

Trading Standards Service

Service Operational Plan 2005 – 2006



Contents

<u>Part Number</u>	<u>Page(s)</u>	<u>Description</u>
Part 1		Service Operational Plan
	1 – 8	Introduction & Background
	8 – 16	Pressures for Change
	17 – 21	Performance
	21 -22	How we will Improve
Part 2		Action Plan
Part 3		Appendices
		Appendix 1 – Organisational Charts
		Appendix 2 – Budget Details
		Appendix 3 – Fees and Charges
		Appendix 4 – Customer Survey Results
		Appendix 5 – Staff Survey Results
		Appendix 6 – Performance Schedules
		Appendix 7 – EFQM Excellence Model
		Appendix 8 – Training Strategies and Programme
		Appendix 9 – Business Continuity Plans
		Appendix 10 – Risk Management
		Appendix 11 – Accommodation
		Appendix 12 – Enforcement Policy
		Appendix 13 – National & Local Performance Indicators
		Appendix 14 – Equal Opportunities Statement
		Appendix 15 – National Performance Framework Core Responsibilities and Profile Forms
		Appendix 16 – Customer’s Come First
		Appendix 17 – Environmental Management

Part 1

Service Operational Plan

INTRODUCTION & BACKGROUND

This operational plan covers the period 2005-2006. It outlines how the Service will tackle the current workload, the new opportunities and the demands on the Service as they materialise over the period of this plan. It includes our compliance with National Performance Indicator BV166 and the Department of Trade and Industry National Performance Framework.

The requirements of the Department of Trade and Industry Service Delivery Plan are incorporated into this Model.

This Operational Plan will reflect the operation of the Service throughout the period of the plan. It is assumed that there will be organisational and financial stability during this period and the plan will be reviewed throughout the year.

Who We Are

The Trading Standards Service is unique in London operating as a consortium partnership between Brent and Harrow. It is a front line service, with Brent and Harrow working together, both Authorities having joint responsibility, with the staff employed by Brent. The Service carries out the statutory obligation placed on the two Authorities to enforce over 45 different pieces of criminal consumer protection legislation, numerous EEC Directives, subordinate legislation, Codes of Practice and guidelines. The Service also gives "prioritised" civil advice, with a Consumer Advice Officer (for each borough) that gives practical assistance to people seeking civil law redress through the County Courts.

The Service is well established, having been operating as a consortium since 1965 with tried and tested operational procedures and practices. Brent and Harrow have confirmed their commitment to continue working together and a new agreement operated from 1 April 1995 under Section 101(5) of the Local Government Act 1972 with the Joint Advisory Board being the relevant body to discharge the functions of the Service. The structure of the Service and its position within the Corporate structure can be seen in Appendix 1.

The Service covers a geographical area of 9,361 hectares, (Brent: 4325 hectares; and Harrow: 5,036 hectares), with a population of 470,278 (Brent: 263,464 (56%) and Harrow: 206,814, (44%) - 2001 census figures). Brent has an ethnic population of 54.7% and Harrow 41.2%.

The Service is accessible by telephone (including minicom), fax, e-mail, web-site, videophone and personal visit. Opening hours are 9.00 – 5.00, Monday to Friday, with a facility to contact the Service outside of these times and leave a message.

The Service's objectives are documented in 'Objectives' below and reflect the wishes of all stakeholders. They are designed to promote the economic well-being and quality of life in the community by ensuring:

- Confident and knowledgeable consumers and businesses
- Support for competitiveness and enterprise in the community
- A fair and safe trading environment

Service Improvements and External Accreditation

The Service achieved initial registration to ISO9002 in November 1994, which has been subsequently maintained annually. It was upgraded to the tougher ISO9001:2000 standard during 2003. As part of the Environmental Services department, the Service was accredited to ISO 14001 In November 2001. It has retained "Notified Body" status from the Department of Trade and Industry for the purpose of verification of EC metrology equipment every year since 1992. It achieved Investor in People Status three consecutive times from 1996 and now holds IIP status as part of a collective accreditation within the Environment Directorate. In November 1995 we were successful in being awarded our first Charter Mark. Our second Charter Mark was awarded in 1998, followed by a third in 2001. Our fourth application has just been submitted, and an assessment visit is planned for March 2005. UKAS accreditation has been granted for the laboratory, initially in November 1995 and each year subsequently. We achieved the Community Legal Service Quality Mark in November 2001 which was subsequently upgraded to 'general help with casework' level in 2003. We have also received two national awards from The Anti Counterfeiting Group, the most recent in 2004. The Service has been recognised as having the first "Local Business Partnership" in either Brent or Harrow and facilitates focus groups for small/large businesses. One of our teams received a Brent staff achievement award for 'achievement in adversity' in 2003, and another team received a staff achievement award for 'achievement in adversity' in 2004.

We have received Consumer Support Network funding from the D.T.I. to set up a local Consumer Support Network, which has now been achieved. Further funding has been applied for, to carry out two CSN Projects to address areas of particular consumer need. One of these relates to doorstep selling to vulnerable consumers, and the other is to raise awareness, access and satisfaction levels amongst the Asian community. These needs were identified from our surveys.

The Service works closely with other Trading Standards Services in London (including a benchmarking club), other departments in Brent and Harrow and with many other organisations, including Police, Customs and Excise, Benefits Agency; Anti Counterfeiting Group; Community Legal Service; Local Courts, etc.

This Service has undergone a Best Value Review with other Regulatory Units and an action plan has been agreed. Further work on seeking these improvements and conducting these improvement actions is continuing during the period of this plan. For example, our Service leads a customer working sub-group for Regulatory Services.

Our Service is continuing to utilise the EFQM Excellence Model for continuous improvement and has recently completed a self assessment. This has led to an improvement action plan which will be worked on this year. Additionally, the

Service is seeking to apply for the UK Business Excellence Award during 2005. Funding for this project has been secured from the Improving Brent fund.

Objectives

Corporate Policy

Brent's vision is:

“Brent will be a borough where all its communities enjoy a high quality of life and will be able to fully participate in society. Brent Council will have a reputation for good democratically accountable leadership, strong partnerships and excellent services. Brent will be a borough proud of its diversity, served by an ambitious, progressive and outward looking council. Brent will be a home of choice for its diverse population and businesses.”

Brent's values are:

- i) Achieving service excellence.
- ii) Raising the quality of life.
- iii) Serving all our communities.
- iv) Developing and motivating our staff.

Brent's key priorities are:

- i) Supporting children and young people.
- ii) Promoting quality of life and the green agenda.
- iii) Regeneration and priority neighbourhoods.
- iv) Tackling crime and community safety.
- v) Achieving service excellence.

Harrow's Vision is:

In Harrow we will strive for a community:

- where everybody is able to enjoy healthy and happy lives in an environment which is clean, safe and secure
- which is cohesive and strong
- where all have the widest range of opportunities to succeed and the capacity to achieve their aspirations
- where no-one feels excluded
- where young people have a strong voice and are heard

Harrow's Strategic Corporate Priorities are:

To achieve our vision, we will focus on the following key strategic corporate priorities which will make a real difference to living and working in Harrow:

- We will enhance the environment in Harrow
- We will strengthen Harrow's local communities
- We will promote Harrow as a centre of lifelong learning
- We will improve the quality of health and social care in Harrow
- We will develop a prosperous and sustainable economy in Harrow
- We will develop a customer focused Council

Service Policy Statement

The Trading Standards Service Policy Statement is: -

“The Trading Standards Service for the London Boroughs of Brent and Harrow aims to provide its customers with the highest quality of service in support of the Council’s commitment to serve the community”.

Service Aim

The overall aim of the Trading Standards Service is **“to ensure a safe, fair and equitable trading environment exists for consumers and commerce alike.”** This aim will be achieved by enforcement of the legislation assigned to the Service, carried out with due regard to our policy statement and within the terms of our overall objectives.

Service Priorities

These have been set following consultation with our stakeholders and customers.

National Priorities: -

- i) Informed Confident Consumers.
- ii) Informed Successful Businesses.
- iii) Enforcement of a Fair and Safe Trading Environment.
- iv) Efficient, Effective and Improving Trading Standards services.

Local priorities (key result areas) for the Service are: -

- i) Investigation of consumer complaints.
- ii) Verification of trade equipment.
- iii) Advice to traders and consumers.
- iv) Inspection of relevant trade premises.
- v) Warning and prosecuting offenders where appropriate.
- vi) Partnership working with other organisations.
- vii) Promotion of these objectives to the community.

Performance Management has been introduced for all staff, who have regular assessments to ensure that our targets and objectives are met. Appraisals of all staff are carried out twice a year. Each officer’s Key Result Areas and Success Criteria reflect the above priorities and objectives.

Service Objectives

These have been set to reflect the wishes of all internal and external stakeholders.

- (i) To enforce the legislation assigned to the Service.
- (ii) Ensure external accreditations are maintained and that best value services are provided through continuous improvement in service delivery.
- (iii) To provide training and development for all staff within the resources available, which reflect both the needs of individuals and the goals and objectives of the Service.
- (iv) To ensure that effective communication systems are in place, both internally and externally.

- (v) To provide an advice, information and educational service and to promote the Service within the consortium area.
- (vi) To achieve wider participation of these objectives by reference to both Councils' corporate policies, Environment Services policies, and by promoting these objectives to existing and potential stakeholders.

Environmental Policy

We work wherever possible to achieve the improvements to the environment set out in our ISO14001 standard Environmental Policy.

Through our operational services we will manage and improve the quality of the environment by:

- complying with all relevant environmental legislation and other obligations;
- preventing, controlling, and reducing the release of pollutants to air, land, and water;
- integrating environmental considerations into Council procurement, including contracts;
- improving on our waste management performance by reducing and recycling wherever possible;
- reducing our contribution to Climate Change by addressing our energy consumption and promoting the use of renewable energy sources;
- improving the quality of the public realm;
- enhancing the ecological value of land for which the Council is responsible; and
- motivating and training our staff through our Going Green campaign.

Through regulation, enforcing the law, and through influence we will:

- enforce all relevant environmental legislation;
- raise awareness of, and coordinate, environmental issues around the Borough;
- work with partners to promote the sustainable development agenda;
- promote and work to deliver a sustainable transport system;
- influence waste management practices in the Borough by regarding waste as a valuable resource;
- control development in the Borough in consultation with stakeholders, to protect and improve the quality of the environment and to improve access for all; and
- maintain and continually improve the environmental quality of Brent.

Context/Strategic Framework

The Service plays it's part in contributing to the Crime Prevention Strategy of both Councils' when enforcing legislation by:

- ◆ **Promoting quality of life and the green agenda (Brent)**

◆ **We will enhance the environment in Harrow (Harrow):**

Protecting the public from illegal trading including the sale of unsafe or falsely described goods and services is the main function of this Service. All enforcement activities are designed to improve the quality of life for the community within our area. Educational talks given to local groups empower them to remain safe, confident consumers. The Trading Standards Service is committed to playing its part in meeting the Environmental Service's green agenda objective of reducing enviro-crime across the borough. This will be carried out by taking action against traders in the following areas:

- Sale of vehicles from public highways
- Reduction of graffiti through enforcement of legislation controlling the sale of paint spray cans
- Provision of advice to the public and local business on energy efficiency labelling for domestic appliances, and
- Provision of advice to local business on passenger car fuel consumption and CO₂ emissions

◆ **Supporting children and young people (Brent)**

◆ **We will promote Harrow as a centre of lifelong learning (Harrow)**

◆ **We will improve the quality of health and social care (Harrow):**

Through our under-age test purchasing programme, and extensive publicity relating to this work we will seek to reduce the number of traders that supply age restricted products to children. These products include fireworks, cigarettes, butane, knives, alcohol, lottery tickets, videos, and paint spray. Current work involves the introduction of a good trader scheme relating to the sale of age restricted goods. We continue working with local schools and colleges to develop greater understanding of consumer education and we provide four work experience placements each year.

◆ **Regeneration and priority neighbourhoods (Brent)**

◆ **We will develop a prosperous and sustainable economy (Harrow):**

We support this corporate objective through working with local businesses to ensure rogue traders are dealt with and bona fide businesses are given support through help and advice. We have introduced a good trader scheme for motor traders to encourage fair competition and to redress the economic balance. Particular attention is paid to priority areas where our Officers are working jointly with other agencies as part of the 'Safer Kilburn Project'. Local businesses are consulted through the Local Business Partnership Groups.

