



**Brent**



## **Trading Standards Joint Advisory Board**

**Monday 24 October 2016 at 7.00 pm**

Committee Room 5, Harrow Civic Centre, Station Road,  
Harrow, HA1 2XY

<b>Membership</b>	<b>Representing</b>	<b>Substitute Members</b>
Councillors:		Councillors:
Jones	Brent	Hector
Long	Brent	Hossain
Stopp	Brent	Hall
Ferry	Harrow	
Mithani	Harrow	
Parmar	Harrow	

**For further information contact:**

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(LB Harrow) Miriam Wearing, Senior Democratic Services Officer,  
0208 424 1542 [miriam.wearing@harrow.gov.uk](mailto:miriam.wearing@harrow.gov.uk)

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit: [\*\*www.brent.gov.uk/committees\*\*](http://www.brent.gov.uk/committees)

**The press and public are welcome to attend this meeting**

# Agenda

Introductions, if appropriate.

Election of Chair for the meeting (from amongst the Brent members)

Apologies for absence and clarification of alternate members

Item	Page
<b>1 Declarations of personal and prejudicial interests</b>	
Members are invited to declare at this stage of the meeting, any relevant financial or other interest in the items on this agenda.	
<b>2 Election of Chair</b>	
<b>3 Minutes of the previous meeting</b>	1 - 4
<b>4 Matters arising</b>	
<b>5 Deputations (if any)</b>	
<b>6 Trading Standards Annual report 2015/16</b>	5 - 26
This report details the work of the Trading Standards Consortium for 2015/16.	
<b>7 Enforcement of Legislation Concerning Letting Agents Redress Scheme</b>	27 - 32
The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014, (the Order) came into force on 1 October 2014. Subject to certain exemptions, it creates a legal requirement for lettings agents and property management businesses to join a Government approved scheme so that tenants, landlords in the private rented sector and leaseholders and freeholders dealing with residential property managers, can if required, complain to an independent person for the purposes of adjudication and/or reaching a settlement to any dispute.	
<b>8 Service Level Agreement with National Trading Standards Scams Team</b>	33 - 46
This report seeks approval from the Joint Advisory Board to agree the Trading Standards Service working in partnership with the National Trading Standards (NTS) Scams Team in respect of the sharing of information and receiving referrals from the NTS Scams Team.	

## 9 Trading Standards Priorities 2016/2017

47 - 60

This report provides information and an opportunity for the Joint Advisory Board to discuss areas of work the Trading Standard Service should prioritise during 2016/17 which will then be used to form our annual work plan.

## 10 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Head of Executive and Member Services (London Borough of Brent) or his representative before the meeting in accordance with the constitutions of both councils.



Please remember to **SWITCH OFF** your mobile phone during the meeting.

- The meeting room is accessible by lift and seats will be provided for members of the public.

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## LONDON BOROUGH OF BRENT

### MINUTES OF THE TRADING STANDARDS JOINT ADVISORY BOARD Monday 21 March 2016 at 7.00 pm

PRESENT: Councillors Aden), Long, Stopp (Brent), Ferry) and Parmar (LB Harrow)

Apologies for absence were received on behalf of Councillor Mithani and Venetia Baptiste (Officer)

Officers in Attendance were: Simon Legg, Richard Le Brut and Aktar Choudhury

1. **Election of Chair**

RESOLVED:

that Councillor Long be elected Chair of the Joint Advisory Board for the meeting.

2. **Declarations of personal and prejudicial interests**

None.

3. **Minutes of the previous meeting**

RESOLVED:-

that the minutes of the previous meeting held on 11 June 2015 be approved as an accurate record of the meeting.

4. **Matters arising**

None.

5. **Deputations**

None.

6. **Trading Standards Fees and charges 2016/17**

The Board received a report that provided them with information concerning the proposed level of fees and charges to be made by the Brent & Harrow Trading Standards service in 2016/17. Simon Legg (Regulatory Services Manager), in introducing the report informed members that the Service's fee structure was applied at the same level for each borough and fell into three main categories.

Statutory fees were set nationwide by Government and accordingly, local authorities have no discretion to vary them. These fees applied to explosive (firework) licenses charged by the Harrow team but in Brent, this function was carried out by the Licensing Team rather than a Trading Standards function with the fees being set by the Health and Safety Executive. He continued that a Retail Price Index (RPI) escalator was applied to Primary Authority partnerships where the Councils had partnered with businesses who work across the whole of the UK, who chose to receive their advice and guidance from one Regulatory Service. The fee charged was to be on a cost recovery basis only. The third category of fees was that determined annually with any change in the fee charged being determined each year according to prevailing circumstances.

Members heard that fee income was a relatively small contributor to the Trading Standards Service budget, the budgeted fee income for 2015/16 (excluding Court cost or proceeds of crime recovery) totalling £23,500. Simon Legg advised members that an anticipated rise in fees was expected to increase income for 2016/17 albeit small, unless there was growth in the amount of fee paying services undertaken during the year.

RESOLVED:

that the report on Trading Standards fees and charges 2016/17 be noted.

## **7. Underage Sales report 2015**

This report provides information about the Trading Standard's duties enforcing underage sales legislation and a summary of this year's underage sales work the Service has carried out. Simon Legg (Regulatory Services Manager) informed members that the Service maintained a regular programme of underage test purchasing operations throughout the year with our current work plan requiring 125 Brent underage test purchases and 135 in Harrow. The frequency of these visits was spread throughout the year but visits were increased during school holiday times.

He outlined the programme of testing designed to make it difficult for young children to purchase any of the items which were illegal to be sold to underage persons as set out in the report including alcohol, tobacco and fireworks. Members heard that options available for offending shops included a warning letter, simple caution, prosecution and for a licensed premises, a review of their operating licence.

For the last eight years, we have operated our free Responsible Trader Scheme that helps businesses to understand and comply with the various requirements of age restricted goods legislation. Members of the scheme receive a complementary training pack and materials to help them implement controls and procedures to prevent illegal sales. In response to members' enquiries, Simon Legg stated that the sources of recruitment of volunteer children were through the Duke of Edinburgh Scheme, Police Cadets, children of Council staff and advertisement in the local press. In terms of risk assessment, he continued that officers followed Home Office guidance and also three officers were always on hand and near the subject shop. Additionally, general advice was given to the volunteers that if they felt vulnerable at any time of the test purchase, they should leave the shop immediately.

In welcoming the report, members urged officers to work in close partnership with Anti-Social agencies and the Police to target any suspected hotspots. Simon Legg added that lack of resources prevented the Service from prioritising internet underage sales and that large businesses had controls in place to combat that.

RESOLVED:

that progress report on underage sales and the contribution made by the Trading Standards Service in preventing illegal underage sales and the continued approach to enforcement be endorsed.

8. **Any other urgent business**

None.

The meeting closed at 8.10 pm

L. JONES  
Chair

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 <p><b>Brent</b></p>	<p><b>London Boroughs of Brent and Harrow Trading Standards Joint Advisory Board</b> 24 October 2016</p> <p><b>Report from the Senior Regulatory Services Manager</b></p>
<p>FOR INFORMATION</p>	<p>All Wards</p>
<p><b>Annual Report 2015/2016</b></p>	

## 1 SUMMARY

1.1 This report details the work of the Trading Standards Consortium for 2015/16.

## 2 RECOMMENDATIONS

2.1 That Members consider the report and comment where appropriate.

## 3 DETAILS

3.1 The Trading Standards Service is provided on a consortium basis for both the London Boroughs of Brent and Harrow. In accordance with the agreement between the two boroughs, an annual report is presented to the Trading Standards Joint Advisory Board. This provides an opportunity to give Members an overview of the total work carried out by the Service. A copy of the report for the year 2015/2016 is attached for Members' information and consideration.

3.2 At the end of this period, the London Borough of Brent, being the consortium's hosting borough, deleted the Head of Service for Regulatory Services through a restructuring exercise and the responsibility of Aktar Choudhury, the Operational Director for Regeneration.

## 4 FINANCIAL IMPLICATIONS

4.1 The Trading Standards Service for 2015/16 was provided within its agreed overall budget of £379,600.

## 5 STAFF IMPLICATIONS

5.1 None relevant.

## 6 BACKGROUND INFORMATION

6.1 Any person wishing to obtain more information should contact Simon Legg, Senior Regulatory Services Manager, Brent Civic Centre, Engineers Way, Wembley Middlesex HA9 0FJ. Telephone: (020) 8937 5522.

SIMON LEGG  
SERVICE MANGER



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# Brent & Harrow Trading Standards

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Annual report  
2015-2016

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## Introduction

During 2015-16, the service celebrated 50 years of working together as a consortium. Earlier in 2015 Brent and Harrow refreshed the legally binding Consortium Agreement to reflect changes in both authority's Executive decision-making arrangements and the subsequent operational changes.

Our annual report gives a summary of some of the many different areas of work and outcomes achieved by Brent & Harrow Trading Standards Service for the year.

The service started the year as part of a wider group of regulatory functions, called Regulatory Services although at the end of the year, commencing in April 2016, the department was restructured into a new team within Brent called Standards and Enforcement which consists of Trading Standards, Food and Planning Enforcement teams.

The Trading Standards service is managed by Simon Legg and Team Leaders Winston Brooks, Sanjay Thakrar and Anu Prashar.

## Priorities

The London Boroughs of Brent and Harrow have the following corporate priorities:

**Brent Council** Borough Plan 2015-2019 priorities:

1. Better Lives
2. Better Place
3. Better Locally



**Harrow Council** corporate priorities were:

1. Making a difference for the most vulnerable
2. Making a difference for communities
3. Making a difference for local businesses
4. Making a difference for families



The table below, sets out how the service contributes to each Council's corporate priorities:

Key activity	Brent	Harrow
Investigate consumer complaints about breaches of consumer protection laws and assisting the vulnerable consumers.	2	1, 3
Advise businesses on the laws that affect them. As trading laws are largely EU-wide, this advice enables businesses to trade throughout Europe.	1	3
Take action against those traders who break the law, providing confident consumers and allowing legitimate businesses that trade fairly to prosper.	2	2, 3, 4
Tackle doorstep crime and take action against rogue traders and scammers.	2	1
Act as 'Home Authority' or 'Primary Authority' for national businesses based within the Consortium.	1,2,	3
Operate a Responsible Trader scheme, offering tailored guidance and support to member businesses.	1,2,3	3
Reduce the level of age-restricted goods sold to children	1, 2,	2, 3, 4

In addition to setting the Service's annual work plan with corporate priorities determined by the London Borough of Brent and Harrow, we also contributes to regional objectives through our active membership of London Trading Standards (LTS) and operations coordinated by the National Trading Standards Board (NTSB).

## Budget

The joint partnership between Brent and Harrow, means that the consortium delivers significant efficiencies and economies of the scale resulting in savings for both boroughs.

The table below shows the consortium budget since 2008/2009:

Date	Budget
2008/09	£1,772,000
2009/10	£1,702,000
2010/11	£1,673,000
2011/12	£1,274,000
2012/13	£1,274,000
2013/14	£1,299,000
2014/15	£ 864,000
2015/16	£ 379,600

It should be noted that the budget from 2014/15 is not a like for like comparison due Brent Council changing the way it accounts for overheads. Prior to 2014/15 costs such as accommodation, financial support, HR support, IT, telephones, printing, copying and administrative support were included in the services' budget costs. These components of the services' costs are now centrally accounted and this has made comparison of budget prior to 2014 difficult. There has been no change in the contribution to Brent from Harrow for these service costs.

