of work and certain activities involving proactive inspections and other enforcement activities. He however assured members that the service would make every effort to continue to provide essential Trading Standards services through greater prioritisation and more collaborative working and that a report would be submitted to a future meeting giving members an opportunity to set their own priorities for the service.

RESOLVED:

that the six monthly report on the operation of the Trading Standards service be noted.

5. Future Proposals for the Formation of a Dedicated Proceeds of Crime Financial Investigations Team

Members considered a report that set out the business case for the formation of a dedicated Proceeds of Crime Act 2002 (POCA) Financial Investigations Team based in the Brent and Harrow Trading Standards Service. Nagendar Bilon, Head of Consumer and Business Protection Service informed members that POCA not only provided a robust set of powers for investigating, restraining and confiscating assets but also allowed the Service to generate much needed funds to subsidise the work of local authority regulators. He clarified that under the Home Office Incentivisation Scheme the investigating and prosecuting authority was allowed to keep 37.5% of the assets confiscated.

He continued that the proposal was to set up a dedicated team to conduct POCA investigations and market their services to internal and external Council services. It was further proposed that any funds received through these means would be used to fund the work of the POCA team thus maintaining the current staffing levels and preventing any adverse impact on the front line work carried out by Trading

Standards Officers. This resource would not only ensure that POCA investigations can be pursued but would help ensure that there were sufficient prosecutions of serious offences to provide the foundation for future financial investigations. The proposal took into account the Home Office Incentivisation Scheme which required that some of funds generated must be set aside in a reserve account to provide some level of stability for continuation of the work. To ensure stability for the continuation of the POCA work it was also proposed that funds received through the Incentivisation Scheme should be saved in a reserve account and surpluses for any given year should be carried forward to allow for periods of sporadic income.

In welcoming the report, members suggested the following additional points to enhance the proposals:

- Officers should seek to identify commissioning officers in other London Boroughs with a view to marketing the services to them.
- Training courses be organised for officers in other departments within both Councils to get them to recognise areas where POCA could apply.
- Trading Standards Service should also focus on Legal Services of both Brent and Harrow with a view to getting the Legal Services to appreciate the capacity of the Trading Standards Service with respect to this area of work.

RESOLVED:

- (i) that a dedicated team to conduct financial investigations under the POCA be set up;
- (ii) that a financial investigations service be provided to other regulators both internally within Brent and externally to other Councils;
- (iii) that in the long term the existing Trading Standards staffing complement be maintained, by replacing the two AFIs, which would enable the detection and prosecution of offenders, therefore, leading to financial investigations under the POCA;
- (iv) that the income from the POCA incentivisation scheme be used to subsidise the Trading Standards budget thus reducing the contribution currently being made by the London Boroughs of Brent and Harrow by a further £100,000 each over three years;
- (v) that Officers should seek to identify commissioning officers in other London Boroughs with a view to marketing the services to them;
- (vi) that training courses be organised for officers in other departments within both Councils to get them to recognise areas where POCA could apply;
- (vii) that Trading Standards Service should also focus on Legal Services of both Brent and Harrow with a view to getting the Legal Services to appreciate the capacity of the Trading Standards Service with respect to this area of work.

6. **Any other urgent business**

None raised at this meeting.

7. **Date of the next meeting**

RESOLVED:

to note that the next meeting would take place on 22 March 2012 at Harrow Civic Centre.

The meeting ended at 8:15pm

L JONES
Chair

The meeting closed at 8.15 pm

L. JONES
Chair

Agenda Item 5

London Boroughs of Brent and Harrow Trading Standards

Joint Advisory Board – 22nd March 2012

Report Number. 04/11 of the Head of Trading Standards

For Information

TITLE OF REPORT: TRADING STANDARDS BUDGET FOR 2012-2013

1.0 Summary

1.1 This report provides Members with the latest information concerning the Trading Standards Budget for 2012-2013 together with the implications on service delivery.

2.0 Recommendations

2.1 That Members consider this report and comment where appropriate.

3.0 Financial Considerations

3.1 The whole report relates to the finance of the Trading Standards Service.

3.2 Although this report does not itself have financial implications, it reflects the position of the Trading Standards budget for 2012-13 following the budget making process in both Brent and Harrow Councils.

