



Trading Standards Joint Advisory Board

Monday, 22 March 2010 at 7.30 pm

Harrow Civic Centre, Committee Room 3, 1st Floor, Station Road, Harrow

Membership:

Members Councillors:	Representing	first alternates Councillors:	Second alternates Councillors:
Baker	LB Brent	Detre	HB Patel
Hashmi	LB Brent	D Brown	CJ Patel
Jones	LB Brent	Ahmed	Arnold
Ferry	LB Harrow	Idaikkadar	
Hall	LB Harrow	Mithani	
Weiss	LB Harrow	Miah	

For further information contact:

(LB Brent) Elly Marks, Democratic Services Officer,
0208 937 1358, Elly.Marks@brent.gov.uk

(LB Harrow) Mark Doherty, Democratic Services Officer,
(020) 8 416 8050 mark.doherty@harrow.gov.uk

The press and public are welcome to attend this meeting

Agenda

Introductions, if appropriate.

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

Apologies for absence and clarification of alternate members

Item	Page
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1	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.

2	Minutes of the previous meeting	1 - 4
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3	Matters Arising	
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4	Trading Standards Budget for 2010/11	5 - 8
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This report provides Members with the latest information concerning the Trading Standards budget for 2010/11, together with the implications on service delivery.

Contact Officer: Nagendar Bilon,
Head of Trading Standards
nagendar.bilon@brent.gov.uk

5	Trading Standards Work Plan for 2010/11	9 - 18
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This report provides Members with information concerning the Trading Standards work plan for 2010/11.

Contact Officer: Nagendar Bilon,
Head of Trading Standards
nagendar.bilon@brent.gov.uk

6	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.

7 Date of Next Meeting

The next meeting is scheduled to take place in July 2010, to be held at Brent Town Hall, at a date to be advised.



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.

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LONDON BOROUGH OF BRENT

MINUTES OF THE TRADING STANDARDS JOINT ADVISORY BOARD

Monday, 7 December 2009 at 7.30 pm

PRESENT: Councillor Jones (London Borough of Brent) (Chair) and Councillors Hashmi (London Borough of Brent), Ferry (London Borough of Harrow) and Hall (London Borough of Harrow)

Apologies were received from: Councillors Baker (London Borough of Brent) and Weiss (London Borough of Harrow)

Officers in Attendance were: Bill Bilon (London Borough of Brent and Harrow), Michael Read (London Borough of Brent) and Ash Shah (London Borough of Brent)

1. **Appointment of the Chair (amongst Brent Members)**

Councillor Jones was appointed to Chair the meeting.

2. **Minutes of the previous meeting**

RESOLVED:-

that the minutes of the previous meeting held on 29 July 2009 be approved as an accurate record of the meeting.

3. **Matters arising**

None.

4. **Half Yearly Report: Six Month Report on the Operation of the Service - April 2009 to September 2009**

Bill Bilon (Head of Trading Standards, London Boroughs of Brent and Harrow) introduced the report which updated members on the work which had been carried out by the Trading Standards Service for Brent and Harrow over the last six months. He invited members of the Board to raise any questions that they had regarding the report.

Following a request for an update regarding the progress of the member of staff who had started her training to become an Accredited Financial Investigator, Bill Bilon stated that she had now passed her exams. He added that the next stage was for her to be mentored by a police officer for six months to a year. After completing some investigations, she would then, he stated, be a fully accredited financial investigator. In response to an enquiry as to why financial investigations could take a long time to conclude, Bill Bilon explained that it was because Trading Standards were unable to make a financial case against someone until the primary investigation into the original trading offence had been carried out.

In order to protect residents, especially elderly people, the Board noted that there was a need for a scheme that could recommend trust worthy and reliable tradesman. It was asked how long it would take to implement such a scheme. Ash Shah (Assistant Head of Trading Standards, London Borough of Brent) explained that they were currently looking into the possibility of using the well established 'TrustMark Scheme'. As part of the scheme, traders were vetted, references sought and complaints investigated. He added that relevant complaints would be passed onto Trading Standards. He explained that they were looking at the possibility of using the scheme in conjunction with Building Control services, partners and other Trading Standards services. Following a concern regarding cost, Bill Bilon explained that it was unlikely that they would need to ask for additional money as the initial outlay from Brent and Harrow Council would be small due to the fact that traders had to pay to join the scheme. The Board requested that more information be provided to the Board regarding the 'TrustMark Scheme' at the next meeting.

