

Appendix A



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**Brent & Harrow  
Trading Standards**

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**Team Work Plan  
2021-2022**

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## Introduction

The Covid pandemic will have been with us for over 12 months and has refocused the work of the Trading Standards Service over the previous year. At the time of writing, we are unable to say when the current measures will cease and what further controls will be put in place. With this in mind the work plan is written on the basis that assuming governments Covid roadmap stays on schedule, we will be running the Service in a more routine manner as we exit out of the pandemic. The Service will make the appropriate adjustments if this is not the case and if further measures are imposed by the government throughout the year.

This work plan has been drafted to accommodate the revised Trading Standards budget, which has been reduced for 2021-2022 to accommodate Harrows reduced funding of the consortium.

In the UK, consumers take a lot for granted. The products we buy are safe, we do not expect to be victims of fraud, the weights quoted on goods are correct and the businesses will trade with us fairly are just some examples.

Trading Standards work is central to maintaining a confident marketplace supporting businesses to develop and the local economy grow. The Service fulfils the local authority's statutory role of a 'weights and measures authority' tasked with enforcing more than 250 pieces of legislation.

This work plan aims to set out some of our priority areas for the coming year and provides a guide to the expected levels of performance for each of the boroughs' teams. The plan offers flexibility to assist in meeting unexpected demands and to adapt service delivery as required, to meet emerging threats or respond to major investigations.

Brexit has now happened and the transitional period with Europe regarding goods and services to and from the UK and Europe has now ended. During this year, it is expected there will be changes in legislation that will have an effect on our businesses. This will put extra burden on our Service to keep up to date with any changes and to disseminate new information and ways of working to our local businesses. We cannot gauge, what the burden on the Service delivery and on businesses will be, but we will be keeping a close eye on any developments in this area.

There will no doubt also be a role of supporting local businesses and encouraging trade back to our local high streets following the lockdown period. Covid restrictions had an unprecedented impact on our business community and we have yet to fully understand how businesses will recover and the longer term impact of the pandemic. We will tailor our approach to accommodate economic recovery wherever it is appropriate for us to do so.

The Service continues to employ two Financial Investigators who conduct investigations generated not only from within our own councils, but also on behalf on various other external agencies. Their duties and outputs are measured differently and are outside the scope of this work plan.

The Service's leadership team currently includes Anu Prashar and Samuel Abdullahi.

## Priorities

The pandemic and Brexit has highlighted the role of Trading Standards in maintaining a confident marketplace, supporting businesses to develop and help the local economy grow.

The Service fulfils the local authority's statutory role of a 'weights and measures authority' and is tasked with enforcing more than 250 pieces of legislation.

Our Service priorities for the year are influenced by the following:

The National Trading Standards Board (NTSB) has identified the following areas in its Strategic Assessment dated October 2020, which it considers to be priority areas of work:

- Mass Marketing Scams - disrupting and reducing consumers' exposure to scams
- Energy related fraud
- Estate agency and Lettings work- protecting tenants and landlords from letting agents who aren't complying with the law
- Doorstep Crime and Cold Calling – safeguarding of vulnerable adults and consumers
- Other Fair Trading issues - specific threats include used cars, housing, travel, distance selling, traders acting as private sellers and complaints about businesses who claim to be in approved trader schemes
- Age Restricted Sales – preventing the sales of knives to children.
- Intellectual property (counterfeiting) – focusing on the rise in social media as a market place, illegal streaming devices, electrical appliances and toys.

London Trading Standards (LTS), who represent the 33 local authority Trading Standards Services across London, have identified their priority areas of work for members.

Intelligence suggests that illicit tobacco is still a large problem across London. Letting agents are also a major threat to consumers within the London region and will continue to be a focus for us over the coming 12 months as the demand for rented accommodation increases.

LTS priority areas are as follows:

- Doorstep crime
- Product Safety
- Intellectual property crime (counterfeiting)
- Fair trading and scams
- Lettings
- Product safety
- Illicit tobacco and cigarettes
- Underage sales

The Office of Product Safety and Standards (OPSS) Product Safety Strategic Intelligence assessment report dated December 2020 for the 2021/22 details the key product safety risks and threats ahead with specific reference to those arising from the pandemic. The Control Strategy outlines the priorities for 2021/22 are as follows:

- Routes to the UK Consumer Products Market
- Peer to Peer Sales
- Substitution
- Online Wholesalers
- COVID-19, Supply Chains and New Products
- Chemicals in Consumer Products
- Homemade Cosmetics

On 26 January 2021, the Ministry of Housing, Communities & Local Government (MHCLG) wrote to all Local Government Chief Executives with its 'Delivering Local Authority Regulatory Services over Winter 2021' plan, which gave a steer on what it considers to be national priorities to help inform local approaches and management of resources across all regulatory areas including licensing, trading standards and environmental health. The MHCLG felt this was necessary as it fully recognised the contribution these teams made to the local Covid response on top of their usual duties.

MHCLG developed a table of board regulatory services activities, categorised in order of priority, to help support local authority decision-making to assist in supporting our local priorities.