In addition, the service commits to meet the cost of providing our financial investigations team through a net contribution to the service from proceeds of crime of £250,000 p.a.

As the challenging financial pressures continue for both authorities, the service will explore options for future cost saving opportunities and efficiencies in the coming year.

## Performance

### Complaints of Dissatisfaction about the Service

During 2015/16, there were two formal complaints of dissatisfaction received about the Service.

The first complaint related to a trader who was unhappy about the way an Officer had spoken to a member of his staff and that we had no grounds to seize goods. The matter was investigated during which time we were able to speak to the alleged victim who did not share the views of her employer confirming that they had no concern whatsoever, with the way they had been spoken to. We disagreed with the second part of this complaint in relation to having the grounds to seize the complainant's goods and the complaint was accordingly, not upheld.

The second complaint was also from a Brent resident who was unhappy with our decision not to investigate his complaint about a business and the length of time we had taken to communicate this to him. After investigation, it was confirmed that our decision not to investigate the complainant's allegation about the business was correct. However, we the length of time we had taken to communicate this to him had fallen well below the expected standards. Steps were taken following this complaint to tighten our procedures to prevent such a reoccurrence.

### Compliments about the Service

Despite the two examples of dissatisfaction highlighted above, I am pleased that the letters of thanks and appreciation we received, far outweighed those of complaint. I have highlighted some examples of the kind words or appreciation we have received during the year where members of the public have praised our staff:

*'I just wanted to say a massive thank you from Islington for acting as our AFI on a recent case. It was a great result..... Thank you for your professionalism and always explaining things to me very clearly – it is much appreciated'.*

*'I just want to thank Trading Standards and their team, particularly Denise, who was extremely helpful in resolving a dispute between myself and a Brent car trader'.*

*'I am writing to you to give my appreciation to one of your members of staff, Amar, who in the past month provided me with excellent guidance and help in an issue I was facing. Without him the situation I was in would of ended up very differently and would of caused me and my family a lot of grief and hardship'.*

*I would like to thank Andrew for his kind support and valuable guidelines to lead the matter in very right direction.....His constant and regular follow ups and commitment towards consumer interest is highly commendable. Personally I have been at high comfort due to Andrew's intervention in the matter. I am really pleased with his knowledge and skills.*



## Freedom of Information Requests

The Service received 8 requests for information under the Freedom of Information Act 2000, down from a total of 17 the previous year, all of which were responded to within the statutory timescale.

2 of these requests related to counterfeiting, 2 were about energy performance certificates in the rental sector, 1 was about the use of surveillance, 1 regarding fibre content marking and there were 2 requests about enforcement of food legislation, (something predominantly carried out by the Environmental Health teams).

## High Risk Inspections

The service has an objective to inspect an agreed number of high risk and/or our most complained about business during the year which formed one of Brent's corporate key performance indications. During 2015/16 to was met in full with a score of 102%.

## Training and Qualifications

There has been a great deal of change in the legislation the Service enforces in recent years with several long standing laws being repealed and replaced with modern equivalents. One significant change was the new Consumer Rights Act which came into force in October 2015 introducing changes to the rights, remedies and obligations applicable to contracts entered into between businesses and consumers for the supply of goods, services and/or digital content. This legislation also provides Trading Standards with a new set of powers and different ways of exercising them.

During 2015/16, staff completed 604 hours of training, (equivalent to 86 days) to make sure that we have professional and competent Officers. The majority of this training was completed with no cost to the Council other than staff time.

I am delighted to report that during the year, three member of staff achieved the level of knowledge, skill and competence required by the Chartered Trading Standards Institute to be awarded the status of 'Chartered Trading Standards Practitioner'. This award has obtained by just seven officers in London and it is great news that 3 of them, work for us.

## Supporting business

### Primary authority

'Primary Authority' is a statutory scheme, established by the Regulatory Enforcement and Sanctions Act 2008. It allows business to partner with a single local authority to receive help, support and advice in relation to achieving regulatory compliance. The enables businesses that trade in multiple locations, to follow advice from one regulator which is generally binding on other enforcement authorities. This gives businesses greater assurance that their approach to ensuring compliance is uniformly accepted by regulators wherever they trade in the UK helping them to reduce the cost of compliance whilst at the same time, providing certainty that what they are doing is legally correct.

Local authorities are allowed to charge for this service on a cost recovery basis. The charge for 2015-2016 was either £54 or £67 per hour depending on the type of contact a business opted for.

Currently we have nine active businesses who have requested a Trading Standards Primary Authority relationship with us. During 2015/16, we recruited three new businesses to the scheme, namely Cantalis Ltd, Dabur International Ltd and UK Electronic Cigarette Ltd. 177 hours of Primary Authority advice was provided to our members.

This represents a reduction on the previous year where we gave 186 hours of advice and is well below the 311 hours provided in the first year of operation. We tend to find that members of the scheme initially take a lot of advice and support from us, but once we have approved their operational systems or helped them with compliance, they continue their business without the need for continual support from us.

It is important that we continually look for new members to join the scheme and staff are very mindful of the need to promote the benefits of membership to businesses that they are in contact with.

### Inspections

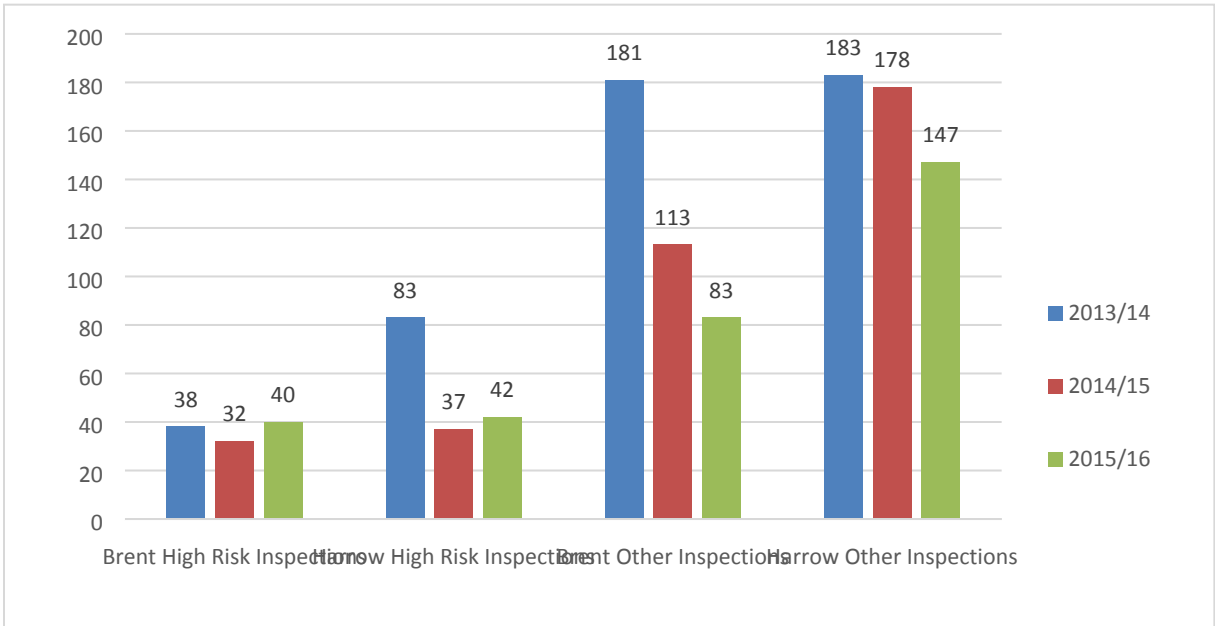
Since the Hampton Review in 2005, the number of inspections being carried out of business premises has been declining. Inspections are no longer routine, instead they are based on intelligence leads, risk assessment and a traders past track record.

During October 2015, the Consumer Rights Act 2015 came into force which provided Trading Standards Officers with a new set of consolidated and modernised set of powers.

The legislation added stronger safeguards regarding Officers powers of entry in accordance with the Protection of Freedoms Act 2012 to achieve a balance between effective and proportionate investigation of breaches of consumer law and not disproportionately burdening compliant businesses.

One key change brought about by this legalisation, is the need for Officers to give businesses two days written notice of their intention to inspect them (although there are some specific exemptions to this requirement in certain circumstances).

There was an overall reduced number of inspections carried out compared to previous years as shown below:



## Trader Enquiries

When a business contacts us asking for advice or where information is received from another Trading Standards authority about a business operating in our area who requires help or advice from us, these requests are logged and recorded as Trader Enquiries. There were 280 Trader Enquiries received by the Service during 2015/16. Advice can be given over the telephone, by email, letter or when necessary, a meeting can take place at the trader’s business premises.

## Landlords Forum



During April 2015, Officers took part for the second year running, in the Harrow Council Landlord’s forum held at the Cumberland Hotel in Harrow. The event aimed to educate and advise interested parties in the law and changes within the industry for landlords and letting agents. We gave a presentation alongside various other trade organisations. The afternoon and evening sessions were both considered to be a success.

## Responsible Trader scheme

During 2015/16, our free *Responsible Trader scheme* was refreshed and updated thanks to funding from Public Health. The scheme is offered to businesses encouraging best practice in preventing the sale of age restricted goods to children. Members receive free training, advice and marketing materials to use with their customers.

Responsible  
Trader Scheme



The number of members of the scheme dropped during the year from 267 to 245 (132 Brent and 113 Harrow). This is largely caused by businesses that change hands and then come under new ownership.

The scheme now has an updated training pack and with its fresh new look, we will be looking to recruit further new members during the coming year. Members of the scheme are subject to periodic audits to check the terms and conditions are being complied with, proving an opportunity to meet local business owners to remind them of their responsibilities and to help them with any problems or issues that they may have. A total of 80 audits were carried out during the year (37 Brent and 43 Harrow).

## Online Commerce

Following feedback from 2014/15's report, Members specifically asked for information about our work dealing with online business. Whereas we do not specifically focus our work on the online market place, we do certainly respond to complaints about online trading and advise businesses on any relevant legal requirements that they need to be aware of.

During 2015/16, the Service specifically checked advertising or terms and conditions on 58 Brent-based websites and 53 Harrow websites. Other ad hoc checks would also have been carried out as part of our routine investigations although we do not keep records of every check made as this would become overly onerous for Officers to record.

In circumstances where online businesses are operating outside of our jurisdiction, problems can be referred to the relevant local authority Trading Standards where the business is located or in some circumstances, the information can be sent to the National Trading Standards Board eCrime Unit for investigation.

