



Brent



Trading Standards Joint Advisory Board

Thursday 11 May 2017 at 7.00 pm
Boardroom 5 - 6 Brent Civic Centre, Engineers Way,
Wembley HA9 0FJ

Membership	Substitute Members	Representing
Councillors:	Councillors	Borough
Jones	Hector	Brent
Long	Hossain	Brent
Stopp		
Ferry	Kendler	Harrow
Mithani	Hall	Harrow
Parmar	Marikar	Harrow

For further information contact:

(LB Brent) Joe Kwateng, Governance Officer
0208 937 1354 joe.kwateng@brent.gov.uk

(LB Harrow) Miriam Wearing, Senior Democratic Services Officer,
0208 424 1542 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

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
1 Election of Chair	
2 Declarations of personal and prejudicial interests	
Members are invited to declare at this stage of the meeting, any relevant financial or other interest in the items on this agenda.	
3 Minutes of the previous meeting - 24 October 2016	1 - 8
4 Matters arising	
5 Deputations (if any)	
6 Trading Standards Fees and Charges 2017/18	9 - 14
This report provides Members with information concerning the proposed level of fees and charges to be made by the Brent & Harrow Trading Standards Service during 2017/18.	
7 Brent & Harrow Trading Standards Proceeds Of Crime Update	15 - 22
This report updates the Joint Advisory Board on work carried out by the Financial Investigation Team since its establishment in 2012 and on the future implications and concerns of work carried out under the Proceeds of Crime Act 2002.	
8 Trading Standards Work Plan for 2017/18	23 - 34
This report provides Members with information concerning Brent & Harrow Trading Standards Work Plan during 2017/18.	
9 Date of next meeting	
23 November 2017.	
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.

This page is intentionally left blank

TRADING STANDARDS JOINT ADVISORY BOARD MINUTES

24 OCTOBER 2016

Present:

Councillors:	* Keith Ferry	London Borough of Harrow
	* Vina Mithani	
	* Varsha Parmar	
	* Lesley Jones	London Borough of Brent
	* Janice Long	
	Sam Stopp	

* Denotes Member present

Officers in Attendance were:

London Borough of Brent

Simon Legg, Service Manager

Aktar Choudhury, Operational Director

London Borough of Harrow

Richard Le-Brun, Environmental Services Manager (Public Protection)

Miriam Wearing, Senior Democratic Services Officer

Officers in Attendance were:

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

RESOLVED: To note that there were no declarations of interests made by Members.

2. **Election of Chair**

RESOLVED: That Councillor Keith Ferry be appointed as Chair for the meeting.

3. **Minutes of the previous meeting**

RESOLVED: That the minutes of the meeting held on 21 March 2016 be taken as read and signed as a correct record.

4. **Matters arising**

None.

5. **Deputations**

RESOLVED: To note that none were received.

6. **Trading Standards Annual report 2015/16**

Simon Legg, Service Manager, introduced the Annual Report, which summarised the work and outcomes achieved by Brent & Harrow Trading Standards Service (The Trading Standards Consortium) for the financial year 2015/16.

The officer updated the Board on work undertaken in the past year and particular attention was drawn to the following:

- two formal complaints of dissatisfaction had been received about the Service which was a low figure in view of the high number of transactions carried out by the Service each year. One complaint was from a trader who is subject to a Court trial in January 2017;
- the officers were trying to engage more with the business community in both Councils in connection with the national Primary Authority Scheme by means of a link on the website, advertising and an article in the NWL business newsletter. Although three new businesses had been recruited to the scheme, there had been an overall reduction in the number of hours worked under the scheme compared to the previous year. This had partly been caused by existing Primary Authority customers not requiring much longer term support once an initial period of work had been completed;
- three members of staff had achieved the status of Chartered Trading Standards Practitioner, at that time an award obtained by just seven officers in London. It was reported that one of the qualified staff was due to leave the Service having accepted employment with another London Borough;
- 15 confiscation orders under the Proceeds of Crime Act totalling £1,721,773 had been secured in 2015/16 which was much higher than the previous year's total of £445,387

Members asked questions about content of the report and the officer responded as follows:

- landlord license schemes had been implemented in two wards in Harrow and an extension to the scheme was under consideration. Trading Standards officers attend the Harrow Landlord Forum but not the one in Brent which

had a different format although the officer was willing to support and attend the group's next meeting;

- training regarding the new Consumer Rights Act was provided at no cost to the consortium other than officer time as this was hosted nationally by the Trading Standards Institute.. Two successful bids had been made to London Trading Standards last year to fund a general criminal law update training course in addition to specific training in the subject area of the new cosmetic safety regulations;
- with regard to the Proceeds of Crime Act (POCA), contact had been made with Harrow's planning service to encourage an increased use of the legislation and the consortium's financial investigators and there had been a significant imbalance regarding the number of cases arising for investigation from each borough. One current Harrow investigation was continuing but difficulty had been experienced in identifying assets or where legitimate money had been mixed with illegal funds which could result in no confiscation order taking place;
- Brent had made good progress with regard to the control of shisha and illicit tobacco seizures/prosecutions, including use of a specially trained sniffer dog to search businesses hiding illegal tobacco. There was concern that prosecutions in Brent had resulted in the offenders trading in neighbouring areas as evidenced by an increase in numbers in Harrow. A joint workshop had been held with traders in Brent and Harrow to raise the awareness of the rules and how businesses must comply with the law. Traders were warned that after a suitable interval to make the required changes enforcement would take place. Work in Brent was being replicated in Harrow with regard to planning breaches for outside structures, smoking in an enclosed space, and recognition that the shisha itself was not classified as anything different to cigarettes;
- with regard to the Harrow trader who had received a third warning in three years, sanctions available included reviewing the conditions of the licence or revoking the alcohol premises licences. It was noted that traders considered sale of illegal tobacco and alcohol as low risk activity which increased profits and therefore took a chance. In order to revoke a licence, it was necessary to prove to the Licensing Panel that the terms of the licence had been breached and that the action was appropriate as it was a major step to remove a licence. Intelligence was shared with other regulatory teams to enable breaches in different areas to be followed up.

The officer was thanked for an informative and interesting report which highlighted the diverse range of duties performed by the Trading Standards team..

RESOLVED: That the report be noted.

7. Enforcement of Legislation Concerning Letting Agents Redress Scheme

The Board was informed that the Scheme which came into force on 1 October 2014 created a legal requirement for lettings agents and property management businesses to join a Government approved scheme that enabled complaints to be made to an independent person for the purposes of adjudication and/or reaching a settlement to any dispute.