◆ **Tackling crime and community safety (Brent)**

◆ **We will strengthen Harrow's local communities (Harrow):**

A key priority for the Service is to ensure that all products for sale are safe, particularly electrical goods, toys, cosmetics, furniture (including that supplied in rented accommodation), bicycles, car tyres, etc. Consumer Safety enforcement is high on the proactive enforcement agenda, and criminal offences are processed whenever appropriate. We intend to work together with the EnviroCrime Co-ordinator and other Units in Brent and Harrow to identify ways in which we can help to reduce crime. Our under age sales work further supports this objective by ensuring that children do not have ready access to alcohol and other similar products which are linked to teenage crime. We regularly conduct a multi-agency approach to enforcement and work alongside other law enforcement agencies both internal and external to the Council.

◆ **Achieving service excellence (Brent)**

◆ **We will develop a customer focussed Council (Harrow):**

Continued use of the EFQM excellence model helps underpin our external accreditations and provides continuous improvement and opportunities for further development. We have already achieved and maintained IIP, UKAS, ISO14001, ISO9001, Charter mark, Notified Body Status, and the CLS Quality Mark. We are a founder member of the Trading Standards London Benchmarking Group, and have been instrumental in developing a number of best practice guidance documents in Trading Standards. Further developments Nationally in Trading Standards are linking in the National Performance Framework and a number of other Government returns into an EFQM based Peer Review, which will allow comparisons to be made with other Trading Standards Services throughout the Country. We are one of the initial tranche to be undertaking this new review.

Improving Brent

The aspirations of the Corporate Improving Brent Programme have been translated into the ES Local Improvement Plan. Some of the actions from this plan have been translated into specific actions for our unit to contribute towards. We provide a staff member to assist with the role of facilitating the IB programme.

Environment Service Development Plan

Our contribution to the Environment Service Development Plan can be seen above under the heading context/strategic framework. We intend to ensure that we work towards the aims within this plan.

Review of Previous Year

We are currently scheduled to achieve our overall targets in both Brent and Harrow as set down in last year's work programme. By way of example, we are expecting to meet 92% of our target for programmed inspections in Brent, yet 129% of our target for criminal complaints investigated. We have maintained 100% compliance with BV166, a good record of invoice payment within target and a good sickness absence level.

Highlights include the introduction of an approved motor trader scheme at a high profile launch event attended by both Mayors.

We managed to retain of accreditations including ISO14001, ISO9001, submission of our next Charter Mark application, UKAS (laboratory) accreditation.

We had national recognition from the Anti-Counterfeiting Group (ACG) in relation to excellence in anti-counterfeiting work.

We achieved a Brent staff achievement award during 2004 for 'achievement in adversity'.

Several large investigations have been successfully concluded during the course of the year and have resulted in some high profile publicity for the Service and the Councils. Other high profile media coverage has included regular articles in the Brent Magazine, Harrow People Magazine, and local newspapers.

Despite having to leave our accommodation at Willesden at very short notice and relocating to Brent House, this was achieved without disruption of service to our customers.

A high level of appreciation exists amongst our customers, as evidenced by 'thank-you' letters received and feedback from our surveys.

Since the introduction of a civil help service to vulnerable consumers, the satisfaction levels with the Service have increased and the number of corporate complaints have gone down.

A high level of training has been maintained for staff, particularly those leading to professional and vocational qualifications and legislation awareness.

PRESSURES FOR CHANGE

New Legislation

An example of new legislation relates to the prevention of graffiti by restricting the supply of paint cans to the younger members of our society. We support the Council's aims and our impact will hopefully lead to a reduction in graffiti offences and re-offending amongst young people. Advice to shops and 'test purchasing' with child volunteers will commence during the period of this plan. Further legislation relating to Fireworks enforcement is being introduced, this will change the registration/licensing regime. The new Licensing Act will have an impact on Trading Standards because we will become a key consulted body for licensing applications/renewals because of our knowledge/experiences with off-licences and public houses. There is a proposal that Trading Standards will have the power to close down licensed premises which continue to breach requirements relating to excessive drinking and sales to under age children. Sellers packs are still due to come into force, requiring estate agents to ensure that packs are made available to give certain property purchase information to prospective purchasers up front.

The legislation changed last year in respect of clamping firms and these changes are beginning to take affect now. The Security Industry Authority (SIA) is now fully set up and operating training schemes for clampers and a licensing regime. We have a role to play in liaison with them, and for us to educate consumers.

Consumer Credit Advertising legislation is being overhauled and likely changes this year are a removal of the old categorisation of credit advertisements that put them into simple, intermediate or full categories and controlling what information could/should be included for each. It is likely that consumer protection will be increased by the changes, and we will have a role in ensuring local business compliance and consumer education.

The new proceeds of crime legislation will have an impact because it is extra demand on officers to consider the monetary gains made by the defendant by conducting the illegal activity, and secure evidence of earnings. It provides us with further opportunities to impose an extra penalty on the defendant.

New Government Initiatives

Consumer Direct

Consumer Direct is a new national helpline which has been set up with funding from the Department of Trade and Industry. The Service will go live in London during March 2005. This helpline will work in conjunction with Trading Standards Departments and provide initial 'next step' advice to consumers. This will empower consumers by providing an alternative option to receive clear, practical consumer information and advice.

Consumer Direct will be a first point of call for consumers, providing first tier advice on a range of consumer matters, including advice before shopping, information on consumer rights and practical guidance on individual problems and how to gain redress. The aim is to give people the knowledge, tools and confidence to be able to resolve matters themselves.

Any matters that require further assistance or investigation will be referred to the local Trading Standards Department for action. This is likely to increase the number of enquiries to us requiring intervention or investigation due to a national advertising campaign for the single Consumer Direct helpline number.

The helpline number is: **08454 04 05 06**

Their website is: <http://www.consumerdirect.gov.uk/>

Consumer Direct will be open 08.00 to 18.30, Monday – Friday, and 09.00 to 13.00 on Saturdays.



Peer Review

CIPFA, DTI, OFT, and others require performance monitoring data annually. This year Brent and Harrow Trading Standards Service has volunteered to be part of a new 'Peer Review' scheme that will reduce the administration of all these separate returns. This will eventually involve all Trading Standards authorities throughout the Country and the data will be used for benchmarking and comparison purposes.

Good Trader Schemes

We launched a Good Trader Scheme for the retail sale of motor vehicles during 2004. This scheme is to be extended to seek more members, and there is pressure from Government to utilise such schemes fully to prevent consumer detriment. Another government led 'quality mark' scheme for the building trade and home improvement sector is being rolled out regionally, there will be a role for us to promote this scheme when the launch in our region occurs.

During 2005 we are beginning work on a scheme in relation to the reduction of sales of age restricted goods to children. This is a very large scheme and the number of traders involved will potentially be quite large given the wide variety of harmful consumer goods that have the potential of being sold to children. The

approach that we are likely to take will be to have a staggered launch for particular trading sectors. This type of approach is encouraged by initiatives such as the Enforcement Concordat and the Consumer Support Network.

National Performance Framework

Despite this being introduced last year it is now undergoing review and major changes are anticipated. This is likely to include participation in Peer Review.

Comprehensive Performance Assessment

Recent Government publications indicate that Trading Standards are likely to be included in each Council's CPA with effect from 2005. This will require changes to the mechanisms that we use to measure performance and report results.

Hampton Report

As part of the 2004 budget, the government asked Philip Hampton to carry out a review of regulatory services and enforcement. An interim report has been produced, but the final report is still awaited. This report is considering as well as many other aspects, whether regulatory services are better delivered locally, nationally or regionally.

DTI Review of Trading Standards nationally

The DTI are committed to ensuring the Trading Standards Service for the UK is the best in the world. They are currently producing a report on the current levels of service nationally and looking at recommendations to ensure improvements where possible. This may well be linked to the Hampton report.

Government Departmental Priorities

DTI have attempted to collate the priorities from several of the government departments that have input into the Trading Standards work. This Service will need to address these requirements.

New Community Pressures

Headline Results from Customer Surveys

There are a number of surveys that have been conducted during 2004/5, including a telephone survey, a general survey of 400 consumer users, the Environment wide survey and a survey of our business customers with whom we have a 'Home Authority' relationship. The headline issues to arise from these are:-

a) Good practice in relation to complaint/enquiry handling should again be communicated. Probably the most comprehensive method of achieving this would be via the corporate 'Customers Come First' programme.

b) Contact within three days, in the minds of our customers, is not being met as much as should happen. This is a very important performance indicator, and a simple matter like this can make all the difference to customer satisfaction levels.

Managers are to be reminded that this indicator must be closely monitored to achieve a 100% satisfaction level in future.

c) The customer perception as to whether we are able to give the advice required is a cause for concern, so it is recommended that the work currently being undertaken by the Regulatory Services Management Group Customer Service Sub-Group into managing customer expectations continues in earnest. Also we must improve at leaving the customer feeling if we cannot solve their problem that we have been helpful in offering viable alternative solutions and clearly explained our role. In future we will look to closely examine the individual cases of dissatisfaction to establish whether the correct advice and explanations were given.

d) Customers think that in relation to civil law complaints (where we are presently only giving next step advice), if it is potentially a wide ranging matter, we should visit traders they complain about to offer good practice guidance. It is not suggested that this should relate to isolated or narrow focussed civil disputes.

Serious consideration will be given to the comments and suggestions that customers have made in their survey responses.

The analysis from our customer survey that relates to the diversity monitoring in general shows three trends, which have been the same in two consecutive years. One trend is that a disproportionately low percentage of respondents from the black community are reflected in the survey. Another trend is that Asian respondents are least happy with the way the officer handled their enquiry and least satisfied with the service. Also, there is a considerable difference in satisfaction levels according to gender. Male survey respondents appear to be a lot less satisfied than female respondents. There has been a big improvement from disabled respondents, who are now overall more satisfied with the Service than non-disabled respondents.

The Environment survey highlights some strengths and issues:

Strengths:

- 76% got through on their first attempt (Environment average 63%)
- 96% responded that our staff are polite
- 90% responded that our staff are helpful
- 88% responded that our Service offers good value for money (Environment average 74%)

Issues:

- Being kept informed of progress/outcome
- The quality of information or advice given
- The accuracy of information given
- Over a third were not satisfied with the outcome
- Of those left unsatisfied, the reasons for the outcome were not made clear to them (in every 2 out of 3 customers)
- Only 28% of customers said they did know how to obtain information about how Environmental Services are performing

Analysis of the make up of the borough

Brent is one of the most culturally diverse boroughs. (BME) ethnic groups in Brent now make up the majority of the population at 54.7%, according to GLA projections. This is the second highest of all the London Boroughs after Newham. A third of Harrow's population is made up of Asian ethnicity. Brent has a population of younger people compared to Harrow.

A survey conducted as part of the Consumer Support Network development plan showed that Asian respondents in Harrow were least happy with the Service, and the responses from the black community in Brent were disproportionately low. As a result of the findings an improvement plan was created, and two project bids were submitted to the DTI for funding. If agreed then work on these projects could commence this year. One of these projects has a mainly Harrow focus to consult with the large Asian community via community representatives on improving accessibility, and finding ways to better manage expectations and improve our service in line with any specific/tailored requirements identified. The other project is to particularly target the black community of Brent to improve accessibility and to address the main area of consumer concern for this area which is home maintenance/repair services offered via doorstep sales.

CLS

We are continuing support for both Boroughs' Community Legal Service partnerships during this plan. The CLS partnerships are a useful forum for local legal advice providers to work more collaboratively.

Freedom of Information

The Service Unit Director has received full training on the new Freedom of Information Act, and most staff have taken the on-line test. The few remaining staff members yet to do so will be encouraged to take it in the near future. In the forthcoming weeks we are intending to contribute to a new FOI database on the intranet. We need to add to this resource to assist others in the authority with identifying who holds which information.

Access to Civil Help Services

Despite having a Consumer Advice Officer for each borough, customers still place an increased demand and expectation for our civil law intervention service. Since the introduction of a civil help service the satisfaction levels with the Service have increased and the number of corporate complaints have gone down.

Customer Expectation Levels

As Services and awareness improve, and consumer confidence increases, there is always increasing expectation. The introduction of the national consumer helpline 'Consumer Direct' will further raise demand on local services through both increased awareness and the number of referrals from the helpline to this Service for further action.

Pressure from Bona Fide Businesses

Legitimate businesses apply pressure for us to maintain high profile enforcement work to prevent unfair competition by discouraging illegal trading and curb the activities of rogue traders.

Council Initiatives and Requirements

Improving Brent

For this forthcoming financial year, we will contribute to the Corporate Improving Brent Programme.