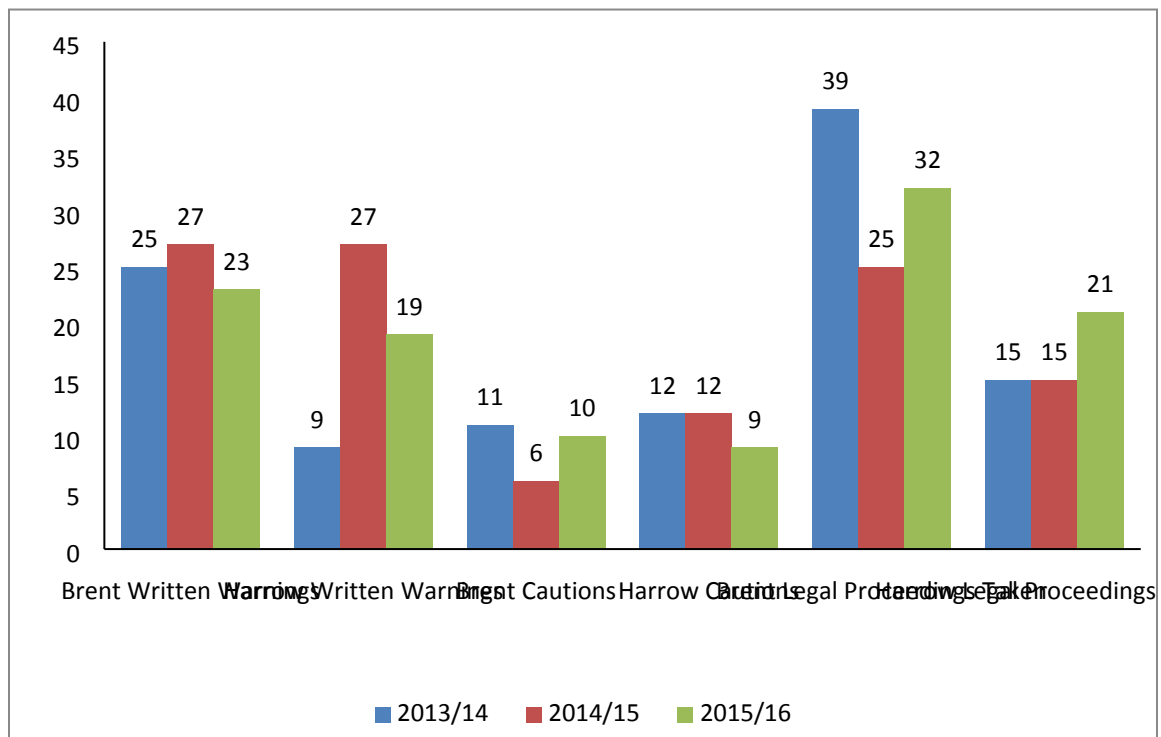
## Investigations

During the year, the Brent Team submitted a total of 50 investigation reports and the Harrow Team a total of 42, an increase of 27 submissions from the previous year.

Investigation reports are prepared and submitted by Officers where there is compelling evidence to prove the commission of a criminal offence(s). Outcomes can include:

- no further action;
- re-inspection/advice;
- letter of warning/advice;
- issue of a Simple Cautions if the trader accepts their guilt; or
- legal proceedings.

The table below shows the number of formal actions taken last year alongside the previous years for comparison. It should be noted when considering this data, that these prosecutions related to 18 businesses in Brent and 14 in Harrow. The figure showing the legal proceeds can appear higher because in some cases, we may prosecute the company and its director. This would show as two examples of legal proceedings although it is only one business or case.



As a result of our prosecutions last year, traders were fined a total of £37,675 compared to a combined total of £39,630 the previous year. A total of £28,560 was awarded to us in prosecution costs. This is a considerable increase from the previous year's total of £6,947 and £17,379 awarded in 2013/14. These prosecution costs provide an essential income towards the Service's budget.

The highest fine was £3,460 awarded against a company who was supplying counterfeit clothing online, and the lowest fine was £75 imposed against a tyre fitting company who supplied an unsafe part worn tyre.

## Underage sales

Despite advice to businesses and the offering of our Responsible Trader scheme, there are still a small number of traders who continue to sell age-restricted goods to children.

The following table shows the results of our test-purchasing in 2015/6, with an overall comparison to the previous year.

Product	Test purchases (no.)		Sales (no.)		Failure rate (%)	
	Brent 2015-16	Harrow 2015-16	Brent 2015-16	Harrow 2015-16	Brent 2015-16	Harrow 2015-16
Alcohol	65	59	4	2	6	3
Tobacco	51	47	1	0	2	0
Knife	14	7	1	2	7	29
Fireworks	0	21	0	0	0	0
Spray Paint	0	0	0	0	0	0
E-Cigarettes	0	7	0	2	0	29
Video	1	0	0	0	0	0
<b>Total 2015/16</b>	<b>131</b>	<b>141</b>	<b>6</b>	<b>6</b>	<b>5</b>	<b>4</b>
Total 2014/15	125	141	3	3	2	2

We shall not comment in any greater detail regarding our work preventing underage sales as this subject was presented in a specific report to the Trading Standards Joint Advisory Board at the meeting on 21 March 2016,

## Multi-agency operations

We frequently take part in multi-agency operations, working alongside other Council departments, Public Health, the Police, Her Majesty's Revenues and Customs (HMRC), UK Border Agency and the Illegal Money Leading Team etc. Our work focuses on issues ranging from doorstep crime, the sale of illicit tobacco and alcohol, anti-social behaviour, tax evasion, illegal immigrants and unlicensed money lenders\loan sharks etc. This working forges strong relationships with other enforcement bodies and increases information and intelligence sharing about problem traders.

Our partnership working has included support for:

- Regular attendance at Harrow's weeks of action events;
- Operation Condor with the Police focusing on licensed premises and Operation Trident preventing young people access to buying knives;
- Operation Liberal, tackling rogue builders; (see below)
- Implementing trial 'No Cold Calling Zone' in Harrow
- Talk about underage sales compliance to Brent On-Premises License Holder's with the Police
- Various London Trading Standards (LTS) initiatives
- Supporting a Fraud Prevention workshop in Harrow in association with Barclays Bank
- Proving Brent Communications with 11 of the Council's 75 Tweets during #ourday generating 70,000 views in a day

## Tobacco and Alcohol

The supply of foreign label and non duty-paid tobacco and alcohol remains a continual problem. Working whenever possible with HMRC, we conducted approximately 20 seizures of alcohol and 40 of tobacco during the year. Retailers are becoming much more creative finding all kinds of hiding places for their illicit stock to avoid it being detected when we visit. We successfully applied for funding to pay for a day when we had the use of a specially trained sniffer dog to help us detect hidden tobacco from a number of businesses where we had prior intelligence to suggest that illegal tobacco was being sold.

Establishments selling shisha breaching Trading Standards, Food Safety, Planning and Licensing laws remain across Brent and Harrow. Fortunately in Brent, the numbers of these businesses are now on the decline following many successful prosecutions but in Harrow, the number is increasing. We routinely carried out evening enforcement inspections to conduct out spot checks at such premises with steps being taken to bring as many of these businesses into compliance as possible.

### Tyre Project

Both Brent & Harrow teams ran a project in partnership with Tyresafe who are the UK's leading tyre safety organisation. The project consisted of advisory visits to tyre fitters, an awareness campaign and then a programme of test purchases and seizures of unsafe second hand part worn tyres.



The project attracted the media's attention with our work being picked up by the BBC's Fake Britain programme. Two Officers occupied a sizable piece of airtime on the programme which was billed as 'Matt [Allwright] reveals the scandal of fake part-worn tyres that are an accident waiting to happen'.

Sadly, it became apparent that despite our advisory work, many traders has continued to flout the law and were still selling dangerous tyres to unsuspecting motorists. The sale of part worn tyres requires a minimum tyre tread depth of 2.0mm, greater than the minimum tyre tread depth allowed on the road which is 1.6mm. The tyres should not have cuts, lumps or any other damages that will compromise its structural integrity, have passed an inflation test and be marked with the part worn stamp.

**Officers were filmed carrying out our tyre project, which appeared on BBC's Fake Britain project over the coming year.**

Six tyre retailers were summonsed to Court. Over a number of weeks, they all pleaded guilty and were ordered to pay over £18,000 in fines. The project would have diminished risk to public safety and will have certainly increased compliance within this sector of the industry. We intend to do some further follow up work on this

### Hover boards

The run up to Christmas saw the team inundated with complaints about hover boards. Hundreds of thousands of unsafe boards were being imported into the UK, including many into our boroughs to satisfy the high demand for this years must have device.

These cheap, poorly manufactured hover boards were considered unsafe for a number of reasons such as issues with the plug, cabling, charger, battery or the cut-off switch within the board, which often failed. We worked with various agencies including the National Trading Standards Ports Project and their staff at Felixstowe, who had either intercepted or provided





intelligence on local addresses where the unsafe hover boards were destined.

We are lucky to have a number of Officers who are experienced in dealing with technical matters who spent many hours visiting businesses who were importing these goods to carry out advisory work, seizing non complaint stock and then undertaking the laborious task of trawling through page upon page of technical documentation. It is our belief that we became probably the most effective London authority at dealing with hover boards as we were receiving many phone calls asking for our help and advice from other Trading Standards colleagues.

We were involved with checking compliance of over 5,000 hover boards. Where possible, the boards were reworked to bring them into compliance but where this was not possible, businesses disclaimed the over to us or we used our powers of suspension, recall or seizure to prohibit them from being placed onto the market. I am certain our swift intervention work and detailed technical examinations of documents and physical samples prevented consumers in from injury whilst at the same time, allowed businesses whose products could be easily brought into compliance to make changes and sell their stock.

### Operation Liberal

Again the Service saw a rise in rogue doorstep trading across both Brent and Harrow (more details provided below) and accordingly, we were very keen to support Operation Liberal. This is a joint national Trading Standards, UKBA, HMRC and Police initiative that runs annually to combat rogue builders and doorstep criminals.



On the day locally, no major offences were identified as part of this operation. However, we did recruit the Councils Waste Enforcement team to the event who were able to apprehend several unlicensed waste carriers driving about the borough.

### Working with NTSB Scams Hub

A number of local residents received money back from us after unwittingly responding to scam mail. Working in partnership with the National Trading Standards Board (NTSB) Scams Hub we were able to identify more than 50 local Brent or Harrow victims who had received unsolicited literature through the post and responded to the scam/s in anticipation of prizes, which included a £500,000 house, a £100,000 car and a large cash sum. Investigations by Officers revealed the prizes to be fictitious acting only as a lure to try and get cash from participants.



Envelopes containing cheques, cash or personal bank details were seized by the Trading Standards Scams Team, so we could return the money to the victims and offer advice about responding to future competitions. In some circumstances, it was necessary to make referrals to the Adult Safeguarding Boards as this sort of unsolicited mailing is a form of financial abuse.

## Doorstep Crime

The Service also provides a rapid response team that springs into action when information comes in about a victim of doorstep crime that is in immediate danger. The team work with local Police Safer Neighbourhood teams to apprehend offenders in the act of committing their fraudulent crimes. Where ever possible the Service will seek to prosecute these unscrupulous rogues, but the primary objective is always to safe guard the vulnerable victim who is quite often elderly or disadvantaged. The team has intervened and saved local vulnerable residences 1000's of pounds during the year.



One of the worst call outs of the year was to a victim who had been pressured into agreeing to pay £14,000 for a new roof on his house after he had been cold called. The work was carried out but the home improvement company were then demanding £40,000 from the victim on the basis that they had used a more expensive tile which was not what had been agreed. With the assistance of an independent surveyor and our intervention, we were able to negotiate price that was agreeable to all parties.

Sometimes, the sum of money can be far less. One call was to a doorstep caller who had agreed £49 to have their gutters cleaned. Having agreed to this, the resident was then presented with a bill for £800 after the trader claimed to have replaced 3 roof tiles which the homeowner had not agreed to. Again, we were able to negotiate considerably lower price for this work which reflected its value although we were unable to prove whether the work was ever necessary.

