



LONDON BOROUGH OF  
**HARROW**

# **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