We are providing a staff member to the cross-cutting Improving Brent Facilitators Group (IBFs). This group, made up of various Service Unit and Directorate representatives, will be ensuring that some of the priorities set out in the Improving Brent Programme and our Local Improvement Plan are delivered. They will do this by using their networking skills, communication / persuasion skills and working outside of their normal boundaries to deliver a collective approach to improving our CPA positioning.

Priorities for the IBFs for 2005/06 are:

- Short Term:
 - BV199 Local Environmental Quality score, including contributing to a brainstorm session to see how we can improve the ES BV199 score - this is directly related to urban environmental quality, measuring cleanliness, litter, weed growth, footway condition, and soon to measure graffiti.
 - StreetCare Waste Services CPA rating, including domestic recycling and refuse collection, street cleansing and domestic waste, fly tipping, envirocrime and benchmarking the service
 - Facilitating improvements to the payments of invoices performance.
- Medium Term:
 - Embedding improvements in Sports
- Long Term:
 - Customers Come First
 - Improvements to next Local Improvement Plan.

Other issues for consideration are: Supporting Ward Working, and Local Development Frameworks.

Local Improvement Plan

There are some elements of Environment's local improvement plan 2004-2005 that we can contribute to. These are detailed in our action plan, but broadly cover:

- Graffiti underage sales
- Partnership working with wardens
- Road traffic/pedestrian/cyclist accidents – enforcement of Road Traffic Act in relation to overloaded vehicles
- Introduction of 360^o appraisals
- Roll out the Customers Come First initiative

- Conduct an impact assessment and associated improvements
- Support the seconded diversity team officer
- Continue our management training programme
- Become involved in the Licensing Act

Customer Comes First

The full CCF details, as they relate in Environment, are contained within appendix 18. Some of the elements where we can have an input have been transferred into our action plan.

Staff Survey

The staff survey showed a drop in staff satisfaction which needs to be addressed. A re-organisation of part of the Service is currently underway, which will be supplemented with focus group feedback and relevant training.

Environmental Pressures

There are five main environmental pressures for change that we need to consider:

- a. The Environmental Information Regulations 2004 (came into force on 1st January 2005) Please note, environmental information is exempt from the Freedom of Information Act 2004 as it is dealt with under these regulations instead.
- b. Other legislation such as the Genetically Modified Food, Feed, and Organisms legislation, or the new Energy Labelling for Household Air Conditioners (very important as when the weather gets hotter due to climate change, more and more people will want to air condition their homes).
- c. Maintaining the Service's ISO14001 certification for another year, including committing to continual improvement.
- d. Climate change is top of the UK Government's agenda for its presidency of the G8, and the Kyoto Protocol becomes legally binding on 16th February 2005.
- e. Risk Assessments: Significant environmental aspects will be considered when activities are prioritised and assessed for risk. The risk assessment process for the Service is undergoing a period of improvement. It is important that we also consider the risks to the environment of any of our more significant activities.

When conducting risk assessments, our ISO14001 rep, Rob Abell, has checked our unit's Aspects Register for any significant environmental aspects. Where there are significant environmental aspects arising from the activity being assessed, they have been considered and allocated risk scores.

In addition, we will review the impacts on the environment of our activities if they are modified in any way, or if new activities are introduced. This ensures that we do not miss opportunities for improvement or management.

Trading Standards Impacts

We have revised our aspects register and reconsidered the impacts that we have on the environment using a scoring mechanism. This scoring is still due to be completed, but of those so far scored, these are some of the environmental impacts that we will be considering for this year:

- Advice on environmental claims to business as part of routine work
- Home authority companies/ relationships - advice given on environmental issues to large companies
- Sampling goods and checking out the accuracy of any 'green' claims
- Environmental Protection (Controls on Dangerous Substances) Regulations 2003
- Enforcement of Energy Act 1976: This Act requires energy claims made about new vehicles to refer to official tests
- Enforcement of The Chemicals (hazard information and packaging for supply) Regulations 1994 (as amended)
- Enforcement of Energy Efficiency Regulations
- Recycling of evidence waste
- Enforcement of The Packaging (essential requirements) Regulations 1998
- Providing information on Fair Trade products to the Brent Community
- Petrol sampling to determine correct level of pollutants: Enforcement of the Motor Fuel (Composition and Content) (Amendment) Regulations 2003 to see if petrol contains water or is the right type
- Enforcement of The Motor Cycles Noise Act 1987

Trading Standards 'Environmental Management Programmes'

We currently have EMP's for these objectives:

- To monitor advice to business within the consortium area in relation to Trading Standards legislation that may have environmental implications. To increase the amount of advice to business thus increasing awareness of their obligations under environmental legislation.
- To monitor compliance by businesses in the consortium area with The Passenger Car (Fuel Consumption & CO2 Emission) Regulations 2001 to ensure that the sales of any new cars are accompanied by the requisite emissions information.
- To monitor compliance by businesses in the London Borough of Brent with Energy Labelling Regulations to ensure that the sales of new electric appliances, as prescribed under all the statutory energy labelling legislation, are accompanied by the requisite labelling information.

Equalities

During the course of this plan, we will continue to support the Service Area Equality Auditors Group by having a nominated Officer to lead on this initiative. An equality impact assessment will be conducted for which our staff representative has already received training. Our last Equalities and Disabilities Action Plan is still being progressed, as is the Environment Race Equality Scheme action plan 2003/4, so we will continue to make improvements in line with those plans. An example is to introduce diversity monitoring of the traders that are subject to inspection visits by us, and to begin diversity monitoring of all our customers. Guidance documents for staff will be developed and training will be provided to ensure that our staff are equipped to undertake the monitoring

activity. On-line training will be set up and utilised within the Unit. Once monitoring has commenced this year, it will enable improvement projects to commence next year to address any areas of concern.

Health and Safety

Further personal protective equipment is due to be acquired during 2005 to give Officer's a level of stab and ballistic protection. The personal issue stab vests will be supported by a work instruction or guidance document for the lead officer of an activity such as executing an entry warrant on a raid, or undertaking large scale seizures from street/market traders.

Upon our move back to Quality House, there will be some health and safety consideration given to the positioning and adequacy of workstations ensuring enough space is available for staff to comfortably move around the workstations and ensure no tripping hazards are created from the new layout. Workstation self assessments will be made available for staff to set up and assess their own layout and chair positions.

We will continue to ensure that all new staff are given health and safety training during their induction. A regular programme of audits will be carried out of our health and safety procedures during the course of this year.

EFQM

A full self assessment utilising the EFQM Model was conducted during December 2004, which forms the basis of an application for the UK Business Excellence Award, to be submitted during 2005, and fulfills our requirement to conduct a 'peer review' this year. The improvements identified by conducting the self assessment have been compiled into an action plan which will form part of our holistic action plan in Part 2 of this Service Operational Plan (to be added later).

Benchmarking

We set up a benchmarking club, which has now covers all London Trading Standards Authorities. Twenty-five best practice matrices have been developed by club members to benchmark against each other and to share best practice. The best practice guides will be examined to find improvements to the service we offer in the boroughs.

The cost of our Service is compared against neighbouring Trading Standards Services. CIPFA statistics are currently used for this. Although in some instances we are more expensive this is correlated by the enhanced level of service that we offer.

PERFORMANCE

Review of past performance

The Audit Commission has required Trading Standards Services to report annually on the number of high and medium risk premises that are visited each year. This Performance Indicator was withdrawn for 2001/2002, but has been retained as a local performance indicator. From 1st April 2004, the criteria for

carrying out risk analysis of trade premises underwent a fundamental change in an attempt to achieve consistency at a national level. A great deal of work has been carried out to upgrade our computer system. A desk top exercise of all the trade premises in Brent and Harrow showed a major reduction in high risk premises. Negotiation with LACORS is ongoing to ensure a more realistic system is implemented.

During the course of this plan new local performance indicators will be used in line with guidance being issued from the Office of the Deputy Prime Minister. It is likely that during the course of this plan BV166 is to be replaced with a sole indicator for measuring the compliance and effectiveness of enforcement activity. It is intended that the measure will be a combination of:

- % of businesses contacted within the year (high risk only)
- % improvement in the level of business compliance
- % of total businesses contacted which were found to be compliant

2004/2005 Performance Results

Ideally the Service should visit all high risk premises once a year, all medium risk premises every 2 years and all low risk premises every 5 years. At 1 April 2004, there were 9472 premises in the consortium liable for inspection (5712 in Brent and 3760 in Harrow). Of these 335 (3.5%) were high risk premises (240 in Brent and 95 in Harrow) and 4963 (52.4%) were medium risk premises (2997 in Brent and 1966 in Harrow). The Service therefore aimed to inspect 1739 high and medium risk premises (each year) in Brent and 1078 high and medium risk premises in Harrow.

	TOTAL PREMISES	HIGH RISK	MEDIUM RISK	LOW RISK	OTHERS
Brent	5712 (60.3%)	240	2997	2475	0
Harrow	3760 (39.7%)	95	1966	1699	0
Consortium	9472 (100%)	335 (3.5%)	4963 (52.4%)	4174 (44.1%)	0

During 2004/2005 the Service agreed to deliver the following work:

Consortium 2004/5	<u>Planned</u>	<u>Actual</u>	<u>2005/6</u>
Requests for action (criminal)	1830	NYK	1830
Civil Investigations	402	NYK	402
Requests for action (non criminal)	3690	NYK	3690
Trader Enquiries (including HA work)	330	NYK	330
Enterprise Act Investigations	12	NYK	12
Announced Comprehensive Primary High Risk Insp.	335	NYK	362
Announced Comprehensive Primary Medium Risk Insp	2482	NYK	2241
Announced Comprehensive Primary Low Risk Insp	595	NYK	844
Announced Secondary High Risk Inspections	170	NYK	130
Announced Secondary Medium Risk Inspections	900	NYK	700
Other Inspection/Test Purchase Visits	1200	NYK	1120
Home Authority Referrals	406	NYK	406
Average Quantity Visits	45	NYK	45
Criminal Reports of Infringement	130	NYK	130
Civil Reports and Action	24	NYK	30
Prosecutions completed	75	NYK	71

Formal Cautions	18	NYK	25
Letters of Warning	32	NYK	32
Projects completed	13	NYK	11
Verification Visits	57	NYK	57
Multi-Agency Operations	14	NYK	22
Mobile Display Unit Visits	26	NYK	26
Electric Blanket Safety Work	3	NYK	2
Child Car Seat Safety Work	2	NYK	2
Talks to external Bodies/Organisations	36	NYK	36
Work Experience Students	4	NYK	4

Brent 2004/5

	<u>Planned</u>	<u>Actual</u>	<u>2005/6</u>
Requests for action (criminal)	930	NYK	930
Civil Investigations	201	NYK	201
Trader Enquiries (including HA work)	130	NYK	130
Enterprise Act Investigations	4	NYK	4
Announced Comprehensive Primary High Risk Insp.	240	NYK	220
Announced Comprehensive Primary Medium Risk Insp	1499	NYK	1248
Announced Comprehensive Primary Low Risk Insp	495	NYK	507
Announced Secondary High Risk Inspections	120	NYK	80
Announced Secondary Medium Risk Inspections	800	NYK	600
Other Inspection/Test Purchase Visits	600	NYK	520
Home Authority Referrals	294	NYK	294
Average Quantity Visits	30	NYK	30
Criminal Reports of Infringement	70	NYK	65
Civil Reports and Action	12	NYK	12
Prosecutions completed	40	NYK	36
Formal Cautions	10	NYK	10
Letter of Warning	17	NYK	17
Projects completed	7	NYK	5
Verification Visits	40	NYK	40
Multi-Agency Operations	8	NYK	16
Mobile Display Unit Visits	13	NYK	13
Electric Blanket Safety Work	1	NYK	0
Child Car Seat Safety Work	1	NYK	1
Talks to external Bodies/Organisations	6	NYK	6

Projects

Lead

- 1 Pricing (M)
- 2 Energy Labelling (FT)
- 3 Jewellers (M)

Contribution to North West London Projects

- 4 Cycle Helmets (M)
- 7 Discounts/special offers in supermarkets (M)