Regrettably, sometimes our involvement comes too late. One Brent resident agreed to work on her roof costing a few hundred pounds following a cold call. This escalated to £3,000 and then jumped all the way to £20,600! The victim paid £15,000 but the builder threatened her with legal action if she didn't pay the balance before the work was fully complete, something that we would never advise doing. Unbelievably, the victim paid in cash with no paperwork or contract being issued. Although some work was done, it was never completed and in the absence of proper contact details for the builder, she was never able to get him to return.

We have worked closely with our Adult Safeguarding teams in a number of these cases involving financial abuse complying with the Council's responsibilities under the Care Act 2014 promoting the wellbeing of adults with care and support needs.

## Financial Investigations

The Financial Investigation Team still consists of two Accredited Financial Investigators, led by our Senior Prosecutor undertaking investigations using powers under the Proceeds of Crime Act 2002 (POCA). Their work comes not only from Trading Standards cases, but also other internal and external local authority departments. Under the Home Office Incentivisation scheme Brent Council receives a percentage of any paid confiscation order.

A number of cases have been referred and are detailed below I am delighted to report a significant rise in the number of external customers who are paying us a fee to use our expertise in financial investigation.

Department	2013-2014	2014-2015	2015-2016
Brent Trading Standards	5	9	24
Harrow Trading Standards	2	2	3
Brent Council's Planning service	6	12	4
Brent Council's Audit and Investigation Service	0	2	1
Other Local Authorities	0	7	19

The team secured 15 confiscation orders under POCA totalling £1,721 773 in 2015/16, much higher than the previous year's total of £445,387.

The Act also gives officers powers to ask the court to grant a restraint order on businesses and individuals. In March 2016, one such order was granted against a property meaning that it cannot be sold should the defendant try to dissipate their asset. This case is currently on going.

From November 2009, Local Authority Accredited Financial Investigators have had the powers to seize cash under POCA. Cash seizure can be used as a quick, hard-hitting alternative enforcement method. Those who trade illegally often deal in cash and can make vast profits. Seizing cash and then applying for detention and forfeiture can be done without the need for a criminal prosecution and 50% of any successfully forfeited cash goes to the authority that seized it. Cash detention and forfeiture is dealt with in the Magistrates' Court and the applicant has to prove that on the balance of probabilities, the seized cash has come from criminal conduct or is to be used in criminal conduct.

In one such case, after the conclusion and conviction of a Brent trader selling counterfeit mobile phone cases on eBay, Hendon Magistrates court ordered the forfeiture of £10,000 of the cash seized from this trader by officers using their POCA powers.

Working with a neighbouring London Borough's Planning Service, a landlord was ordered to pay a confiscation order for £382,467. This was our biggest order made last year. This matter related to a landlord who had converted his property into six self-contained flats without planning permission. He had not complied with an enforcement notice issued by the Council, so legal proceedings were instituted.

In another case, a notorious landlord in different London Borough, was ordered to pay a £70,000 confiscation order by Blackfriars Crown Court. The investigation concerned a basement which had been used as a self-contained flat without planning permission for 14 years. The owner has a vast property portfolio and owns 161 properties believed to be worth in excess of £600million. He has appeared on various BBC rogue landlord programmes in relation to providing sub-standard accommodation.

In yet another external planning case, a husband and wife and the wife's sister had purchased a property and converted it into bedsits/flats without planning permission. After agreement with

the defence, the entire confiscation order was made against the husband as he did not want to involve his wife and sister-in-law any further in the matter. Isleworth Crown Court ordered the husband to pay a £180,000 confiscation order.

In a previous case dating back to 2010, a defendant had failed to pay the order. The case concerned benefit fraud relating to nine family members. The defendants applied for a certificate of inadequacy to Harrow Crown Court, stating he did not have a money to pay the order. When our AFI intervened and re-examined the case, the application was withdrawn. The matter returned to Westminster Magistrates Court for enforcement. The District Judge advised the defendant that his default sentence would be activated. The order was paid in full with interest, totalling £87,552.

In July 2015 a confiscation order was made at Harrow Crown Court against a seller of counterfeit headphones for £43,642. The order has since been paid in full.

In October 2015 a confiscation order for £170,000 for failure to comply with an enforcement notice which related to a property in Brent. The property had been converted into three self-contained flats without planning permission. On the same day a second confiscation order was made at Harrow Crown Court for £17,600 against the same defendant after he failed to comply with another enforcement notice which related to another property on the North Circular Road that had been converted into eight self-contained flats without planning permission. Both orders have since been paid in full.



*Picture above relates to the case of the North Circular Road property*

In November 2015 a confiscation order was made at Harrow Crown Court for £126,492. The defendant had been convicted by Brent Council for benefit fraud.

The Financial Investigation team were nominated and shortlisted for the prestigious Local Government Awards. The nomination was in the innovation category, for applying POCA to planning cases successfully. Whilst unfortunately the team were unsuccessful on this occasion, the nomination increased our profile and raised awareness of the great work being done.

## **Brent Team Investigations**

The year started with guilty pleas on 2 April 2015, from a window fitting company and its director who had falsely made claims that they were approved by FENSA and the UK Trade Confederation. The matter came to the Service's attention following a number of complains about shoddy window installations and the non-issuing of insurance backed guarantee documents. The fines and costs imposed against the company and director totaled £1,241.

A second-hand car salesman was handed a 12 month suspended jail term and ordered to do 150 hours of community sentence, after duping customers into waiving warranties on motor vehicles. His company was also fined £4,100. The defendant was convicted of fraud and of obstructing Officers investigating the business following the trial at Harrow Crown Court in January 2015.

Officers found that Mr Jawad had been deliberately misleading buyers, in not bringing to their attention the small print of the sale agreement which waived the consumers' statutory consumer rights, and absolved the company of any liability for the vehicle after the point of sale. He had also provided warranty documents to customers which were worthless, as he deliberately did not properly register the guarantee. The crooked salesman also was offering finance without a consumer credit licence.

During the summer of 2015, a street trader from Birmingham was prosecuted after he had been caught selling counterfeit football merchandise outside the Capital One Cup Final at Wembley Stadium. The Court heard how the trader had ignore warnings from Officers not to trade before they seized 106 badges from him which carried the unauthorised trade marks of the competing teams. He was given a £1,800 fine.

A company and its director were prosecuted in January 2016 for offences in relation to selling and possessing unsafe phone chargers, some of which were later revealed as being counterfeit. The company and its director and was fined £595 each and were ordered to pay £825 costs.

February 2016 saw the conclusion of an investigation involving two companies distributing and selling counterfeit clothing. Both companies involved pleaded guilty to various charges under the Trade Marks Act 1994. Magistrates imposed fines and costs which totalled £9,045.

A Kilburn convenience store owner pleaded guilty in February following an underage test purchase of alcohol to two child volunteers aged just 12 and 13 years old. The volunteers were able to buy the beer without any questions whatsoever. The shop owner was given a conditional discharge for one year and made to pay £500 towards costs.

## **Harrow Team Investigations**

In December 2015, a repeat offender was prosecuted for the third time in three years! During an inspection, Officers discovered tobacco that did not carry the correct health warnings, hidden under the counter. The raid came only weeks after the owner had pleaded guilty to selling counterfeit vodka. The shop owner was fined £2,000 and ordered to pay costs totalling more than £1,500.

An Ealing based company and its director, pleaded for supplying unsafe toys to two stallholders operating in central Harrow. The items were found not to display the correct labelling, had small parts which may have presented a choking hazard to young children, did not show any suitable safety warnings and the items were counterfeit. The Magistrates heard that both defendants had

previous convictions relating to very similar offences which was reflected in their sentence amounted to £7,315 between them.

An off-licence owner was fined in excess of £6,000 after being caught selling a bottle of whisky to a 13 year old boy without asking any questions whatsoever and having illegal packets of cigarettes that did not carry the correct health warnings, hidden under the counter in his shop. The defendant was not able to show any evidence that he had trained his sales assistant who had only been working there for three months.



In October 2015, a South Harrow businessman pleaded guilty to eight offences and ordered to pay fines totalling £1,226.00 after more than 500 unclassified DVDs were seized by Officers. Without the film classification or rating, it is not clear whether the films contain violent or sexual content. BBFC classifications are required to protect the public and ensure people can make an informed choice before they decide to purchase or rent a film. The defendant claimed that he brought the DVDs from a man who visited his shop. Despite owning the entertainment business, he claimed not

to be aware that the films required classification.

And finally, we often get asked what happens to all the seized goods which the Court orders to be forfeited from the defendant/s. In the majority of cases, we work with a number of specialist contractors and charities who are able to take items and have them securely recycled. In the case of clothing, much of it gets debranded and distributed via charities to the needy overseas or is sold in charity shops within the UK.



Sadly, this is not always possible to recycle everything and on occasions, we have to destroy the goods ourselves. The picture below shows a 25 tonne digger bringing an end to some unsafe toys we had to destroy.

 <b>Brent</b>	<p><b>London Boroughs of Brent and Harrow Trading Standards Joint Advisory Board 24 October 2016</b></p> <p><b>Report from the Regulatory Manager</b></p>
FOR INFORMATION	All Wards
<b>Enforcement Of Legislation Concerning Letting Agents Redress Scheme</b>	

## 1.0 SUMMARY

- 1.1 The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014, (the Order) came into force on 1 October 2014. Subject to certain exemptions, it creates a legal requirement for lettings agents and property management businesses to join a Government approved scheme so that tenants, landlords in the private rented sector and leaseholders and freeholders dealing with residential property managers, can if required, complaint to an independent person for the purposes of adjudication and/or reaching a settlement to any dispute.

## 2.0 RECOMMENDATIONS

- 2.1 That Members agree:

2.1.1 The Trading Standards Service, being authorised by the London Borough of Brent's Cabinet, to take full or part responsibility for the Council's statutory duty of enforcing the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014.

2.1.2 The Trading Standards Service being authorised by the London Borough of Harrow's Cabinet (subject to consultation with the Portfolio Holder and Divisional Director), to take part responsibility for the Council's statutory duty of enforcing the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014.

2.1.3 Any monetary penalties received in connection with the Order be used to fund the costs of enforcing the Order.

## 3.0 DETAILS

- 3.1 The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014, (the Order) came into force on 1 October 2014. Subject to certain exemptions, it creates a legal

requirement for lettings agents and property management businesses to join a Government approved scheme so that tenants, landlords in the private rented sector and leaseholders and freeholders dealing with residential property managers, can if required, complaint to an independent person for the purposes of adjudication and/or reaching a settlement to any dispute.

3.2 There are three Government approved schemes as follows:

1. Ombudsman Services Property
2. Property Redress Scheme
3. The Property Ombudsman

3.3 The schemes require a yearly membership fee to be paid and cover breaches of letting agency codes of conduct such as:

- Ensuring transparency about fees for tenants
- Preventing false or misleading property descriptions
- Poor quality customer service
- Disputes surrounding refunds of deposits taken to reserve a property known as 'holding deposits'
- Not passing on tenants' rents to their landlord
- Infringement of consumer's legal rights and/or unfair treatment

3.4 Redress schemes typically require letting agencies to:

- Follow a strict code of practice
- Operate their own complaints procedure to be followed in the event of a dispute
- Cooperate with any investigation commenced by the Redress Scheme operator

3.5 Guidance for business effected by the Order was published by the Department for Communities and Local Government (DCLG) in 2014. Guidance for local authorities regarding the Order which was published in March 2015. Links to these two sets of guidance can be found in Appendix 1.