The London Borough of Harrow and London Borough of Brent were 'enforcement authorities' under the Order. Harrow had delegated the enforcement of the provisions of the Order whereas Brent had yet to delegate the responsibility.

Although advisory visits to businesses following an allegation that they were not complying with an order no formal action had been taken for noncompliance. To avoid duplication of work already being undertaken by Harrow, the proposal was that whichever team, including housing teams, received a complaint would take the lead role in enforcement. Therefore where other offences may have been committed, the relevant department could conduct the investigation.

The Board was informed that the legislative requirements could be absorbed within current resources and any action required prioritised against other demands on the basis that the service provided a reactive, rather than proactive approach.

In response to a question, it was stated that the three Government approved schemes of Ombudsman Services Property, Property Redress Scheme and The Property Ombudsman all had good websites. Other organisations could join if they could satisfy the criteria.

The report did not require action by the Board. It expressed its support for:

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. the Trading Standards Service, being authorised by the London 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.
3. Any monetary penalties received in connection with the Order be used to fund the costs of enforcing the Order.

8. Service Level Agreement with National Trading Standards Scams Team

The views of the Board were sought on the proposal that the Trading Standards Service work in partnership with the National Trading Standards (NTS) Scams

Team in respect of the sharing of information and receipt of referrals from the NTS Scams Team.

It was noted that there was a choice of two agreements, a regular 'service level agreement' which provided for an agreed number of referrals on a monthly basis or a 'priority service level agreement' where priority only referrals were sent through. The proposal was to participate in the latter agreement initially with up to 5 referrals per month per borough with a review in 6 to 9 months dependent on the number of referrals received. Either party could terminate the agreement with 30 days written notice.

Members were advised that paragraph 3.19 should read that 175 local authorities had agreed the Scams Team Service Level Agreement. It was not known which of the two agreements the 175 had signed up to.

In response to questions, the Board was informed that:

- as the best intervention was a personal call, the possibility of a large number of referrals in a short time would have workload implications;
- the national team's role was to coordinate activity. For large scams the national team worked with the trading standards team for the area concerned with the latter taking the lead on the matter;
- evidence that the perpetrator was based in the borough would usually be required to commence an investigation as the 'lead authority'.

RESOLVED: That

1. the report be noted and the Board support the Trading Standards Team participation in a priority service level agreement with the National Trading Standards Scams Team on a trial basis;
2. that a report reviewing the scheme, and including case studies, be submitted to the June 2017 meeting of the Board

9. **Trading Standards Priorities 2016/2017**

The Board received a report that outlined areas of work for consideration of priorities for the second half of 2016/17 and into the coming year which would be used to form the annual work plan. Information matching duties to corporate plans was noted. It was noted that the National Trading Standards Board identified priorities for the current year and whilst there was no remit to require the same focus in local activities it was intended that where possible, work carried out on a local basis would feed into that being done regionally and nationally. Priorities were identified by London Trading Standards through an intelligence based task as those causing the highest amount of consumer detriment across London.

Members expressed the view that priority should be given to the protection of the old and young who were the most vulnerable. In response to queries regarding doorstep crime and scams, the officers provided the following responses:

- scams could have a large financial impact, even the loss of life savings, and the protection of the elderly and vulnerable was a priority. Scams were dealt with on a case by case basis and efforts made to avoid vulnerable residents having their names added to lists to be targeted again if there had been previous dealings with a rogue company;
- with regard to underage sales for cigarette, knives and alcohol, this must remain a priority to protect children from harm;
- in Brent a task force partnership based approach was being developed with other regulatory council services and key partners to deal with the Boroughs' top issues such as shisha bars. This was achieving some success and was in accordance with the aspiration that should all work together for seamless public protection. There was no clear divide between licensing or trading standards and intelligence was improving. An example of multiagency support was planning enforcement and members encouraged this approach in both boroughs;
- Members expressed concern that Council 'week of action' campaigns see the situation revert back within a week and stressed the need for task forces to have a strategy to ensure sustainability. The Joint agreement between Brent and Harrow helped prevent the spread across the border but task forces operated within a borough boundary whilst perpetrators did not so there was a spread to other areas. The officer reported on a much improved pooling of information;
- it was not possible with current levels of resource, to investigate every complaint made to the Service by members of the public. Therefore, each complaint was risk assessed against a set criteria so officers could then determine which complaints would receive further investigation.

The Board expressed satisfaction with the priorities set out in the report and noted that these would be further considered at the March meeting of the Board when the budget for the forthcoming municipal year was known and the annual service plan was presented. In response to a question, the Chair indicated that he was unaware of any proposals for reductions in funding for trading standards in the Harrow budget. With regard to Brent an officer reported that an exercise was underway for all services to look at funding reductions plus innovative means of generating income.

RESOLVED: That the report be noted.

10. **Any other urgent business**

None.

11. **Date of next meeting**

It was noted that the next meeting was scheduled for 8 March 2017. Proposed agenda items for the meeting included the budget, priorities and an update on the Proceeds of Crime Team. The Chair stated that the update should include how income from the Proceeds of Crime Team was able to benefit the service during lean years and that it was ring fenced for this purpose.

(Note: The meeting, having commenced at 7.00 pm, closed at 8.50 pm).

K FERRY
(Signed)
Chair

This page is intentionally left blank

**London Boroughs of Brent and Harrow
Trading Standards Joint Advisory Board
11 May 2017**

FOR INFORMATION

TRADING STANDARDS FEES AND CHARGES 2017/18

1 SUMMARY

- 1.1 This report provides Members with information concerning the proposed level of fees and charges to be made by the Brent & Harrow Trading Standards Service during 2017/18.

2 RECOMMENDATIONS

- 2.1 That Members consider the report and make any recommendations where appropriate.