5 Sunglasses (lead) (M) 8 Hallmarking (FT)
 6 Goods sold from bulk (M) 9 Web vs phone charges (FT)

Contribution to London-wide Projects

10 Furniture

Harrow 2004/5

	<u>Planned</u>	<u>Actual</u>	<u>2005/6</u>
Requests for action (criminal)	900	NYK	900
Civil Investigations	201	NYK	201
Trader Enquiries (including HA work)	200	NYK	200
Enterprise Act Investigations	8	NYK	8
Announced Comprehensive Primary High Risk Insp.	95	NYK	142
Announced Comprehensive Primary Medium Risk Insp	983	NYK	993
Announced Comprehensive Primary Low Risk Insp	100	NYK	337
Announced Secondary High Risk Inspections	50	NYK	50
Announced Secondary Medium Risk Inspections	100	NYK	100
Other Inspection/Test Purchase Visits	600	NYK	600
Home Authority Referrals	112	NYK	112
Average Quantity Visits	15	NYK	15
Criminal Reports of Infringement	60	NYK	65
Civil Reports and Action	12	NYK	18
Prosecutions completed	35	NYK	35
Formal Cautions	8	NYK	15
Letter of Warning	15	NYK	15
Projects completed	6	NYK	6
Verification Visits	17	NYK	17
Multi-Agency Operations	6	NYK	6
Mobile Display Unit Visits	13	NYK	13
Electric Blanket Safety Work	2	NYK	2
Child Car Seat Safety Work	1	NYK	1
Talks to external Bodies/Organisations	6	NYK	6

Projects

Lead

1 Laser Pointers (M) 4 On-line Auctions (FT)
 2 New House Descriptions (FT) 5 Pricing (M)
 3 Distance Selling (FT)

Contribution to North West London Projects

6 Cycle Helmets (M) 9 Discounts/special offers in supermarkets (M)
 7 Sunglasses (M) 10 Hallmarking (FT)
 8 Goods sold from bulk (M) 11 Web vs phone charges (FT)

Contribution to London-wide Projects

12 Furniture (M)

Development & Support 2004/5

	<u>Planned</u>	<u>Actual</u>	<u>2005/6</u>
Requests for action (non criminal)	3690	NYK	3690
Mobile Display Unit visits	26-1 officer	NYK	26-1 officer
Talks to external Bodies/Organisations (general)	24	NYK	24

Work Experience students
Initial contacts by Telephone/personal visits*

Max 4 p.a.
38,300

NYK Max 4 p.a.
NYK 38,300

*Telephone calls received service wide.

	Brent	Harrow	Consortium
Number of premises affected by consumer legislation (at 1/4/04)	5712	3760	9472
Proportion of visits made to high and medium risk premises	NYK	NYK	NYK

Comparisons with other Boroughs

Trading Standards Comparison Table with audit "family" authorities 2003/2004:

Authority	Net Expenditure	Net Expenditure per 1000 pop	Table Staff at 1.4.04	Consumer led enquires	Request from business	Total of all enforcement activities	Letters of Caution	Formal Cautions	Formal Undertaking	Prosecutions
Harrow	730,408	3528	15.6	3104	326	3432	20	8	2	71
Brent	834,096	3028	16	3139	197	4531	24	7	0	41
Barnet	609,000	1877	13	5774	459	1294	59	3	0	6
Ealing	568,000	1862	12.9	2562	254	2122	55	3	0	13
Hounslow	594,000	2790	10.4	3237	252	579	0	2	0	1
Hewham	832,000	3320	14.1	2543	156	716	22	4	0	24
Waltham Forest	774,000	3493	11.7	2434	71	1217	8	15	0	41

Where we are in terms of quartiles

When we compare ourselves to other local Trading Standards Departments it appears that our Service is better resourced than some of the smaller Services, and it is apparent that the work output is considerably higher. In addition we engage ourselves in more service improvement activities, hold more accreditations and undertake more partnership and co-operative functions.

Performance areas for improvement

We are looking into the introduction of good trader scheme for underage sales, and conducting a project on doorstep selling, and other similar projects which will have an impact on the Council's core objectives which will result in reducing crime particularly amongst the young and encouraging businesses to flourish (attracting business to the area).

Indicators to measure improvement

BVPIs

Under the Best Value Performance Indicators for Environmental Service's, there will be a new BVPI for the FOI responses. To accompany this, there shall also be a new BVPI on responses to the Environmental Information Regulations 2004. The only current BVPI for Trading Standards is BV166, against which we intend

to maintain 100% compliance. New BVPIs for Trading Standards are being incorporated as part of the CPA regime.

CPA

For the first time, Trading Standards will be included in the Council's Comprehensive Performance Assessment. The indicators are likely to be BV 166; business satisfaction; consumer satisfaction; high risk premises contacted and total business compliance

Target setting

National targets are set and contained within the national performance framework for Trading Standards. The work programme is set with reference to the core functions for Trading Standards and the targets for each individual aspect are set in line with historic data, budgets, Government initiatives, local objectives and the priorities of our stakeholders.

HOW WE WILL IMPROVE

Extensive audit has just been carried out utilizing the EFQM Excellence Model to identify strengths and AFI's, and an action plan has been devised to make future improvements. This plan will be used during the course of the year as a basis for prioritising. Other improvement opportunities identified from other sources, such as equality impact assessment and staff survey results will be incorporated into our overall Service action plan contained within this SOP.

Reduction in Budget

In an arena of increased legislation for our Service to become involved with, we are facing a required cut of £40,000 in the Brent budget for this forthcoming year. Full details of the budgetary position are contained within appendix 2. This will create extra pressure on remaining staff and will require greater prioritisation of work, with some work not being carried out. The work programme and targets (appendix 12) will be amended to reflect this requirement, and the new matrix of work (appendix 12) is utilized for setting enforcement priorities.

Environmental Audits

One of the ways that we will achieve service excellence is by conducting environmental audits.

Without environmental audits we have no clear idea of our progress, no way of checking we are doing what we say we will, no clear way of highlighting conflicts of interest, no (easy) way of finding the inefficiencies in the system and improving it, and so on. Audits are perhaps the best tool we have for improving our environmental performance and ironing out the aspects of our activities that are preventing us from performing at an optimum level.

It is essential that we not only commit to conducting environmental audits, but also to using the findings to improve the service they provide by applying effective, and timely, corrective actions.

We have considered our unit's significant environmental aspects, and of those

most significant, thought about the areas that you would really like to be investigated and improved this year. We are making arrangements for an environmental audit to be arranged to help us achieve this.

Part 2

Action Plan

Trading Standards Action Plan

Ref	Team	Detail	Person responsible	Timescale	Source
EFQM Excellence Model Self Assessment					
		Not yet complete			TS Self Assessment 2005
Equalities & Diversity – Impact Assessment, etc.					
E&D1	-	Universal Services: Seconded Diversity Team officer to work with units delivering universal services to find better ways of dealing with diversity issues to improve our service offer and service outcomes.	SAN	April 2005	Environment Service Development Plan 2005-2008
E&D2	-	Equality Impact Assessments: Seconded Diversity Team officer to work with relevant units to improve quality of assessments undertaken targeting any outstanding assessments.	SAN	April 2005	

Trading Standards Action Plan

Ref	Team	Detail	Person responsible	Timescale	Source
Staff Survey					
SS1-SS10	S/MMT	Identify reasons for low scoring items headed "Issues" in staff survey	SMT/MMT	September 2005	ES Staff Survey 2004
Customer Satisfaction Analysis					
CC1	DAS	Ensure good practice in relation to complaint/enquiry handling is recommunicated. Possibly via the CCF programme or in-house if CCF training too far off.	RSA		ES Customer Survey
CC2	SMT/MMT	Improve survey results in terms of our 3 day first response target.	SMT	April 2005	
CC3	SMT/MMT	Improve the survey result on 'were we able to give the advice you required'.			
CC4	SMT/MMT	Improve the survey result relating to where we were not able to give the help required that we have offered viable alternative solutions and clearly explained our role. We intend to closely examine individual cases of dissatisfaction.			
Ref Team Detail Person responsible Timescale Source					
Customer Satisfaction Analysis					
CC5		Customers feeling that they are being kept informed on the progress/outcome of their enquiry is not as high as it should be.			ES Customer Survey

Trading Standards Action Plan

CC6		The quality and accuracy of information and advice given could be improved.			
CC6		We will consider our policy on visiting/advising traders on civil law disputes in light of the numerous responses stating we should visit the trader that was complained about. We can consider discussing complaints with traders and offering good practice guidance even if they relate to civil law matters.			TS Customer Survey
CC7		The comments and suggestions made by survey respondents need to be considered.			
CC8		TS customer survey diversity monitoring data has been analysed and three issues require action. A disproportionately low percentage of responses were from the black community. Asian respondents were least happy with the way the officer handled their enquiry and were least satisfied with the service. Male respondents are a lot less satisfied than female respondents.			
Ref	Team	Detail	Person responsible	Timescale	Source
Customer Comes First					
CC1 & CC2	DAS	Inform staff of Customers come 1 st initiatives and include the proposed Customer Care training in Service Units' 2005/6 training plans. Resources	RSA	May 2005	ES Customers Come 1 st Action Plan

Trading Standards Action Plan

		£50 per staff member			(Appendix 17)
DEV1	DAS	Develop service information and contact details on intranet	RSA	June 2005	
DEV1	DAS	Document procedures/processes for publication on intranet	RSA	August 2005	
DEV2	DAS	Develop/implement SMS Facilities	MB	May 2005	
Org Iss	SMT	Completion of online awareness training for Freedom of Information Act	SMT	June 2005	
Org Iss	QT	Inclusion of CCF policy in induction pack	Quality Team	June 2005	
Improving Brent/Local Improvement Plan					
IBF1		Short Term 1: BV199 Local Environmental Quality score, including contributing to a brainstorm session to see how we can improve the ES BV199 score - this is directly related to urban environmental quality, measuring cleanliness, litter, weed growth, footway condition, and soon to measure graffiti.	RSA	December 2005	Identified by Improving Brent Facilitators from Improving Brent Action Plan 2004 – 2006
Ref	Team	Detail	Person responsible	Timescale	Source
Improving Brent/Local Improvement Plan					
IBF2		Short Term 2: Assisting StreetCare wherever possible with improving the Waste Services CPA rating, including domestic recycling and refuse	RSA	December 2005	Identified by Improving Brent Facilitators from

Trading Standards Action Plan

		collection, street cleansing and domestic waste, fly tipping, envirocrime and benchmarking the service			Improving Brent Action Plan 2004 – 2006
IBF3		Short Term 3: Assisting across ES to improve the payments of invoices performance	RSA	December 2005	
LIP1	HFT/ BFT	Improvement Area: Envirocrime. “Implement a programme of alley gating to protect an additional 1300 properties. Improve removal of graffiti through the introduction of a third graffiti team. Improve performance in tackling abandoned vehicles and fly tipping. Consider use of new powers.” – we can contribute to this by maintaining high profile enforcement and test purchasing of paint spray cans to children.			Environment Local Improvement Plan 2004-2005
LIP2	HFT/ BFT	Improvement Area: Wardens. “Roll out warden services to two further town centres; implement mobile town warden service; introduce parks wardens to two further parks and introduce mobile park warden service; implement Control Room alongside CCTV Control Room” – we can contribute with effective working relationships with the wardens, offering training and accompanying wardens to places with street trading activity.			
Ref	Team	Detail	Person responsible	Timescale	Source
Improving Brent/Local Improvement Plan					
LIP3	HMS/ BMS	Improvement Area: Road Traffic Accidents. “Reduce Killed and Seriously Injured and Slightly Injured casualties year on year through			Environment Local Improvement

Trading Standards Action Plan

		engineering interventions, education, encouragement and enforcement to achieve 40% reduction over a decade. Meet PSA targets by 2006. PSA priority” – we can assist by enforcement of the Road Traffic Act and targeting overloaded vehicles using the borough’s roads.			Plan 2004-2005
LIP4	SMT/ MMT	Improvement Area: Managers performance. “We will introduce bi-annual 360 ⁰ appraisals to improve our measurement of our managers’ performance against Brent’s management competencies.” – we are using the system for the first time in February/March 2005.			
LIP5	DAS	Improvement Area: Customer Care. “We will roll out the corporate Customers Come 1 st programme including the telephone handling modules. We will support and supplement this with an Environment Customers Come 1 st initiative” – we can ensure that our staff are fully a part of the scheme, our induction packs will be amended for new starters and we will ensure that future refreshers for existing staff occur.			
Ref	Team	Detail	Person responsible	Timescale	Source
Improving Brent/Local Improvement Plan					
LIP6	SMT	Improvement Area: Equality standard. “Develop an Action Plan to ensure that we meet Level 2 of the Equality Standard and are working towards Level 3	SAN		Environment Local Improvement

