

Appendix A



**Brent & Harrow
Trading Standards**

**Team Work Plan
2022-2023**

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Introduction

Covid measures have been with us in one form or another throughout the year. This has had an impact on our work e.g. not being able to carry out age restricted test purchases. At the time of writing, most Covid measures that affected our work have ceased and we are hoping by the start of April 2022 we will be able to go back to business as usual.

In 2021/2022 the London Borough of Harrow reduced its funding to the consortium. It is expected that funding will be maintained at this level in relation to the Trading Standards budget and this is reflected in the work plan.

The coronavirus pandemic has fundamentally altered our lives: from how and where we work, how we shop and buy goods and how we sell our products. The last two years has also seen changes in how criminals and rogue traders have changed their practices to take advantage of new opportunities to make financial gain at the expense of consumer and damage the reputation of law abiding traders.

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

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

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

Brexit has now happened and the transitional period with Europe regarding goods and services to and from the UK and Europe has now ended. A new agreement between the UK and the EU was finally struck in December 2020, containing new rules for how the UK and EU will live, work and trade together. The UK is also now free to set its own trade policy and negotiate deals with other countries. It is perhaps clearer now more than ever that market standards are vital for our economy and any potential new trade deals. Frontline Trading Standards Officers will have to unpick the uncertainties and make sure that the regulatory and legal framework operate effectively.

Our role is also one of supporting local businesses and encouraging trade back to our local high streets following the pandemic. Covid restrictions had an unprecedented impact on our business community and we will tailor our approach to accommodate economic recovery wherever it is appropriate for us to do so.

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

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

Priorities

The 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 Interim Strategic Assessment dated September 2021, which it considers to be priority areas of work:

- Doorstep Crime and Cold Calling – safeguarding of vulnerable adults and consumers
- Mass Marketing Scams - disrupting and reducing consumers' exposure to scams
- Estate agency and Lettings work- protecting tenants and landlords from letting agents who aren't complying with the law
- Energy related fraud
- Intellectual property (counterfeiting) – focusing on the rise in social media as a market place, illegal streaming devices, electrical appliances and toys.
- Other Fair Trading issues – including misdescriptions arising from advertising, pricing, descriptions of goods and services, terms and conditions, holidays, and house improvements.
- Used cars - fake service history, misdescription of vehicles for sale (particularly numbers of previous owners, description/condition of vehicles), sales of unsafe/unroadworthy vehicles, hidden administration fees etc
- Tobacco products - illicit and counterfeit tobacco products

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

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

LTS priority areas are as follows:

- Doorstep crime
- Product Safety
- Intellectual property crime (counterfeiting)
- Fair trading and scams
- Lettings

- Product safety
- Illicit tobacco and cigarettes
- Underage sales

At the time of writing the Office of Product Safety and Standards (OPSS) had not produced a current Product Safety Strategic Intelligence assessment report. The previous report dated December 2020 for the 2021/22 details the key product safety risks and threats ahead with specific reference to those arising from the pandemic. The Control Strategy outlines the priorities for 2021/22 are as follows:

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

Within the London Boroughs of Brent and Harrow each local authority has a corporate plan setting out what it is to accomplish in the future and how this will be achieved. Brent has a 'Borough Plan 2019-2023' and Harrow an 'Ambition Plan 2020'. These plans highlight the broad subject areas listed below as priority areas for each Council:

Brent:¹

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

Harrow:²

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

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

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

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

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

- 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 2022/23 priorities:

High Priority

Most Complained About Businesses	Estate Agents/Letting Agents
Doorstep Crime and Scams	Counterfeit Goods (Large Scale Operation)
Unsafe Goods (Manufacture /wholesale) including Port referrals and Cosmetic Products	Proceeds of Crime Investigations
Primary Authority Partnerships	Underage Sales – nicotine inhaling products, knives, alcohol, tobacco
Niche and Illicit Tobacco Products including nicotine inhaling products (vape products)	Energy related fraud investigations and enforcement
Second hand car dealers	

Medium Priority

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

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

Low Priority

	Restrictive Notices
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Misleading Descriptions (low value goods)	Underage Sales – lottery, spray paints, games, butane
Mock Auctions	Essential Packaging
Market Sales	Price Marking of Goods or Services
Single use carrier bag charges	Business Names
Misleading Prices/Promotions (unless high value)	Provision of Advice re Credit Card Charges

Work Volumes

The tables below show the projected performance of the respective Brent and Harrow teams during 2022/23. 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.

Harrow Team 2022/23 Based on staff numbers:	Brent Team 2022/23 Based on staff numbers:
<ul style="list-style-type: none"> 2.5 Enforcement Officers 	<ul style="list-style-type: none"> 3.5 Enforcement Officers

	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
Press Releases Issued	6	4