It was noted by the Board that the fraudulent use of International Calling Cards had become a serious problem. Bill Bilon explained that Trading Standards were aware of the problem and had been taking action. However, he added that the number of companies selling these fraudulent phone cards kept increasing. He explained that they were aware of the need to work with the Office of Fair Trading as prosecuting the occasional company was not enough. In response to an enquiry into the use of tablet computers, Ash Shah explained that tablet computers were small notebook type computers which allowed officers to gain access to all their records when they were out in the field. He stated that they were hoping that in the future they would be able to use mobile printers as well.

It was noted that Harrow Council could also run the Ma Kelly event that was successfully held in Brent. The money required from Harrow Council in order to do this, Ash Shah explained, was £1,200. He added that in Brent the money had come from three of the council's Neighbourhood Working schemes. The Board concluded their discussion by noting that the service had completed some excellent work over the last six months.

RESOLVED:-

- i. that the Six Month Report, for the period ending 30 September 2009, be noted;
- ii. that more information on the 'TrustMark Scheme' be provided to members at the next meeting of the Joint Advisory Board.

5. **Trading Standards Budget for 2010/2011**

The Head of Trading Standards for Brent and Harrow presented a report which provided the Board with information on the Trading Standards budget required for 2010/11 that had been forecast in accordance with Clause 23 of the Consortium Agreement. He explained that as part of the agreement he was required, as the Head of Trading Standards, to produce a report detailing the implication of budget changes for members' consideration and discussion.

Bill Bilon informed members of the Board that there was little scope for increasing income. He explained that deregulation had enabled manufacturers to verify their

own equipment, which had led to a reduction in this source of income for the service. He stated that main source of income for the service was now from costs awarded against defendants following successful court convictions. He emphasised however that the cost of undertaking prosecutions had increased, particularly in cases where there was no alternative but to use barristers in matters that were heard in the Crown Court. Bill Bilon explained that The Proceeds of Crime Act allowed prosecuting authorities to seize assets of those who benefit from criminal lifestyles, such as counterfeiting. However, he stressed that sufficient resources were needed to investigate this type of criminal activity and to conduct complicated financial investigations.

Bill Bilon stressed the need for prioritising the work of the service. He then informed the Board as to the required budget for the consortium for 2010/2011. He stated that, including an inflation increase of 0.75% from the previous year's budget, the required budget was £1,714,046. This, he added, equated to £891,264 for Brent and £822,782 for Harrow. Bill Bilon explained that the Consortium Agreement required him, as Head of Trading Standards, to provide alternatives to the proposed budget for consideration by the respective councils. However, he stated that, in recognition of the current financial situation with both councils, he was not proposing to seek any growth in the Trading Standards Budget apart from the inflationary increase already mentioned. Similarly, he added that a decrease in the 2010/11 Trading Standards Budget would lead to a significant reduction in the service's ability to respond to customer complaints, to deal with trader enquiries, to carry out proactive work and to achieve the upper threshold standard with respect to the new national performance indicator. Nevertheless, in order to comply with the requirements of the Consortium Agreement, he highlighted several options that should be considered along with the impact of any such increase/reduction in the 2010/11 Trading Standards Budget. Bill Bilon concluded by asking members of the Board to take note of the report and to discuss it with the main committee in each borough.

In the discussion which followed, a concern regarding the detrimental impact that a budget reduction could have on the service was raised by the Board. The Board noted that Trading Standards was operating an excellent service, as highlighted in the six months report, and that a reduction in budget could seriously affect the service's ability to provide such a high standard of service for the residents of Brent and Harrow. However, it was also recognised that due to the financial climate, budgets in all service areas were under considerable strain and that reductions may be unavoidable. In acknowledgment of this fact, the Board requested that information be made available on what the potential impact on the service would be if a 5% budget reduction was introduced, so that the implications of such a reduction could be considered by the main committee for each borough. It was suggested by a member of the Board that the Chair may wish to write a letter to the relevant committees stating their consideration of this matter.

The high reputation of the service was noted by members of the Board. Bill Bilon informed the Board that a very positive article on the service, provided by Trading Standards, had featured in the Willesden & Brent Times and the Harrow Times. The reporter who wrote this article, he added, was also currently doing a follow up to this report for the next issues of these newspapers. It was asked whether any progress had been made in marketing the skills of financial investigators. In response Bill Bilon explained that no progress had been made with regards to this

issue, but that a London wide approach to this was currently being looked at. He added that he would feedback to the Board when he had more information on this. He explained, in response to another enquiry, that the £70,000 income, mentioned in the report, related to the costs awarded against defendants following successful court convictions. The proceeds of crime, he added, was separate to this as the proceeds of crime related to the seizing of the assets of those who benefit from criminal lifestyles.