Trading Standards Action Plan

		by April 2006” – we are contributing a staff member to the auditor’s group, and will be undertaking an impact assessment this year.			Plan 2004-2005
LIP7	SMT	Improvement Area: Universal Services. “Seconded Diversity Team officer to work with units delivering universal services to find better ways of dealing with diversity issues to improve our service offer and service outcomes” – we can assist by working with this Officer to identify improvements.			
LIP8	SMT	Improvement Area: Management Training. “Continue with existing programmes of Level 1, 2 and 3 training as required. Introduce and deliver new level 2½ training to meet specific needs not covered elsewhere.” – two of our managers are currently completing the course and another two are just starting the level 2½ training.	NSB/MG		
Ref	Team	Detail	Person responsible	Timescale	Source
Improving Brent/Local Improvement Plan					
LIP9	SMT	Improvement Area: Licensing Act. “Ensure that Licensing Policy is agreed and reviewed as necessary; establish Licensing Committee and Sub-Committees and provide training to Members;			Environment Local Improvement Plan 2004-2005

Trading Standards Action Plan

		monitor impact of policy and decisions” – we will become a consultative body for HSL on applications/renewals and objections.			
IT related improvements					
IT 1	DAS	Publicity of new SMS contact availability – leaflets	RSA	July 2005	ES Customers Come 1 st Action Plan
IT 2	DAS	Publicity of new SMS contact availability – article	RSA	July 2005	
IT 3	DAS	Improvements in use of ‘ward’ data	MB/WB	August 2005	Internally identified improvement opportunities
IT 4	DAS	Feasibility of use of ‘tablets’ within Regulatory Services	MB/WB	September 2005	
IT 5	DAS	Improve within ES at sharing information electronically via the intranet	MB/WB	November 2005	
IT 6	DAS	Create linkages with Consumer Direct for our database and telephone systems	MB/WB	June 2005	
IT 7	DAS	Investigate feasible methods of accessing the databases from remote locations	MB/WB	July 2005	
ISO14001 Environmental Management System					
EMS1	DAS	Completion of aspects register and risk scoring	RSA	May 2005	ES ISO14001 Co-ordinator
EMS2	DAS	Ensure all appropriate control measures are in place for high scoring aspects	RSA	July 2005	
Ref	Team	Detail	Person responsible	Timescale	Source
ISO14001 Environmental Management System					
EMS3	DAS	Progress our three Environmental Management Programmes	RSA	December 2005	

Part 3

Appendices

Appendix 1

Corporate, Environmental and Trading Standards Organisational Charts

Brent – A Borough of Contrasts and Challenges

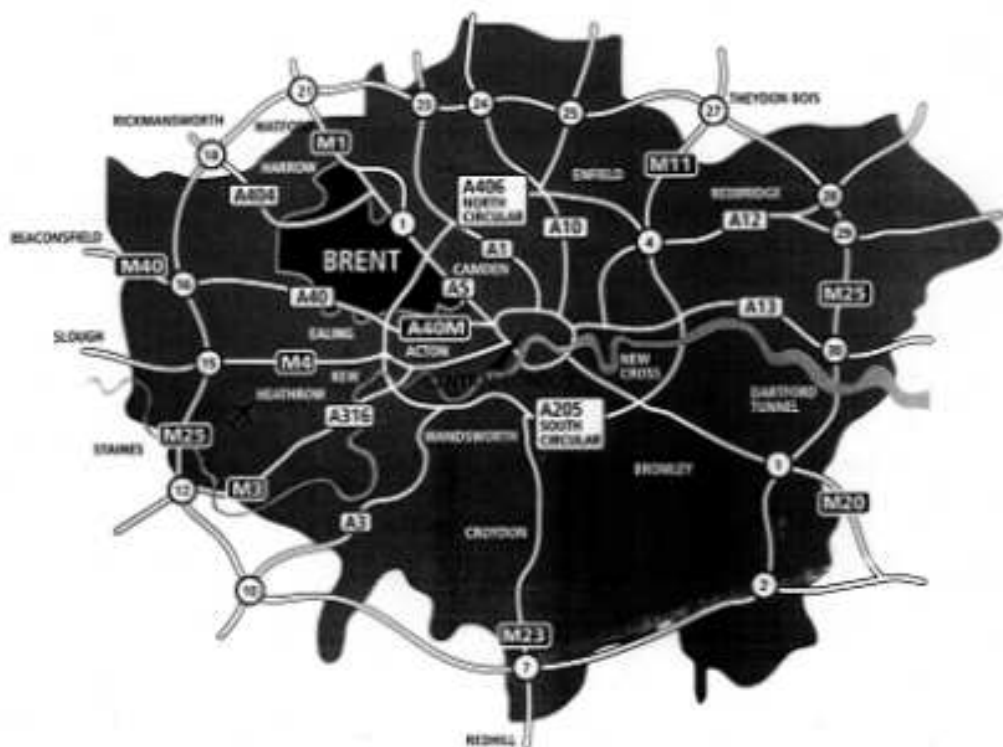
The Borough

Brent, with a population of over 247,000, is one of London's most diverse Boroughs. It straddles inner and outer London, stretching from Kilburn and Park Royal in the south to Colindale in the north and Northwick Park in the north-west. The Borough is highly developed and consists of 2 distinct areas, in terms of age of development and the local environment. The south of the Borough was substantially developed between 1890 and 1910 with a number of high-density comprehensive development schemes taking place in the 1960s and 70s. Development of the north of the Borough primarily occurred in the 1920s and 30s. This essentially suburban nature largely survives today.

Brent is a complex Borough. Its most striking feature is, without doubt, the contrasts which exist in its economic, environmental, ethnic, and social make-up. Its population is the most culturally and racially diverse of all the authorities in England and Wales. We already have an ethnic majority community, with the white UK population accounting for less than 50% of all residents. The Black and Asian communities account for over 40% of the local population and almost one in ten residents are Irish.

Poverty, particularly in the south of the borough, is still a significant issue, however as a business location Brent has much to offer and makes an important contribution to London's economic well-being. It is well located with good road and rail links to Central London, Europe and the rest of the UK, and a market of 7 million people within a 45 minute drive. In addition it contains two of London's largest industrial estates – Park Royal and Wembley – and some of the country's foremost industrial concerns such as Guinness, Heinz and United Biscuits.

Notwithstanding a comprehensive regeneration programme using over £1.2 billion of new resources, much is required to be done to re-shape the economic base of the borough. A major challenge for Brent Council therefore, in partnership with the Government and private industry, is to ensure the successful implementation of plans to rejuvenate the area, encourage inward investment and create jobs.



Brent Council Structure

The Council has five main Service Areas:

- Education
- Social Services
- Environmental Services
- Housing
- Community Development

Each has a Service Area Director who reports to the Chief Executive. The StreetCare Service is within Environmental Services. The Chief Executive chairs the Corporate Management Team which includes the five Service Area Directors plus:

- Director of Finance
- Director of Corporate Services
- Director of Policy & Regeneration Unit
- Director of Human Resources

Environmental Services

Environmental Services has 13 Service Units of which StreetCare is one of the largest. There is a strong commitment to devolution and the Head of StreetCare has considerable freedom over day-to-day management issues. All Units have devolved powers in areas such as finance, personnel and IT. The StreetCare Service has its own bank account and chequebook.

This approach empowers managers to directly take decisions to improve services on a regular basis. This encourages innovation and cuts out the delays inherent in traditional hierarchical line management structures. Devolution takes place within corporate rules to ensure probity, and training support allows new managers to gain necessary skills.

Environmental Services is committed to providing Best Value services within a sustainable environment. We expect excellent front line services and StreetCare has an important role in creating an environment of which we can be proud.

For many years Environmental Services has focused on meeting the needs of customers. Brent Council currently holds eleven CharterMarks, of which seven are in Environmental Services. Environmental Services has recently gained ISO 14001 certification for its approach to environmental management and we aim to have Investors in People accreditation by the end of 2001.

The Council has launched an ambitious five-year programme called "Improving Brent". We will use this to ensure continuous improvement in services, to provide more comprehensive training for staff and Members, and to better deliver our equalities agenda. We are an outward-looking authority and have built many successful partnerships over the years. The StreetCare Service has key links with a number of private-sector contractors as well as many local organisations such as residents' associations, traders' groups and the police.

Brent Council Structure

The Council has five main Service Areas:

Education

Social Services

Environmental Services

Housing

Community Development

Each has a Service Area Director who reports to the Chief Executive. The Planning Service is within Environmental Services. The Chief Executive chairs the Corporate Management Team which includes the five Service Area Directors plus:

