



London Borough of Hackney

# Trading Standards Service Delivery Plan 2019/20



INVESTOR IN PEOPLE

## Table of Contents

1.INTRODUCTION.....	3
2. Trading Standards Aims & Objectives.....	3
2.1 Aims & Objectives .....	4
2.2 Performance indicators.....	7
3. BACKGROUND .....	9
3.1 Profile	
3.2 Scope of the Trading Standards Service.....	10
3.3 The main areas of criminal law that we enforce.....	10
3.4 Demands on the Service .....	10
4.Service Priorities and delivery.....	12
5.Enforcement Policy.....	17
6.Resources.....	17
7.Authorisation & Competencies.....	19
8.Quality Assessment.....	20
9.Highlights .....	21

## INTRODUCTION

The plan sets out the activities identified for the Trading Standards Service in 2019/20.

The Trading Standards Service sits within the Community Safety, Business Regulation and Enforcement Service.

Hackney Council's Trading Standards Service has responsibility for the vast majority of consumer protection issues that arise in the borough. Trading Standards provide advice and guidance to consumers and businesses based within Hackney, in conjunction with Citizens Advice Consumer Service. Trading Standards plays an important role in residents' health, safety and economic wellbeing.

This service plan provides information on the achievements of the service and future plans and how we intend to deliver them with the continued cooperation of our internal and external partners and stakeholders.

New Challenges: - Impact of Brexit

*Consumer protection and business confidence will be fundamentally weakened following Britain's exit from the EU if current regulatory, enforcement and advice partnerships are not maintained, according to a report published by the Chartered Trading Standards Institute (CTSI).*

The report entitled *Trading standards opportunities and threats from the UK withdrawal from the EU*, is the culmination of research from the CTSI Brexit Think Tank, a collection of consumer protection and trading standards experts brought together to assess the potential challenges and opportunities of Brexit. The reduction in Trading Standards Officers over the last decade throws doubt on the UK's ability to carry out any meaningful checks on businesses after Brexit, the report warns. Sudden divergence from EU standards and regulations will put extreme pressure on UK businesses and cause uncertainty among consumers, which would have a measurable impact on the UK economy. Concerns were also raised over the unsustainable loss of resources for regulation and market surveillance from local authority trading standards services.

The Service provides advice and regulatory services that protect both consumers and businesses as well as creating safer communities and a safe and fair economic environment for Hackney businesses.

The Service is currently staffed by a Principal Officer who fulfils the role of an Accredited Financial Investigator, four Senior Trading Standards Officers, one of who is employed on a two year fixed term contract (part funded by Public Health) to lead on the sale of illicit tobacco and alcohol and one Business Standards Officer.

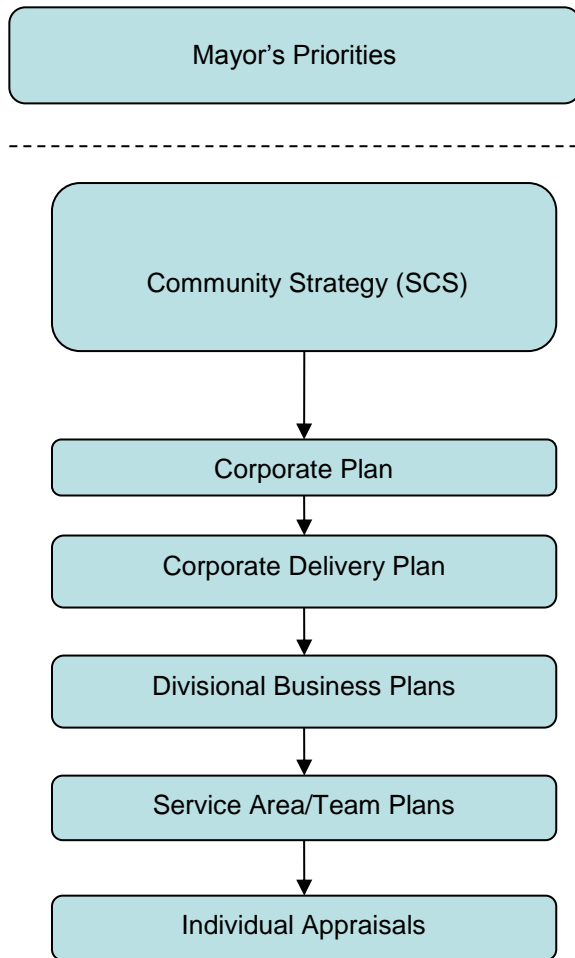
## 1. TRADING STANDARDS SERVICE AIMS AND OBJECTIVES

## **Aims and Objectives**

### 1.1 The Services broadly aims to:-

- ensure fair trading with respect to consumer credit, counterfeiting, misleading prices, advertising and the description of goods, services and property; ensure that weighing and measuring equipment used in the Borough meets legal requirements;
- protect consumers from unsafe goods and unfair trade practices;
- support businesses through education and advice;
- protect young people from sales of age-restricted products;
- identify and enforce legislation against “rogue traders” in the borough using a range of sanctions including advice, warnings, simple cautions and prosecutions; work in partnership with members of the business community and with external agencies such as the police and HMRC to enforce a fair trading environment;
- process circa 3000 customer complaints and trade enquiries each year (this includes matters which are notification only).  
Triage’s circa 600 complaints which are not notifications.  
investigate offences and prosecute offenders.
- utilisation of an accredited financial investigator.
- developing strong links with Planning have encouraged the use of the Proceeds of Crime Act 2002 to remove the financial benefit from rogue developers. The service is seeking to train further financial investigators to replace two who left the department last year.
- assessing cases for POCA. Awards are known as confiscation order. When an 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.

