



# Trading Standards Joint Advisory Board

Thursday 5 March 2026 at 6.15 pm

To be held as an online virtual meeting via MS Teams

The press and public are welcome to attend this meeting by viewing the live webcast. The link to view the meeting is available [HERE](#)

## Membership:

Members Councillors:	Representing	First alternates Councillors:	Second alternates Councillors:
Pritesh Stevenson	Harrow	Blackman	Harrow
Suresh Crabb	Harrow	Greek	Harrow
Kennelly	Brent	Kalu	Harrow
Krupa Sheth	Brent	Miller	Brent
		Chohan	Brent
		Vacancy	Brent

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## **Notes for Members - Declarations of Interest:**

If a Member is aware they have a Disclosable Pecuniary Interest\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest\*\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also a Prejudicial Interest (i.e. it affects a financial position or relates to determining of any approval, consent, licence, permission, or registration) then (unless an exception at 14(2) of the Members Code applies), after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

### **\*Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences**- Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

### **\*\*Personal Interests:**

The business relates to or affects:

(a) Anybody of which you are a member or in a position of general control or management, and:

- To which you are appointed by the council;
- which exercises functions of a public nature;
- which is directed is to charitable purposes;
- whose principal purposes include the influence of public opinion or policy (including a political party of trade union).

(b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting, to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the electoral ward affected by the decision, the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who employs or has appointed any of these or in whom they have a beneficial interest in a class of securities exceeding the nominal value of £25,000, or any firm in which they are a partner, or any company of which they are a director
- any body of a type described in (a) above.

# Agenda

Introductions, if appropriate.

Item	Page
<b>1 Election of Chair</b>	
To be appointed from members of the London Borough of Brent for this meeting.	
<b>2 Apologies for Absence and Clarification of Alternate Members</b>	
<b>3 Declarations of Interests</b>	
Members are invited to declare at this stage of the meeting, any relevant personal or disclosable pecuniary interests in the items on this agenda.	
<b>4 Minutes of Previous Meeting</b>	1 - 6
To approve the minutes of the previous meeting held on Wednesday 5 November 2025 as a correct record.	
<b>5 Matters Arising</b>	
<b>6 Deputations (if any)</b>	
<b>7 Fees and Charges Report 2026-27</b>	7 - 12
This report provides Members with information concerning the proposed level of fees and charges to be applied by the Brent & Harrow Trading Standards Service during 2026/27.	
<b>8 Work Plan Report 2026-27</b>	13 - 22
This report provides Members with information concerning the proposed 2026/27 work plan for Brent & Harrow Trading Standards.	
<b>9 Date of Future Meetings</b>	
Members are asked to note the provisional schedule of meetings agreed between Brent & Harrow for the 2026-27 Municipal Year:	
<ul style="list-style-type: none"><li>• Tuesday 30 June 2026 at 6pm to be hosted (online) by the London Borough of Harrow</li><li>• Tuesday 3 November 2026 at 6pm to be hosted (online) by the London Borough of Brent</li></ul>	

- Thursday 4 March 2027 at 6pm to be hosted (online) by the London Borough of Harrow

These dates will be subject to final confirmation by each respective borough in approving their calendar of meetings for the 2026-27 Municipal Year.

## **10 Any Other Urgent Business**

Notice of items to be raised under this heading must be given in writing to the Deputy Director Democratic & Corporate Governance (London Borough of Brent) or their representative before the meeting in accordance with the constitutions of both Councils.



# **Trading Standards Joint Advisory Board**

## **Minutes**

### **5 November 2025**

**Present:**

<b>Chair:</b>	Councillor Pritesh Patel	– London Borough of Harrow
<b>Councillors:</b>	Norman Stevenson	– London Borough of Harrow
	Krishna Suresh	– London Borough of Harrow
	Krupa Sheth	– London Borough of Brent
	Daniel Kennelly	– London Borough of Brent

**1. Election of Chair**

**RESOLVED:** That Councillor Pritesh Patel (London Borough of Harrow) be elected as Chair for the meeting.

**2. Apologies for Absence and Clarification of Alternate Members**

Apologies were received from Councillor Stephen Crabb.

**3. Declarations of Interests**

**RESOLVED:** To note that there were none.

**4. Minutes of Previous Meeting**

**RESOLVED:** That the minutes of the meeting held on 4 June 2025 be taken as read and signed as a correct record subject to the changes raised by the Chair.