DETAILS

- 3.1 Paragraph 13(f) of the Consortium Agreement between the London Borough of Brent and the London Borough of Harrow states that the Joint Advisory Board 'should consider and make recommendations on the level of fees and charges to be made to the public in respect of any part of the service, for consideration by whoever is authorised to make fees and charges decisions by each respective council's constitution'.
- 3.2 Brent's Cabinet agreed on 13 February 2017, a new 'Fees and Charges Policy' which included delegated powers to vary fees within set parameters. This policy has been taken into account when recommending any changes to fees and charges detailed within this report.
- 3.3 A The Service's fee structure is applied at the same level for each borough.
- 3.4 Fees fall into three categories, as follows:
1. Statutory fees (Set by Statute)
 2. RPI linked fee (Agreed previously by Brent's Executive)
 3. Discretionary fees (Discretion to increase or decrease them)

3.4.1 **Statutory fees** are set nationwide by Government and accordingly, local authorities have no discretion to vary them. These fees apply to explosive (firework) licenses charged by the Harrow team. In Brent, this function is carried out by the Licensing Team and is not a Trading Standards responsibility. The fees are set by the Health and Safety Executive who applied a small rise in them from 6 April 2016 by virtue of the Health and Safety and Nuclear Fees Regulations 2016. This has seen fees rise typically between £1-10.00 as per the following table:

Service	Duration	Fee
Licence to store explosives where, by virtue of regulation 27 of, and Schedule 5 to, the 2014 Regulations, a minimum separation distance of greater than 0 metres is prescribed Explosives licence 251-2,000Kg (fireworks Harrow)	1 year	£185
	2 years	£243
	3 years	£304
	4 years	£374
	5 years	£423
Renewal of licence to store explosives where a minimum separation distance of greater than 0 metres is prescribed Explosives licence 251-2,000Kg (fireworks Harrow Renewal)	1 year	£86
	2 years	£147
	3 years	£206
	4 years	£266
	5 years	£326
Licence to store explosives where no minimum separation distance or a 0 metres minimum separation distance is prescribed Explosives licence 1-250Kg (fireworks Harrow)	1 year	£109
	2 years	£141
	3 years	£173
	4 years	£206
	5 years	£238
Renewal of licence to store explosives where no minimum separation distance or a 0 metres minimum separation distance is prescribed Explosives licence 1-250Kg (fireworks Harrow Renewal)	1 year	£54
	2 years	£86
	3 years	£120
	4 years	£152
	5 years	£186
Varying the name of licensee or address of site		£36
Fireworks All Year Round licence - Fireworks Regulations 2004 Reg 9	1 year	£500
Any other kind of variation (we are able to charge any 'reasonable' cost to the licensing authority of having the work carried out (suggested fee per hour)		£36
Transfer of licence		£36
Replacement of licence if lost		£36

*VAT is not applied to these statutory fees

3.4.2 Another form of statutory fee is found under the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014 which was subject to a report presented to the Joint Advisory Board in October 2016. This legislation states that a monetary penalty of up to £5,000 can be imposed in some circumstances where a breach has taken place, but gives the local authority the option to determine what level they wish to set the fee.

3.4.3 In the above mentioned report, it was recommend that the penalty imposed when a charge was made, is set at £5,000, reduced by 50% for an early payment made within 14 days, subject to any mitigating factors that the terms of the Order require us to consider. This proposal was agreed by Brent’s Cabinet at their meeting on 24 April 2017.

The penalty fee is the same in the London Borough of Harrow although Trading Standards have not yet been delegated permission by Harrow to enforce the provisions of this Order.

3.4.4 A **RPI escalator** applies to Primary Authority partnerships where we have partnered with businesses who work across the whole of the UK, who chose to receive their advice and guidance from one regulatory service as opposed to multiple authorities wherever they trade. Section 31 Regulatory Enforcement and Sanctions Act 2008 provides that a local authority is entitled to charge a business on a ‘cost recovery’ basis, for primary authority services supplied through the partnership. Brent’s Executive agreed a report titled “*Introduction of a Charge Based Regulatory Advice Service for Businesses*’ in June 2013, to increase the rates charged for primary authority advice, on an annual basis on 1st April each year by the annual change in the Retail Price Index (RPI) for January of the year concerned.

The Office of National Statistics assessed the RPI against a Code of Practice for official statistics and found it not to meet the required standards, so instead, use a variant of the RPI called RPIJ. Using this, at January 2017, the 12 month rise was 1.8%. In view of this, the table below shows the proposed increase to the hourly rates charged for our primary authority service.

Service	2016/17	2017/18
Primary Authority – fixed contract (per hour)	£54.90	£55.89
Primary Authority - pay as you go (per hour)	£68.68	£69.91

3.4.5 The remaining fees the Council has **discretion to determine annually**, with any change in the fee being set each year according to prevailing circumstances. In order to attract work, we need to remain competitive with fees charged by other local authorities or private businesses in some circumstances. The prevailing rate of RPIJ, i.e. 1.8% has been used to determine the suggested fees for 2017/18.

- 3.4.6 The exception to this, is the registration fee for a premises auction. S26(2) Greater London Council (General Powers) Act 1984 states that a 'reasonable fee must be paid to the council to cover administration and inspection costs'.
- 3.4.7 In relation to our fees for weights and measures work. S11(5) and S49(4) of the Weights and Measures Act 1985 stipulates that the local authority can charge 'such reasonable fees as we determine' for carrying out our duties under the Act. To assist setting these fees, we recommended following annual guidance issued by the Association of Chief Trading Standards Officers (ACTSO).
- 3.4.8 The table below shows the proposed increase to these fees:

Service	VAT	2016/17	2017/18	
			(excl VAT)	(incl VAT)
Registration of premises for auction	0%	321.22	327.00	No VAT
Verification of weights & measures equipment	20%	59.60	60.00	72.00
Calibration of eights for business	20%	59.60	60.00	75.00
Weights & measures testing for other local authorities (per item)	0%	59.60	60.00	No VAT
Additional officer testing assistance (per hour)	0%	35.87	36.12	No VAT
Use of safety lab (per hour)	20%	62.20	63.32	75.98
Officers working Stadium events (per hour) (see 3.4.9 below)	0%	35.00	£40Tbc	No VAT
Financial Investigator (per hour excluding share of any incentivisation scheme money) (see 3.4.10 below)	0%	35.45	36.09	No VAT

- 3.4.9 At the time of writing, we are currently in discussion regarding increasing the hourly rate for officers working at Wembley Stadium events up to £40 per hour. These discussions form part of the S106 Town and Country Planning Act 1990 (as amended) agreement, designed to mitigate the impact of the planning application, which if agreed, will see an increase of up to 28 events at the stadium each year.
- 3.4.10 The hourly fee quoted above for our financial investigation services, does not apply to any internal London Borough of Brent or London Borough of Harrow referrals. The hourly rate to be applied, is the rate on the date that any contract is made with an external authority as opposed to the applicable fee on the date a financial investigation may conclude. The hourly fee is in addition to any other agreement entered into which will detail our share of any Home Office incentivisation money received as part of the investigation.