### **1.3 How the Service Links to Corporate Priorities**



**Mayor's Priority 1:**

Working and campaigning to keep Hackney a place for everyone with genuinely affordable homes, job opportunities and excellent schools; where everyone can play a part and where tackling inequality is at the heart of what we do.

**Mayor's Priority 2:**

Making Hackney a place where everyone can feel healthy and safe, at home, at work, and on streets, parks and estates.

**Mayor's Priority 3:**

Making Hackney an economically and environmentally sustainable place, with strong, cohesive and diverse communities.

The **2018-2028 Community Strategy** has five themes:

<p><b>1</b> A borough where everyone can enjoy a good quality of life and the whole community can benefit from growth. (Business advice and proportionate enforcement by Trading Standards benefits the Hackney community. The Service tackles inequality by protecting vulnerable groups such as the elderly and young by undertaking proactive project work and reacting to complaints as they are received.)</p>	<p><b>2</b> A borough where residents and local businesses fulfil their potential and everyone enjoys the benefits of increased local prosperity and contributes to community life. (The work of Trading Standards of ensuring there is a level playing field for all traders helps improve the prosperity of legitimate business. The service deals with complaints and service requests and specialises in Proceeds of Crime work which brings income to the council whilst removing the financial benefits for criminals.)</p>	<p><b>3</b> A greener and environmentally sustainable community which is prepared for the future. (Trading Standards alongside their Environmental Health colleagues check the validity of organic certification claims. They are also committed to removing unsafe products from the market such as illegal skin lighteners.)</p>	<p><b>4</b> An open, cohesive, safer and supportive community. (There is a clear commitment from trading standards to provide support to business and consumers to facilitate a safer and supportive community by removing rogue traders and unwanted doorstep selling.)</p>	<p><b>5</b> A borough with healthy, active and independent residents. (Our aim is to achieve a safe, healthy and fair trading environment for our residents and businesses. This is evidenced with the commitment to combating the sale of age restricted goods such as knives and the work combat the supply of illicit tobacco and the work to protect vulnerable adults from scams.)</p>
---	---	--	--	---

## 2.2. PERFORMANCE INDICATORS

## 2.3. KPIs

Key Performance Indicators	Frequency of reporting	2019/20 Target
High Risk Inspections	Monthly*	100% by 31 <sup>st</sup> March 2020
Upper Medium Risk Inspections	Monthly	100% by 31 <sup>st</sup> March 2020
Animal Feed inspections (Statutory FSA requirement)	Monthly	100% by 31 <sup>st</sup> March 2020
Weights and Measures inspections(Statutory requirement from National Measurement Office)	Monthly	Minimum 72 inspections by 31 <sup>st</sup> March 2020

\*see 3.3 below

## 2.4(i) LPIs

Local Performance Indicators	Frequency of reporting	2019/20 Target
Percentage of complaints responded to concerning serious illegal trading practices in relation to - counterfeit goods responded within 5 working days	Monthly	100%
Percentage of complaints responded to concerning serious illegal trading practices in relation to - sales of unsafe goods responded to within 5 working days	Monthly	100%
Percentage of complaints responded to concerning serious illegal trading practices in relation to - sales of restricted goods to children underage responded to within 5 working days	Monthly	100%
Percentage of licensing consultation comments made within targets	Monthly	100%
Number of Notifications	Monthly	Reporting only
Total Number of complaints received	Monthly	Reporting only
Total Number of referrals received	Monthly	Reporting only
Number of Service Requests received	Monthly	Reporting only
Number of Licensing service requests received	Monthly	Reporting only

## 2.5(ii) New Impacts and Outcomes Framework

The Association of Chief Trading Standards Officers has created a framework entitled *TS Impacts and Outcomes* which helps service managers raise the profile of their service whilst offering the Association the ability to paint a picture of how services are collectively supporting consumers and honest businesses nationally. If challenged in the future, Heads of Service will be able to point to this piece of work as the first step in addressing the issues raised by the National Audit Office, as well as having something to hand to highlight local performance.

The Local Government Association have been supportive of this approach because of the voluntary nature of the proposal and the fact that this means local authorities are trying to help themselves. This allows Hackney to look to our colleagues and neighbouring boroughs in the profession to support Hackney in making the best of the resources that are available.