Pritesh should be correctly spelt as Pritesh, not P-r-i-t-i-s-h  
Rashmi Patel should read Rashmi Kalu.

No other amendments or comments were raised.

## **5. Matters arising**

**RESOLVED:** None received.

## **6. Deputations (if any)**

**RESOLVED:** No requests for deputations had been submitted for the meeting.

## **7. Trading Standards Mid-Year Review**

The Senior Regulatory Service Manager introduced the Trading Standards Mid-Year Review and explained that the mid-year report served as a snapshot of performance and progress across Brent and Harrow, focusing on key legislative changes, enforcement activity, and service outcomes to date.

The Senior Regulatory Service Manager highlighted two significant new pieces of legislation:

- The Digital Markets, Competition and Consumers Act 2024, which replaced the Consumer Protection from Unfair Trading Regulations 2008, introducing new offences such as misleading actions, omissions, aggressive practices, drip pricing, and false online reviews.
- The ban on single use vapes, which had now come fully into effect. Officers reported a noticeable reduction in disposable vapes seen in local areas and street litter.

The Senior Regulatory Service Manager summarised performance statistics, noting that 2,116 service requests had been received through Citizens Advice and other channels, with 960 examined in more detail (512 for Brent and 448 for Harrow). Around 70 business advice requests were also recorded (32 Brent / 38 Harrow).

Enforcement work included 120 inspection visits, with 27 high-risk premises visited so far (15 Brent / 12 Harrow), ensuring compliance in areas with higher risk profiles such as product safety and previously prosecuted traders.

The Senior Regulatory Service Manager emphasised that the service was intelligence-led, acting on referrals from the public, councillors, other authorities, and the police. 38 test purchases had been carried out to monitor underage sales of age-restricted products, resulting in a 15% failure rate, primarily involving vape and butane sales.

The Senior Regulatory Service Manager also reported ongoing joint operations with the police and HMRC targeting illicit tobacco, with 22 premises visited and illicit goods still being found across both boroughs — a persistent issue nationwide.

Proceeds of Crime investigations had led to £193,376 in confiscation orders, while monetary penalties totalling nearly £13,000 had been issued for breaches of letting agent regulations and client money protection rules.

The Senior Regulatory Service Manager noted that the team was also exploring the use of Closure Orders for repeat-offender tobacco premises. One such case in Brent had been prepared, though the shop in question closed voluntarily before action was taken.

Following the presentation, Members asked questions and held a discussion.

Members commended officers for the detailed report and the increased enforcement activity.

Members raised the following questions how Trading Standards prevented advance warnings among retailers, for example through WhatsApp messages alerting others of inspection visits. Officers acknowledged the challenge of preventing tip-offs among traders but explained that officers often deployed sniffer dogs capable of detecting concealed tobacco, even in hidden compartments such as stools, floors, or storage boxes. The approach had proven effective despite the warning networks.

Members asked regarding the timescale for implementing Closure Orders and whether these could be accelerated to demonstrate strong enforcement. On closure orders, officers confirmed that templates and procedures were now in place for both Brent and Harrow, and officers were working with Public Health to gather supporting evidence, including antisocial behaviour elements such as spitting. Once sufficient intelligence was obtained, implementation could proceed swiftly.

Members referred to national news coverage about tobacco being hidden in vehicles near shops and queried whether officers were aware of this practice. Officers confirmed awareness of the trend, noting that traders were becoming increasingly sophisticated in concealing illicit goods in inaccessible areas such as cars or flats above premises. Officers emphasised the reliance on robust intelligence and surveillance before applying for search warrants. Officers added that similar patterns were being reported across the country, reflecting a nationwide epidemic rather than an isolated local issue.

Members thanked officers for a clear presentation and sought clarification on how the 2,116 service requests related to the 960 cases analysed further. They asked whether this represented prioritisation and filtering based on relevance or seriousness. Officers confirmed this was correct — all cases were logged, but many were simple notifications or civil complaints requiring no direct action. Priority was given to those indicating potential criminal breaches.

Members also asked if future annual reports could include year-on-year comparisons. Officers confirmed they would.

Members asked whether any specific types of offences had increased compared to the previous year. Officers reported no notable increase in offences overall, though illicit tobacco remained consistently high, mirroring national trends.