Areas of priority work identified by MHCLG included-

- Business confidence, supporting businesses through Brexit and Covid 19
- Trade in goods - product safety: Risk-based checks of consumer products
- Tobacco and related products enforcement activity
- Consumer protection/scams – vulnerable consumers
- Enforcement of consumer law and business regulation
- Legal metrology reactive work
- Illegal and/ or unsafe storage of petroleum or explosives

Within the London Boroughs of Brent and Harrow each local authority has a corporate plan setting out what it is to accomplish in the future and how this will be achieved. Brent has a 'Borough Plan 2019-2023' and Harrow has its new Borough plan which sets out five priorities where there are significant challenges to deliver the desired outcomes. These plans highlight the broad subject areas listed below as priority areas for each Council:

Brent:<sup>1</sup>

- Every opportunity to succeed
- A future built for everyone, an economy for all
- A cleaner, more considerate Brent
- A borough where we can all feel safe, secure, happy and healthy
- Strong foundations

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<sup>1</sup> <https://www.brent.gov.uk/boroughplan>

Harrow:<sup>2</sup>

- Improving the environment and addressing climate change
- Tackling poverty and inequality
- Building homes and infrastructure
- Addressing health and social care inequality
- Thriving economy

These areas of work have each been given consideration including an assessment of the intelligence available. From this, we are able to focus where our resources should be deployed to achieve the biggest impact. This approach is in line with the IOM (National Trading Standards Intelligence Operating Model) as well as contributing to the relevant Borough objectives.

Whilst setting our work plan, the following assumptions have been made:

- Work will be reactive (complaint-driven) focusing on statutory responsibilities rather than proactive except for the purposes of supporting specific borough priorities or initiatives
- All complaints (service requests) received for investigation will be risk-assessed via our matrix and will only be investigated if the relevant threshold is reached
- We will continue to focus on steering business towards primary authority advice
- Any commercial activities which generate an income will be prioritised to maximise revenue
- We will seek to manage demand where possible by signposting service users to other resources and encouraging greater use of on-line advice and information
- We will publicise our work as much as possible to act as an educational resource or deterrent warning when applicable.

### **Reviewing of priorities**

As the impact of the situation with Covid 19 develops and changes, it will be necessary for the service to adapt accordingly and to review its priorities regularly. We will also need to happen once the final financial settlement with the London Borough of Harrow has been agreed.

We have categorised the following areas of work to form the basis of our 2021/22 priorities:

### High Priority

Most Complained About Businesses	Provision of advice to business on the application of Covid19 regulations,
Doorstep Crime and Scams	Estate Agents/Letting Agents
Unsafe Goods (Manufacture /wholesale)	Counterfeit Goods (Large Scale Operation)
Primary Authority Partnerships	Proceeds of Crime Investigations
Niche and Illicit Tobacco Products	Brexit related advice and training
Investigation and action following complaint, and enforcement of Covid 19 provisions	Underage Sales – alcohol, tobacco, knives
Energy related fraud investigations and enforcement	

### Medium Priority

Misleading Descriptions (higher value goods)	Incorrectly Labelled Goods (safety)
Consumer Credit/illegal lending*	Counterfeiting and Copyright (low level)
Underage Sales – fireworks (seasonal)	Cosmetic Products
Unsafe Goods (Retail Level)	Hallmarking
Package Travel holiday complaints	Storage of Fireworks (unless critical safety implication)
Inaccurate Weights and Measures	Online Terms and Conditions
Misdescribed or Unroadworthy Cars	Energy Labelling of Premises and Goods

\*High priority cases are also referred to Illegal Money Lending Team

### Low Priority

Classification of video works	Restrictive Notices
Misleading Descriptions (low value goods)	Underage Sales – lottery, films, spray paints DVDs / games, butane
Mock Auctions	Essential Packaging
Market Sales	Price Marking of Goods or Services
Metrication	Business Names
Misleading Prices/Promotions (unless high value)	Provision of Advice re Credit Card Charges

## Work Volumes

The tables below show the projected performance of the respective Brent and Harrow teams during 2021/22. It should be noted the nature of Trading Standard's duties is variable especially during the Covid 19 restrictions and Brexit and therefore these figures are subject to change.

As a result, at year end some areas of work may have generated a higher than expected volume whereas other areas might see a decrease as a result of the need to respond to demands in other areas that arise during the year. Our work volumes will be kept under continuous review and reported quarterly to ensure that they are being implemented effectively and progress is being made.

The work volumes are based on a Harrow's proposed number of enforcement staff of 2.5. At the time of writing the financial settlement regarding the Harrow Team had not been finalised and therefore may change.

<b>Harrow Team 2021/22</b> Based on staff numbers:	<b>Brent Team 2021/22</b> Based on staff numbers:
<ul style="list-style-type: none"> <li>2.5 Enforcement Officers</li> </ul>	<ul style="list-style-type: none"> <li>3.5 Enforcement Officers</li> </ul>

	Planned volume Brent	Planned volume Harrow
Complaints (Service Requests) Completed	366	250
Trader Enquiries / requests for advice	78	54
High Risk / Most Complained-about Trader Inspections	31	25
Other Business Inspections	66	71
Weights & Measures, Average Quantity or Verification visits	4	3
Primary Authority Hours	117	36
Underage Test Purchase Visits	62	57
Infringement reports (average 40 work units per report)	31	21
eReports (average 7 work units per report)	9	7
Prosecutions completed – Crown Court	2	1
Prosecutions completed – Magistrates' Court	8	6
Licensing Reviews Completed	1	1
Simple Cautions Signed	6	4
Letters of Warning Issued	9	10
Fixed Penalty Notices Issued	8	7
Local and Regional Projects Completed	2	2
Service Improvement Work (Hours)	97	107
Approved Trader Scheme New Recruits or Audits	12	21
Doorstep Crime Rapid Response Actions	3	5
Number of Scam Victims Contacted c/o NTS Scams Hub	47	43
Partnership or Area Based Working Events / Weeks of Action	8	6
Samples, Mileage and Websites Checks	58	54
Number of Intelligence Logs Input on Regional Database	78	60
Press Releases Issued	6	4
RIPA/Warrant Applications	1	1