Indicator	Frequency of reporting	2019/20Target
-----------	------------------------	---------------

Outcomes of Investigations and Prosecutions	Yearly	Reporting only
Enterprise Act Undertakings	Yearly	Reporting only
Redress obtained for consumers or victims of crime by service actions	Yearly	Reporting only
Number of scam victims supported	Yearly	Reporting only
Number of businesses receiving advice	Yearly	Reporting only
Number of businesses found non-compliant when visited subsequently brought into compliance during the financial year	Yearly	Reporting only
Deal with problematic businesses where an intervention is made	Yearly	Reporting only
Support for legitimate businesses by trader approval schemes	Yearly	Reporting only
Support for legitimate businesses by removing counterfeit goods from the market	Yearly	Reporting only
Unsafe or non-compliant goods prevented from entering or removed from marketplace	Yearly	Reporting only
Businesses tested for compliance with the law using underage volunteers OR compliance with mandatory Challenge 21/25 conditions	Yearly	Reporting only
Tackling the availability of illicit tobacco	Yearly	Reporting only
Tackling the availability of illicit alcohol	Yearly	Reporting only

## 2.6 PROGRAMMED INSPECTIONS 2019/20

Risk Category	Category A – High (to be Inspected 2019/20) (e.g. a premises selling products subject to safety legislation such as knives)	Category B1 – Upper Medium (to be Inspected 2019/20) (E.g. a car dealer or premises selling high value goods. There could be an associated consumer credit agreement)	Category B2 – Low Medium (Inspected every 5 years) (e.g. a trader which is a newsagent which is inspected with respect to pricing compliance)	Total
Total number of premises	149	190	Total 267 ( 170 visits and 97 by alternative enforcement action)	606 Annual target
Target for percentage of visits to be completed at end March 2019	100%	100%*	N/A	

\* Visits will include targeted project visits as set out 2.0 above.

## 3. BACKGROUND

### 3.1 Profile

The borough is an Inner London borough with a population of around 273,526 and covers an area of 19.06sq kilometres.



## **Health and wellbeing**

Life expectancy is increasing for men and women, and is now 78.9 years for men and 82.8 years for women. Life expectancy in Hackney is below the London average, especially for men. There has been an increase in bogus caller crime in Hackney according to crime statistics and Trading Standards are supporting residents to avoid falling prey to those who may trick or con their way into a home at events such as Hackney Council's Winter Warmer event. Conversely Hackney is a relatively young borough with a quarter of its population under 20. The proportion of residents between 20-29 years has grown in the last ten years and now stands at just under a fifth. People aged over 55 make up only 14% of the population.

The Service has thus developed a program of Age Restricted Test Purchase Operations to protect the increasing number of young people.

## **Economy**

The number of firms in Hackney has increased by 61% since 2010. To ensure traders receive good trader advice and to protect Hackney consumers the service intends to visit all High and Upper Medium Risk premises.

## **Housing**

The proportion of households who rent from a private landlord in Hackney has more than doubled in the past 10 years. Nearly a third of all households are now private renters. Trading Standards have thus prioritised visiting letting agents to ensure all agents belong to a redress scheme and are transparent with all fees and charges.

## **Hackney's people**

Hackney is the 6th most diverse borough in London, down from 3rd in 2005, but it has a higher ethnic diversity score<sup>1</sup> than in 2005, which suggests that London as a whole is becoming more ethnically diverse.

Given the diverse nature of businesses in Hackney Trading Standards have needed to conduct Equality Impact Assessments on activities such as Age Restricted Test Purchasing to overcome the fact that a disproportionate number of Turkish off Licences sell age restricted alcohol to minors.

### 3.2 Scope of the Trading Standards Service

3.3 The main areas of criminal law that we enforce are as follows: -

- safety of consumer goods,
- false or misleading descriptions relating to goods and services,
- product counterfeiting,

- failure to display selling prices of goods and misleading price indications,
- consumer credit malpractice and age restricted sales and
- animal feeding stuffs and feed registrations.

### 3.4 Demands on the Service

#### London Priorities

Analysis by questionnaire of the 33 Trading Standards Authorities in London has shown that the top priorities facing trading standards are:

- Doorstep Crime / Cold Calling
- Counterfeiting
- Under Age sales

#### National Priorities

The National Trading Standards Board (NTSB) has identified the following priority areas:-

- Doorstep crime.
- Mass marketing scams.
- Fair trading issues.
- Product safety.
- Intellectual property.

## 4.0 SERVICE PRIORITIES AND DELIVERY

### Trading Standards Priorities 2019/2020

Work activity	Desired Outcome	Target	Performance Indicator / Measure	Timescale
<b>Projects</b>				