Members also queried how the team handled paan spitting and products made with or without tobacco. Officers clarified that tobacco-containing paan was treated as an illicit tobacco product and seized accordingly.

Officers from Environmental Health, added that non-tobacco paan was classified as a food product, requiring food hygiene checks and compliance with cleanliness standards. Enforcement on street cleanliness and spitting fell under her team's remit, often in partnership with Trading Standards.

The Chair requested that future reports specify the exact six-month reporting period (e.g., April–September) for clarity.

He also asked:

The Chair queried whether the 15% underage sale failure rate could be compared with London or national averages. Officers explained that benchmarking data might be available through the Association of Chief Trading Standards Officers (ACTSO) and agreed to provide comparative figures at the next meeting.

The Chair asked how the income from penalties and confiscation orders were utilised and whether it could strengthen Trading Standards resources. Officers confirmed that proceeds from confiscation orders were divided according to statutory rules under the Proceeds of Crime Act and currently funded the boroughs' two financial investigators.

With no further comments raised the Chair thanked officers for the update provided and it was **RESOLVED**: That the report be noted.

## 8. OP CECE - Joint Advisory Board Report

The Senior Regulatory Service Manager presented the report on Operation CeCe (OPCC), noting that it was a timely follow-on from the previous discussion on illicit tobacco.

It was explained that Operation CeCe began in January 2021, with the objective of tackling the sale and supply of illegal tobacco products such as cigarettes, hand-rolling tobacco, shisha, and smokeless tobacco across England and Wales. The initiative was funded by HMRC and delivered via National Trading Standards (NTS) and London Trading Standards (LTS), with local authorities such as Brent and Harrow able to apply for targeted funding.

The three main areas of legislation enforced under the operation were outlined:

1. The Standardised Packaging of Tobacco Products Regulations 2015 – prohibiting logos, trademarks and promotional imagery.
2. The Tobacco and Related Products Regulations 2016 – requiring prescribed English-language health warnings with pictograms.
3. Provisions under which non-compliant or foreign-labelled products constituted criminal offences subject to seizure and prosecution.

It was stressed that Operation CeCe funding covered disruption and enforcement work, including test purchases of illicit tobacco and sniffer-dog operations, but did not cover underage test purchasing or prosecution costs. In some cases, officers first carried out test purchases pretending to be ordinary customers to gather intelligence before arranging full enforcement visits. This was especially useful where consecutive premises along one road were suspected of illegal activity.

Since the operation's inception in March 2021 through to September 2025, Brent and Harrow Trading Standards had:

- Conducted 184 enforcement visits,
- Seized over 480,000 sticks (24,000 packs) of illegal cigarettes,
- 10 kg of hand-rolling tobacco,
- 23 kg of smokeless tobacco, and
- 115 kg of shisha and other tobacco products.

Figures had continued to rise since the report was written, with further seizures made in recent months.

In total:

- 63 warning letters and 10 simple cautions had been issued,
- 24 prosecutions had been brought before the courts, resulting in £38,000 in fines and £25,000 in awarded costs,
- and £25,841 in cost recovery had been claimed under Operation CeCe funding since 2021.

## Member Questions and Discussion

Members queried why Operation CeCe funding could not be used for underage test purchasing and whether any monitoring of online sales of tobacco or vape products had been undertaken. Officers explained that the funding was ring-fenced by HMRC and LTS solely for tackling illicit tobacco, meaning it could not be used for lawful goods sold to underage customers. Underage test purchases concerned legal products being sold unlawfully to minors, whereas Operation CeCe focused on illegal products regardless of age. No online enforcement work had yet been undertaken, though the suggestion would be considered for future exploration.

Members also queried the data showing that Brent had roughly double the number of enforcement visits compared with Harrow and asked whether this reflected higher levels of intelligence, different demographics, or retail patterns. Officers confirmed that the distribution of visits was entirely intelligence-led, determined by the number of complaints and referrals. Brent had received 214 complaints compared with 112 in Harrow, and in several cases, multiple complaints related to the same premises. The apparent higher tonnage of shisha seized reflected the product's heavier packaging rather than a greater number of units. Smaller products such as smokeless tobacco often appeared in large quantities but weighed far less.