The need to update the Consortium Agreement between Brent and Harrow Council was noted by the Board. In response, Michael Read (Assistant Director of Policy & Regulation) explained that Legal Services were currently working on this issue.

RESOLVED:-

- i. that the report be noted and implications considered;
- ii. that information be made available on what the potential impact on the service would be if a 5% budget reduction was introduced, so that the implications of such a reduction could be considered by the main committee for each borough.

6. **Any other urgent business**

None.

7. **Date of next meeting**

It was noted that the next meeting of the Trading Standards Advisory Board was scheduled for Monday 22nd March 2009 at Harrow Civic Centre.

The meeting closed at 8.15 pm

L. JONES
Chair

**London Boroughs of Brent and Harrow
Trading Standards Advisory Board
22 March 2010**

Report from the Head of Trading Standards

FOR INFORMATION

Trading Standards Budget for 2010/2011

1.0 Summary

1.1 This report provides Members with the latest information concerning the Trading Standards Budget for 2010/2011 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 2010-11 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 2006/07 the total budget has been reduced by 10%.

	2006/07	2007/08	2008/09	2009/10
Brent	£1,041K	£963K	£956K	£886K
Harrow	£844K	£816K	£816K	£816K
Total	£1,885K	£1,779K	£1,772	£1,702

4.2 A major organisational review of the Trading Standards Service in 2006/07 resulted in the loss of four management posts and created a much leaner staffing structure.

Following annual budget cuts thereafter (see above), there has been a repeated deletion of posts with the result that there are five fewer FTE posts now than there were at the beginning of 2007/08. This represents a reduction in staff complement of 15%, which has had a dramatic effect on a relatively small workforce. Meanwhile other efficiency measures have been introduced which have produced a Service that now spends 67% of its financial resources on the provision of its frontline services. This figure is supported by both the recent Price Waterhouse Coopers (PWC) survey that Brent Council commissioned and the 2007/08 CIPFA statistics.

5.0 **Staffing Implications**

- 5.1 As a result of the budget provided by Brent and Harrow for the 2010-11 financial year the current staffing levels will be maintained but it is possible that some frontline services may have to be reduced or cut.

6.0 **Detail**

- 6.1 At the Trading Standards Advisory Board meeting on 1st December 2009, Members considered report No.03/09 concerning the Trading Standards budget for 2010/2011. In the discussion which followed, concerns were raised by Members regarding the detrimental impact that a budget reduction could have on the Service. The Board noted that Trading Standards was operating an excellent service and that a reduction in budget could seriously affect the Service's ability to continue to provide such a high standard of service for the residents of Brent and Harrow. However, it was also recognised that due to the financial climate, budgets in all service areas were under considerable strain and that reductions may be unavoidable. It was suggested by a member of the Board that the Chair may wish to write a letter to the relevant committees asking them to take into account the previous budget cuts when considering the future funding of the Trading Standards Services in their respective boroughs.
- 6.2 Brent is providing a total budget of £886,000 for the 2010-11 financial year. However, during 2009-10, they provided an identical amount of £886,000, the net effect of which is a 'cash freeze' which means that there was no increase for inflation or for staff salaries.
- 6.3 For the 2010-11 financial year, Harrow is providing a budget of £828,000, which represents an inflationary increase of 1.5% from the previous year's contribution of £816,000.
- 6.4 The combined Brent and Harrow budget for the Service for 2010-2011 will be £1,714,000. This equates to Brent contributing 51.7% and Harrow contributing 48.3% to the total budget. The overall work output will be as detailed in report 05/09, which appears later on the agenda for this meeting. As a result of this, there will be a slight reduction in service delivery with respect to the Brent outputs and it is not envisaged that there will be any reduction in service delivery for Harrow. An even greater amount of re-prioritisation will occur with some realignment of activities which will invariably mean that we, as a Service, will become less proactive and more reactive.

7.0 **Background Information**

7.1 2010/2011 Budget File.

Any person wishing to inspect the above should contact N Bilon, First Floor, 249 Willesden Lane, London NW2 5JH, telephone 020 8937 5500.

NAGENDAR BILON
HEAD OF TRADING STANDARDS

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**London Boroughs of Brent and Harrow
Trading Standards Advisory Board
22 March 2010**

Report from the Head of Trading Standards

FOR INFORMATION

Trading Standards Work Plan for 2010/2011

1.0 Summary

1.1 This report provides Members with information concerning the Trading Standards Work Plan for 2010/2011.

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 2010/2011.

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 Brent have been reduced following the deletion of half a post due to budget cuts.