Work activity	Desired Outcome	Target	Performance Indicator / Measure	Timescale
Tackling Counterfeit Good	<ul style="list-style-type: none"> <li>Reduce the level of non-compliance and raise awareness through appropriate publicity.</li> </ul>	<ul style="list-style-type: none"> <li>A minimum of three visits to Hackney markets to carry out market surveillance and robust action to address non-compliance.</li> <li>All cases to be considered for financial investigation.</li> <li>Sampling, testing and enforcement including licence review.</li> <li>Scanning social media to identify local suppliers (desktop).</li> </ul>	<ul style="list-style-type: none"> <li>Non-compliance addressed will be addressed in line with the Service's Enforcement Policy.</li> <li>Minimum 4 targeted visits to markets.</li> <li>At least one visit per quarter</li> </ul>	Ongoing from April 2019
Operation Liberal (Doorstep/Cold Calling)	<ul style="list-style-type: none"> <li>To disrupt the activities of doorstep criminals operating within the Borough.</li> <li>To gather further intelligence for future investigations.</li> <li>Take enforcement action in line with the Service's Enforcement Policy against persistent offenders.</li> <li>To raise the level of business compliance</li> <li>To raise awareness around the issues of door step crime</li> </ul>	<ul style="list-style-type: none"> <li>To gather intelligence and progress any cases.</li> <li>Investigating domestic building sites with a view to disrupt the activities of rogue traders.</li> <li>Identify residential addresses in N16 and E5, concentrating in and around Stoke Newington common, Lower Clapton and Chatsworth which may be subject to possible door step crime/ rogue trader offences</li> <li>To generate intelligence reports for further analysis</li> </ul>	<ul style="list-style-type: none"> <li>Minimum 1 targeted operation in 2019/20.</li> <li>Reactive responses will be made in line with the current Complaints Investigation procedure.</li> <li>Summary report to be produced after analysis of intelligence reports and receipt of result of enquiries</li> <li>Minimum 10 properties viewed</li> </ul>	By end Q1 2019/20
Tobacco and Alcohol Control Work	<ul style="list-style-type: none"> <li>Reduction in illegal sales of tobacco and alcohol in support of government efforts to encourage smoking cessation and reduce alcohol abuse.</li> </ul>	<ul style="list-style-type: none"> <li>Detection and disruption of sales of illegal and counterfeit tobacco.</li> <li>Itinerant sellers of illegal and counterfeit tobacco</li> <li>Q2 and Q4 events. An outreach and education event with the aim</li> </ul>	<ul style="list-style-type: none"> <li>To measure the effectiveness of the project at the start and end of Q2 and Q4 to measure improvement.</li> <li>To maintain Service Level Agreement with Public Health.</li> </ul>	Start Q2 2019/20

Work activity	Desired Outcome	Target	Performance Indicator / Measure	Timescale
	<ul style="list-style-type: none"> <li>• To participate in appropriate/related health initiatives.</li> <li>• Compliance in retail establishments with relevant legislation.</li> <li>• Employment new STSO will:- <ul style="list-style-type: none"> <li>• much needed experience in the field of Illegal Tobacco and Alcohol</li> <li>• deliver enforcement projects around underage sales and niche tobacco</li> <li>• assist Hackney with respect to tackling shisha bars and the sale of shisha in retail premises</li> <li>• Will help educate Hackney traders.</li> <li>• Utilise existing relationships with the Metropolitan Police and HMRC to help enforcement in Hackney.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>of generating intelligence regarding the supply of illicit tobacco.</li> <li>• Targeted visits with the sniffer dogs. At least 4 Action Days.</li> <li>• A twitter and social media campaign with the aim of generating intelligence about the retail and wholesale supply of alcohol and tobacco. Councillor engagement and press release.</li> <li>• Participation in regional project work as appropriate.</li> <li>• Outreach event in Narrow Way.</li> </ul>	<ul style="list-style-type: none"> <li>• Trailer in Narrow Way. Public event held in partnership with Public Health. Survey to be conducted of public to obtain new intelligence on illegal tobacco.</li> </ul>	
Under age sales Work	<ul style="list-style-type: none"> <li>• Improved health and wellbeing for young people through reduced access to potentially harmful Products.</li> <li>• Supports businesses in regulatory compliance and reduce risk of reputational harm following media profile of underage sales</li> <li>• Reduction in incidence of under-age young people purchasing</li> </ul>	<ul style="list-style-type: none"> <li>• Trading Standards will investigate 100% of all age restricted sales complaints and enquiries they receive.</li> <li>• At least 4 under age sales test purchase operations will take place throughout the year. They will be intelligence-led or provoked by national or regional remit into specific areas.</li> </ul>	<ul style="list-style-type: none"> <li>• At least 1 operation per quarter.</li> </ul>	Start Q1 2019/20.

Work activity	Desired Outcome	Target	Performance Indicator / Measure	Timescale
	alcohol, tobacco, fireworks and other goods. <ul style="list-style-type: none"> <li>Increase in retailers' compliance rates regarding the display of warning notices about tobacco and alcohol sales</li> </ul>	<ul style="list-style-type: none"> <li>Develop and promote under age sales 'alternative resolutions' package', which gives sellers option to attend and complete training provided by Trading Standards and in doing so no legal proceedings will be taken against the trader.</li> </ul>		
Product Safety Work	<ul style="list-style-type: none"> <li>To ensure products sold in Hackney are safe and meet the relevant legislative requirement.</li> </ul>	<ul style="list-style-type: none"> <li>Develop 1 intelligence-led safety project for the area.</li> <li>Participate in regional and sub-regional safety specific projects that are relevant to the area.</li> <li>Inspections of premises which sell fireworks to ensure storage safety.</li> </ul>	<ul style="list-style-type: none"> <li>Test purchases carried out based on intelligence report. At least 1 test purchase.</li> <li>To participate in London Trading Standards joint initiative. The theme is yet to be determined.</li> </ul>	By end Q3 2019/20
Community Outreach	<ul style="list-style-type: none"> <li>To undertake a Winter Warmer Event.</li> <li>Conduct Chartered Trading Standards Institute 'Do you PASS?' training for traders who infringe legislation as alternative enforcement action.</li> </ul>	<ul style="list-style-type: none"> <li>Trading Standards will provide advice to minimise the risk of our elderly citizens from becoming victims of scams and rogue traders.</li> <li>Supply training to at least 10 traders</li> </ul>	<ul style="list-style-type: none"> <li>Conduct outreach event at Hackney Town Hall.</li> <li>Conduct follow up test purchases to be carried out to check compliance levels.</li> </ul>	By end Q3 2019/20
<b>Ongoing work streams</b>				
Education of identified vulnerable groups in conjunction with partner agencies	<ul style="list-style-type: none"> <li>Education of residents thereby reducing the impact of scams and doorstep crime.</li> </ul>	<ul style="list-style-type: none"> <li>Q1 Operation Liberal. A week of partnership work with the police</li> <li>Attendance at events giving an opportunity to carry out consumer education.</li> </ul>	<ul style="list-style-type: none"> <li>Consumer education events attended</li> <li>Resources directed at most significant identified problems.</li> <li>Meetings attended</li> </ul>	By end Q1 2019/20