Further queries were raised regarding the reference to 63 letters of warning, asking why some offenders received warnings rather than prosecution, and what criteria determined this approach. Officers explained that letters of warning were issued in lower-level cases where only small quantities (e.g. one or two packets) were found. Each case was assessed on its own merits, considering context, scale, and previous offences. Repeat offenders were escalated to simple cautions or prosecution. An example was given of a trader who had been caught five times; following repeated offences and escalating sanctions, the trader ultimately received a six-month custodial sentence, which had been widely publicised to deter others.

The team adopted a proportionate and graduated enforcement approach, balancing deterrence with practicality, while ensuring serious or persistent offenders faced strong legal action. Members acknowledged the explanation and commented that although the approach was pragmatic, maintaining a strong deterrent remained vital given the widespread problem nationally.

There being no further questions, **RESOLVED** the Operation CeCe report be noted.

The Chair thanked the officers from both Brent and Harrow for their continued hard work in this complex and challenging area of enforcement. Members echoed appreciation for the team's diligence and commitment to tackling illegal tobacco across both boroughs.

## **9. Date of Future Meetings**

**NOTED** the dates for the schedule of meetings agreed between Brent & Harrow for the 2025-26 Municipal Year as follows:

- Thursday 5 March 2026 at 6pm to be hosted (online) by the London Borough of Brent

(Note: The meeting, having commenced at 6.00 pm, closed at 6.50 pm).

COUNCILLOR PRITESH PATEL  
Chair

**London Boroughs of Brent & Harrow  
Trading Standards Joint Advisory Board  
5 March 2026  
Report from the Senior Service Manager**

**FOR INFORMATION**

**TRADING STANDARDS FEES AND CHARGES 2026/27**

## **1.0 Purpose of the Report**

- 1.1 This report provides Members with information concerning the proposed level of fees and charges to be applied by the Brent & Harrow Trading Standards Service during 2026/27.

## **2.0 Recommendations**

- 2.1 That Joint Advisory Board Members consider the report and make recommendations or comments where appropriate.

## **3.0 Details**

- 3.1 In accordance with paragraph 13(f) of the Consortium Agreement between the London Borough of Brent and the London Borough of Harrow, the Joint Advisory Board 'should consider and make recommendations on the level of fees and charges to be made to the public in respect of any part of the service, for consideration by whoever is authorised to make fees and charges decisions by each respective council's constitution'.

- 3.2 As per the council's Fees and Charges policy, our Strategic Director has delegated powers in conjunction with the Chief Executive, to vary fees in certain circumstances without the need to bring reports before Cabinet or other decision making bodies. When appropriate circumstances provide, the Service will utilise this policy to maximise income opportunities.

- 3.3 Brent is the host authority for the consortium and therefore the fee structure and charges are applied at the same level to each borough.

- 3.4 Trading Standards fees fall into the following categories:

1. Statutory fees (set by legislation, although some offer discretion to vary the amount up to a maximum value)
2. RPI linked fees (agreed previously by Brent's Executive)
3. Discretionary fees (there is discretion to vary the value charged)

- 3.4.1 Statutory fees are set nationwide by government. Generally, local authorities have no discretion to change these fees although on occasions, the legislation

will permit a fee to be set locally up to a maximum value.

- 3.4.2 We aim to always benchmark our Trading Standards fees against other comparable local authorities, to ensure that we are in line with other boroughs for example and to maintain a competitive position for services that can be offered to customers who are not tied to using a specific local authority.
- 3.4.3 Unfortunately, this is not always possible because over the years, whilst our Trading Standards team has become more commercially minded, other London boroughs have gone the opposite direction, with many not offering the services that we charge for.
- 3.4.4 Where possible, we have benchmarked our fees against others and if we haven't been able to find a comparable London authority, we have used data available from other authorities who offer a similar service. Broadly speaking, we seek to maximise charges to ensure full cost recovery for each respective borough.

#### *Explosive License Fees*

- 3.4.5 The fees to process explosive (firework) licenses, charged by the Harrow team are set by the Health and Safety Executive by virtue of the Health and Safety and Nuclear (Fees) Regulations as amended by the The Health and Safety and Nuclear (Fees) (Amendment) and Gas Safety (Miscellaneous Amendment) Regulations 2024. Firework Regulations 2004 sets all year round sales licence which is in addition to the storage licence. The fees vary subject to the exact licence required although they are typically £59 to renew a one year licence in addition to £500 for an all year round license. It remains the case that in Brent, this function is the responsibility of the Licensing Team who receive the income.