4 FINANCIAL IMPLICATIONS

4.1 Fee income is a relatively small contributor to the Trading Standards Service budget, with budgeted fee income totaling £24,000 for 2016/17 (excluding Court costs awarded or proceeds of crime recovery). The 2016/17 income received from the fees amounted to £39,000. This figure was much higher than that budgeted, largely due to an unexpected contract we were awarded for a short term piece of administrative work for London Trading Standards, a small increase in primary authority custom and some financial investigation income separate to the Home Office incentivisation scheme funds.

7

4.2 We anticipate any rise in fees if agreed for 2017/18, will generate a small increase in income. However, there will be no income from London Trading Standards as per paragraph 4.1 above. With a continuing focus on generating additional revenue from our fee paying services, we budget for an income of £29,500 for 2017/1 (excluding Court costs awarded or proceeds of crime Home Office incentivisation scheme income).

5 STAFF IMPLICATIONS

5.1 There are no staffing implications arising from this report.

6 LEGAL IMPLICATIONS

6.1 There are no legal implications arising from this report.

7 BACKGROUND INFORMATION

7.1 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

This page is intentionally left blank

**London Boroughs of Brent and Harrow
Trading Standards Joint Advisory Board
11 May 2017**

FOR INFORMATION

BRENT & HARROW TRADING STANDARDS PROCEEDS OF CRIME UPDATE

1.0 SUMMARY

- 1.1 This report updates the Joint Advisory Board on work carried out by the Financial Investigation Team since its establishment in 2012 and on the future implications and concerns of work carried out under the Proceeds of Crime Act 2002.

2.0 RECOMMENDATIONS

- 2.1 For Members to consider the report and make recommendations where appropriate including to continue the work of the Financial Investigation Team.

3.0 DETAILS

PROCEEDS OF CRIME ACT 2002

- 3.1 The Proceeds of Crime Act 2002 (POCA) is a piece of legislation used in relation to confiscating money that has been acquired as a result of crime. The Act also provides Accredited Financial Investigators (AFI) with a robust set of powers for investigating, restraining and confiscating assets. Recovering the proceeds of crime is one of the government's top priorities for law enforcement.
- 3.2 In 2012 Brent and Harrow Trading Standards Service established a dedicated Financial Investigation Team to take advantage of the opportunities offered by POCA in terms of ensuring criminals do not financially benefit from wrongdoing and that confiscated proceeds of crime could be used towards the cost of carrying out investigations.
- 3.3 The Government introduced an incentivisation scheme to encourage authorities to use POCA. The scheme is administered by the Home Office and sees local authorities being able to retain a percentage of all successful confiscation orders that they obtain, when they are paid. Full details are found in paragraph 3.8 below.

PERFORMANCE

- 3.5 The Brent & Harrow Financial Investigation Team is well respected within local authority networks. In 2016 our Financial Investigation team were nominated and shortlisted for the prestigious LGA Awards in the innovation category for a continuing successful track record in which they applied POCA to planning cases.

Whilst they did not win the award, the event showed a high recognition for the team's excellence in this area of law. Previously, one of our officers won 'Best Individual' award in the 'Keith Hughes Award Scheme' run nationally by the National Crime Agency, which recognises outstanding performance in the field of financial investigation.

- 3.6 From April 2011 to December 2016 the team received 271 referrals. 73 came from Brent & Harrow Trading Standards, 68 from services within Brent Council, 13 referrals from services within Harrow Council and 44 referrals from other London Boroughs. Although some of these referrals are still under investigation, many will have led to successful confiscation orders. Following each referral, a financial investigation is commenced in order to establish the benefit made from crime and where appropriate cases are then progressed through the Court system using the confiscation regimes set in place by POCA.
- 3.7 Over the years Brent Council has secured a number of successes using POCA. Examples where the team have been successful are outlined in Appendix 1. One of the largest confiscation orders led to a payment of £204,134.25 to Brent Council. In one case during a search by Trading Standards Officers £46,801 in cash was detained by the AFI, which resulted in the court ordering the forfeiture of the cash. A recent restraint order led to a confiscation order of £250,000.

FINANCIAL BENEFITS

- 3.8 When a confiscation order is paid, the money is divided in accordance with the Home Office incentivisation scheme, which means that 50% will be apportioned to the Government. The remaining 50% is divided between the prosecuting authority (18.75%), the investigating authority (18.75%) and the HM Court Service (12.5%). Therefore, where we conduct our own investigations and are also the prosecuting authority, our share under the incentivisation scheme is 37.5%. The Home Office is currently also taking a top slice from the 37.5% ranging from 0% to 3% each quarter to fund their crime initiatives.
- 3.9 Since April 2011 the team has secured 60 confiscation orders. This has resulted in a total £2,053,376.43 payment from the Home Office under the incentivisation scheme. This money has then been distributed to the Local Authorities as follows;

Year	Total Incentivisation Received	Brent & Harrow TS	Other Brent Services	Other Harrow Services	Other Local Authorities
2011/12	£131,925.62	£131,925.62			
2012/13	£78,527.70	£48,527.70	£30,000.00		
2013/14	£483,185.90	£125,639.17	£346,109.77	£11,436.96	
2014/15	£518,650.54	£130,657.88	£367,175.98	£20,816.68	
2015/16	£403,857.67	£141,425.69	£256,684.73	£291.00	£5456.25
2016/17 (up to October 2016)	£437,229.00	£83,992.62	£199,193.36		£154,043.02
Totals	£2,053,376.43	£662,168.68	£1,199,163.10	£32,544.64	£159,499.27

This figure makes Brent Council one of the highest performing local authorities in the whole of the UK in terms of asset recovery.

FINANCIAL INVESTIGATION TEAM

- 3.10 The team consists of two fully trained Accredited Financial Investigators (AFI) who carry out all the financial investigations, source future work for the team and assist colleagues with guidance as to investigations with potential for POCA work.
- 3.11 POCA invests the National Crime agency (NCA) Proceeds of Crime Centre (PoCC) with a statutory responsibility for the training, accreditation and monitoring of financial investigators.
- 3.12 To become an AFI, officers must complete the Financial Investigation Training Programme which comprises three skill-based courses, including Financial Intelligence Officer course, Financial Investigation course and Confiscation course. All three courses require officers to undertake a test before they can start the course as well as successful completion and assessment of a Personal Development Portfolio. The cost of this training is in the region of £3,500. Once qualified, the NCA PoCC will set a number of Continuous Professional Development tasks that AFIs must complete to maintain their accreditation and officers must also update them with a summary of POCA work done.
- 3.13 This Service currently aspires to train the Senior Prosecutor to become an AFI to maintain resilience within the team and expand work capacity at times of strong demand, thereby generating increased revenue. As there is only one supplier of the course there are limited places and as more local authorities are turning to POCA to ease the pressure of the austerity cuts, it is extremely difficult to achieve a place on a London training course. Despite being on the waiting list for a number of months, we have not been offered a place and all 2017 training spaces are oversubscribed. We are reliant on having an available budget if and when any spaces on a course are offered.