Work activity	Desired Outcome	Target	Performance Indicator / Measure	Timescale
		<ul style="list-style-type: none"> <li>Liaison with partner agencies and implementation of an intelligence-based approach to targeting rogue traders</li> </ul>		
Animal Feed (Statutory)	<ul style="list-style-type: none"> <li>Ensure any animal feeding stuff issues are dealt with effectively and efficiently.</li> </ul>	<ul style="list-style-type: none"> <li>Register or approve premises as required</li> <li>Visit all registered premises</li> </ul>	<ul style="list-style-type: none"> <li>List of registered premises created</li> <li>To visit 30 registered premises by end of Q2.</li> </ul>	By end Q2 2019/20
Weights & Measures	<ul style="list-style-type: none"> <li>Conduct weights and measures visits.</li> <li>Respond to weights and measures requests</li> </ul>	<ul style="list-style-type: none"> <li>Conduct a minimum of 72 weights and measures visits per year.</li> </ul>	<ul style="list-style-type: none"> <li>Visit a minimum of 6 premises per month</li> </ul>	Measure from Q1 2019/20
Inspections	<ul style="list-style-type: none"> <li>To inspect a range of premises including High; Upper Medium, Lower Medium and Low risk premises</li> </ul>	<ul style="list-style-type: none"> <li>100% of High risk premises</li> <li>100% of Upper Medium</li> <li>Alternative Enforcement strategy for low risk premises</li> </ul>	<ul style="list-style-type: none"> <li>Measure will be taken each month and quarterly to ensure the targets are achieved.</li> </ul>	Measure from Q1 2019/20
Use of communications to raise awareness of the work of the service and provide improved information for residents and businesses.	<ul style="list-style-type: none"> <li>Contribute articles to suitable internal publications.</li> <li>Website information to be maintained and updated as necessary.</li> </ul>	<ul style="list-style-type: none"> <li>Publicity to highlight the work undertaken by the team</li> <li>Website reviewed/updated.</li> <li>Participation in ongoing workshops to improve business experience of using Trading Standards webpage.</li> </ul>	<ul style="list-style-type: none"> <li>Articles in publication.</li> </ul>	By end Q2 2019/20
Partnership working – opportunities to be identified for joint working with external stakeholders.	<ul style="list-style-type: none"> <li>Raise service profile by attending relevant meetings and other stakeholder engagement.</li> </ul>	<ul style="list-style-type: none"> <li>100% attendance at Inner London / London Trading Standards s group meetings.</li> <li>A minimum of 2 regional projects to be carried out.</li> </ul>	<ul style="list-style-type: none"> <li>Highlights to be reported through the submission of the monthly reports</li> </ul>	Ongoing from Q1 2019/20

Work activity	Desired Outcome	Target	Performance Indicator / Measure	Timescale
Carry out Licensing checks	<ul style="list-style-type: none"> <li>Ensure compliance with licensing principles.</li> </ul>	<ul style="list-style-type: none"> <li>All allocated visits completed and requests for information dealt with, within required timescales.</li> </ul>	<ul style="list-style-type: none"> <li>Measurement of first response to a request within 10 days.</li> </ul>	Ongoing from Q1 2019/20
Service Improvement	<ul style="list-style-type: none"> <li>Improved internal processes</li> </ul>	<ul style="list-style-type: none"> <li>Review and update Trading Standards procedures including property control</li> <li>Improve use of intelligence from both internal and external sources to prioritise proactive work of the service. Fully engage with London Trading Standards Regional Intelligence Officer.</li> </ul>	<ul style="list-style-type: none"> <li>New Process/Procedure</li> <li>Resources directed at most significant identified problems.</li> <li>Increase in the number intelligence reports submitted to the Memex Intelligence database. Minimum 1 submission per month.</li> </ul>	Ongoing from Q1
POCA / Financial investigating and confiscation	<ul style="list-style-type: none"> <li>Completion of financial investigation</li> </ul>	<ul style="list-style-type: none"> <li>To have conduct of financial investigations within regulatory services.</li> <li>Support planning confiscations</li> </ul>	<ul style="list-style-type: none"> <li>Monthly reporting</li> <li>At least two financial investigations/confiscation.</li> </ul>	Ongoing from Q1 2019/20
Reporting	<ul style="list-style-type: none"> <li>Maintain and improve reporting systems.</li> </ul>	<ul style="list-style-type: none"> <li>Completion of statutory returns for the service.</li> <li>Section 70 WMA, Feeding Stuffs</li> </ul>	<ul style="list-style-type: none"> <li>Reports produced</li> <li>Improved Monthly Dashboard Reports</li> </ul>	By end Q3 2019/20
<b>New work Stream</b>				
Bid application to be submitted to tasking	<ul style="list-style-type: none"> <li>To obtain funding for piece of work such as Wenlock Road or fraudulent scoring at restaurant.</li> </ul>	<ul style="list-style-type: none"> <li>Make at least one bid application to Regional/National Tasking.</li> </ul>	<ul style="list-style-type: none"> <li>Bid application drafted and submitted.</li> </ul>	By end Q4 2019/20
Training for Traders who sell Age Restricted Goods	<ul style="list-style-type: none"> <li>To help reduce the number of traders supplying age restricted goods to minors</li> </ul>	<ul style="list-style-type: none"> <li>To train a minimum of 10 people.</li> </ul>	<ul style="list-style-type: none"> <li>At least 10 people trained by end of financial year</li> </ul>	By end Q4 2019/20