3.6 This legislation followed the DCLG inquiry into the private rented sector which identified high levels of consumer detriment in respect of 'letting and property management businesses' trading practices. One recommendation resulting from the inquiry, was the requirement of such businesses to join a redress scheme seeking to improve overall standards.

3.7 This Order states it is the duty of every 'enforcement authority' to enforce the Order. The London Borough of Brent and the London Borough of Harrow are both 'enforcement authorities' for the purposes of the Act. This differs from much of the other legislation Trading Standards has the responsibility to enforce which specifically says it is the duty of every 'weights and measures authority to enforce.....' (Trading Standards are a weights and measures authority). Instead, this provides the enforcement authority discretion as to who should enforce the legislation.



- 3.8 The London Borough of Harrow has already delegated its Divisional Director authority to enforce the provisions of this Order following a Cabinet meeting on 19 November 2015 whereas the London Borough of Brent has yet to delegate the responsibility.
- 3.9 The DCLG guidance for local authorities referred to in paragraph 3.5 above, states on page 53 that 'Where Trading Standards services sit within one of these enforcing authorities, trading standards officers will be able to enforce the regulations and issue the penalty notices, as well as housing officers'.
- 3.10 A survey was carried out by London Trading Standards in June 2016. 27 London Boroughs responded, of which 56% of the replies confirmed Trading Standards teams were enforcing the provisions of this Order. The remaining 44% were in the process of seeking the required authorisation.
- 3.11 Our records show 159 business premises categorised as estate or letting agents in Harrow and 223 in Brent. It is unlikely that the Order will apply to all of them but it will be applicable to most. The survey referred to above showed that London local authorities who had carried out proactive checks to gauge compliance with the Order found between 95-99% of businesses to be compliant.
- 3.12 To date, we have carried out advisory visits where necessary to businesses following an allegation that they are not complying with the Order. We have not taken any formal action for noncompliance.
- 3.13 It is not our intension to duplicate work already being carried out by the London Borough of Harrow. Instead, we suggest that whichever team receives a complaint from a member of the public, would consult with colleagues within Brent or Harrow and thereon in, take the lead role in enforcing the provisions of this Order. This means that in circumstances where other offences may have been committed, the relevant department can conduct any investigation rather than having to refer the matter to another Council team which would then lead to duplicity with two different teams investigating the same business.
- 3.14 In practical terms, subject to agreement with Harrow's Housing Team and others as appropriate, this would mean if we revealed noncompliance of the Order alongside other offences which Trading Standards investigate, then after consultation, we would take the lead role investigating the matter. If however, a complaint was received by Harrow's Housing Team alleging breaches of other legislation within their jurisdiction, then after consultation with us, they would take the lead.
- 3.15 We would also suggest the same practise is agreed in Brent, with Trading Standards sharing enforcement responsibilities with colleagues in Private Housing Services, subject to their agreement.
- 3.16 The Order provides powers that when the local authority is satisfied on the balance of probabilities that someone is engaged in letting or property management work and is required to be a member of a redress scheme, but has not joined such a scheme, that a monetary penalty can be imposed of up to £5,000.

- 3.17 Whilst the enforcement authority has the discretion to determine the level of penalty, the DCLG guidance referred to in paragraph 3.5 above states, 'the expectation is that a £5,000 fine should be considered the norm and that a lower fine should only be charged if the enforcement authority is satisfied that there are extenuating circumstances'. The London Borough of Harrow has agreed its monetary penalty at £5,000 offering a 50% reduction for early payment within 14 days but only on the basis there has been no previous penalty charge.
- 3.18 If this report was agreed, we suggest that the same penalty and early payment discount would apply to Harrow based businesses. The London Borough of Brent would be able to agree its own level of charge considering the DCLG guidance.
- 3.19 If a lettings agent or property manager remains noncompliant with the Order and does not join a redress scheme following a penalty being imposed, then there is no limit to the number of penalties that could be issued should a breach continue.

#### **4. FINANCIAL IMPLICATIONS**

- 4.1 On the assumption that levels of compliance with the Order within our boroughs is generally good, it would be our intention to absorb routine advice regarding compliance with this Order within current staffing resources and existing budgetary provision. Where it is necessary to take formal action to enforce the requirements of the Order, a greater staffing resource will be needed which may result in staff being taken away from other duties. It should also be noted, that if enforcement of this Order was considered to be a high priority requiring proactive checks to relevant businesses, then a financial budget to provide for additional staffing resources would be required.
- 4.2 Any penalty fines received as a result of formal action, will be used to offset the overall cost of the enforcement activity within the Service. On the basis that the maximum penalty of £5,000 is agreed, it is likely that this would cover the Service's costs up to the point of issuing the penalty charge. It is possible that if businesses do not pay the penalty, steps will need to be taken to enforce the debt which will incur additional costs from the Service's budget. These will need assessing on a case by case basis.
- 4.3 Data obtained from the survey referenced in paragraph 3.10, showed that between October 2014 and June 2016, 49 penalty charge notices has been issued in London by Trading Standards, 39 of which were generated by two Boroughs alone. Despite this, it is expected that most businesses will chose to comply with the terms of the Order as the cost of membership is much lower than any penalty fine. Therefore, it is expected that any income received from penalty notices, will be minimal.

#### **5. STAFF IMPLICATIONS**

- 5.1 There are no significant staffing implications arising from this report. Written procedures and notices will need drafting to enforce the provisions of this Order, for the purposes of consistency, we would propose adopting a similar template used already in the London Borough of Harrow. Staff will need training in relation to these procedures but it is expected that this can be accommodated within

existing staffing resource and there is a free training 'toolkit' available online to assist with this process.

## **6.0 BACKGROUND INFORMATION**

- 6.1 Any person wishing to obtain more information should contact Simon Legg, Senior Regulatory Service Manager, Regulatory Services, Brent Civic Centre, Engineers Way, Wembley Middlesex HA9 0FJ.

SIMON LEGG  
SENIOR REGULATORY SERVICE MANAGER  
020 8937 5522  
simon.legg@brent.gov.uk

## **APPENDIX 1**

- 1) Department for Communities and Local Government Guidance for Letting Agents and Property Managers

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/361556/Lettings\\_Agents\\_and\\_Property\\_Managers\\_redress\\_scheme\\_leaflet.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/361556/Lettings_Agents_and_Property_Managers_redress_scheme_leaflet.pdf)

- 2) Department for Communities and Local Government Guidance for Local Authorities

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/412921/Improving\\_private\\_rented\\_sector.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/412921/Improving_private_rented_sector.pdf)

- 3) London Borough of Harrow Cabinet Report dated 19 November 2015

<https://www.harrow.gov.uk/www2/documents/s131027/Legislation%20affecting%20Private%20Rented%20Sector%20-%20Main%20Report.pdf>

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 <b>Brent</b>	<p><b>London Boroughs of Brent and Harrow Trading Standards Joint Advisory Board 24 October 2016</b></p> <p><b>Report from the Senior Regulatory Services Manager</b></p>
FOR INFORMATION	All Wards
<b>Service Level Agreement With National Trading Standards Scams Team</b>	

## 1.0 SUMMARY

- 1.1 This report seeks approval from the Joint Advisory Board to agree the Trading Standards Service working in partnership with the National Trading Standards (NTS) Scams Team in respect of the sharing of information and receiving referrals from the NTS Scams Team.

## 2.0 RECOMMENDATIONS

- 2.1 That Members consider the report and make any recommendations where appropriate including which of the two agreements, a regular 'service level agreement' or a 'priority service level agreement' we should agree to.

## 3.0 DETAILS

- 3.1 The National Trading Standards (NTS) was set up by the Government to provide leadership, influence, support and resources to help combat consumer and business detriment nationally, regionally and locally. One of their current priorities includes cross border mass marketing and internet scams.
- 3.2 In response to this, the NTS has created its Scams Team with the aim of tackling mass marketing scams bringing disruption to the perpetrators. The team works closely with scam campaign Think Jessica, the Metropolitan Police, Citizens Advice, Royal Mail and other mail providers, the Financial Ombudsmen Service and the National Crime Agency.
- 3.3 The NTS Scams Team estimates that each year, mass marketing mail scams, which often target vulnerable or disadvantaged consumers, cause approximately £3.5 billion worth of detriment to UK consumers.
- 3.4 Scams are frequently targeted at the vulnerable members of our community such as the elderly or those who might be already in debt. As well as being a nuisance receiving cold calls and unsolicited mail in the post, scams are a serious and endemic problem which can cause not just a financial loss, but also lead to mental health deterioration to the often silent victims of fraud.

- 3.5 Research conducted by the Scams Team suggests that people respond to scams for a number of reasons. They have identified that the following factors may result in an increased risk of scam victimisation:
- Are over 70 years old
  - Have access to their own funds
  - Live alone
  - Have few or no visitors
  - Often spend the day at home
  - Are trusting of peoples motives
  - Own a landline telephone
  - Have physical or mental health problems
  - Suffer from a cognitive impairment such as a form of dementia like Alzheimer's disease
- 3.6 People respond to scams because:
- They want to provide a financial gift to their family
  - They are bored or lonely and want something to do during the day
  - They are recently widowed or inexperienced in dealing with financial matters
  - They are in financial hardship
  - They respond impulsively
  - They feel pressured to respond
  - Through habit or a dislike of change
  - They think it may be worth taking the risk
- 3.7 The Scams Team runs a 'Work Time Listening and Learning' training scheme with the Royal Mail to combat mail scams. This has been delivered to more than 2,000 post people to help them identify the tactics used by mail scammers and to spot potentially vulnerable households.
- 3.8 The Scams Team hosts a number of educational campaigns throughout the year. This included their 'Mail Marshal' scheme which allows a scam mail victim to collect scam mail they have been receiving and send it to the Scams Team to support their investigative work and the 'Friends Against Scams' initiative which aims to protect and prevent people from becoming victims of scams by empowering communities to Take a Stand against Scams.
- 3.9 The Scams Team have two different types of agreement. The regular Service Level Agreement that provides for an agreed number of referrals to be sent through on a monthly basis. The Scams Team expect feedback every 4 weeks along with any further updates as necessary once we have advised the victim/s. The system for referrals is flexible with the Scams Team suggesting a minimum of 4 per month up to their total included on the whole list which is sorted in order of most recent referrals.
- 3.10 The second type of Service Level Agreement is for priority only referrals. These are confirmed scam victims and details would be sent through to us as and when they are detected. Again, feedback is expected every 4 weeks and thereafter as required. It is our recommendation that we initially chose to adopt this type of

agreement so we only have contact with the priority scam victims.

