

Appendix A



**Brent & Harrow
Trading Standards**

**Team Work Plan
2024-2025**

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Introduction

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 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 or assist our Primary Authority businesses on complex and legal matters.

Online shopping for items such as electrical household appliances and toys remain at a significant high, presenting challenges for the Service in terms of product compliance and safety. We will continue to explore the most effective ways to tackle consumer issues within these markets and take appropriate action to safeguard consumers.

The cost-of-living crisis is also putting strain on the consumers and business pockets. The challenging economic situation for most households is causing an increase in vulnerability, including temporary vulnerabilities, amongst residents. We will continue our work with our cost of living project including raising awareness of new frauds as they emerge and protect the most vulnerable in our communities who are often deliberately targeted and exploited by frauds, illicit, unsafe and counterfeit goods. We will identify products and marketplaces most likely to be susceptible to cost of living pressures. We will support people to help themselves.

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 2023, which it considers to be priority areas of work:

- Doorstep crime and cold calling (including energy fraud).
- Lettings (England only).
- Mass marketing fraud/scams.
- Illicit and underage sale of vapes (England only).
- Illicit tobacco.
- Used cars.
- Intellectual property.
- Other fair trading issues.
- 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:

- e-Crime 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 – 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) fund some of our product testing. OPSS inform us when there are product safety issues and recalls. OPSS no longer produces a Product Safety Strategic Intelligence assessment report but publish a Product Safety Database (PSD) report 2022 to 2023 dated October 2023.

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. Our officers monitor the PSD which provide an opportunity to identify emerging safety issues, including those arising from new and novel products. This can feed into and drive our regulatory activity and decision making to target specific markets or conduct market surveillance.

Our officers upload Product Safety Recalls to alert OPSS and other enforcement agencies of products presenting a high or serious risk. This is key to protecting our consumers locally, nationally and cross border.

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

The most frequently notified product category on the PSD was electrical appliances and equipment (32.7% of products notified) followed by toys (24.1%) and cosmetics (15.6%).

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:¹

- Prosperity and Stability in Brent

¹ [Brent Borough Plan 2023-27.pdf](#)

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

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 as soon as the relevant threshold is reached
- We will continue to focus on steering business towards primary authority advice to assist business and ensure full legislative compliance in all TS related matters
- 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, encouraging greater use of on-line advice and information, and working in partnership with our Services and agencies when the opportunity presents itself
- 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 2024/25 priorities:

High Priority

Most Complained About Businesses	Estate Agents/Letting Agents including partnership working
Doorstep Crime and Scams	Counterfeit Goods (Large Scale Operation)
Unsafe Goods (Manufacture /wholesale) including Port referrals	Underage Sales – nicotine inhaling products, knives, alcohol, tobacco, fireworks

² [Restoring Pride in Harrow 2023 - 26](#)

Primary Authority Partnerships	Energy related fraud investigations and enforcement
Illicit Tobacco Products and nicotine inhaling products (vape products) enforcement activity	Second hand car dealers
Cost of living including consumer complaints regarding Weights and Measures and Prices and Promotions.	

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 2024/25. 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 2024/25 Based on staff numbers:	Brent Team 2024/25 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