Work activity	Desired Outcome	Target	Performance Indicator / Measure	Timescale
Primary Authority Partnership	<ul style="list-style-type: none"> <li>To provide advice to trader in as per joint agreements</li> </ul>	<ul style="list-style-type: none"> <li>To provide legal advice re label or other request within agreed timescales</li> </ul>	<ul style="list-style-type: none"> <li>To respond to requests within times agreed.</li> </ul>	Ongoing from Q1 2019/20

## 5.0 ENFORCEMENT POLICY

5.1 The Service is committed to the principles of good enforcement and takes account of the principles of the Enforcement Concordat, the Regulator's Code, and London Trading Standards guidance, and has regard to Crown Prosecution Service guidelines and Equality Impact issues. A revised Enforcement Policy was approved by Cabinet on 21<sup>st</sup> January 2019. The Policy will allow the use of resources more effectively in assessing high risk activities whilst delivering benefits to low risk and compliant businesses.

The Service performs its duties in various ways including: inspection, sampling, test purchasing, testing, investigation and prosecution but also by informing, advising and educating businesses and consumers.

A key element of the activities carried out by the service is to facilitate and encourage economic growth and wherever possible the service will work in partnership with businesses, particularly small traders and the voluntary/community organisations to assist them with meeting their legal obligations without unnecessary expense.

In addition the service provides a Proceeds of Crime service to the Council.

## 6.0 RESOURCES

The table below is the estimation of a full time equivalent.

<b>1 year</b>	<b>52 weeks (260 days)</b>
<b>Annual Leave / Bank holidays</b>	<b>7 weeks (35 days)</b>
<b>Training / briefings etc.</b>	<b>2 weeks (10 days)</b>
<b>Sick leave / dependency / special leave etc.</b>	<b>1 week (5 days)</b>
<b>Number of working weeks</b>	<b>42</b>
<b>Number of working days</b>	<b>210 days</b>



1 FTE

210 days (1512 hours)

6.1 The staffing for Trading Standards function for 2018/19 was as follows:-

0.3 FTE x Regulatory Services Manager

1.0 FTE x Principal Trading Standards Officer & POCA Officer

3.0 FTE x Senior Trading Standards Officers including 2 POCA Officers (2.0 FTE recruited following departure of 2.0 FTE)

1.0 FTE x Business Standards Officer

1.0 FTE x Technical Business Support

**Total staffing resources = 6.3 FTE**

6.2 The staffing for Trading Standards function for 2019/20 is as follows:-

0.3 FTE x Regulatory Services Manager

1.0 FTE x Principal Trading Standards & POCA Officer

4.0 FTE x Senior Trading Standards Officers

1.0 FTE x Business Support Officer

0.5 FTE x Technical Business Support

**Total staffing resources = 6.8 FTE**

6.3 Total Resource Required:-

Activity	Calculation	FTE
Inspections	696 inspections completed at 3.5 hours including paperwork follow up actions and Civica actions	$2436/1512 = 1.61$ FTE
Complaints and Service Requests	827 assuming average 1 hour	$827/1512 = 0.54$ FTE
Financial Investigations	5184 hours	$5184/1512 = 3.43$ FTE

Projects	4000 hours	$2952/1512 = 2.64$ FTE
Simple Cautions	2 anticipated 72 hours	$72/1512 = 0.05$ FTE
Prosecutions	2 anticipated 72 hours	$72/1512 = 0.05$ FTE
Alternative Enforcement Actions	100 hours	$100/1512 = 0.07$ FTE
Technical Business Support	756 hours	0.5 FTE
<b>Total requirement 8.89 FTE</b>		

#### 6.4 ALLOCATION OF RESOURCES TO DELIVER THE PLAN

The resources required to fulfil the plan for 2019/20 is 8.89 FTE, the actual FTE available is 6.8 FTE. This service is under resourced by 2.09 FTE which will provide significant challenges in the delivery of the service plan for 2019/20.

#### 7.0 AUTHORISATION AND COMPETENCIES IN LINE WITH NEW REQUIREMENTS OF CODE OF PRACTICE

7.1 The Chartered Trading Standards Institute (CTSI) is committed to empowering members of the profession, through the Continuous Personal and Professional Development (CPPD) scheme. All Trading Standards Officers are part of the scheme and have a personal responsibility to maintain their competences. TSI has a responsibility to invest resources in assisting staff to meet these development commitments. The scheme is inclusive of all trading standards professionals. In addition a training needs analysis is carried out with all staff to identify individual development needs.