#### *Letting and/or Property Management Penalty Fees*

- 3.4.6 Under the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014 and the Consumer Rights Act 2015, we can impose monetary penalties of up to £5,000 where breaches of the legislation have taken place.
- 3.4.7 Under the Tenant's Fees Act 2019 and Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019, we can impose monetary penalties of up to £30,000 where breaches of the legislation have taken place.
- 3.4.8 However, the legislation requires enforcing authorities to take into consideration any representations received from the recipients of such penalties. Accordingly, the value of each penalty is considered on a case by case basis to determine what is appropriate in the given circumstances. It is proposed that the penalties range from £1,000 (low harm) to £5,000 (high harm) for first offences. For subsequent offences, we will either prosecute or levy a penalty of £5,000 (low harm) to £30,000 (high harm). These penalties only relate to the legislation quoted in 3.4.4 above.

### *Primary Authority Fees*

3.4.9 A RPI escalator (Retail Price Index) applies to our Primary Authority partnerships which is a scheme enabling us under Section 31 Regulatory Enforcement and Sanctions Act 2008, to charge businesses on a 'cost recovery' basis, for primary authority services.

3.4.10 Brent's Executive agreed a report titled "*Introduction of a Charge Based Regulatory Advice Service for Businesses*" in June 2013, which stipulates that an increase is applied to the rates charged for primary authority advice, on an annual basis on 1 April each year by the annual change in the RPI for January of the year concerned. The RPI in December 2025 was 4.2%.

3.4.11 The proposed rounded up, hourly rate increase in our primary authority fees to include this rise are shown in the table below.

<b>Service</b>	<b>2025/26</b>	<b>2025/26</b>
Primary Authority – fixed contract (per hour)	£78.00	£81.00
Primary Authority - pay as you go (per hour)	£97.00	£100.00

3.4.12 The remaining fees the Council has discretion to determine annually, with any change in the fee being set each year according to prevailing circumstances. When determining the level to fix these fees, care is required to ensure we remain competitive amongst other local authorities who offer similar services so as to ensure we do not lose custom.

### *Weights and Measures Fees*

3.4.13 By virtue of S11(5) and S49(4) of the Weights and Measures Act 1985, the local authority can charge 'such reasonable fees as we determine' for carrying out our duties under the Act. The Association of Chief Trading Standards Officers (ACTSO) used to publish annual guidance for weights and measures fees to local authorities so they could remain competitive. ACTSO took the decision in April 2019 not to give this guidance as the 'actual costs of each local authority vary widely for many reasons and local authorities must follow their own corporate rules in relation to assessing costs and charging'. The fees have risen between 3.7% and 3.92%.

3.1.14 The table below shows the proposed fees:

Service Charged Per Officer Per Hour	VAT	2025/26 (Inc VAT where applicable)	2026/27	
			(excl VAT)	(incl VAT)
Verification of weights & measures equipment	20%	£97.20	£84	£100.80
Calibration of weights for business	20%	£97.20	£84	£100.80
Weights & measures testing for other local authorities (per hour)	0%	£81	£84	£84
Additional officer testing assistance (per hour)	0%	£51	£53	£53
Officer use of safety lab (per hour)	20%	£108.60	£88	£108.60

#### *Registration of Premises for Auction Fee*

3.1.15 By virtue of S26(2) Greater London Council (General Powers) Act 1984, we apply a 'reasonable fee' for the registration of a premises to host an auction. The legislation states this fee has to cover 'administration and inspection costs'. The current fee is £414 and it is proposed this fee increases to £430.

3.1.16 It is very rare to get applications for this purpose with none received during 2025/26.

#### *Fee for Officers Carrying Out Duties at Wembley Events*

3.1.17 A charge is made for officers conducting their duties at Wembley events on behalf of brand holders or other merchandisers. The rate for this work £74 per hour per Enforcement officer and £99 for Senior/Supervisory Staff. Officers are expected to work during matches and events held at Wembley although this work and the structure used to deliver it, is currently under review with Wembley Stadium following the council's pay and allowances review.

#### *Financial Investigator's Fee*

3.1.18 Our Financial Investigators continue to offer their services to other local authorities. In addition to agreements with these local authorities, which ensures a share of any money raised via the Home Office Proceeds of Crime incentivisation scheme, we charge an hourly fee for our time spent conducting the investigation. This covers our costs in the event that no order is made or if an order is made by the Court and it is not paid for any reason resulting in no incentivisation scheme payment being received.