- 3.11 Our initial suggestion is that the Service would aim to accept up to 5 referrals per month, per borough. This would be then reviewed in 6-9 months time dependent on the number of referrals.
- 3.12 We have trialed working with the Scams Team on several occasions. Most recently, was during September 2016. This resulted in receiving details of 62 potential scam mail victims, (29 were Harrow residents and 33 resided in Brent). This example evidences the potential number of local residents who are unwittingly responding to mailing scams, with this being the small number that the Scams Team have been able to intercept. Potentially, the number of victims is likely to be considerably higher.
- 3.13 We are required to contact the victim detailed in the referral, explain that they have been a victim of a scam, provide advice about responding to similar 'prize draws' and offer support to them with the assistance where necessary, of the relevant borough's Adult Safeguarding Teams.
- 3.14 Advice from the Scams Team is the best intervention with a victim is by personal visit as many are silent victims of doorstep crime as well and this reduces the risk of immediate safeguarding issues being missed. However, there is discretion for us to provide other methods of intervention. We have tried various methods of intervention including home visits, phone calls and contacting the recipients in writing. Where money was returned, these visits were all carried out in person.
- 3.15 Recently, the Scams Team have been working with the Home Office as part of a Joint Taskforce bringing together regulators and financial institutions to tackle fraud. Part of this work has seen the renewal of a National Banking Protocol agreeing a set of guidelines for financial institutions aimed at identifying customers who were subject to doorstep crime or other fraudulent activity and reporting this to either the Police or Trading Standards.
- 3.16 The Protocol is set to launch on a trial basis in London on the 24th October 2016. Training materials are being developed for distribution to bank staff and training is being given to the Police. It is expected that this collaborative approach will increase our contact with the victims of scams, and in doing so, will ensure they receive the better support and advice. Furthermore, it will provide us with more information, intelligence and evidence about the perpetrators.
- 3.17 Officers receive a monthly newsletter and an alert every two weeks from the Scams Team which detail the latest scams to watch out for. This can be publicised and/or circulated to neighbourhood watch or other community groups.
- 3.18 The team is carrying out a research project with Professor Keith Brown and Bournemouth University to raise awareness of the scale of scams within the UK. Working with the Chartered Trading Standards Institute, the team is aiming to document how early intervention with scam victim allows them to remain independent and living in their own homes longer than victims who receive later or no intervention.

- 3.19 To date, on a national basis, 17 local authorities have agreed the Scams Team Service Level Agreement. In London, 24 Boroughs have signed up with the remaining likely to agree the protocol in due course.
- 3.20 Agreeing to work in partnership with the Scams Team will bring the benefit of being able to reach some of our Borough's most vulnerable residents who otherwise may have no contact with the Trading Standards or even their Council as a whole. Having made contact with these residents, we will be able to offer support and clearly signpost those residents to others who could assist them as appropriate whilst helping our authorities fulfil their statutory safeguarding responsibilities to prevent financial abuse under the Care Act 2014. This work also fits the corporate agenda's namely the 'Better Lives' objective in the Brent Borough Plan and 'Protecting the Most Vulnerable' found in Harrow's Ambition Plan 2020.

#### **4. FINANCIAL IMPLICATIONS**

- 4.1 There are no direct financial implications for each borough as a result of this proposal as the work will be absorbed within current staffing resources and existing budget provision. However, it should be noted that both borough teams are already working at full capacity and this work should it be agreed, would have to be prioritised in amongst other duties such as reducing the number of consumer complaints we investigate.
- 4.2 Should the reprioritising approach not be agreed, then additional financial resources would be required to increase staff numbers to undertake this work.

#### **5. STAFF IMPLICATIONS**

- 5.1 As mentioned in paragraph 3.15 above, it would be necessary for us to exercise our discretion to moderate the number of referrals received each month in order to assist managing staff workloads.
- 5.2 The agreement does not commit the London Borough of Brent (as the Consortium's hosting Borough) to undertake any investigation or formal action against the perpetrators that it would not have done otherwise. Either party can terminate the agreement with 30 days written notice.
- 5.3 There is an online information resource for training members of staff provided by the National Trading Standards at no cost.

#### **6.0 BACKGROUND INFORMATION**

- 6.1 Any person wishing to obtain more information should contact Simon Legg, Senior Regulatory Service Manager, Regulatory Services, Brent Civic Centre, Engineers Way, Wembley Middlesex HA9 0FJ.

SIMON LEGG  
SENIOR REGULATORY SERVICE MANAGER  
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**APPENDIX 1**

**DRAFT PRIORITY SERVICE LEVEL AGREEMENT WITH NATIONAL SCAMS TEAM**

**NATIONAL SCAMS TEAM  
PRIORITY RECEIVER SERVICE LEVEL AGREEMENT  
WITH BRENT AND HARROW TRADING STANDARDS**

**Brent and Harrow Trading Standards agrees to work in partnership with the National Scams Team (NTS) in respect of scam victims and the receiving of priority referrals from the NTS Team.**

**Brent and Harrow Trading Standards agrees to support the National Scams Team as determined by this Service Level Agreement.**

**Brent and Harrow Trading Standards Agrees to work in partnership with the NTS Scams Team and provide the structure and mechanism that will enable the NTS Scams Team to send referrals to them**

<b>NTS Scams Team Signatory</b>	
<b>Name of person signing (please print):</b>	
<b>Signed by:</b>	
<b>Position:</b>	
<b>Date:</b>	

<b>Brent and Harrow Trading Standards Service Signatory:</b>	
<b>Name of person signing (please print):</b>	
<b>Signed by:</b>	
<b>Position:</b>	
<b>Date:</b>	

## Glossary

For the purposes of this Protocol –

NATIONAL SCAMS TEAM (**NST**) means

East Sussex Trading Standards (ESTS)

East Sussex County Council (ESCC)

Brent and Harrow Contact Officer (Brent and Harrow CO).

**PRIORITY referral- A referral received by the NST from certain sources (not to be divulged) where a person has been confirmed as responding to a scam.**

## Introduction

The NST Service Level Agreement (SLA) will define clearly the roles and responsibilities of **Brent and Harrow Trading Standards** and the NST in the support of the Scam Team.

## Background

Each year mass marketing scams cause approximately £3.5 billion worth of detriment to UK consumers. In addition, the psychological impact of scams can seriously damage individual consumers trust in markets. Scams are often targeted specifically at vulnerable or disadvantaged consumers, such as those already in debt. These consumers can suffer disproportionate levels of harm as a result of mass marketed and other scams. Furthermore, mass marketing of scams continues to increase as technology allows greater pinpointing of potential victims. Research carried out in May 2009 by the University of Exeter School of Psychology for the OFT, found it significant how some victims kept their decision to respond to a scam private and avoided speaking about it with family members and friends. The research found that scams cause psychological, as well as financial, harm to victims.

According to the OFT a mass marketed scam is a “misleading or deceptive business practice where the person receives an unsolicited or uninvited contract (e.g. by letter, email, phone or advertisement) and false promises are made to con the victim out of money”. Each year 3.2 million adults fall victim to these scams.

## Scams Team Aims

The aims of the team are to:

### **Reduce the impact of scams and consumer detriment in relation to mass marketing fraud within the UK**

Through

- Effective partnership identify the silent victims of scams and facilitate an intervention for a consumer
- Devising an enforcement/disruption strategy with partners to tackle UK based companies/enablers, aiding, abetting or committing fraud or other offences.
- Securing partnership agreements with Trading Standards nationally to intervene with scam victims in their area. Encourage Trading Standards to work with their partners such as Adult Social Care or the Police to assist, educate and support scam victims
- Supporting Local Authorities in helping local victims and taking local enforcement action and provide guidance, best practice and establishing a centre of excellence in all areas (MMF).
- Collating all feedback and providing national statistics in relation to consumer detriment/savings and harm

## Definition

The SLA will set the agreed content for securing the support from **Brent and Harrow Trading Standards**. It recognises that the NST has different forms of accountability and are answerable to a different range of stakeholders. But common to both **Brent and Harrow Trading Standards** and NST is the need for integrity, objectivity, accountability, openness, honesty and leadership. There is added value in working in partnership towards common aims and objectives, in this case ensuring that people are protected from scams locally, regionally and nationally.

## Roles and Responsibilities

1. **Brent and Harrow Trading Standards** will designate and appoint a **Brent and Harrow Trading Standards** Contact Officer (Brent and Harrow CO).

## Referral of Information/Intelligence to and from the NST Project Team

1. The NST will set up mechanisms to received referrals relating to **PRIORITY** scam victims from key partners. This information will then be recorded and passed to an identified local organisation for further action.
2. A designated secure email address will be provided by **Brent and Harrow Trading Standards** as well as Brent and HarrowCO to the NST. All referrals from the NST will be sent securely to this email address or/and discussed over the phone with the Brent and HarrowCO or an officer **Brent and Harrow Trading Standards** nominated to deal with the referral.
3. **Brent and Harrow Trading Standards** will then make steps to contact the consumer detailed in the **PRIORITY** referral and provide support where they can.

**Brent and Harrow Trading Standards will not at this point be delaing with any other potential victims identified by the NST. Only the one's considered as a PRIORITY as detailed in glossary above.**

4. **Brent and Harrow Trading Standards** will provide feedback on request at 4 and 26 week intervals after the NST has referred a possible scam victim to them where they will provide details on what steps they have taken to assist the consumer.
5. **Brent and Harrow Trading Standards** will endeavour to provide as much relevant information and intelligence as reasonably and practicably possible to the NST concerning any investigation being carried out within **Brent and Harrow** having regard to any statutory limitations/restrictions.
6. Information and intelligence will be provided by the Brent and Harrow CO to the Head of NST or a person designated by him/her.
7. NST and **Brent and Harrow Trading Standards** agree to process personal data only in accordance with the requirements of the Data Protection Act 1998 and to disclose information only in accordance with the requirements of the Enterprise Act 2002.
8. NST will be responsible for its responsibilities under the Data Protection Act 1998, the Freedom of Information Act 2000 and the Enterprise Act 2002.

### **Responsibilities and Actions of the Authorities**

1. ESCC shall be liable for the actions and competence of the persons employed within the NST and shall ensure that the NST shall comply with all legislative requirements and take all reasonable steps to ensure any actions taken are lawful and within the spirit of the protocol.
2. **Brent and Harrow Trading Standards** shall be liable for the actions and competence of persons within its employ and shall take all reasonable steps to ensure the competence of those persons in carrying out their functions and that they comply with legislative requirements and the spirit of this protocol.
3. Information / intelligence provided between NST and **Brent and Harrow Trading Standards** shall be used for the purpose intended and shall not be divulged to third parties unless to do so would be lawful and in pursuant of an investigation / enquiry subject to this protocol.
4. NST and **Brent and Harrow Trading Standards** endorse a joined up working approach to the protection of scam victims. The partners will attempt to promote consistency in interventions and education. However, this protocol does not attempt to restrict the powers of authorised officers of the NST or **Brent and Harrow Trading Standards** from discharging their duties, as appropriate.

**Commencement date: *tbc***

### **Consultation**

The NST will undertake to consult with all stakeholders in relation to any changes made to the Scams Team at least 30 days prior to any proposed changes.

### **Termination**

Either party issues written notice of termination 30 days prior to the end of any calendar month.