All officers are authorised in accordance with the Authorisation, Induction and Training Procedure and their competencies assessed against the framework.

#### 7.2 STAFF DEVELOPMENT PLAN NEW REQUIREMENTS OF THE CODE OF PRACTICE

Annual Appraisal and Development scheme will be completed at the start of the year. At the same time personal development plan, comprising the main objective for the year with targets will be developed. Records of all identified training needs are recorded and incorporated into a training plan. In addition, staff also receive regular one-to-ones/supervision/check-in meetings whereby competencies and development needs are discussed and assessed and adjustments are made to training plan where possible and appropriate.

All training records are maintained in accordance with the Authorisation, Induction and Training procedure.

Officers will be assisted in achieving 20 hours' Continual Professional Development (minimum 20 hours).

## 8. QUALITY ASSESSMENT

### 8.1 Internal Arrangements

Monitoring arrangements to assess the quality and performance of the Trading Standards work is carried out by team meetings; Annual performance appraisals; Development needs assessments and training plan; and one-to-one check in meetings.

### 8.2. External Arrangements

The service does not have formal arrangements although the service routinely contributes to benchmarking programmes with other local authorities.

## 9. HIGHLIGHTS

### 9.1 Table outlining Trading Standards Highlights

Activity	Service Aim/Target/Results	Update								
High Risk Visits	To visit 100% of the high risk inspections by 31st March 2019. Monthly reporting.	The service have visited 100% of High Risk inspections.								
Upper Medium Risk Visits	To visit 100% of the Upper Medium risk premises by 31st march 2019. Monthly reporting.	The service has visited 100% of Upper Medium risk inspections.* It should be noted 2018/2019 will be first time 100% inspections across High, Upper Med, Lower Med premises.								
Processing Complaints	To process complaints	From April 2018 – March 2019 there were a total of 3162 consumer complaints received from members of the public. This is up from 2817 for the same period for the previous year. <table border="1" data-bbox="1442 1217 2036 1289"> <thead> <tr> <th>Notifications</th> <th>Referrals</th> <th>Other</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2414</td> <td>576</td> <td>172</td> <td>3162</td> </tr> </tbody> </table>	Notifications	Referrals	Other	Total	2414	576	172	3162
Notifications	Referrals	Other	Total							
2414	576	172	3162							
Weights and Measures Visits	6 visits per month	<b>Weight and Measures inspections</b>								

		<table border="1"> <tr> <td>Total Number of weights and measures inspections</td> <td>190</td> </tr> <tr> <td>Percentage of visits compared to annual target (190 compared to target of 72)</td> <td>263%</td> </tr> </table>	Total Number of weights and measures inspections	190	Percentage of visits compared to annual target (190 compared to target of 72)	263%
Total Number of weights and measures inspections	190					
Percentage of visits compared to annual target (190 compared to target of 72)	263%					
Prosecution (Cosmetics retailer)	Process using proportionate Prosecution Policy	<p>Dalston Hair and Cosmetics Ltd trading as Shabba Cosmetics of 36-42 Kingsland High Street London E8 2JP was fined £59,793 at Thames Magistrates Court on Friday 13<sup>th</sup> April 2018 for supplying dangerous skin lightening products.</p> <p>A formal caution was obtained for Wura Cosmetics 102 Ridley Road London E8 2NR They were found in possession of a range of infringing skin lighteners but were given a caution as they had not been advised about these products in recent years.</p>				
Counterfeit Goods	Visits conducted to retail premises	<p>A visit was conducted at Vicky's Afro Food Store 136 Hoxton Street London N1 6SH. Following a test purchase of a Louis Vuitton handbag Officers returned to the premises and seized a range of designer goods. Samples of the goods have been sent for analysis.</p> <p>Visits are regularly conducted to Ridley Road and other Hackney markets.</p>				
Licence Review	Process at least 1 review where appropriate	<p>Trading Standards applied for a review of the licence for Kingsland Wine, 77 Kingsland High Street London E8 2PB. on Tuesday 7<sup>th</sup> August 2018. This review occurred following the supply of illicit tobacco and a proxy sale of</p>				

		<p>alcohol to a minor. The decision of the committee was to suspend the licence for six weeks. This will allow for works to reorganise the layout of the premises. Representations were made by the Police and Public Health.</p> <p>Subsequent visits conducted by Trading Standards revealed the business was indeed closed for refurbishment as instructed by the licensing committee.</p>
Animal Feed	Visit all Premises in Hackney	The Service conducted 29 animal feed visits out of 29 registered premises. This represents 100% of premises.
Tobacco Control	Reduction in illegal sales and the use of tobacco in support of government efforts to encourage smoking cessation. To participate in appropriate/related health initiatives.	<p>Trading Standards alongside partners such as Public Health and the Fire Brigade joined forces in the fight against illegal tobacco by holding a roadshow in the Narrowway on Friday 27th July 2018.</p> <p>Trading Standards in partnership with public health have appointed an officer who will be used to combat illegal tobacco and alcohol.</p>
Consumer Advice and Education (Outreach Event)	Promote the Service and deliver advice to residents and businesses.	<p>A Winter Warmer event was held for over 55s at Stoke Newington Town Hall on Tuesday 27th November 2018.</p> <p>Trading Standards along with partners from the Intelligence Hub provided advice to minimise the risk of our elderly citizens from becoming victims of scams and rogue traders.</p>
Financial investigations	To use financial investigations to remove the financial benefit from crime	The Service has had a reduction from three accredited financial investigators undertaking investigations to one in the period to the end of Q2 2018/19. However the service still