OPPORTUNITIES

- 3.14 AFIs are usually are structured within local authority's Trading Standards Service as they have been trained in highly skilled investigative techniques as required in this field, have the ability to investigate a range of cases and have obtained courtroom experience.
- 3.15 Increasingly, local authorities have realised that using AFIs can maximise the amount of money that can be reinvested into enforcement and investigations as well as other areas within the remit of the incentivisation scheme. A number have used incentivisation money from POCA investigations to invest in their own AFIs. Therefore there are limited opportunities for the team to increase their work with other authorities as others are keen to undertake the work themselves and retain the full incentivisation scheme awards.
- 3.16 The greatest potential for growth is internal to Brent and Harrow councils, including increasing the areas of large scale criminal investigations within the Trading

- Standards team and expanding to services such as Planning Enforcement.
- 3.17 In order for this to be achieved within the Trading Standards team, it is essential that the Service is sufficiently resourced to undertake large-scale and complex cases such as those involving fraud or intellectual property. Current resources and the focus on Council priority areas or work, preclude the proactive investigation of such cases which can take several years to investigate and progress through the legal system.
- 3.18 If the additional resources were made available to the Trading Standards Service, we could establish a proactive service which focused specifically on investigations which may lead to proceeds of crime investigations such as counterfeiting infringements, working more closely with brand holders and where necessary, targeting offenders operating outside of our usual area of jurisdiction.
- 3.19 Particularly key to our ability to grow our Planning Enforcement work will be that Harrow Council utilise this valuable resource of having AFIs and seek to overcome barriers that have limited their current usage. We are keen to continue and grow this area of work and have made a proposal to Harrow's Divisional Director of Commissioning and Commercial Services as to one way of achieving this. This proposal would see a member of Brent's Planning Enforcement team, seconded to work with Harrow's Planning team with the sole purpose of identifying and progressing cases that may lead to potential confiscation proceedings.
- 3.20 The greater use of AFIs has led to the advancement of tools to carry out the mundane recording of financial information such as bank account statements showing ingoing's and outgoings. We have received a quote from the supplier of one such product for this purpose which cost £5,150 for the first year to include set up and training costs and then we would have to pay an annual licence fee of £4,115. These costs have prohibited us access to the software. Such software would be very useful as it not only collates most of the information contained in the statements of the defendants but also present it in a spreadsheet to aid further analysis substantially cutting the amount of officer's time in manually inputting the information, thereby freeing them up to carry out other investigations and generate more revenue.
- 3.21 If we are to remain competitive and maintain our reputation for being a leading authority in POCA investigation, we need to seriously consider the purchase of this software as other authorities would be able to offer this service as a reduced cost due to technological investment. We recommend investing in such a system during the forthcoming financial year.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no direct financial implications for each borough as this is an update on the work carried out by the Financial Investigation team. However, Members may wish to consider whether the business need for investing in a financial investigation software mentioned in 3.20, to increase our capacity by reducing the number of administrative hours currently taken by our two FIs inputting financial records into spreadsheets. Previously, a request was made to senior management to purchase this software which was declined.

5. LEGAL IMPLICATIONS

5.1 There are no legal implications.

6.0 STAFF IMPLICATIONS

6.1 There are no current staff implications.

7.0 BACKGROUND INFORMATION

6.1 Any person wishing to obtain more information should contact Anu Prashar, Senior Prosecutor, Regulatory Services, Brent Civic Centre, Engineers Way, Wembley Middlesex HA9 0FJ or anu.pashar@brent.gov.uk.

ANU PRASHAR
SENIOR PROSECUTOR

APPENDIX 1

EXAMPLES OF SUCCESSFUL ORDERS UNDER POCA LEGISLATION

- 1.1 A defendant in 2013 was ordered to pay £60,000 under POCA following a conviction which was secured by the Brent & Harrow Trading Standards Service which related to the supply of copyright infringing music. The defendant was given six months to pay the order or face 15 months in prison. He has paid the order in full, of which Brent and Harrow Trading Standards received 37.5%, £22,500.
- 1.2 In another case where the defendant supplied clocked cars from his company was ordered to pay £138,000 under POCA following a conviction which was secured by the Brent & Harrow Trading Standards Service. He was ordered to pay in within six months or face two years in prison. The defendant paid the order in full. Some of the money also went to the victims in the form of compensation.
- 1.3 In a Brent Trading Standards case a confiscation order was made for £43,642.50 in relation to a person who traded in counterfeit goods. Brent Council had seized large volume of goods from this person, including counterfeit toner cartridges. The court gave six months for the order to be paid and since this the order has been paid in full.
- 1.4 In a Harrow Trading Standards case a confiscation order was made for £15,809.95 in relation to a person who traded in counterfeit DVD's. The court gave three months for the order to be paid.
- 1.5 In a Brent Trading Standards case the defendant was jailed for selling equipment designed to circumvent paid-for TV services. This business sold equipment that allowed subscription TV services to be viewed, by passing the payment required by broadcasters. It specialised in providing equipment which allowed viewers in the UK to watch live premier league football matches. During the search of his home and business address the Financial Investigator found £46,801 in cash which was detained under POCA. After the conclusion of the criminal case, Willesden Magistrates court ordered the forfeiture of the cash. The cash seizure order ensures that no benefit was made from money gained through his criminality.
- 1.6 One of the orders was a case against a landlord who had converted a single dwelling property into 9 self-contained dwellings. Brent Council had served an enforcement notice, however the landlord ignored this, so a prosecution was mounted. Following the prosecution Brent Council started Confiscation proceedings in order to recover the rental income that had been made as a result of renting the nine dwellings. As a result of these proceedings an order was made under POCA for £494,314.30 and the defendant was given six months to pay up or serve three years in prison. The defendant has since paid in full and Brent Council received 37.5% of this order, £185,367.86.
- 1.7 Working with a neighbouring London Borough's Planning Service, a landlord was ordered to pay a confiscation order for £382,467. 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.