**NATIONAL SCAMS TEAM  
PRIORITY RECEIVER SERVICE LEVEL AGREEMENT  
WITH BRENT AND HARROW TRADING STANDARDS**

**Brent and Harrow Trading Standards agrees to work in partnership with the National Scams Team (NTS) in respect of scam victims and the receiving of priority referrals from the NTS Team.**

**Brent and Harrow Trading Standards agrees to support the National Scams Team as determined by this Service Level Agreement.**

**Brent and Harrow Trading Standards Agrees to work in partnership with the NTS Scams Team and provide the structure and mechanism that will enable the NTS Scams Team to send referrals to them**

<b>NTS Scams Team Signatory</b>	
<b>Name of person signing (please print):</b>	
<b>Signed by:</b>	
<b>Position:</b>	
<b>Date:</b>	

<b>Brent and Harrow Trading Standards Service Signatory:</b>	
<b>Name of person signing (please print):</b>	
<b>Signed by:</b>	
<b>Position:</b>	
<b>Date:</b>	

## Glossary

For the purposes of this Protocol –

NATIONAL SCAMS TEAM (**NST**) means

East Sussex Trading Standards (ESTS)

East Sussex County Council (ESCC)

Brent and Harrow Contact Officer (Brent and Harrow CO).

**PRIORITY referral- A referral received by the NST from certain sources (not to be divulged) where a person has been confirmed as responding to a scam.**

## Introduction

The NST Service Level Agreement (SLA) will define clearly the roles and responsibilities of **Brent and Harrow Trading Standards** and the NST in the support of the Scam Team.

## Background

Each year mass marketing scams cause approximately £3.5 billion worth of detriment to UK consumers. In addition, the psychological impact of scams can seriously damage individual consumers trust in markets. Scams are often targeted specifically at vulnerable or disadvantaged consumers, such as those already in debt. These consumers can suffer disproportionate levels of harm as a result of mass marketed and other scams. Furthermore, mass marketing of scams continues to increase as technology allows greater pinpointing of potential victims. Research carried out in May 2009 by the University of Exeter School of Psychology for the OFT, found it significant how some victims kept their decision to respond to a scam private and avoided speaking about it with family members and friends. The research found that scams cause psychological, as well as financial, harm to victims.

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## Roles and Responsibilities

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## Referral of Information/Intelligence to and from the NST Project Team



9. The NST will set up mechanisms to received referrals relating to **PRIORITY** scam victims from key partners. This information will then be recorded and passed to an identified local organisation for further action.
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11. **Brent and Harrow Trading Standards** will then make steps to contact the consumer detailed in the PRIORITY referral and provide support where they can. **Brent and Harrow Trading Standards will not at this point be delaing with any other potential victims identified by the NST. Only the one's considered as a PRIORITY as detailed in glossary above.**
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14. Information and intelligence will be provided by the Brent and HarrowCO to the Head of NST or a person designated by him/her.
15. NST and **Brent and Harrow Trading Standards** agree to process personal data only in accordance with the requirements of the Data Protection Act 1998 and to disclose information only in accordance with the requirements of the Enterprise Act 2002.
16. NST will be responsible for its responsibilities under the Data Protection Act 1998, the Freedom of Information Act 2000 and the Enterprise Act 2002.

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7. Information / intelligence provided between NST and **Brent and Harrow Trading Standards** shall be used for the purpose intended and shall not be divulged to third parties unless to do so would be lawful and in pursuant of an investigation / enquiry subject to this protocol.
8. NST and **Brent and Harrow Trading Standards** endorse a joined up working approach to the protection of scam victims. The partners will attempt to promote consistency in interventions and education. However, this protocol does not attempt to restrict the powers of authorised officers of the NST or **Brent and Harrow Trading Standards** from discharging their duties, as appropriate.

### Commencement date:

### Consultation

The NST will undertake to consult with all stakeholders in relation to any changes made to the Scams Team at least 30 days prior to any proposed changes.

### Termination

Either party issues written notice of termination 30 days prior to the end of any calendar month.

 <b>Brent</b>	<p><b>London Boroughs of Brent and Harrow Trading Standards Joint Advisory Board 24 October 2016</b></p> <p><b>Report from the Senior Regulatory Services Manager</b></p>
FOR INFORMATION	All Wards
<b>Trading Standards Priorities 2016/2017</b>	

## **1 SUMMARY**

- 1.1. This report provides information and an opportunity for the Joint Advisory Board to discuss areas of work the Trading Standard Service should prioritise during 2016/17 which will then be used to form our annual work plan.

## **2 RECOMMENDATIONS**

- 1.2. That Members consider the report and comment where appropriate making recommendations for areas of work in which they would like the Trading Standards Service to prioritise during the second half of 2016/17 and into the coming year.

## **3 DETAILS**

- 1.1. This report is presented to the Trading Standards Joint Advisory Board to provide Members with some background information as to what drives our work and priorities and how this should be focused in the future. We welcome any comments or questions.

## **4 BACKGROUND**

- 4.1 The Trading Standards Service is responsible for the discharge of a wide ranging list of statutory duties on behalf of the London Borough of Brent and the London Borough of Harrow. These duties primarily concern consumer protection and span approximately 250 different pieces of legislation.
- 4.2 The enforcement of this law is a statutory function with legislation typically worded quoting 'it shall be the duty of every weights and measures authority [Trading Standards] in Great Britain to enforce within their area the provisions of' and then the section would go on to list what has to be enforced. However, there is no authority or statutory definition to determine the required level of activity for the Council to be able to effectively discharge these statutory duties. This provides a

margin of discretion for the manner in which we determine how the legislation is enforced within the Council.

- 4.3 Feedback has been received by the current Service Manager that the Service needs to tailor its activities to bring them more in line with the Borough's corporate plans and that members, portfolio holders and strategic directors are given a greater opportunity to input into our priorities.
- 4.4 The London Borough of Brent has recently appointed a new Strategic Director for Regeneration and Environment and the Service also has a new Lead Member. This has meant that we have deferred agreeing our priorities for 2016/17 until now.
- 4.5 In the London Borough of Harrow, we have discussed our priorities with the Public Protection Head of Service and we will further consult the Divisional Director for Commissioning Services as required by our consortium agreement.
- 4.6 Based on the previous year's work plan, our time is roughly divided by 20% investigating consumer complaints made about businesses, 20% advising and/or inspecting businesses, 20% investigating criminal non compliance, 10% taking formal action for non compliance with the remaining 30% being made up of other miscellaneous tasks such as administration, undertaking projects, media work, maintaining equipment and stores, presentations, attending meetings and training.
- 4.7 In order to inform members in making recommendations around which priorities we should focus, I have provided some further background information concerning what currently influences the work we carry out.

#### **4.8 Service Requests**

- 4.9 During the previous financial year, we received 6,341 Service Requests from members of the public, businesses or other regulatory agencies. As is now common throughout the country, the majority of these requests are received via the government funded Citizens Advice Consumer Service (CACS). Their staff log calls and provide help and support with a vast range of consumer issues. Once calls they have logged, they are electronically transferred onto our own database. Each one is classified as either a 'referral' or a 'notification'. In general terms, referrals require us to make contact with the enquirer whereas a notification is for our information only. We have pre existing protocols in place with CACS which helps them to know how to assign a service request.
- 4.10 Service requests received directly by Brent Council's Customer Service team are usually directed to contact the CACS so that the enquirer can benefit from the help and advice that they offer or in some circumstances, they are passed onto us directly.
- 4.11 Whilst all requests from businesses and other regulators are responded to, regrettably, it is not possible to investigate every service request that we receive from consumers with the limited resources available to us. Therefore, we apply a matrix risk assessment to requests to help prioritise which ones will receive our attention. Getting the balance right as to what we will help with and what we won't,

whilst trying to ensuring the best possible customer care and our statutory duties are met is very difficult. It is inevitable that many members of the public who report things to us, do not get the follow up investigation that they feel entitled to.

#### **4.12 Intelligence-led approach**

4.13 The Trading Standards profession is very intelligence led. The National Trading Standards Board (NTSB) have identified the following national priority areas of work for the current year.

- Doorstep Crime – Safeguarding of vulnerable adults and consumers
- Scams - disrupting and reducing consumers exposure to scams
- Fair trading issues - reducing incidents of bad practices and their impact
  
- E-crime - disrupting trading crime perpetrated on-line
- Product Safety - improving intervention on unsafe products, including points of entry into England and Wales
- Illegal Money Lending – disrupting operations and reducing exposure to those most at risk
- Intellectual Property (counterfeiting) - disrupting operations and support partnership working

4.14 Whilst they have no remit to require us to have the same focus in our local activities, it is intended that where possible, work carried out on a local basis, will feed into that being done regionally and nationally.

4.15 London Trading Standards (LTS) represents the 33 local authority Trading Standards Services across London has identified the following priority areas for its members.

- Door Step Crime and Mass Marketing Fraud
- Fair Trading – focusing on sales of second-hand cars
- Intellectual Property Crime (counterfeiting)
- Product Safety
- Sales of age-restricted goods in the informal economy

4.16 Again, LTS are not able to insist that we adopt the same priorities, but these areas have been identified through an intelligence based task, as causing the highest amount of consumer detriment across London.

#### **4.17 Most Complained about Traders**

4.18 On a local borough level, we do not produce a documented intelligence strategic assessment, but we do monitor local businesses who attract the highest number of complaints and sectors of trade which are most complained about.

4.19 The impact of interventions we undertake varies. It is difficult to measure the impact of preventative interventions such as advice and guidance. Where Officers intervene on a one to one basis (such as in response to a consumer complaint) the impact of the intervention is relatively low compared to where interventions are undertaken to protect the collective interests of consumers. Accordingly,

investigations into our most complained about traders are where we should achieve the greatest impact.

4.20 This means that whilst our involvement in a consumer/business dispute can achieve a very high impact and can have significant effect on the local economy, our biggest impact comes from a relatively small number of in depth and resource intensive investigations as opposed to the a higher number of lower value interventions.

4.21 Financially, it would appear to make better sense to concentrate on high value interventions but this must be balanced against a reduction in service at the lower levels which are often expected from consumers who have a dispute. At the same time, early, low level intervention can secure compliance often much quicker and before problems have a chance to escalate into something bigger.

4.22 With continuing pressure on our resources and a clear focus on achieving a high impact, Trading Standards needs to shift emphasis further away from one-to-one dispute resolution and mediation, towards more targeted interventions which feed into the relevant Borough Plans and achieve the greatest impact.

4.23 The Service's work is not diminishing and coping with peaks in demand such as last years 'hoverboard' scare over the two month festive period places extra strains on Officers who are already stretch.

4.24 It is important that the Service changes its focus to ensure we are offering the services and prioritising our work so that it meets the needs of both Councils now and in the future.

#### 4.25 **Borough Task Force**

4.26 Brent has been taking a 'task force' partnership based approach with other regulatory council services and key partners such are the Police, Fire Service, HMRC etc to deal with the Borough's top issues such as shisha bars, fly tipping and responding to concerns raised by community groups such as resident association etc.

4.27 This approach is similar to Harrow's Days of Action which provide a coordinated response to certain pre agreed geographical areas within the Borough.

Trading Standards will, where relevant be part of such task force groups and will support 'days of action' or equivalent, wherever it is possible for us to do so.

## 5 **FURTHER INFORMATION**

5.1 Any person wishing to obtain more information should contact Simon Legg, Senior Regulatory Services Manager, Brent Civic Centre, Engineers Way, Wembley Middlesex HA9 0FJ. Telephone: (020) 8937 5522.