4.0 Background

4.1 Over the past four years both Brent and Harrow Councils have reduced the amount that they provide for the provision of Trading Standards services in their respective boroughs (see table below). Since 2008/09, the total Trading Standards budget has been reduced by 27%, Brent (30%) and Harrow (25%).

	2008/09	2009/10	2010/11	2011/12
Brent	£956K	£886K	£886K	£676K
Harrow	£816K	£816K	£828K	£625K
Total	£1,772	£1,702	£1,714	£1,301

4.2 A major organisational review of Brent Council services took place in 2011-12 which resulted in the centralisation of the Trading Standards support officers and the cessation of the civil advice service that was previously offered to Brent and Harrow residents. As a result of this, there was a reduction of £210K (25%) and £203K (25%) in the contribution from both Brent and Harrow Councils respectively. Apart from deleting the civil advice service and centralisation of the support services, the above mentioned savings were achieved through a leaner management structure with greater 'spans of control'. The full implications of the above mentioned restructuring was reported to Members during the Joint Advisory Board meeting on 28th November 2011 (report number 02/11).

- 4.3 The recent restructure led to number of redundancies and redeployments as a result of which the staff complement has reduced from 29.5 FTE to 19.5 FTE, reflecting a 34% reduction in Trading Standards staffing levels.
- 4.3 The new structure was implemented in August 2011 at the same time when the move from Willesden Green to our temporary accommodation in Wembley prior to the impending move to the new Civic Centre in 2013. I am pleased to say that we have managed to secure suitable storage space for our evidence at a nearby location.
- 4.4 As previously stated in my report Number 03/11, it is envisaged that additional savings can be made through the Proceeds of Crime incentivisation scheme which would provide a further reduction in the contribution made by both Brent and Harrow Councils towards the 2011-12 budget. I am pleased to say that as a result of the cases undertaken by our Accredited Financial Investigators, it is highly likely that each borough will receive £25K at the end of this financial year, thereby reducing the respective 2011-12 Brent and Harrow budgets to £651K and £600K. Furthermore, approximately 80% of the total expenditure from the Trading Standards budget is spent on the provision of front line services and therefore, any further reduction in this budget will undoubtedly result in a significant decline in service delivery to the extent that some of our statutory functions will not be fulfilled.

5.0 **Staffing Implications**

- 5.1 Assuming that there are no further reductions in the Trading Standards budget by Brent and Harrow Councils for the financial year 2012-13, the current staffing levels will be maintained. However, as already outlined above it is possible that some frontline activities will have to be reduced.

6.0 **Detail**

- 6.1 For a standstill budget, Brent and Harrow Councils will have to provide a budget of £676,000 and £625,000 respectively for the 2012-13 financial year. This will result in a slight decrease in service delivery due to inflationary costs for goods and services but not as a result of salary increases as there are no plans for pay rises during 2012-13.
- 6.2 The combined Brent and Harrow budget for the Service for 2012-2013 will be £1,301,000. This equates to Brent contributing 51.9% and Harrow contributing 48.1% to the total budget. The overall work output will be as detailed in report 05/11, which appears later on the agenda for this meeting. As stated above, there will be a slight reduction in service delivery with respect to the Brent and Harrow outputs and activities. An even greater amount of re-prioritisation will occur and some services will cease which will invariably result in the Service becoming less proactive and more reactive.

7.0 **Background Information**

- 7.1 2012/2013 Budget File.

Any person wishing to inspect the above should contact N Bilon, Third Floor, 349-357 High, Wembley, Middlesex, HA9 6BZ, telephone 020 8937 5500.

NAGENDAR BILON
HEAD OF TRADING STANDARDS

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Advisory Board – 22nd March 2012

Report Number 05/09 from the Head of Trading Standards

For information

Title of Report: **Trading Standards Work Plan for 2012/2013**

1.0 Summary

1.1 This report provides Members with information concerning the Trading Standards Work Plan for 2012/2013.

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, and the Work Plan reflects the amount of work that can be achieved with the budget provided for the Service for 2012/2013.

