



Brent & Harrow Trading Standards

Team Work Plan 2019-2020

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Introduction

The Trading Standards Service will start the year with a new Head of Regulatory Services, with Simon Legg taking up this role. This marks the start of the restructuring exercise to bring together Brent Council's regulatory functions to form a more resilient and cohesive team which will continue throughout 2019/20. In addition to Trading Standards, Food Safety and Environmental Health functions will report directly to this new post. The Head of Regulatory Services reports to the Environment Operational Director.

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.

At the time of writing, the team is recruiting to appoint staff to two vacant enforcement officer posts that it is hoped will be filled by the beginning of the new financial year. We will be losing the Brent Assistant Enforcement Officer post following a Council wide offer of voluntary redundancy. This will unfortunately, put extra burdens on to the existing frontline staff in the Brent team, so we are exploring different ways to mitigate this loss of capacity.

The Service will continue conducting financial investigations for both our own Council's and other external customers. We are keen to increase this work and hope plans to undertake more financial investigations on behalf of the London Borough of Harrow, will progress during the coming year. At present, we employ two Financial Investigators. Their duties and performance measures are monitored and accounted for outside the scope of this work plan.

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

Priorities

Trading Standards' work is central to maintaining a confident marketplace, supporting businesses to develop and help 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 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 2018, 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
- Fair Trading issues - specific threats include used cars, housing, travel, distance selling, traders acting as private sellers and complaints about businesses who claim to be in approved trader schemes
- Product Safety - improving intervention on unsafe products, of particular concern are electrical items, toys and cosmetics
- Intellectual property (counterfeiting) – focusing on the rise in social media as a market place, illegal streaming devices, electrical appliances and toys.

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. The Government has introduced new legislation, the Tenant Fees Act 2019, which will come into effect on the 1 June 2019. New rules have been created which means holding deposits cannot be more than one week's rent and security deposits are capped at five week's rent. Landlords and agents are only able to recover reasonably incurred costs from tenants and must provide evidence of these costs before they can impose any charges.

Initial breach of the fees ban means Trading Standards Services can impose a £5,000 fine. Criminal offences are then created where a person has been fined or convicted of the same offence within the last 5 years. Financial penalties of up to £30,000 can be issued as an alternative to prosecution.

LTS priority areas are as follows:

- Doorstep crime
- Fair trading and scams
- Intellectual property crime (counterfeiting)
- Product safety
- Illicit tobacco and alcohol
- Underage sales
- Lettings

Within the London Boroughs of Brent and Harrow each Borough 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:

- 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.

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

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

We have categorised the following areas of work to form the basis of our 2019/20 priorities:

High Priority

Most Complained About Businesses	Underage Sales – alcohol, tobacco, knives
Doorstep Crime and Scams	Estate Agents/Letting Agents
Unsafe Goods (Manufacture /wholesale)	Counterfeit Goods (Large Scale Operation)
Primary Authority Partnerships	Proceeds of Crime Investigations
Niche and Illicit Tobacco Products	

Medium Priority

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

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

Low Priority

Classification of video works	Restrictive Notices
Misleading Descriptions (low value goods)	Underage Sales – lottery, films, spray paints DVDs / games, butane
Mock Auctions	Essential Packaging
Market Sales	Price Marking of Goods or Services
Metrication	Business Names
Misleading Prices/Promotions (unless high value)	

Work Volumes

The tables below show the projected performance of the respective Brent and Harrow teams during 2019/20. It should be noted the nature of Trading Standard's duties is variable. For example some investigations take much longer than others or it may be necessary to carry out more inspection visits than expected in response to a particular outbreak of noncompliance.

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.

Harrow Team 2019/20 Based on staff numbers:	Brent Team 2019/20 Based on staff numbers:
<ul style="list-style-type: none"> 3.5 Enforcement Officers 	<ul style="list-style-type: none"> 4.5 Enforcement Officers

	Planned volume Brent	Planned volume Harrow
Complaints (Service Requests) Completed	471	350
Trader Enquiries / requests for advice	100	75
High Risk / Most Complained-about Trader Inspections	40	35
Other Business Inspections	86	100
Weights & Measures, Average Quantity or Verification visits	5	4
Primary Authority Hours	150	50
Underage Test Purchase Visits	110	110
Infringement reports (average 40 work units per report)	40	30
eReports (average 7 work units per report)	12	10
Prosecutions completed – Crown Court	2	2
Prosecutions completed – Magistrates' Court	10	8
Licensing Reviews Completed	1	2
Simple Cautions Signed	8	5
Letters of Warning Issued	12	14
Fixed Penalty Notices Issued	8	2
Local and Regional Projects Completed	3	3
Service Improvement Work (Hours)	125	150
Approved Trader Scheme New Recruits or Audits	25	45
Doorstep Crime Rapid Response Actions	4	7
Number of Scam Victims Contacted c/o NTS Scams Hub	20	30
Partnership or Area Based Working Events / Weeks of Action	4	8
Samples, Mileage and Websites Checks	75	75
Number of Intelligence Logs Input on Regional Database	100	84
Press Releases Issued	8	6
RIPA/Warrant Applications	1	1

National Performance Indicators

The Service will be completing the year end Association of Chief Trading Standards Officers performance indicators which are being followed on a voluntary basis nationally with most Trading Standards Services across the country, participating in this process. The data collected will help to show the impacts that local services are having across the country.

Examples of the data to be collected are:

- Outcomes of investigations
- Redress obtained for consumers or victims of crime by service actions
- Number of businesses receiving advice
- Number of businesses found non-compliant when visited subsequently brought into compliance during the financial year
- Support for legitimate businesses by removing counterfeit goods from the market
- Unsafe or non-compliant goods prevented from entering or removed from marketplace
- Tackling the availability of illicit tobacco

Service Structure as of March 2019