SIMON LEGG  
SENIOR REGULATORY SERVICE MANAGER



Appendix 1

Table matching Duties to Corporate Plans

Trading Standards Activity	Brent's Corporate Plan	Harrow's Corporate Plan	Other Plans / Comments
<p><b>Doorstep Crime and Scams (Protecting the most vulnerable)</b></p> <p>Investigating criminal complaints</p> <p>POCA referrals for consideration of potential POCA investigations.</p> <p>Giving trader advice on relevant legislation e.g cancellation notices regarding contracts, CPRs etc</p> <p>Proactive partnership working days targeting rogue traders with the Police, building control, DWP, waste licencing, UKBA, HMRC etc.</p> <p>Exchange of information and a commitment to sign up to the National Trading Standards scams hub.</p> <p>Education and information to</p>	<p>Borough Plan</p> <p>S1. Better lives: supporting vulnerable people when they need it.</p> <p>S2. Better place; reduce crime and making people feel safe.</p> <p>S3. Better locally: fairness and responsibility amongst local peoples, strengthen the sense of community amongst the people who live and work in Brent</p> <p>2020 Vision</p> <p>2. Regeneration – physical, social and environmental - to improve the economic, social and environmental conditions in the borough.</p> <p>4. Demand Management – to manage down the pressure on needs led budgets such as adult social care</p>	<p>Harrow Ambition 2020</p> <p>Building a better Harrow assisting local businesses to be successful and reach their full potential.</p> <p>Building a better Harrow providing a safe environment</p> <p>Help older people remain in their homes for longer and designing out crime</p> <p>Protect the most vulnerable, safeguarding adults and children reducing dependency on the Council.</p>	<p>Satisfies a number of other policies by protecting the vulnerable, elderly, mentally unwell. Safe guarding and ensuring less reliance on Council support services. Disruption of organised crime gangs</p> <p>Meets both NTSB and LTS priorities</p>



<p>effective targeted groups, and organisations that can refer matters to us. E.g., local banks, Age UK, CABs , Demetria groups, neighbourhood watch and other community groups.</p> <p>Referrals to the Safeguarding team.</p> <p>Doorstep Crime Rapid Response Team; immediately responding to doorstep crime incidents.</p> <p>Setting up and monitoring to ensure compliance of designated No Cold Calling Zones (NCCZ)</p>			
<p><b>Underage sales of age restricted products eg, knives, Alcohol, Tobacco, DVDs, Solvents etc</b></p> <p>Intelligence led proactive visits to businesses selling age restricted products to ensure compliance by test purchases by children. (Acting on Intelligence from consumer/business complaints, Police, Noise team, community safety team, safeguarding etc)</p>	<p>Borough Plan</p> <p>S1. Better lives: enabling people to live healthier lives and reducing health inequalities.</p> <p>S2. Better place; reduce crime and making people feel safe.</p> <p>S3. Better locally: fairness and responsibility amongst local peoples, strengthen the sense of community amongst the people who live and work in</p>	<p>Harrow Ambition 2020</p> <p>Building a Better Harrow assisting local businesses to be successful and reach their full potential.</p> <p>Building a better Harrow providing a safe environment and promoting the borough's nightlife</p> <p>Being more business friendly</p>	<p>Safer Brent Partnership Strategy re preventing anti-social behaviour</p> <p>Meets an LTS priority</p>

<p>Promotion and growth of our Responsible Trader Scheme, with advice visits , audits and compliance checks.</p> <p>Investigating non-compliances with a view to submitting infringement reports for consideration of legal proceedings.</p> <p>Use of licensing reviews where appropriate.</p>	<p>Brent.</p> <p>2020 Vision</p> <p>2. Regeneration – physical, social and environmental - to improve the economic, social and environmental conditions in the borough.</p> <p>4.Demand Management – to manage down the pressure on needs led budgets such as children’s social care, adult social care and homelessness.</p>	<p>Protect the most vulnerable, safeguarding adults and children reducing dependency on the Council.</p>	
<p><b>Product Safety (protecting local residents and ensuring Brent and Harrow are a safe place to live and work)</b></p> <p>Advising and supporting local businesses such as Importers, manufactures, wholesalers, distributors and retailers on relevant legislation.</p> <p>Investigating consumer and business complaints about product safety with formal action taken when appropriate.</p> <p>Participating in intelligence led</p>	<p>Borough Plan</p> <p>S1. Better Lives: supporting business, growth &amp; jobs.</p> <p>S2. Better place; reduce crime and making people feel safe.</p>	<p>Harrow Ambition 2020</p> <p>Building a Better Harrow assisting local businesses to be successful and reach their full potential.</p> <p>Building a better Harrow providing a safe environment</p> <p>Being more Business Friendly</p> <p>Protect the most vulnerable, safeguarding adults and children reducing dependency on the Council.</p>	<p>Meets both NTSB and LTS priorities</p>

<p>local and national product safety initiatives (projects).</p> <p>Increase monitoring of Rapex referrals, suspensions notices and recall, withdrawals of unsafe goods.</p> <p>Screen testing of products in the safety laboratory.</p>			
<p><b>Illicit Tobacco and Alcohol</b></p> <p>Advising and supporting businesses to ensure they are complaint.</p> <p>Intelligence led programmed inspections to businesses, seizing illicit (counterfeit alcohol and tobacco products without the correct warning, no duty paid) products and investigating these infringements, Inc Shisha Cafes.</p> <p>Partnership working with HMRC, Food Safety, Community Safety, Police, Fire Service and Planning.</p> <p>Potential proceeds of crime referrals when investigating</p>	<p>Borough Plan</p> <p>S1. Better lives: enabling people to live healthier lives and reducing health inequalities – by reducing smoking and substance abuse.</p> <p>S2. Better place; reduce crime and making people feel safe.</p> <p>2020 Vision</p> <p>2. Regeneration – physical, social and environmental - to improve the economic, social and environmental conditions in the borough.</p> <p>4. Demand Management – to manage down the pressure on needs led budgets such as</p>	<p>Harrow Ambition 2020</p> <p>Building a Better Harrow assisting local businesses to be successful and reach their full potential.</p> <p>Building a better Harrow providing a safe environment whilst promoting night life</p> <p>Being more Business Friendly</p> <p>Protect the most vulnerable, safeguarding adults and children reducing dependency on the Council.</p>	<p>Safer Brent Partnership Strategy re preventing anti-social behaviour.</p> <p>Links to other policies by the public health benefits, tackling the hidden economy, creating an environment that attracts businesses, enables them to flourish, create jobs and improve the economy.</p> <p>Meets an LTS priority</p>

non compliance.	children's social care, adult social care and homelessness.		
<p><b>Counterfeiting, intellectual property and other major fraud</b></p> <p>Investigating criminal complaints.</p> <p>Complex investigations into organised crime.</p> <p>Potential proceeds of crime referrals with the ability to assume 'lifestyle' assumptions Conducting project work and participating in national campaigns.</p>	<p>Borough Plan</p> <p>S2. Better place; reduce crime and making people feel safe.</p> <p>2020 Vision 5. Raising income through our assets – to support the delivery of core services.</p>	<p>Being more Business Friendly</p> <p>Protect the most vulnerable, safeguarding adults and children reducing dependency on the Council.</p>	Meets both NTSB and LTS priorities
<p><b>Illegal Money Lending (Protecting the vulnerable, elderly, mentally unwell. Safe guarding and ensuring less reliance on Council support services. Disruption of organised crime gangs).</b></p> <p>Partnership working with National Trading Standards illegal money lending team, Community Safety, Financial</p>	<p>Borough Plan</p> <p>S1. Better lives: supporting vulnerable people when they need it.</p> <p>S2. Better place; reduce crime and making people feel safe.</p> <p>S3. Better locally: fairness and responsibility amongst local peoples, strengthen the sense</p>	<p>Building a better Harrow providing a safe environment</p> <p>Help older people remain in their homes for longer and designing out crime</p> <p>Protect the most vulnerable, safeguarding adults and children reducing dependency on the Council.</p>	<p>Meets a NTSB priority</p> <p>Financial inclusion strategy- Loan sharks, credit unions etc.</p> <p>Links to other policies by protecting the vulnerable, elderly, and mentally unwell. Safe guarding and ensuring less reliance on Council support services. Disruption of organised crime gangs.</p>

<p>inclusion co-ordinator, Police etc.</p> <p>Promoting national\Local campaigns\Projects. (Social media, website, local groups).</p> <p>Investigating criminal complaints.</p> <p>Complex investigations into organised crime.</p> <p>Potential proceeds of crime referrals.</p>	<p>of community amongst the people who live and work in Brent</p> <p>2020 Vision</p> <p>2. Regeneration – physical, social and environmental - to improve the economic, social and environmental conditions in the borough</p>		
<p><b>Primary Authority (paid for business advice)</b></p> <p>Chargeable advice to local and national businesses, cost recovery, remaining cost neutral.</p> <p>Promote the scheme, explore potential for a dedicated PA officer\.</p>	<p>Borough Plan</p> <p>S1. Better Lives: supporting business, growth &amp; jobs</p> <p>Promoting economic growth for local businesses.</p> <p>2020 Vision</p> <p>3. Business and housing related growth – to maximise the tax base to support the delivery of core services.</p> <p>5. Raising income through our assets – to support the delivery of core services.</p>	<p>Harrow Ambition 2020</p> <p>Building a Better Harrow assisting local businesses to be successful and reach their full potential.</p> <p>Being more Business Friendly</p>	

<p><b>Weights &amp; Measures</b></p> <p>Investigating complaints made by consumers and businesses.</p> <p>Advising and supporting local businesses such as Importers, manufactures, packers, wholesalers, distributors and retailers.</p> <p>Participating in intelligence led local and National Weights and Measures initiatives (Projects).</p> <p>Investigate any non-compliances with a view to submitting infringement reports for formal action.</p> <p>Testing, verifying and calibrating weights and measures such as trader scales submitted to us (generating income) on site or in the laboratory.</p> <p>Testing average weight products.</p> <p>Investigating breaches of weight restricted roads.</p> <p>Investigating breaches of over-</p>	<p>Borough Plan</p> <p>S1. Better Lives: supporting business, growth &amp; jobs</p> <p>S2. Better place; reduce crime and making people feel safe.</p> <p>2020 Vision</p> <p>3. Business and housing related growth – to maximise the tax base to support the delivery of core services</p> <p>5. Raising income through our assets – to support the delivery of core services.</p>	<p>Harrow Ambition 2020</p> <p>Building a Better Harrow assisting local businesses to be successful and reach their full potential.</p> <p>Being more Business Friendly</p>	<p>Long Term Transport Strategy- TS align with 3 of the 5 Brent priorities, namely;</p> <ul style="list-style-type: none"> <li>• Road safety (weight restricted roads and overloaded vehicles, unsafe part-worn tyres.</li> <li>• Air quality (weight restricted roads and overloaded vehicles).</li> <li>• Health (weight restricted roads and overloaded vehicles, unsafe part-worn tyres).</li> </ul>
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loaded vehicles on the public highway.			
<p><b>High Risk Visit \ Most Complained About Traders.</b> (Previously a Service KPI)</p> <p>Inspecting high risk businesses and most complained about traders, ensuring compliance, giving advice, conducting investigations and taking formal action where necessary.</p>	<p>Borough Plan</p> <p>S1. Better Lives: supporting business, growth &amp; jobs</p> <p>S2. Better place; reduce crime and making people feel safe.</p>	<p>Harrow Ambition 2020</p> <p>Building a Better Harrow assisting local businesses to be successful and reach their full potential.</p> <p>Being more Business Friendly</p>	

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