4.0 Staffing Implications

4.1 There are no staffing implications arising from this report.

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. The plan is closely linked to the budget and reflects the outputs achievable with the budget provided. The outputs in both Brent and Harrow have been reduced following the deletion of 7 FTE posts due to budget cuts and the transfer of 3 FTE administration staff to the central Business Support Team.

5.2 A copy of the plan for the year 2012/2013 is attached as an Appendix to this report.

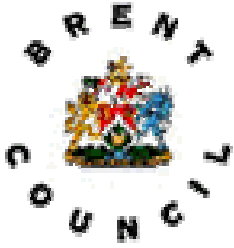
6.0 Background information

6.1 The Service Plan file.

Any person wishing to inspect the above should contact: N Bilon, 3rd Floor, Brent House, 349 – 357 High Road, Wembley, HA9 6BZ. Tel: 020 8937 5500.

Nagendar Bilon
Head of Trading Standards

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TRADING STANDARDS

2012 – 2013

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 much smaller programme of risk based inspections of trade premises during 2012/2013. 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 at the end of the Work Plan but the main priorities of the Consortium will be:

- ❖ Underage sales
 - Conducting underage test purchase exercises
 - The Responsible trader scheme
 - Concentrating on alcohol, cigarettes and knives

- ❖ Doorstep Crime
 - Proactive partnership working
 - Rapid responses to consumer requests for help

- ❖ Large scale cases involving consumer fraud
 - Counterfeiting
 - Car clocking
 - Importing / wholesaling of unsafe goods

- ❖ Proceeds of Crime

- ❖ Primary Authority

Partnerships

We will continue to work in partnership with colleagues within both Councils and from other Enforcement Agencies wherever the opportunity arises. This will include London Organising Committee of the Olympic and Paralympic Games (LOCOG) and the Olympic Delivery Authority (ODA) as well as Her Majesty's Revenue & Customs (HMRC0 and UK Border Agency (UKBA), particularly during

the approach to the forthcoming Olympic Games. We will also liaise and work in partnership with the regional Trading Standards groups to which we belong.

Olympic Games

In the period leading up to and during the Olympic Games itself, there will be an increased demand on our Service, as we have been called upon by the ODA to assist with the enforcement of the various Olympic specific legislation that has been enacted. It is anticipated that the Service will be able to manage this competing priority by backfilling the posts within the Trading Standards teams during the 80 day period when these extra duties will be required. Funding for this backfilling of posts has been received through the City Operations scheme in recognition of the additional work that the Trading Standards Service will have to carry out.

Primary Authority

One new area of work for the Service will be operating the Primary Authority scheme with local and national businesses. The Local Better Regulation Office (LBRO) oversees the legislation which puts the Primary Authority scheme on a statutory footing.

It's main aim is to provide one point of contact within one Local Authority for all the regulators to refer issues to, which are then discussed with the company concerned. Solutions are then found by negotiation between the company and the designated Local Authority.

There are significant benefits to the company who forms such a partnership with a Local Authority which include;

- Access to robust and reliable advice
- Introduction of nationwide inspection plans
- Consistency of advice
- Avoidance of repetition
- Dispute resolution
- A recognition by all regulators of the partnership
- Statutory assurance mechanism

Units of Work

For 2012/2013, the Service will produce 9,800 units of work outputs for Harrow and 9,800 units for Brent: - a total of 19,600 units. Both borough totals reflect a full establishment based on a complement of 19.5 FTE staff members.

The main activities of the Service are 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 that are 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

Following the major restructuring that was completed in August 2011, some changes to the Work Plan have inevitably resulted. Each of the two Borough Teams is now directly managed by one Service Manager. As a result, most of their time is mainly taken up with the management of their respective teams with some operational activities. In the past there was another tier of management below Service Manager which has now been removed.

Units of Work

A total of 200 days @ 7 hours per day = 1400 hours 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. Their role now consists far more in supporting Enforcement Officers now that there is one AEO per Borough rather than two. The contribution from each Service Manager has also been reduced to 350 units each which reflect the additional time that they spend on management functions due to the increase in their number of direct reports.

