

Appendix A



**Brent & Harrow
Trading Standards**

**Team Work Plan
2023-2024**

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Introduction

This year started with no Covid measures though other factors such as the cost-of-living crisis and high inflation rates has meant we have carried out projects with this in mind.

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.

Brent and Harrow Trading Standards is responsible for the enforcement of a wide range of legislation controlling the advertising, marketing, distribution and supply of goods and services throughout the manufacturing, importation, distribution, and service delivery chain. Its remit covers criminal and contract law and includes product safety, fraud, weights and measures, trademark protection, e-commerce and unfair trading practices.

The role of the Trading Standards is to promote a fair, healthy and safe trading environment in Brent and Harrow by ensuring compliance with regulatory legislation, protecting consumers and supporting local businesses. Trading Standards has a statutory responsibility to enforce regulatory legislation aimed at protecting consumers, particularly the most vulnerable and preventing businesses from engaging in unfair, illegal or unsafe practices.

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 the development of business local economy growth. 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.

Parliament is now debating the Retained EU Law (Revocation and Reform) Bill. This Bill is currently in the House of Lords. The Bill would involve the "sunsetting" of retained EU law by the end of this year if the laws are not amended or changed. This would cover over 2400 pieces of legislation across 21 Government Departments and could involve the rewrite of many of our domestic laws.

A significant number of areas of Trading Standards work is underpinned by such legislation including:

- Consumer Protection from Unfair Trading Regulations – which provide a cornerstone of huge protections to consumers from misleading claims, scams and rogue traders
- Weights and Measures regulations
- Product Safety
- Intellectual Property

- Business Protection from misleading marketing

Due to the changes that may come with the implementation of this Bill to an Act of Parliament we will need to ensure that staff are trained to advise our businesses and consumers of any changes that will affect them.

The cost-of-living crisis is also putting strain on the consumers and business pockets. Research carried out by ACTSO (the Association of Chief Trading Standards Officers) highlights that the risks associated with the cost-of-living crisis is apparent across all work areas and is placing increasing demands on the Trading Standards Service.

Highlights from the report include:

- Over half a billion pounds of consumer detriment (£548 million) was prevented by Trading Standards across England and Wales
- A major increase in counterfeit goods with Trading Standards seizing over 4 million counterfeit products with a market value of £111M - three times more than the previous year
- The removal of over 4.2M unsafe/non-compliant products including dangerous toys, lights and phone chargers
- A significant increase in the amount of illicit tobacco, with 14.9M illicit cigarettes seized
- Concerns that consumers are more at risk of being scammed, with 17,600 scam victims supported and approximately £47M of money saved by Local Authority Trading Standards in 2021/22.

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 September 2022, which it considers to be priority areas of work:

- Tier 1: Doorstep Crime, energy related fraud, mass marketing fraud/scams and lettings.

- Tier 2: Illicit tobacco, intellectual property crime, used cars, other fair trading and estate agents.
- Tier 3: Animal feed with dedicated FSA funding.
- Cross cutting issues: eCrime and the use of on-line and social media; serious and organised crime; and 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 priority areas are as follows:

- Doorstep crime
- Product Safety
- Fair trading and scams
- Lettings
- Product safety
- Illicit tobacco and cigarettes
- Underage sales

The cost-of-living crisis is the overarching theme to these priorities

At the time of writing the Office of Product Safety and Standards (OPSS) had produced a Product Safety Strategic Intelligence assessment report 2022/2023. The report details the key product safety risks and threats ahead with specific reference to those arising from the pandemic. The report outlines the priorities for 2022/23 are as follows:

- UK Supply Chains
- Asian Imports
- Impact of COVID-19, Supply Chains and New Products
- Substitution
- Chemicals in Consumer Products
- Net Zero and Consumer Products

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 'Corporate Plan 2023 -2026'. These plans highlight the broad subject areas listed below as priority areas for each Council:

Brent:¹

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

¹ [Brent Borough Plan 2023-27.pdf](#)

Harrow:²

- 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 2023/24 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	Referrals for 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	Inaccurate Weights and Measures
Unsafe Goods (Retail Level)	

² [\(Public Pack\)Agenda Document for Cabinet, 16/02/2023 18:30 \(harrow.gov.uk\)](#)

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
Online Terms and Conditions	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

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

Work Volumes

The tables below show the projected performance of the respective Brent and Harrow teams during 2023/24. 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.

Brent Team 2023/24 Based on staff numbers: <ul style="list-style-type: none"> • 3.5 Enforcement Officers 	Harrow Team 2023/24 Based on staff numbers: <ul style="list-style-type: none"> • 2.5 Enforcement Officers
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	Planned volume Brent	Planned volume Harrow
Complaints (Service Requests) Completed	300	230
Trader Enquiries / requests for advice	78	54
High Risk / Most Complained-about Trader Inspections	31	25
Port Referrals	5	1
Other Business Inspections	66	69
Weights & Measures, Average Quantity or Verification visits	10	10
Primary Authority Hours	117	20
Underage Test Purchase Visits	62	57
Infringement reports (average 50 work units per report)	30	15
eReports (average 7 work units per report)	15	9
Prosecutions completed – Crown Court	1	1
Prosecutions completed – Magistrates’ Court	8	6
Licensing Condition Reviews	1	1
Simple Cautions Signed	6	4
Letters of Warning Issued	9	10
Fixed Penalty Notices Issued	8	7
Local and Regional Projects	2	2
Service Improvement Work (Hours)	97	53
Approved Trader Scheme New Recruits or Audits	10	10
Doorstep Crime Rapid Response Actions	3	4
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	58
Press Releases Issued	6	4