- 1.8 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 and Brent Council received 37.5% of this order, £70,350.
- 1.9 In one Brent planning case a confiscation order was made against a property developer for £1,438,180.59 following the conversion of a property into 12 dwellings without planning permission. Brent Council served an Enforcement Notice in relation to this property in Willesden Lane, NW2, however it was ignored so legal proceedings commenced. This confiscation order was the subject of an appeal and was later reduced to £544,358.00. This order has since been paid in full and Brent Council received 37.5% of this order, £204,134.25.
- 1.10 In another Brent case another confiscation order was made for £494,314.30 under the POCA in relation to a property on Church Road, London, which had been converted into 9 separate dwellings without planning permission. Brent Council had served an Enforcement Notice which had not been complied with. The Court gave six months for the order to be paid and since this the order has been paid in full and Brent Council received 37.5% of this order, £185,367.86.
- 1.11 In a more recent case, a Brent property owner was ordered to pay £158,780.00 following failure to comply with an Enforcement Notice issued by Brent Council against a property in NW2. The enforcement notice was served because the property had been converted into ten self-contained flats without planning permission. The flats were described by the independent surveyor as 'poorly presented' and in need of a 'comprehensive overhaul'. This is another confiscation order that has been paid in full and Brent Council received £59,542.50.
- 1.12 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 and Brent and Harrow Trading Standards received £16,365.75.
- 1.13 In some instances, rather than go through a lengthy court procedure regarding confiscation, the defendants agree to a confiscation order of an agreed benefit amount which is endorsed by the court. This occurred on a recent case where the defendant pleaded guilty to possessing and supplying counterfeit DVDs. The order was made for £15,809.95 and was given three months to pay.
- 1.14 POCA allows for assets to be restrained and this can be done prior to a person being charged or summonsed. Over the years Brent Council has secured a number of restraint orders to prevent assets from being dissipated prior to any confiscation order being paid.

- 1.15 The most recent restraint order was sought in March 2016, in a planning case where the proprietor of the property was a limited company registered in the British Virgin Islands and it later transpired the owners lived in Dubai. The restraint was effective and the Council secured a confiscation order of £250,000.

**London Boroughs of Brent and Harrow
Trading Standards Joint Advisory Board
11 May 2017**

FOR INFORMATION

TRADING STANDARDS WORK PLAN FOR 2017/18

1 SUMMARY

- 1.1 This report provides Members with information concerning Brent & Harrow Trading Standards Work Plan during 2017/18.

2 RECOMMENDATIONS

- 2.1 That Members consider the report, make any recommendations and comment where appropriate.

3. DETAILS

- 3.1 The Service produces a Work Plan, which details the activities it is planning to undertake for the financial year ahead. The plan has been written having considered Brent's 'Performance Management Framework' dated December 2016 and is closely linked to the budget reflecting the outputs achievable within the resources provided.

- 3.2 In accordance with paragraph 23.3 of the consortium agreement, this report discharges Brent Council's responsibility to estimate the number and type of activities to be achieved by the Service during the financial year and to present this to the Joint Advisory Board.

- 3.3 A copy of the plan for the year 2017/18 is attached as an Appendix to this report.

4 FINANCIAL IMPLICATIONS

- 4.1 There are no financial considerations arising from this report as the work plan reflects the amount of work that can be achieved within the budget provided for the Service for 2017/18.

5 STAFF IMPLICATIONS

- 5.1 There are no staffing implications arising from this report.

6 LEGAL IMPLICATIONS

6.1 There are no legal implications arising from this report.

7 BACKGROUND INFORMATION

7.1 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



Brent & Harrow Trading Standards Service

Team Work Plan 2017-2018

Contents

Introduction	2
Priorities	3
Work Volumes.....	6
Departmental Service Plan Objectives	8
Key Performance Indicators.....	9
Service Structure	10

Introduction

The Trading Standards Service currently functions within the Council's Standards and Enforcement division providing a focus to support local consumers and businesses alike, alongside our colleagues from the Planning Enforcement and Food Safety & Standards teams.

All three regulatory functions report directly to the Operational Director within the Regeneration and Environment Department. Despite being a larger team within the department, we are in fact a small resource when you consider that our service is provided to two busy and diverse London boroughs.

Staff in the Trading Standards Service provide advice and support regarding a vast spectrum of regulatory legislation that protects both consumers and honest businesses, creating safer communities and a strong, fair, economic environment allowing new and existing businesses of all shapes and sizes to trade confidently and thrive.

Current economic conditions, the increase in internet trading across national barriers, more sophisticated and numerous scams and the ease of which rogue businesses operate to avoid detection of offences, mean that the job of the Trading Standards Officers has become much more complex.

The vast majority of businesses want to comply with the law and maintain good levels of customer satisfaction. We will happily support and encourage such businesses, to help them achieve compliance and future prosperity. However, there are many, who take shortcuts to achieve an unfair competitive advantage or who seek to exploit vulnerable members of the public, to increase their financial gain as quickly as they can. Many of these businesses have no intention whatsoever of carrying out their trading activities lawfully.

Not only do these rogue businesses disadvantage consumers, they harm the reputation of some sectors of trade and take business away from legitimate traders. In such circumstances, we need to provide a tough approach to prevent the rogue businesses from operating whilst at the same time, supporting those who want to trade compliantly. The activities set out in the work plan aim to achieve this, balancing our priorities so that we can keep on top of rogue traders before problems escalate and to make certain their local impact is prevented as easily as possible.

The team enters 2017/18 with several vacant posts and a priority at the beginning of the year will be to recruit new, enthusiastic staff to the team to complement the existing officer's skills. This will see the team maintaining 19 FTE staff. At the time of writing, the Service has the benefit of an investigator funded by National Trading Standards Board, Tri Region Investigation Team working with us. His role is specifically concerned with the investigation of an alleged home improvement fraud.

The Service continues to employ two Financial Investigators who conduct investigations generated not only from within our own Councils, but also on behalf of various other external agencies. Their duties and outputs produced, are measured differently and are outside the scope of this work plan.