3.1.19 It is proposed to increase this fee from £51 to £53. This is to ensure we remain competitive with other local authorities offering a similar service. This fee is charged in addition to a share of any subsequent incentivisation scheme payment.

3.1.20 The hourly fee quoted above for our financial investigation services, does not apply to any internal London Borough of Brent but will apply to London Borough of Harrow referrals. The hourly rate to be applied is the rate on the date that any contract is made with an external authority as opposed to the applicable fee on the date a financial investigation may conclude.

#### **4.0 Financial Implications**

4.1 Below is the list of the previous income budgets.

- 2020/21 - £45,500
- 2021/22 - £40,200
- 2022/23 - £42,000
- 2023/24 - £50,500
- 2024/25 - £45,500
- 2025/26 - £42,500

(These figures exclude income received from court costs awarded or proceeds of crime recovery).

4.2 At the time of drafting this report, income of £61,355 for 2025/26 had already been achieved via its fees and charges against a fees and charges income figure of £42,500k. This extra income is mainly attributable to the increased Wembley event schedule during 2025 and the above budgeted income reflects this.

#### **5.0 Legal Implications**

5.1 There is no legal implications arising from this report.

#### **6.0 Equality Implications**

6.1 The proposals in this report have been screened to assess their relevance to equality and were found to have no equality implications.

#### **7.0 Consultation with Ward Members and Stakeholders**

7.1 There is no requirement to specifically consult Ward Members about this report as it affects all wards across both Boroughs.

#### **8.0 Human Resources Implications**

8.1 There are no human resource or property implications arising from this report although it should be noted that the number of staff vacancies currently within the Service may result in a reduced ability to generate income, as well as the continued restrictions during the pandemic.

#### **Contact Officer**

Any person wishing to obtain more information should contact Anu Prashar, Senior Regulatory Service Manager, Brent Civic Centre, Engineers Way, Wembley Middlesex HA9 0FJ. Telephone: (020) 8937 55215, [anu.prashar@brent.gov.uk](mailto:anu.prashar@brent.gov.uk)

ANU PRASHAR  
SENIOR REGULATORY SERVICE MANAGER

**London Boroughs of Brent & Harrow  
Trading Standards Joint Advisory Board  
5 March 2026  
Report from the Senior Service Manager**

**FOR INFORMATION**

**TRADING STANDARDS WORK PLAN 2026/27**

## **1.0 Purpose of the Report**

1.1 This report provides Members with information concerning the proposed 2026/27 work plan for Brent & Harrow Trading Standards.

## **2.0 Recommendations**

2.1 That Joint Advisory Board Members consider the report and make any recommendations or comments where appropriate including suggesting alternative priority areas of work that the Trading Standards Service may wish to consider.

## **3.0 Details**

3.1 The Service drafts an annual work plan, which proposes the activities to be undertaken and the priority areas of work for the coming financial year. The plan also acts as a guide for the purposes of monitoring performance during this period.

3.2 In accordance with the consortium agreement, there is a requirement for the London Borough of Brent to estimate the number and type of activities that will be undertaken by the Service during the financial year and to present this to the Joint Advisory Board.

3.3 A copy of the proposed work plan for the year 2026/27 is attached as an Appendix to this report.

## **4.0 Financial Implications**

4.1 There are no financial considerations arising from this report as the work plan is drafted in a manner to be achieved within the budget provided for the Service for 2026/27.

4.2 This report is written as if the 2026/27 budget will remain unchanged from the previous year. If there are any changes to the budget after the drafting of this report, the work plan will be adjusted accordingly to reflect any changes.

## **5.0 Legal Implications**

5.1 There is no legal implications arising from this report.

## **6.0 Equality Implications**

6.1 The proposals in this report have been screened to assess their relevance to equality and were found to have no equality implications.

## **7.0 Consultation with Ward Members and Stakeholders**

7.1 There is no requirement to specifically consult Ward Members about this report as it affects all wards across both Boroughs.

## **8.0 Human Resources Implications**

8.1 There are no human resource or property implications arising from this report although it should be noted that the number of staff vacancies currently within the Service may result in a reduced ability to generate income, as well as the continued restrictions during the pandemic.

