

Appendix



**Brent & Harrow
Trading Standards**

**Team Work Plan
2020-2021**

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Introduction

The Trading Standards Service starts the year with a new Acting Senior Regulatory Service Manager, Anu Prashar, who has taken up this role as the previous incumbent Simon Legg is the Head of Regulatory Services. Trading Standards, Food Safety and Environmental Health functions report directly to the Head of Regulatory Services. During 2019/20 the Licensing Team move into the Regulatory Services to create a more resilient and cohesive team. A restructuring exercise will take place during this year to accommodate the new team within the Regulatory Service Team. It is also anticipated that a further restructuring exercise of Trading Standards will take place in this year.

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.

After a recruitment drive, the team appointed a new enforcement officer to the Harrow Team. Unfortunately, this member of staff took on another role outside of the Council after 7 months. Both teams have been functioning with vacancies, which has put extra burdens on to the existing frontline staff.

Across the Trading Standards profession, there is difficulty in finding suitable candidates to recruit to the vacant enforcement roles. The Service has participated in recruiting a Regulatory Compliance Apprentice, who will spend time across the teams in Regulatory Services. We were hoping to have someone in place by April 2020, but this is not the case. We will be continuing to participate in this recruitment and hope to have at least one apprentice in place during this year.

The Service will continue conducting financial investigations for both our own Council's and other external customers. We are keen to increase this work and hope plans to undertake more financial investigations on behalf of the London Borough of Harrow, will progress during the coming year. At present, we employ two Financial Investigators. Their duties and performance measures are monitored and accounted for outside the scope of this work plan.

Brexit has now happened, and there is now in the transitional period with Europe regarding goods and services to and from the UK and Europe. During this year, it is expected that 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 any information to our businesses. We cannot gauge, at the time of writing this report, 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.

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

Priorities

Trading Standards' work is central to 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 September 2019, which it considers to be priority areas of work:

- Mass Marketing Scams - disrupting and reducing consumers' exposure to scams
- 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
- Fair Trading issues - specific threats include used cars, housing, travel, energy frauds, 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

Within the London Boroughs of Brent and Harrow each Borough 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 an 'Ambition Plan 2020'. These plans highlight the broad subject areas listed below as priority areas for each Council:

Brent:¹

- 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

Harrow:²

- Build a Better Harrow
- Be More Business-like and Business Friendly
- Protect the Most Vulnerable and Support Families

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.

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

² http://www.harrow.gov.uk/download/downloads/id/8431/harrow_ambition_plan

We have categorised the following areas of work to form the basis of our 2020/21 priorities:

High Priority

Most Complained About Businesses	Underage Sales – alcohol, tobacco, knives
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

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 2020/21. It should be noted the nature of Trading Standard's duties is variable. For example some investigations take much longer than others or it may be necessary to carry out more inspection visits than expected in response to a particular outbreak of noncompliance or there might be a large volume of trader enquiries resulting from changes in legislation.

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.

Harrow Team 2020/21 Based on staff numbers:	Brent Team 2020/21 Based on staff numbers:
<ul style="list-style-type: none"> 3.5 Enforcement Officers 	<ul style="list-style-type: none"> 4.5 Enforcement Officers

	Planned volume Brent	Planned volume Harrow
Complaints (Service Requests) Completed	470	350
Trader Enquiries / requests for advice	100	75
High Risk / Most Complained-about Trader Inspections	40	35
Other Business Inspections	85	100
Weights & Measures, Average Quantity or Verification visits	5	4
Primary Authority Hours	150	50
Underage Test Purchase Visits	80	80
Infringement reports (average 40 work units per report)	40	30
eReports (average 7 work units per report)	12	10
Prosecutions completed – Crown Court	2	2
Prosecutions completed – Magistrates' Court	10	8
Licensing Reviews Completed	1	2
Simple Cautions Signed	8	5
Letters of Warning Issued	12	14
Fixed Penalty Notices Issued	10	10
Local and Regional Projects Completed	3	3
Service Improvement Work (Hours)	125	150
Approved Trader Scheme New Recruits or Audits	15	30
Doorstep Crime Rapid Response Actions	4	7
Number of Scam Victims Contacted c/o NTS Scams Hub	60	60
Partnership or Area Based Working Events / Weeks of Action	10	8
Samples, Mileage and Websites Checks	75	75
Number of Intelligence Logs Input on Regional Database	100	84
Press Releases Issued	8	6
RIPA/Warrant Applications	1	1

Service Structure as of March 2020