The Service's leadership team is currently:

Senior Regulatory Service Manager	Simon Legg
Regulatory Team Leader	Vacant Post (covered by Anu Prashar)
Regulatory Team Leader	Vacant Post (covered Samuel Abdullahi)
Principal Prosecutor	Anu Prashar

Priorities

At our Joint Advisory Board meeting in October 2016, a report was presented to members for discussion titled 'Trading Standards Priorities 2016/17'. This report identified priorities set by the National Trading Standards Board (NTSB) which are summarised below.

- 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

A similar exercise has also been carried out regionally by London Trading Standards (LTS) who represent the 33 local authority Trading Standards Services across London who have identified the following, as priority areas of work for its members:

- Doorstep 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

On a local basis, each Borough has a documented corporate plan setting out what it is to accomplish in the future and how this will be achieved. Brent has a 'Borough Plan 2015-2019' and Harrow an 'Ambition Plan 2020'. These plans highlight the broad subject areas listed below as priority areas for each Council:

Brent: ¹

- Better Lives
- Better Place
- Better Locally.

Harrow:²

- Build a Better Harrow
- Be More Business-like and Business Friendly
- Protect the Most Vulnerable and Support Families

All of these priorities have been considered in turn and assessed against the intelligence available to us to determine where we should focus our resources to make certain our work carries the biggest impact, focuses on the areas of most concern, where possible follows the IOM (National Trading Standards Intelligence Operating Model) and contributes to the relevant Borough objectives.

In determining our work plan for the coming year, the following assumptions have been made:

¹ <https://www.brent.gov.uk/media/14308131/brent-borough-plan-2015-2019.pdf>

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

- Most of our work will now be reactive (complaint-driven) rather than proactive except for pre-planned project work
- All complaints received for investigation will be risk-assessed via our matrix and will only be investigated if the relevant threshold is reached
- We will always respond to reasonable requests from local businesses seeking advice and support to us up to the agreed number of hours and/or steer business towards primary authority advice
- Any commercial activities which generate an income will be prioritised to maximise revenue to balance budgets
- We will seek to manage demand where possible by signposting service users to other resources and encouraging greater use of on-line advice and information.
- We will promote our work as much as possible to act as an educational resource or deterrent warning when applicable

We have categorised the following areas of work to form the basis of our 2017/18 priorities:

High priority

Most Complained About Traders	Underage Sales – alcohol, tobacco, knives
Doorstep Crime and Scams	Estate Agents/Letting Agents
Unsafe Goods (Manufacture /wholesale)	Clocked & Insurance ‘write off’ Cars
Business Advice and Primary Authority	Counterfeit Goods (Large Scale Operation)
Niche and Illicit Tobacco Products	Proceeds of Crime Investigations
Large Scale or High Value Frauds	

Medium Priority

Misleading Prices/Price Marking	Incorrectly Labelled Goods (safety)
Consumer Credit/illegal lending*	Counterfeiting and Copyright (low level)
Furniture and Furnishings	Un-roadworthy Cars
Road Traffic – Overloaded Vehicles	Harassment of Debtors
Package Travel holiday complaints	Storage of Fireworks (unless critical safety implication)
Inaccurate Weights and Measures	Hallmarking
Underage Sales – fireworks (as seasonal)	Unsafe Goods (Retail Level)

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

Low Priority

Energy Labelling of Goods	Restrictive Notices
Misleading Descriptions (low value goods)	Underage Sales – lottery, films, spray paints
Energy Performance Certificates	Essential Packaging
Mock Auctions	Motorcycle Exhaust Silencers
Market Sales	Business Names
Metrication	Bogus Colleges
Underage Sales – DVDs / games, butane	Video Recordings – Unclassified DVDs

Work Volumes

The tables below show the projected performance of the respective Brent or Harrow teams during 2017/18. It should be noted that the nature of Trading Standard's duties is variable, for example, some investigations take much longer than others or during some years, it might be necessary to carry out more inspection visits than expected in response to a particular outbreak of noncompliance, such as was seen in 2015 with the influx of unsafe hover boards.

This means that it may be the case at year end, some areas of work have generated a higher than expected volume of work whereas other areas might see a decrease which is necessary to respond to demands as they arise during the year. Our work volumes will be kept under continuous review and reported quarterly, to ensure that they are being implemented effectively and progress is being made.

Harrow Team 2017/18	Brent Team 2017/18
Based on staff numbers:	Based on staff numbers:
<ul style="list-style-type: none"> 1 Team Leader 5½ Enforcement Officers 1 Assistant Enforcement Officer 	<ul style="list-style-type: none"> 1 Team Leader 5½ Enforcement Officers 1 Assistant Enforcement Officer

	Planned volume Brent	Planned volume Harrow
Complaints (Service Requests) Completed	650	650
Trader Enquiries / requests for advice	75	75
High Risk / Most Complained-about Trader Inspections	40	50
Other Business Inspections	90	120
Weights & Measures, Average Quantity or Verification visits	5	4
Primary Authority Hours	150	65
Underage Test Purchase Visits	115	125
Infringement reports (average 55 work units per report)	43	43
eReports	11	11
Prosecutions completed – Crown Court	2	2
Prosecutions completed – Magistrates' Court	12	10
Licensing Reviews Completed	2	2
Simple Cautions Signed	10	8
Letters of Warning Issued	15	15
Local and Regional Projects Completed	3	3
Service Improvement Work	150	150
Approved Trader Scheme New Recruits or Audits	50	60
Doorstep Crime Rapid Response Actions	6	7
Number of Referrals To or From Safeguarding Board	4	4
Number of Scam Victims Contacted c/o NTS Scams Hub	50	50
Partnership or Area Based Working Events / Weeks of Action	8	10
Samples, Mileage and Websites Checks	75	80
Number of Intelligence Logs Input on Regional Database	99	100
Press Releases Issued	6	6
RIPA Applications	2	2

Departmental Service Plan Objectives

The departmental service plan sets out how each department will contribute to the delivery of Borough's priorities during 2017/18. It includes objectives, key milestones and outcome targets against which we will be judged on our success. Trading Standards have identified the following areas of work which will feed directly into our departmental service plan objectives applicable to both boroughs.