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ANU PRASHAR  
SENIOR REGULATORY SERVICE MANAGER

**Appendix A**



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**Brent & Harrow  
Trading Standards**

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**Team Work Plan  
2026-2027**

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## Introduction

This work plan has been developed to outline the key proposed work-streams of Brent and Harrow Trading Standards for the period of the 1 April 2026 to the 31 March 2027.

Brent & Harrow Trading Standards exists to protect consumers, support responsible businesses and uphold a fair, safe and competitive marketplace across both boroughs. Our joint service model enables us to pool specialist expertise, coordinate investigations and deliver targeted projects on issues that cause the greatest detriment—from unsafe and counterfeit goods to illicit tobacco and vapes, unfair trading, underage sales, weights and measures, lettings and estate agency enforcement, and e-commerce compliance.

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

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

The ongoing move towards new and emerging online markets remains a significant issue for the Service and we will continue to explore the most effective ways to tackle consumer issues within these new markets.

Last year the Digital Markets, Competition and Consumers Act 2024 (DMCC) which strengthen enforcement of consumer protection laws mainly came into force in April 2025. It is expected that the elements dealing with subscriptions will come into force no earlier than Spring this year.

The government this year, has set an intent to harden controls on online knife sales (two-step age verification, suspicious order reporting, tougher penalties), signalling expanded Trading Standards engagement with platforms, couriers and large retailers.

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

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

## Priorities

The Trading Standards Service aim is for a safe, fair and legal marketplace, that supports and benefits local businesses and which helps the local economy grow.

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

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

The National Trading Standards Board (NTSB) has identified the following areas in its Strategic Assessment dated October 2025, which it considers to be priority areas of work:

- Doorstep crime and cold calling (including energy fraud).
- Lettings (England only).
- Mass marketing fraud/scams.
- The importation of illicit vapes (England only).
- Used cars.
- Illicit tobacco.
- Other fair trading issues.
- Intellectual property.
- Estate agency.
- Animal feed work

NTSB also has the following as cross cutting themes and enablers, as they impact on each of their priority areas:

- eCrime and the use of social media/online platforms.
- Serious and organised crime.
- The cost-of-living crisis.

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

LTS thematic priority areas are as follows:

- Lettings – focus on intelligence gathering/sharing and identifying non-compliant traders.
- Doorstep crime – assists protection and safeguarding; to include Scams issues.
- Fair trading and Scams – assists protection, advice for consumers and safeguarding business; this includes other Scams issues.
- Intellectual property crime – Assists in Safeguarding legitimate business (which has a cross over into)-
- Product safety – assists in Safeguarding from unsafe products available to consumers and IP Crime.
- Illicit Tobacco and Alcohol – Assists in Safeguarding, IP Crime and can include Product Safety – focus on intelligence gathering, identifying traders and lawful sharing with partners.

The sub- thematic priorities are;

- Doorstep Crime – focus on Services, Construction, and all Home Maintenance traders.
- Fair Trading – particularly all Investments; Enablers i.e. - Virtual Offices / Boiler rooms etc; Identifying rogue traders, (Cost-Of-Living Crisis); and Fake / Copycat websites.
- Intellectual Property – focus on intelligence gathering / sharing and identifying traders including the supply and *more so*; the storage of illicit goods.

- Product Safety – focus on MOT’s Servicing and Repairs; Beauty treatments and cosmetics; Electrical Services and Installations; and identifying traders and importers.
- Underage sales – focus on intelligence gathering / sharing and identifying traders.
- Lettings – Money and Tenancy protection schemes, Redress schemes and Tenants Fees Act 2019

The Office of Product Safety and Standards (OPSS) work and fund some of our product testing. OPSS inform us when a product safety and recalls. OPSS no longer produces a Product Safety Strategic Intelligence assessment report but publish a Product Safety Database (PSD) report 2024 to 2025 dated July 2025.

The PSD is a core dataset for OPSS, providing insight into the market surveillance activity of regulatory officers across the UK and highlighting where the greatest levels of activity are taking place in terms of product sectors, as well as providing an oversight of the most reported hazards and corrective actions taken. Analysis of PSD data can also highlight where there may be emerging safety issues for novel products and within certain sectors, which can feed into and drive OPSS’s regulatory activity and decision making to target market surveillance activity, reduce risk and protect consumers.

The report sets out high level findings from the PSD incorporating product safety and non-compliance notifications from local authorities and national regulators.