Inspections

Inspections of trade premises are carried out in line with the 'Hampton Principles', 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 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. However this Service is demand led, and we are seeing a year on year increase in the number of complaints made by residents of Brent and Harrow, and these requests for action will, as usual, take priority over other work.

As at 1st March 2012, there were 10,853 premises in the consortium area liable for inspection; of these 1.4% are rated as high-risk premises.

Business Premises

	Total number of premises	High Risk	Medium Risk	Low Risk
Brent	6,414(59%)	86	2,930	3,084
Harrow	4,439 (41%)	62	2,102	1,970
Consortium	10,853	148 (1.4%)	5,032 (46%)	5,054 (46%)

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
Underage Test Purchase Visits	3
Alternative Enforcement Action	0.25
Home Authority Referrals	1.75
Home/Primary Authority Referrals	3.5
Average Quantity Visits	5.25
Criminal reports of Infringement	> 7 (depending on complexity)
Financial Investigations under Proceeds of Crime	> 40 (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
Approved Trader Scheme audits	3.5
Consumer Credit Checks	14
Verification Visits	3.5
Doorstep Crime Multi-agency Operations	21
Doorstep Crime Rapid response actions	14
Local Partnership Working	10
Mileage checks (each car)	2
Web sites (per check)	2
Press Releases issued	2

Harrow Enforcement Team 2012/13

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

Service Manager (0.25)

- 6 x Enforcement Officers (1.0)
- 1 x Assistant Enforcement officer (0.25)
- Financial Investigator (0.5)

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	850	2975
Trader Enquiries (including HA work)	30	157
Enterprise Act Complaints completed	1	14
Announced Primary High Risk Insp.	70	210
Announced Primary Medium Risk Insp	25	50
Announced Primary Low Risk Insp	24	12
Announced Secondary High Risk Inspections	10	15
Announced Secondary Medium Risk Inspections	40	40
Test Purchase Visits	150	450
Home/Primary Authority Referrals	145	508
Average Quantity Visits	8	42
Criminal Reports of Infringement	50	3000
Financial Investigations under Proceeds of Crime	6	420
Enterprise Act Reports	1	60
Prosecutions completed	25	1125
Simple Cautions	12	84
Letters of Warning	20	40
Approved Trader Scheme audits	30	105
Consumer Credit Checks	4	56
Verification Visits	4	14
Doorstep Crime Multi-Agency Operations	6	126
Doorstep Crime Rapid response actions	6	84
Local Partnership Working	2	20
Mileage checks (each car)	40	80
Web sites (per check)	45	90
Press Releases issued	12	24
Total		9,800

Brent Enforcement Team 2012/13

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

Service Manager (0.25)

- 6 x Enforcement Officers (1.0)
- 1 x Assistant Enforcement officer (0.25)
- Financial Investigator (0.5)

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	850	2975
Trader Enquiries (including HA work)	30	157
Enterprise Act Complaints completed	1	14
Announced Primary High Risk Insp.	70	210
Announced Primary Medium Risk Insp	25	50
Announced Primary Low Risk Insp	24	12
Announced Secondary High Risk Inspections	10	15
Announced Secondary Medium Risk Inspections	40	40
Test Purchase Visits	150	450
Home/Primary Authority Referrals	145	508
Average Quantity Visits	8	42
Criminal Reports of Infringement	50	3000
Financial Investigations under Proceeds of Crime	6	420
Enterprise Act Reports	1	60
Prosecutions completed	25	1125
Simple Cautions	12	84
Letters of Warning	20	40
Approved Trader Scheme audits	30	105
Consumer Credit Checks	4	56
Verification Visits	4	14
Doorstep Crime Multi-Agency Operations	6	126
Doorstep Crime Rapid response actions	6	84
Local Partnership Working	2	20
Mileage checks (each car)	40	80
Web sites (per check)	45	90
Press Releases issued	12	24
	Total	9,800

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 give

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	Primary Authority

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 Misdcriptions	Estate Agents
Mock Auctions	Timeshares
Road Traffic – Overloaded Vehicles	Underage Sales – crossbows
Metrication	Motorcycle Exhaust Silencers

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