Director of Finance

Director of Corporate Services

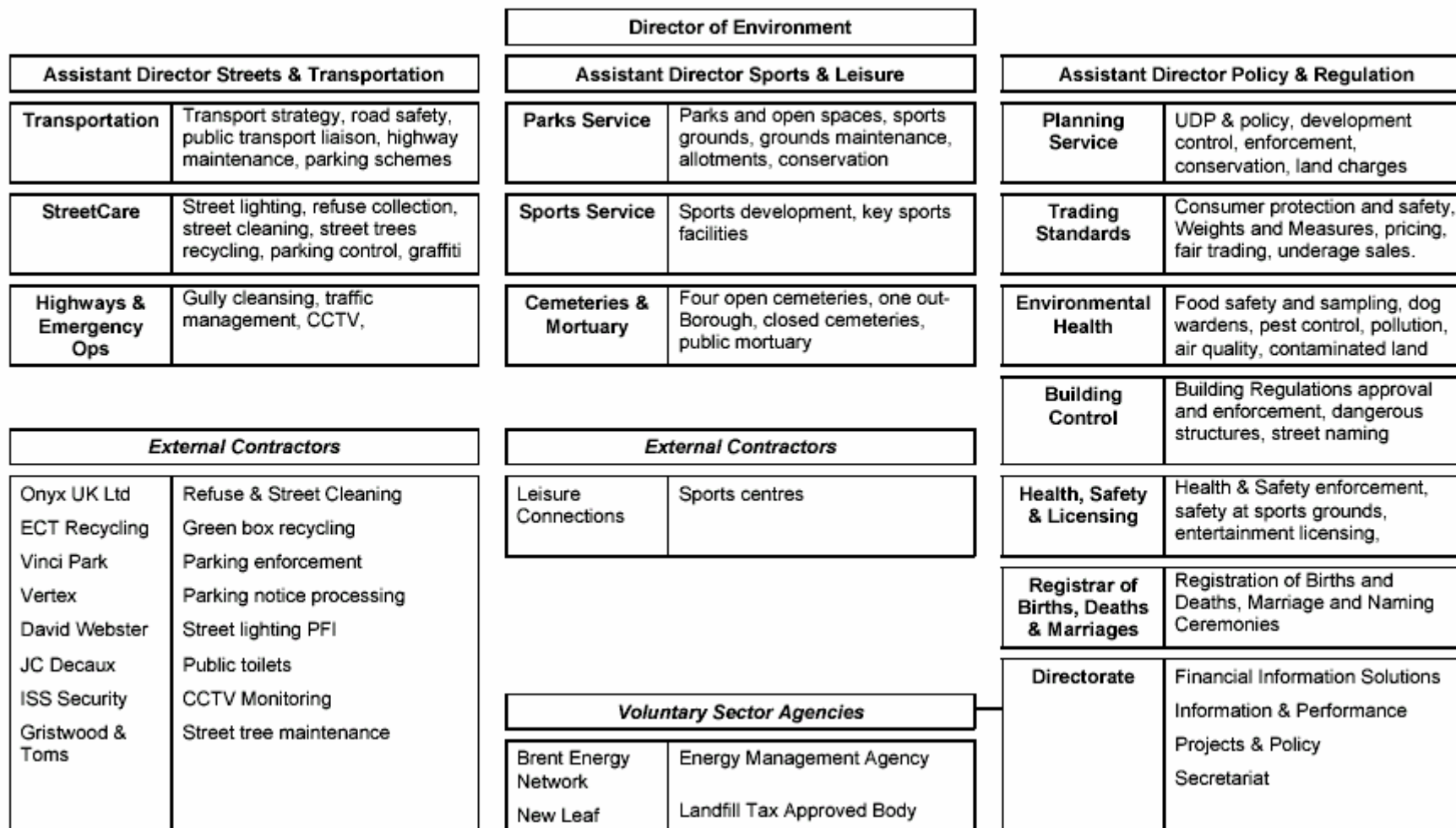
Director of Policy & Regeneration Unit

Director of Human Resources

Brent Council Corporate Management Team Structure

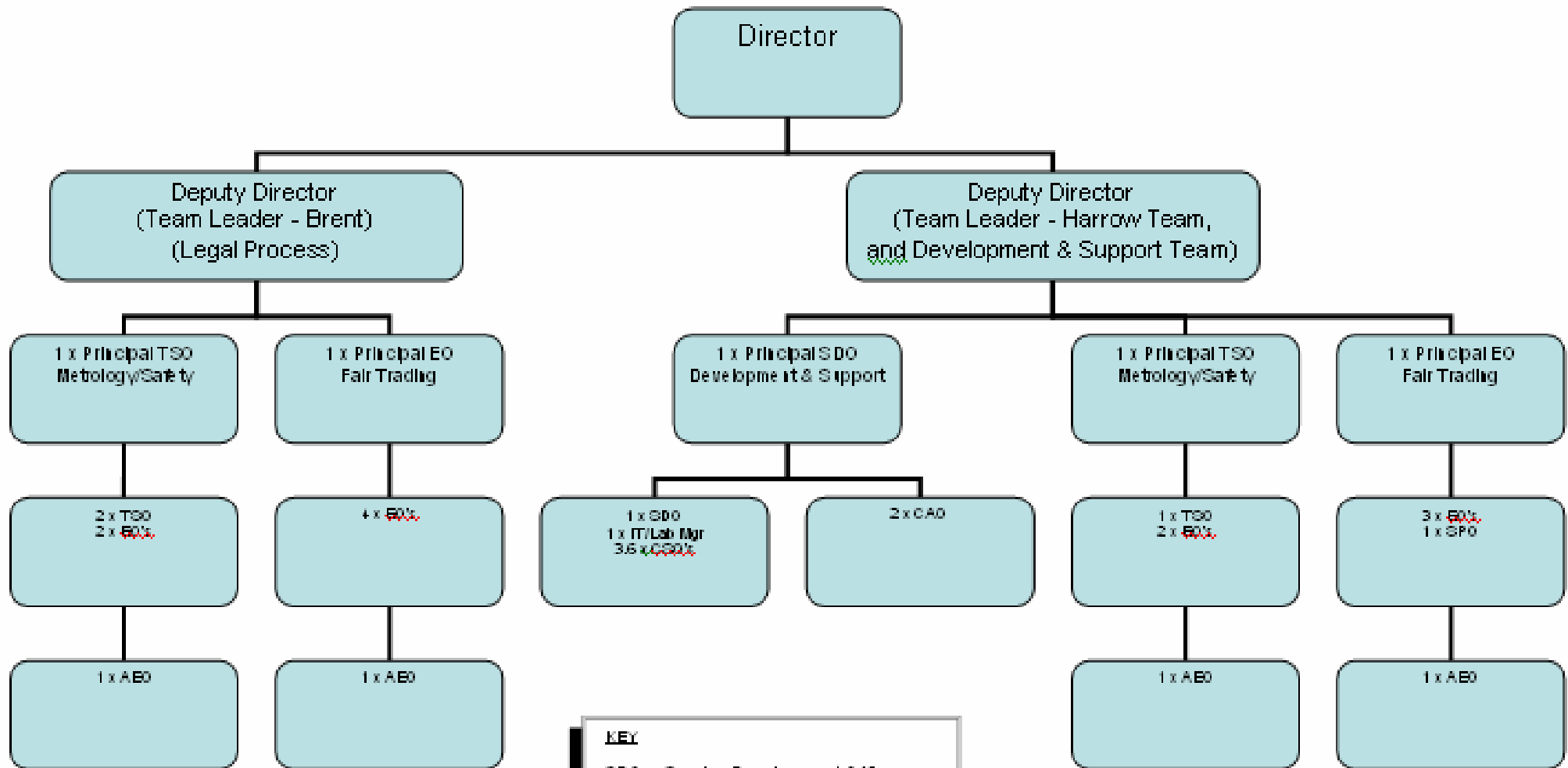


OUR SERVICES & THEIR ORGANISATION



Brent & Harrow Trading Standards Service

Total Establishment: 34.6
Chart Accurate as at Feb05



Key:
 SDO - Service Development Officer
 TSO - Trading Standards Officer
 EO - Enforcement Officer
 SPO - Special Projects Officer
 CAO - Customer Advice Officer
 CSO - Customer Services Officer
 AEO - Assistant Enforcement Officer

Appendix 2

Budget Details

UNIT NAME: Trading Standards

APPENDIX 4

BUDGET MATRIX - SUBJECTIVE ANALYSIS

ITEM	YEAR 1	YEAR 2				YEAR 3				YEAR 4				YEAR 5			
	2004/2005 Approved Budget £'000 (1)	Agreed Growth £'000 (2)	Committed Savings £'000 (3)	Inflation £'000 (4)	2005/2006 Budget Forecast £'000 (5)	Agreed Growth £'000 (6)	Committed Savings £'000 (7)	Inflation £'000 (8)	2006/2007 Budget Forecast £'000 (9)	Agreed Growth £'000 (10)	Committed Savings £'000 (11)	Inflation £'000 (12)	2007/2008 Budget Forecast £'000 (13)	Agreed Growth £'000 (14)	Committed Savings £'000 (15)	Inflation £'000 (16)	2008/2009 Budget Forecast £'000 (17)
Employee Expenses																	
Direct - staff on payroll	1533		-40	64	1557		-20	51	1588			52	1640			50	1690
Direct - Staff not on payroll - Agency staff	0				0				0			0					0
Indirect - pensions payroll	0				0				0			0					0
Indirect - not through payroll - training, PRC	13			1	14			2	16			1	17			3	20
Total	1546	0	-40	65	1571	0	-20	53	1604	0	0	53	1657	0	0	53	1710
Premises Related Exp.																	
Repairs & Mice of buildings, plant &	0				0				0			0					0
Energy costs and water	0				0				0			0					0
Rents	122			5	127			3	130			3	133			5	138
Rates	0				0				0			0					0
Others	1				1				1			1					1
Insurance	0				0				0			0					0
Total	123	0	0	5	128	0	0	3	131	0	0	3	134	0	0	5	139
TOTAL of wd	1669	0	-40	70	1699	0	-20	56	1735	0	0	56	1791	0	0	58	1849

UNIT NAME: Trading Standards

APPENDIX 4a

BUDGET MATRIX - SUBJECTIVE ANALYSIS

ITEM	YEAR 1		YEAR 2			YEAR 3				YEAR 4				YEAR 5			
	2004/2005 Approved Budget £'000 (1)	Agreed Growth £'000 (2)	Committed Savings £'000 (3)	Inflation £'000 (4)	2005/2006 Budget Forecast £'000 (5)	Agreed Growth £'000 (6)	Committed Savings £'000 (7)	Inflation £'000 (8)	2006/2007 Budget Forecast £'000 (9)	Agreed Growth £'000 (10)	Committed Savings £'000 (11)	Inflation £'000 (12)	2007/2008 Budget Forecast £'000 (13)	Agreed Growth £'000 (14)	Committed Savings £'000 (15)	Inflation £'000 (16)	2008/2009 Budget Forecast £'000 (17)
	TOTAL b/fwd	1669	0	-40	70	1699	0	-20	56	1735	0	0	56	1791	0	0	58
Transport Related Exps.																	
Direct transport Costs	55			1	56			1	57			1	58			1	59
Supplies and Services																	
Equip., furniture and materials	27			1	28			1	29			1	30			2	32
Clothing, uniforms & laundry	1				1				1				1				1
Printing, stationery, office exp.	17			1	18			1	19			1	20			2	22
Test purchases/analysis	20			1	21			1	22			1	23			2	25
Postage/printing/stationery	16			1	17			1	18				18			1	19
Subscriptions/insurance	9				9				9				9				9
Env Personnel	3				3				3				3				3
Payroll	4				4				4				4				4
Support Services	11			3	14				14				14			2	16
Miscellaneous expenses/bank charges	9				9				9				9			1	10
Total	117	0	0	7	124	0	0	4	128	0	0	3	131	0	0	10	141
TOTAL c/fwd	1841	0	-40	78	1879	0	-20	61	1920	0	0	60	1980	0	0	69	2049

UNIT NAME: Trading Standards

APPENDIX 4a

BUDGET MATRIX - SUBJECTIVE ANALYSIS

ITEM	YEAR 1	YEAR 2				YEAR 3				YEAR 4				YEAR 5			
	2004/2005 Approved Budget £'000 (1)	Agreed Growth £'000 (2)	Committed Savings £'000 (3)	Inflation £'000 (4)	2005/2006 Budget Forecast £'000 (5)	Agreed Growth £'000 (6)	Committed Savings £'000 (7)	Inflation £'000 (8)	2006/2007 Budget Forecast £'000 (9)	Agreed Growth £'000 (10)	Committed Savings £'000 (11)	Inflation £'000 (12)	2007/2008 Budget Forecast £'000 (13)	Agreed Growth £'000 (14)	Committed Savings £'000 (15)	Inflation £'000 (16)	2008/2009 Budget Forecast £'000 (17)
TOTAL bfwd	1841	0	-40	78	1879	0	-20	61	1920	0	0	60	1980	0	0	69	2049
Third Party Payments																	
External contract payments					0				0				0				0
Capital Financing Costs																	
Leasing charges					0				0				0				0
TOTAL EXPENDITURE	1841	0	-40	78	1879	0	-20	61	1920	0	0	60	1980	0	0	69	2049

UNIT NAME: Trading Standards

APPENDIX 4a

BUDGET MATRIX - SUBJECTIVE ANALYSIS

ITEM	YEAR 1	YEAR 2				YEAR 3				YEAR 4				YEAR 5			
	2004/2005 Approved Budget £'000 (1)	Agreed Growth £'000 (2)	Committed Savings £'000 (3)	Inflation £'000 (4)	2005/2006 Budget Forecast £'000 (5)	Agreed Growth £'000 (6)	Committed Savings £'000 (7)	Inflation £'000 (8)	2006/2007 Budget Forecast £'000 (9)	Agreed Growth £'000 (10)	Committed Savings £'000 (11)	Inflation £'000 (12)	2007/2008 Budget Forecast (13)	Agreed Growth £'000 (14)	Committed Savings £'000 (15)	Inflation £'000 (16)	2008/2009 Budget Forecast (17)
Income																	
Internal contract income	0				0				0				0				0
Fines&Costs	28			3	31			1	32				32				32
External fees & charges	19			1	20				20				20			-5	15
Harrow Income	797			32	829			26	855			27	882			28	910
Other external income					0				0								
Total Income	844	0	0	36	880	0	0	27	907	0	0	27	934	0	0	23	957
NET EXPENDITURE (funded by Service Area)	997	0	-40	42	999	0	-20	34	1013	0	0	33	1046	0	0	46	1092

BEST VALUE ACCOUNTING - APPORTIONMENT OF 2004/05 REVENUE BUDGET

UNIT NAME: Trading Standards

EXPENDITURE	TOTALS	Service Expenditure Analysis													TOTAL (excluding non apportioned)	Check should equal Zero			
	PER	Description																	
	SUBJECTIVE	Inspection & Enforcement	Advice & Education																
	ANALYSIS	Codes																	
SECTION 1 to be completed by Service Unit EXPENDITURE	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000		
Direct Employees	1,538	1,424	114														1,538	0	
Agency & other staff not on the payroll																		0	0
Indirect Employees Expenses (Training, Redundancy)	13	10	3															13	0
Indirect Employees Expenses - PRC costs non payroll																			
Indirect Employees Expenses (Pension Payroll PRC)																			
Premises	123	117	6															123	0
Transport	55	50	5															55	0
Contract Payments - Internal																		0	0
Contract Payments - External																		0	0
Other Supplies and Services (excluding contract payments)	117	105	12															117	0
Third Party Payments																		0	0
Leasing/Debt Charges																		0	0
Joint Arrangements																		0	0
TOTAL EXPENDITURE	1,846	1,706	140	0	0	0	0	0	0	0	0	0	0	0	0	0	1,846	0	