Between 1 April 2024 and 31 March 2025, a total of 1,418 notifications were received on the PSD, covering 1,792 products. A single notification may relate to multiple products, and the same product may appear in more than one notification. Of the notifications received, 24% were reported as presenting a serious risk, 12% as high risk, 8% as medium risk, 10% as low risk, and 2% as inconclusive.

The most frequently notified product category on the PSD was electrical appliances and equipment (26% of products notified), followed by toys (19%) and cosmetics (12%).

Within the London Boroughs of Brent and Harrow each local authority has a corporate plan setting out what it is to accomplish in the future and how this will be achieved. Brent has a ‘Borough Plan 2023-2027’ and Harrow a plan entitled ‘Restoring pride in Harrow. These plans highlight the broad subject areas listed below as priority areas for each Council:

Brent:<sup>1</sup>

- Prosperity and Stability in Brent
- A Cleaner, Greener Future
- Thriving Communities
- The Best Start in Life
- A Healthier Brent foundations

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<sup>1</sup> [Brent Borough Plan 2023-27.pdf](#)

Harrow:<sup>2</sup>

- A council that puts residents first
- A borough that is clean and safe
- A place where those in need are supported.

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

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

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

We have categorised the following areas of work to form the basis of our 2026/27 priorities:

### High Priority

Most Complained About Businesses	Estate Agents/Letting Agents including partnership working
Doorstep Crime and Scams – vulnerable consumers	Counterfeit Goods (Large Scale Operation)
Unsafe Goods (Manufacture /wholesale) including Port referrals	Underage Sales – nicotine inhaling products, knives, alcohol, tobacco, fireworks
Primary Authority Partnerships	Energy related fraud investigations and enforcement
Illicit Tobacco Products and nicotine inhaling products (vape products) enforcement activity	Second hand car dealers / used car sales

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<sup>2</sup> [Restoring Pride in Harrow 2024 - 26](#)

## Medium Priority

Misleading Descriptions (higher value goods)	Incorrectly Labelled Goods (safety)
Consumer Credit/illegal lending*	Counterfeiting and Copyright (low level)
Online Terms and Conditions	Energy Labelling of Premises and Goods
Unsafe Goods (Retail Level)	Hallmarking
Package Travel holiday complaints	Storage of Fireworks (unless critical safety implication)

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

## Low Priority

Single use carrier bag charges	Restrictive Notices
Misleading Descriptions (low value goods)	Underage Sales – lottery, spray paints, games, butane
Mock Auctions	Essential Packaging
Market Sales	Provision of Advice re Credit Card Charges
	Business Names

## Work Volumes

The tables below show the projected performance of the respective Brent and Harrow teams during 2026/27. It should be noted the nature of Trading Standard's duties is variable and therefore these figures are subject to change.

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

The work volumes are based on a Harrow's number of enforcement staff of 2.5 and Brent's number of enforcement staff of 3.5.

<p>Brent Team 2026/27 Based on staff numbers:</p> <ul style="list-style-type: none"> <li>• 3.5 Enforcement Officers</li> </ul>	<p>Harrow Team 2026/27 Based on staff numbers:</p> <ul style="list-style-type: none"> <li>• 2.5 Enforcement Officers</li> </ul>
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	Planned volume Brent	Planned volume Harrow
Complaints (Service Requests) Completed	366	250
Trader Enquiries / requests for advice	78	54
High Risk / Most Complained-about Trader Inspections	31	25
Port Referrals	5	1
Other Business Inspections	66	71
Weights & Measures, Average Quantity or Verification visits	4	3
Primary Authority Hours	117	36
Underage Test Purchase Visits	62	57
Infringement reports (average 40 work units per report)	31	21
eReports (average 7 work units per report)	9	7
Prosecutions completed – Crown Court	2	1
Prosecutions completed – Magistrates' Court	8	6
Licensing Reviews Completed	1	1
Simple Cautions Signed	6	4
Letters of Warning Issued	9	10
Fixed Penalty Notices Issued	8	7
Local and Regional Projects Completed	2	2
Service Improvement Work (Hours)	97	107
Approved Trader Scheme New Recruits or Audits	12	21
Doorstep Crime Rapid Response Actions	3	5
Number of Scam Victims Contacted c/o NTS Scams Hub	40	43
Partnership or Area Based Working Events / Weeks of Action	8	6
Samples, Mileage and Websites Checks	58	54
Number of Intelligence Logs Input on Regional Database	64	60
External social media including press releases issued	6	4