5.2 A copy of the plan for the year 2010/2011 is attached as an Appendix to this report.

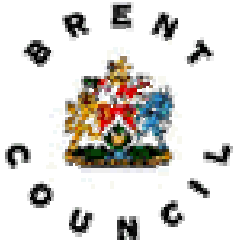
6.0 Background information

6.1 The Service Plan file.

Any person wishing to inspect the above should contact: N Bilon, 1st Floor, Quality House, 249 Willesden Lane, London, NW2 5JH. Tel: 020 8937 5500.

**Nagendar Bilon
Director of Trading Standards**

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TRADING STANDARDS

2010 - 2011
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 2010/2011. 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 2010/2011, the Service will produce 12,600 units of output work for Harrow and 14,700 units for Brent: - a total of 27,300 units. Both borough totals reflect a full establishment based on a complement of 30.5 FTE staff.

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 - 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.

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 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. At the time of writing this report, there were 10,045 premises in the consortium area liable for inspection, of these 179 (1.8%) are high-risk premises.

	Total number of premises	High Risk	Medium Risk	Low Risk
Brent	5,956(59.3 %)	104	2,856	2,984
Harrow	4,089 (40.7 %)	75	2,094	1,910
Consortium	10,045	179 (1.8%)	4,950 (49.3%)	4,894 (48.7%)

Allocation of units for different activities

Activity	Number of units
Requests for action (criminal) completed	3.5
Requests for action (non criminal) completed	1
Civil Investigations	6.5
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
Home Authority Referrals	1.75
Average Quantity Visits	5.25
Criminal reports of Infringement	> 7 (depending on complexity)
Financial Investigations under Proceeds of Crime	> 40 (depending on complexity)
Civil reports and action	> 10 (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	10
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 2010/2011

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

Assistant Head of Service (0.5)

- 2 x Team Leader
 - 4.5 x (Senior) Enforcement Officer
 - 2 x Assistant Enforcement Officer (1.0)
- Financial Investigator (0.5)
- Civil Advisor

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	960	3360
Requests for action (non criminal)	350	350
Civil Investigations	80	520
Trader Enquiries (including HA work)	168	882
Enterprise Act Complaints completed	4	56
Announced Primary High Risk Insp.	75	225
Announced Primary Medium Risk Inspections	121	242
Announced Primary Low Risk Inspections	62	31
Announced Secondary High Risk Inspections	10	15
Announced Secondary Medium Risk Inspections	80	80
Test Purchase Visits	190	570
Home Authority Referrals	84	147
Average Quantity Visits	12	63
Criminal Reports of Infringement	59	3540
Financial Investigations under Proceeds of Crime	6	420
Enterprise Act Reports	4	240
Civil Reports and Action	5	120
Prosecutions completed	30	1400
Simple Cautions	12	84
Letters of Warning	24	48
Projects completed	1	30
Approved Trader Scheme audits	80	280
Verification Visits	8	28
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)	50	100
Electric Blanket Safety Work	1 day	46
Exhibitions & Displays	2	28
Talks to external Bodies/Organisations	14	49
Press Releases issued	18	36
	Total	13,300

Brent Enforcement Team 2010/2011

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

Assistant Head of Service (0.5)

- 2 x Team Leader
 - 5 x (Senior) Enforcement Officer
 - 2 x Assistant Enforcement Officer (1.0)
- Financial Investigator (0.5)
- Civil Advisor

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	1000	3500
Requests for action (non criminal)	275	275
Civil Investigations	100	650
Trader Enquiries (including HA work)	240	1260
Enterprise Act Complaints completed	4	56
Announced Primary High Risk Inspections.	70	210
Announced Primary Medium Risk Inspections	100	200
Announced Primary Low Risk Inspections	50	25
Announced Secondary High Risk Inspections	6	9
Announced Secondary Medium Risk Inspections	20	20
Test Purchase Visits	190	570
Home Authority Referrals	76	133
Average Quantity Visits	16	84
Criminal Reports of Infringement	65	3575
Financial Investigations under Proceeds of Crime	6	420
Enterprise Act Reports	4	240
Civil Reports and Action	8	192
Prosecutions completed	36	1680
Simple Cautions	10	70
Letters of Warning	10	20
Projects completed	1	30
Approved Trader Scheme audits	72	252
Verification Visits	10	35
Doorstep Crime Multi-Agency Operations	6	126
Doorstep Crime Rapid response actions	6	84
Local Partnership Working	2	20
Mileage checks (each car)	50	100
Web sites (per check)	30	60
Exhibitions & Displays	1	14
Talks to external Bodies/Organisations	12	42
Press Releases issued	24	48
	Total	14,000

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	

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