ACCO UNT CODE	ACCOUNT DESCRIPTION	TOTAL COSTS	SHARED COSTS	VARIABLE COSTS	Variable costs split (Apportionment based on 15staff B +13staff H) Brent Harrow	
	T.S.BUDGET-2005/006 EMPLOYEES					
NR11 0101	SALARIES	1,532,380	357,422	1,174,958	614,136	560,822
NR11 0111	OVERTIME	14,900	2,171	12,729	6,600	6,129
NR11 0911	APPROVED QUALIFICATIONS	11,745	6,235	5,510	2,855	2,655
NR11 0109	CAR LEASING COSTS	13,841	4,472	9,369	5,225	4,144
NR11 0931	NAT & PROF ADVERTS	1,695		1,695	848	847
			1,574,561	370,300	1,204,261	
	PREMISES					
NR11 1721	FITTINGS - PURCHASES	538	538			
			538	538	0	0
	TRANSPORT					
NR11 2233	TRANSPORT CHARGES	6,435	6,435			
NR11 2314	FARES	1,143	510	633	328	305
NR11 2411	ESSENTIAL USER	41,182	5,254	35,928	18,288	17,640
NR11 2412	CASUAL USER					
			48,760	12,199	36,561	
	SUPPLIES & SERVICES					
NR11 3111	EQUIPMENT PURCHASES	7,844	7,844			
NR11 3113	EQUIPMENT REPAIRS	15,464	15,464	23,308		
			4			
NR11 3301	FURNITURE - PURCHASES	1,121	1,121			
NR11 3401	TOOLS	322	322			
NR11 3454	TEST PURCHASES	7,980		7,980	4,138	3,842
NR11 3621	PROTECTIVE CLOTHING	1,121	1,121			
NR11 3711	PRINTING	3,356	3,356			
NR11 3712	STATIONERY	2,670	2,670			
NR11 3713	GOVERMENT- PUBLICAT	6,286	6,286			
NR11 3714	PHOTOCOPYING	437	437			
NR11 3715	BOOKS	831	831			
NR11 3721	MICROFILMING & MICROFICHE	448	448			
NR11 3724	COMPUTER CONSUMABLES	971	971			
NR11 3725	OTHER OFFICE EXPENSES	448	448			
NR11 3813	CONSULTANT'S FEES	17,103		17,103	8,868	8,235

NR11	4011	POSTAGES	2,631	2,631				
NR11	4021	MOBILE PHONES	1,677	1,677				
NR11	4055	COMPUTER DATALINKS	2,000	2,000				
NR11	4111	SUBSISTENCE	580	580				
NR11	4320	OTHER SUBSCRIPTIONS	673	673				
NR11	4401	MISCELLANEOUS INSURANCES	7,845	7,845				
NR11	3812	BANK CHARGES	545	545				
NR11	4403	OTHER MISC EXPENSES	9,018	9,018				
					91,371	42,980	25,083	
		CAPITAL FINANCING						
		SUPPORT SERVICES						
NR11	7002	ACCOMODATION(5964 sq ft)	70293	70,293				
				3				
NR11	7003	TELEPHONES	6973	6,973				
NR11	7220	COMMITTEE						
NR11	7015	INSURANCE		0				
NR11	7115	PAYROLL-IT NET/ES	4588	4,588				
NR11	7120	COMPUTER SERVICES - SUPPORT						
NR11	7210	TELEPHONES - PRECEPTS	11227	11,227				
				7				
NR11	7225	INTERNAL AUDIT						
NR11	7802	ENV SERVICES FINANCE	6335	6,335				
NR11	7803	ENV SERVICES PERSONNEL	3016	3,016				
					102,432	102,432		
		TOTAL GROSS EXPENDITURE			<u>1,817,662</u>			
		TOTAL GROSS FIXED COSTS				<u>551,757</u>		
		TOTAL GROSS VARIABLE COSTS					<u>1,265,905</u>	661,286 604,619
		INCOME						
NR13	8,01	GRANT-DTI QUALIFICATION						
	1							
NR13	8,01	GRANT-DTI BUSINESS COORD						grant for LBPCo-ord
	2							
NR11	8214	OTHER INCOME etc						
NR11	8355	WEIGHBRIDGE/LICENCE FEES	-1,200	-				
				1,200				
NR11	8600	WEIGHTS&MEASURES FEES	-15,500	-		-13,200	-9,200	-4,000 (based on history)
				2,300				
NR11	8398	FINES & COSTS RECOVERED	-33,000			-33,000	-14,000	-19,000 (based on history)

	INCOME-SUB TOTAL	-49,700	-3,500	-46,200	
	TOTAL NET VARIABLE COSTS			<u>1,219,705</u>	638,086 581,619
	TOTAL NET FIXED COSTS		<u>548,257</u>		301,322 246,935 (based on 54.96%B,45.04%H) (sum variable+fixed costs)
	CONSORT NET EXPENDITURE	<u>1,767,962</u>			
NR11	8395 CONTRIBUTION- L.B.HARROW	-828,554			
NR11	8,90 CONTRIBUTION-L.B.BRENT 1	-939,408			
	CONSORTIUM CONTRIBUTION	<u>-1,767,962</u>			
	Brent Notional Rent	-31,732			
	Total Brent Consortium Contribut	-971,140			
	Harrow notional rent	-27,654			paid by Brent
	Total Brent Contribution	-998,794			
	TOTAL SERVICE COST	<u>1,827,348</u>			

brent contribution=53.55%,harrow contribution=46.45%, (before notional rent is added)

brent contribution= 55.07 %,harrow contribution= 44.93 % (including notional rent)

variable salary costs:- brent =£614,136,(52.9%); harrow = £560,822,(47.1%)harrow

essential car user costs:- brent = £18,288,(50.9%); harrow £17,640,(49.1%)

accommodation costs:-£98,604 core rent+ £31,075 tenant rent = £129,679 - £59,386 notional rent = £70,293

fixed costs:- total (ex notional rent) = £548,257 ;brent = £301,322,(54.96%);harrow = £ 246,935,(45.04%)

variable costs:- total = £1,219,705, brent = £638,086(52.93%); harrow = £581,619,(47.07%)

Budget based on inflation of 2.95% salaries + oncosts;employers superannuation of 20.1%; 5.2% accom;and 2% for other budgets

This draft includes increased employers contribution of 20.1% and Brent's reduction of £40K

Appendix 4

Customer Survey Results

TRADING STANDARDS COMPARISON 2001- 2004

	2001	2002	2003	2004
1. Contacts - How did you first make contact with the....				
Telephone	81%	73.80%	81%	73%
Writing - post	7%	9.50%	5%	14%
Writing - e-mail	0%	4.80%	7%	16%
Submitted an application	0%	2.40%	0%	2%
Council contacted you	2%	2.40%	0%	2%
In person/OSS	10%	7.10%	7%	0%
Others	0%	0.00%	0%	0%
2. If you contacted the service by phone, the number of times to get through to the service.				
Once	44%	51.20%	67%	76%
2 or three times	35%	26.80%	18%	16%
More than 3 times	8%	12.20%	15%	5%
Can't remember	4%	7.30%	0%	3%
Not applicable	8%	2.40%	0%	0%
3. How easy or difficult to find out who to contact about the service required?				
Very easy	42%	22.50%	49%	43%
Fairly easy	31%	52.50%	25%	36%
Neither	17%	5.00%	16%	11%
Fairly difficult	6%	7.50%	5%	2%
Very difficult	4%	12.50%	5%	7%
4. How satisfied were you with? (VERY SATISFIED/FAIRLY SATISFIED)				
The politeness of staff	88%	90.70%	86.0%	95%
The helpfulness of staff	79%	85.00%	80.9%	89%
The time taken to respond to initial request	74%	80.00%	75.6%	85%
The time taken to respond fully to the matter	60%	65.00%	64.1%	75%
Being kept informed of progress / outcome	51%	58.33%	44.1%	63%
The quality of information or advice given	67%	73.81%	76.3%	64%
The accuracy of information given	71%	68.42%	71.0%	73%
Overall, how satisfied were you with the service provided	66%	68.18%	70.8%	68%
5. Did you feel that you had been treated fairly by the service?				
Yes	78%	71.74%	85%	82%
No	22%	28.26%	15%	18%
6. Were you satisfied with the outcome of your request?				
Yes	57%	60.00%	73%	65%
No	43%	40.00%	27%	35%
7. If no, were the reasons for the outcome made clear to you?				
Yes	17%	46.67%	50%	31%
No	17%	53.33%	50%	69%
Not applicable	67%	0.00%	0%	0%

Appendix 6

Performance Schedules

Key Targets

The 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 targeted programme of inspection visits during 2005/2006.

For 2005/2006 the Service will produce 16,597.75 units of output work for Harrow, 17,838.5 units for Brent and 2195 from Development and Support: - a total of 36,631.25 units. Both borough totals reflect a full establishment based on the 2005/2006 complement of staff, but one Enforcement Officer in each borough producing 75% output due to DTS training. The main activities of the Service are based on the following average units of work: -

Requests for action (criminal) completed	3.5 units
Civil Investigations	6.5 units
Requests for action (non criminal) completed	0.5 units
Enterprise Act investigations	150 units
Trader Enquiries (including HA work)	5.25 units
Announced Comprehensive Primary High Risk Inspections	3.0 units
Announced Comprehensive Primary Medium Risk Inspections	2.0 units
Announced Comprehensive Primary Low Risk Inspections	0.5 units
Announced Secondary High Risk Inspections	1.5 units
Announced Secondary Medium Risk Inspections	1.0 units
Other Inspection/Test Purchase Visits	0.5 units
Home Authority Referrals	1.75 units
Average Quantity Visits	5.25 units
Criminal reports of Infringement	17.5 - 560 units (depending on complexity)
Civil reports and action	8 units
Prosecutions completed	31.5 units
Formal Cautions	7 units
Letters of Warning	2 units
Projects completed	119 units
Verification Visits	3.5 units
Multi-agency Operations	21 units
Mobile Display Unit Visits	7 units
Electric Blanket Safety Work	126 units (91-H 2days, 35-B 1day)
Child Car Seat Safety Work	84 units (42 - 1day each)
Talks to external Bodies/Organisations	3.5 units

Each unit equates to 1 hour's work and each day equates to 7 units. Based on 260 days availability for work.

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 Technical Assistant is expected to contribute 700 units of work to their team targets.

Ideally the Service should visit all high-risk premises once a year, all medium risk premises every 2 years and all low risk premises every 5 years. At 1 April 2005, there are 9258 premises in the consortium liable for inspection (5444 in Brent and 3814 in Harrow). Of these 362 (3.9%) are high-risk premises (220 in Brent and 142 in Harrow) and 4672 (50.5%) are medium risk premises (2686 in Brent and 1986 in Harrow). The Service should therefore aim to inspect 1563 high and medium risk premises each year in Brent and 1135 high and medium risk premises in Harrow.

	TOTAL PREMISES	HIGH RISK	MEDIUM RISK	LOW RISK	OTHERS
Brent	5444 (58.8 %)	220	2686	2538	0
Harrow	3814 (41.2 %)	142	1986	1686	0
Consortium	9258 (100%)	362 (3.9%)	4672 (50.5%)	4224 (45.6)	0

For 2005/2006 the Service aims to complete the following work:-

CONSORTIUM 2005/6

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	1830	6405
Civil Investigations	402	2613
Requests for action (non criminal)	3690	1845
Trader Enquiries (including HA work)	330	1732.5
Enterprise Act Investigations	12	1800
Announced Comprehensive Primary High Risk Insp.	362	1086
Announced Comprehensive Primary Medium Risk Insp	2241	4482
Announced Comprehensive Primary Low Risk Insp	844	422
Announced Secondary High Risk Inspections	130	195
Announced Secondary Medium Risk Inspections	700	700
Other Inspection/Test Purchase Visits	1120	560
Home Authority Referrals	406	710.5
Average Quantity Visits	45	236.25
Criminal Reports of Infringement	130	7778
Civil Reports and Action	30	240
Prosecutions completed	71	2643
Formal Cautions	25	175
Letters of Warning	32	64
Projects completed	11	1309
Verification Visits	57	199.5
Multi Agency Operations	22	462
Mobile Display Unit Visits	26	546
Electric Blanket Safety Work	2	91
Child Car Seat Safety Work	2	84
Talks to external Bodies/Organisations	36	252
Total		36631.25

DEVELOPMENT & SUPPORT 2005/6

Requests for action (non criminal)	3690	1845
Mobile Display Unit visits	26 (1 Officer)	182
Talks to external Bodies/Organisations (general)	24	168
Work Experience students	Maximum of 4 p.a.	
Initial contacts by Telephone/personal visits	38,300	
		<hr/> 2195

HARROW TEAM 2005/6

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	900	3150
Civil Investigations	201	1306.5
Trader Enquiries (including HA work)	200	1050
Enterprise Act Investigations	8	1200
Announced Comprehensive Primary High Risk Insp.	142	426
Announced Comprehensive Primary Medium Risk Insp	993	1986
Announced Comprehensive Primary Low Risk Insp	337	168.5
Announced Secondary High Risk Inspections	50	75
Announced Secondary Medium Risk Inspections	100	100
Other Inspection/Test Purchase Visits	600	300
Home Authority Referrals	112	196
Average Quantity Visits	15	78.75
Criminal Reports of Infringement	65	3923
Civil Reports and Action	18	144
Prosecutions completed	35	1102.5
Formal Cautions	15	105
Letter of Warning	15	30
Projects completed	6	714
Verification Visits	17	59.5
Multi-Agency Operations	6	126
Mobile Display Unit Visits	13	182
Electric Blanket Safety Work	2	91
Child Car Seat Safety Work	1	42
Talks to external Bodies/Organisations	6	42
	<hr/> Total	<hr/> 16,597.75

Harrow Projects

Lead

1	4
2	5
3	

Contribution to North West London Projects

6	9
7	10
8	11

Contribution to London-wide Projects

12

In addition, Harrow will carry out test purchasing of age restricted goods on a minimum of twelve occasions.