Activity	Milestone	Outcome	Corporate Alignment
Responding to doorstep crime incidents with a 'rapid response' service where required, to safeguard vulnerable consumers from financial harm	All required call outs are responded to within 24hrs with an onsite visit if necessary. Trader and consumer advice given as necessary and where appropriate, settlement of financial agreement.	Prompt support for vulnerable consumers. Trader and consumer legal advice provided. Assistance agreeing terms to remedy work and/or financial settlement.	Better Lives Better Place Protect the Most Vulnerable and Support Families
Take appropriate action to reduce the number of complaints being received against the Borough's most complained about businesses	Quarterly reporting to identify most complained about traders. Trader advisory meetings taking place. Appropriate enforcement action and/or Primary Authority commitment	Better educated and compliant businesses Reduced consumer complaints about these businesses. Less longer term demands on the Service,	Better Lives Better Place Demand Management Be More Business Friendly
Reduce the availability of illicit tobacco products including cigarettes, chewing tobacco and shisha and ensure compliance with the new plain packaging requirements for cigarettes.	Pre-planned inspections of premises believed to be involved with the illicit sales of tobacco including shisha. Trader advice and awareness training regarding new tobacco legislation.	Better educated and compliant businesses Reduced availability of illicit tobacco products. Reduction of anti social behavior is shisha bars. Increased health benefits.	Better Lives Better Place Be More Business Friendly Protect the Most Vulnerable and Support Families
Intervention of unsafe consumer goods from the supply chain, specifically from businesses at the manufacturing, importation or wholesale supply process.	Pre-planned inspections of premises believed to be involved with the supply of unsafe goods. Trader advice and support given. Seizure, suspension or reworking of unsafe goods.	Better educated and compliant businesses Reduced availability of unsafe products from the supply chain. Intervention at the highs' level of the supply chain resulting in efficiencies	Better Lives Be More Business Friendly
Pursue effective day to day robust enforcement action where expedient (in partnership with other Service areas), to ensure serious infringements are dealt with expediently, reducing criminal benefit from crime, tackle large	Take effective enforcement action when required, reduction of illegal shisha cafes and other problem sectors of trade such as second hand car businesses, responding to doorstep crime, fraud and other scam allegations as early as	Enforcement action taken against problem businesses premises and a reduction of any fraudulent trading in the borough.	Better Place Be More Business Friendly Protect the Most Vulnerable and Support Families

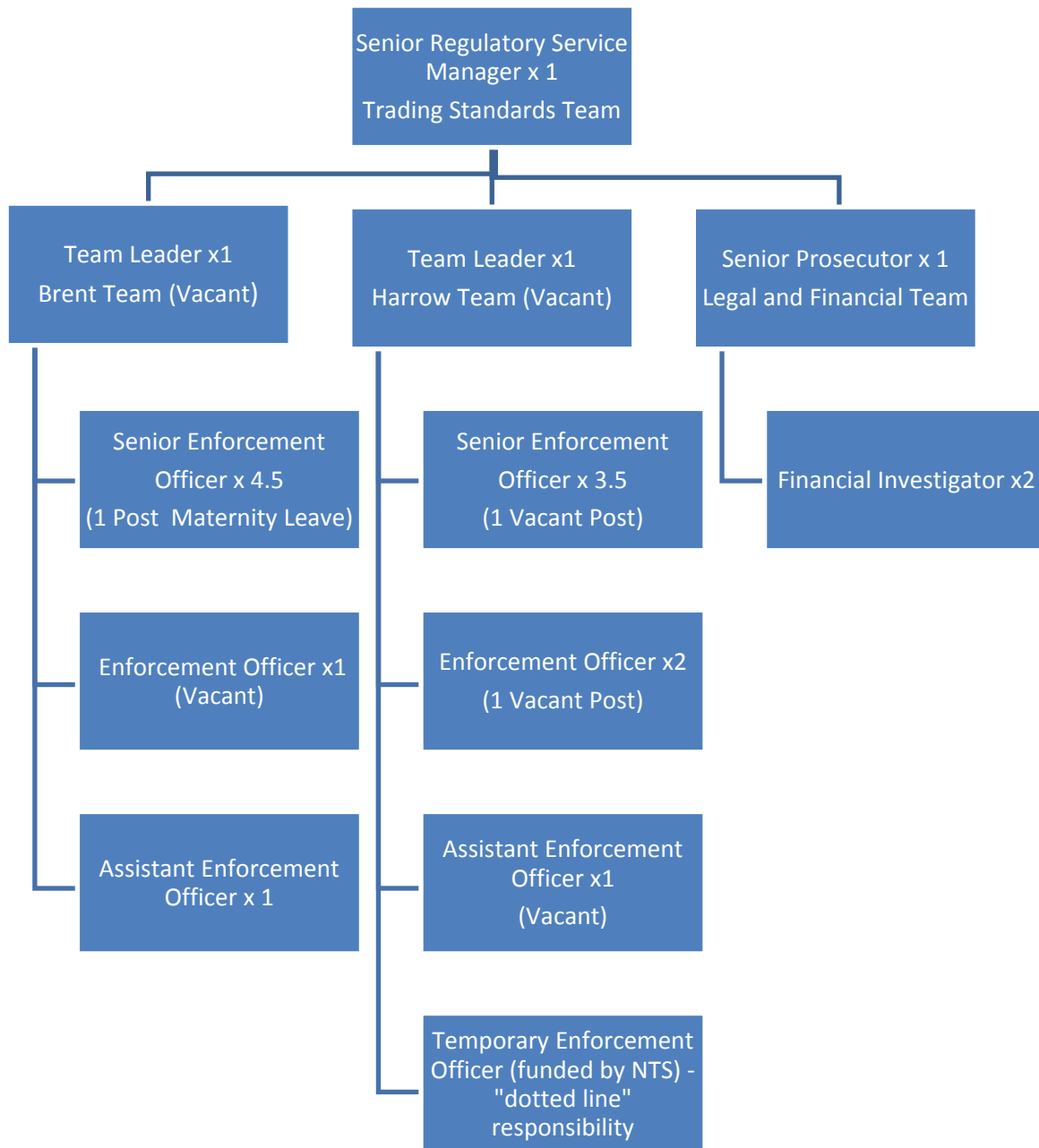
scale frauds and to remain one of the most effective regulatory teams in the country.	possible to limit financial harm.		
---	-----------------------------------	--	--

Key Performance Indicators

The Service will report quarterly on the following KPIs:

Activity	Success Criteria
The number of businesses audited in accordance with the terms of membership or recruited to the Responsible Trader Scheme	50 businesses audited or recruited to the scheme per Borough
% of high-risk or most complained about businesses inspected	We shall visit 80% of the high risk traders identified at the beginning of the year or the most complained about traders as identified in quarterly reporting
The amount of consumer's money saved by our intervention following a doorstep crime incident	A collective monetary value reported alongside the number of interventions made

Service Structure



This page is intentionally left blank