Met & Safety:-

1 PTSO
1 TSO

Fair Trading:-

1 PEO
3 EO

1 Team Leader
1 Civil Advisor

1.75 EO (1 APEL=0.75)
1 AEO

1 SPO
1 AEO

} =

16597.25
units

BRENT TEAM 2005/6

	<u>Planned</u>	<u>Units</u>
Requests for action (criminal)	930	3255
Civil Investigations	201	1306.5
Trader Enquiries (including HA work)	130	682.5
Enterprise Act Investigations	4	600
Announced Comprehensive Primary High Risk Insp.	220	660
Announced Comprehensive Primary Medium Risk Insp	1248	2496
Announced Comprehensive Primary Low Risk Insp	507	252.5
Announced Secondary High Risk Inspections	80	120
Announced Secondary Medium Risk Inspections	600	600
Other Inspection/Test Purchase Visits	520	260
Home Authority Referrals	294	514.5
Average Quantity Visits	30	157.5
Criminal Reports of Infringement	65	3855
Civil Reports and Action	12	96
Prosecutions completed	36	1540.5
Formal Cautions	10	70
Letter of Warning	17	34
Projects completed	5	595
Verification Visits	40	140
Multi-Agency Operations	16	336
Mobile Display Unit Visits	13	182
Electric Blanket Safety Work	0	0
Child Car Seat Safety Work	1	42
Talks to external Bodies/Organisations	6	42
	<hr/>	<hr/>
Total		17,838.5

Brent Projects

Lead

1 Child Accident Prevention Week

2

3

Contribution to North West London Projects

4 7

5 8

6 9

Contribution to London-wide Projects

10

In addition, Brent will carry out test purchasing of age restricted goods on a minimum of twelve occasions.

Met & Safety:-

1 PTSO
2 TSO

1.75 EO (1 APEL=0.75)
1 AEO

Fair Trading:-

1 PEO
4 EO

1 AEO

1 Team Leader
1 Civil Advisor



= 17838.5
units

*Infringement reports will be based on the following categories:

Category	No. of Reports		No. of Days Each	No. of Units Each	Total Units	
	Harrow	Brent			Harrow	Brent
1	3	5	2.5	17.5	52.5	87.5
2	20	26	5	35	700	910
3	25	18	7.5	52.5	1312.5	945
4	10	10	10	70	700	700
5	4	5	15	105	420	525
6	3	1	more than 15	7 per day	738	687.5
TOTALS	65	65			3923	3855

The criteria for each category will be:-

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

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

- a) 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.
- b) Interviews - multiple interviews requiring preparation or single interview of an extremely complex and demanding nature.
- c) Statements - several witness statements from non Trading Standards Officers required.
- d) Evidence - large quantities of evidence involved or smaller quantities of evidence of a diverse nature requiring considerable analysis.
- e) Report - large and complicated report required to fully explain the investigation and the nature of the offences.
- f) Other enquiries - significant problems encountered during investigation, large amount of non standard correspondence required (for example solicitors 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:-

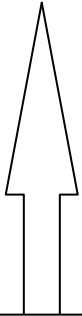
- a) The metrology control system is inspected and
- b) Records and documents are checked and
- c) Reference tests are carried out on a random sampling basis in accordance with the Packaged Goods Regs and
- d) "Code of Practice Guidance" advice is given and

details of the above are recorded on an A.Q. inspection form.

Enforcement Priorities

The grid below shows how the Service wishes to prioritise its work based on the hazard a particular type of activity poses to the local community and the impact that the activity has on the local consumers. Therefore, the bigger the hazard and impact, the more resource this Service put into combating this type of crime. Conversely, certain types of legislation have very little bearing on the community at large with little or no hazard or impact.

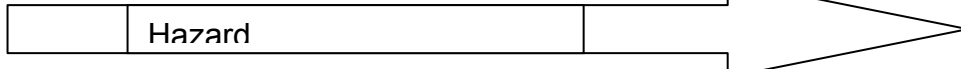
high



impact

<p>Misleading Prices, Clocked Cars Supermarkets/petrol sites Goods not correctly packed to AQ Inaccurate weights and measures Price Marking, VRA, Hallmarking' Control of pollution Restrictive notice, Consumer Credit, TDA (Low value goods)</p>	<p>Age restricted sales (alcohol, knives, butane, fireworks UA Cigarettes Enterprise Act Unsafe Goods, Storage of fireworks (Harrow) Counterfeit Goods, un-roadworthy cars Package Travel Mock Auctions Property Misdescriptions Intox Subs Supply Trade Descriptions Act (high value goods)</p>
<p>Broadcasting Act Estate Agents Act Education Reform Act, UA Lottery Unsolicited goods Development of Tourism Act Incorrectly labelled goods (safety) Energy Act Motorcycle Noise Act Trading Stamps Act Crossbows Act</p>	<p>UATP Spray paints Business Names Act Road traffic (overloading) Administration of Justice Act Furniture and furnishings Accommodation Agencies Act</p>

low



high

Appendix 13

National and Local Performance Indicators

National Indicators – Target for 2005/6

Ref	Description	Brent Target 05/06
BVPI 166	Score against a checklist of enforcement practice for environmental health/trading standards Trading Standards	100%
	<u>Written enforcement policies</u> 1. a) Does the authority have written and published enforcement policy/policies	Yes
	b) Is non-compliance with statutory requirements followed up in accordance with the enforcement policy/policies.	Yes
	c) Do the policy/policies confirm that the authority has signed the Enforcement Concordat?	Yes
	d) Do the policy/policies take into account the guidance set out in “The Code for Crown Prosecutors”?	Yes
	e) Do the policy/policies include the criteria to be met before formal enforcement by the authority?	Yes
	f) Do the policy/policies make provision for situations where there is a shared enforcement role?	Yes
	g) Do the policy/policies make provision for the particular interests of consumers within the authority’s including business owners, employees and the public?	Yes
	h) Are the policy/policies mentioned above followed, monitored, and reported on, and any variations addressed within a service plan or BVPP?	Yes
	<u>Planned Enforcement Activity</u> 2. Does the authority have risk-based inspection programmes, and sampling and surveillance regimes for regulatory services that: a) meet legal requirements: b) otherwise have regard to official guidance; c) otherwise have regard to other appropriate professional guidance and standards	TS- a) not applicable b) not applicable c) Yes
	3. Are the programmes and regimes mentioned above in point 2 followed, monitored, and reported on, and any variations addressed within a service plan or BVPP?	Yes
	4. Does the authority have targeted	Yes

	educational and information programmes?	
	5. Are the programmes mentioned above in point 4 followed, monitored, and reported on, and any deviations from the planned programmes addressed within a service plan or BVPP?	Yes
	<u>Reactive and responsive enforcement activity</u> 6. Does the authority have and implement policies , procedures and standards for: a) responding to and dealing with complaints made to the local authority about a third party and requests for services regarding statutory enforcement functions? b) supporting the provision of consumer advice, including participation in a Consumer Support Network?	a) Yes b) Yes
	7. Does the authority have and implement policies, procedures and standards for responding to and dealing with; a) statutory notifications (e.g. RIDDOR reports of accidents, occupational diseases and dangerous occurrence)? b) the referral to other regulators of relevant information received where there is wider regulatory interest?	a) Not applicable b) Yes
	8. Are the policies, procedures and standards mentioned above in points 6 and 7 followed, monitored, and reported on, and any variations addressed within a service plan or BVPP.	EH – Yes TS - Yes
	<u>Appropriate Resources</u> 9. Has the authority within the last five years benchmarked its resources for relevant services against similar local authorities or comparable service providers including private and voluntary?	EH – Yes TS - Yes
	<u>Consultation and satisfaction levels</u> 10. a) Does the authority have a range of mechanisms in place to consult stakeholders affected by their service regarding the development of the enforcement policy? b) Does the authority have a range of mechanisms in place to consult stakeholders affected by their service regarding satisfaction levels? c) and are the consultation responses considered and acted upon?	Yes Yes Yes
Local	The percentage of consumer protection complaints and requests for services	100%

	responded to within the target time (3 working days)	
--	--	--

Corporate Indicators (corporate target in brackets)

Indicator	Description	Target 05/06
BV8	The % of invoices of commercial goods and services that were paid by Trading Standards within 30 days of receipt.	100% (93%)
BV12	The % number of working days lost to sickness absence during the year.	2.5% (5%)
	% of correspondence answered within 15 days.	100%
	% of telephone calls answered within 5 rings.	98% (90%)
	% of stage 1 complaints responded to within 15 working days.	100% (85%)
BV177	Is the authority part of a Community Legal Service Partnership? Yes/No	Yes

Other Quarterly Report Indicators

Other Local Indicators	Description	Consortium Target 05/06
	The average number of visits per high and medium risk premises	Brent: 51% Harrow: 53%
	Complaints Received Completed (Request for Actions).	Brent: 3132 Harrow: 3121
	No. of infringement reports submitted	Brent: 65 Harrow: 65
	Total Prosecutions	Brent: 36 Harrow: 35
	% of business enquiries responded to within 2 working days	100%
	% of complaints responded to within 3 working days	100%
	% of verification tests on metrology equipment carried out within 10 working days	100%

Local Indicators

The Service currently complies with the National Performance Indicator BV166 at a level of 100%.

SERVICE UNIT NAME: Trading Standards

Indicator	Actual 2003/04	Projected outcome 2004/05	Target 2004/05	Target 2005/06	Target 2006/07	Target 2007/08	Environment Priority Number
UNIT BEST VALUE INDICATORS							
BV166 Checklist of enforcement best practice for Trading Standards	100%	100%	100%	100%	100%	100%	4
UNIT LOCAL :							
The average number of visits per high and medium risk premises	0.46	0.48	0.54	0.51	0.51	0.51	4
% complaints responded to within 3 working days	98%	98%	100%	100%	100%	100%	4
Complaints Received Complaints Completed	3113 3048	3153 3132	2996	3500	3800	4000	4
No. of infringement reports submitted	70	50	70	65	65	65	4
Total Prosecutions	25	30	40	36	36	36	4
% of business enquiries responded to within 2 working days	98.5%	96%	100%	100%	100%	100%	4
% of verification tests on metrology equipment carried out within 10 working days	100%	100%	100%	100%	100%	100%	4

Environment Priorities:

1. Investing in our Public Realm
2. War on Waste
3. Transforming Transport
4. Protecting the Public
5. Delivering the Strategy for Sport
6. Making Wembley Work for us
7. Securing the Public Realm
8. Aiming for Beacon Standards

SERVICE UNIT NAME:

Indicator	Actual 2003/04	Projected outcome 2004/05	Target 2004/05	Target 2005/06	Target 2006/07	Target 2007/08
CORPORATE INDICATORS						
BV8 - % of invoices paid within 30 days	71% Corporate	100%	90%	97%	100%	100%
BV12 – The number of working days/shifts due to sickness absence	8 days Corporate	7.1 days	8 days	8 days	8 days	7days
ENVIRONMENTAL SERVICES CROSS CUTTING INDICATORS:						
% of telephone calls answered	86%	98%	90%	98%	98%	98%
% of stage 1 complaints responded to within 15 working days	71%	100%	85%	100%	100%	100%
% of correspondence answered within 15 working days		97%	85%	100%	100%	100%
% of Freedom of Information Act requests responded to within 20 working days		100%	90%	100%	100%	100%

Bold type – Corporate Target
 Bold Italic type- Environment Target