		managed to bring over 40k to Hackney Council.																											
Underage Sales		<p>There have been 8 Age Restricted goods operations.</p> <table border="1" data-bbox="1464 336 2031 1362"> <thead> <tr> <th data-bbox="1464 336 1659 403">Date</th> <th data-bbox="1659 336 1854 403">Products</th> <th data-bbox="1854 336 2031 403">Sale/No Sale</th> </tr> </thead> <tbody> <tr> <td data-bbox="1464 403 1659 507">Saturday 26th May 2018</td> <td data-bbox="1659 403 1854 507">Knives</td> <td data-bbox="1854 403 2031 507">No Sale</td> </tr> <tr> <td data-bbox="1464 507 1659 643">25th October 2018</td> <td data-bbox="1659 507 1854 643">Fireworks, Alcohol, Cigarettes and knives</td> <td data-bbox="1854 507 2031 643">1 sale (Knives)</td> </tr> <tr> <td data-bbox="1464 643 1659 778">3rd November 2018</td> <td data-bbox="1659 643 1854 778">Fireworks, Alcohol, Cigarettes and knives</td> <td data-bbox="1854 643 2031 778">No Sale</td> </tr> <tr> <td data-bbox="1464 778 1659 914">1<sup>st</sup> December 2018</td> <td data-bbox="1659 778 1854 914">Fireworks, Alcohol, Cigarettes and knives</td> <td data-bbox="1854 778 2031 914">1 sale (alcohol)</td> </tr> <tr> <td data-bbox="1464 914 1659 1050">13<sup>th</sup> January 2019</td> <td data-bbox="1659 914 1854 1050">Alcohol, Cigarettes knives and Vape shops.</td> <td data-bbox="1854 914 2031 1050">1 sale (alcohol)</td> </tr> <tr> <td data-bbox="1464 1050 1659 1153">3<sup>rd</sup> February 2019</td> <td data-bbox="1659 1050 1854 1153">Alcohol, Cigarettes and knives.</td> <td data-bbox="1854 1050 2031 1153">No Sale</td> </tr> <tr> <td data-bbox="1464 1153 1659 1257">27<sup>th</sup> February 2019</td> <td data-bbox="1659 1153 1854 1257">Alcohol, Cigarettes and knives.</td> <td data-bbox="1854 1153 2031 1257">No Sale</td> </tr> <tr> <td data-bbox="1464 1257 1659 1362">3<sup>rd</sup> March 2019</td> <td data-bbox="1659 1257 1854 1362">Alcohol, Cigarettes and knives</td> <td data-bbox="1854 1257 2031 1362">1 sale (alcohol)</td> </tr> </tbody> </table>	Date	Products	Sale/No Sale	Saturday 26th May 2018	Knives	No Sale	25th October 2018	Fireworks, Alcohol, Cigarettes and knives	1 sale (Knives)	3rd November 2018	Fireworks, Alcohol, Cigarettes and knives	No Sale	1 <sup>st</sup> December 2018	Fireworks, Alcohol, Cigarettes and knives	1 sale (alcohol)	13 <sup>th</sup> January 2019	Alcohol, Cigarettes knives and Vape shops.	1 sale (alcohol)	3 <sup>rd</sup> February 2019	Alcohol, Cigarettes and knives.	No Sale	27 <sup>th</sup> February 2019	Alcohol, Cigarettes and knives.	No Sale	3 <sup>rd</sup> March 2019	Alcohol, Cigarettes and knives	1 sale (alcohol)
Date	Products	Sale/No Sale																											
Saturday 26th May 2018	Knives	No Sale																											
25th October 2018	Fireworks, Alcohol, Cigarettes and knives	1 sale (Knives)																											
3rd November 2018	Fireworks, Alcohol, Cigarettes and knives	No Sale																											
1 <sup>st</sup> December 2018	Fireworks, Alcohol, Cigarettes and knives	1 sale (alcohol)																											
13 <sup>th</sup> January 2019	Alcohol, Cigarettes knives and Vape shops.	1 sale (alcohol)																											
3 <sup>rd</sup> February 2019	Alcohol, Cigarettes and knives.	No Sale																											
27 <sup>th</sup> February 2019	Alcohol, Cigarettes and knives.	No Sale																											
3 <sup>rd</sup> March 2019	Alcohol, Cigarettes and knives	1 sale (alcohol)																											

<p>Operation Liberal</p>	<p>This project/ initiative had the following aims:          To disrupt the activities of doorstep criminals operating within the Borough.          To raise awareness around the issues of door step crime</p>	<p>Morning Activities</p> <p>Intelligence was gathered concerning vehicles, traders and individuals operating in the N16 area and the Service will be using the national intelligence database to check for target nominals and vehicles.</p>	<p>Afternoon Activities</p> <p>Visits to building sites at targeted locations to ensure legal compliance</p>
--------------------------	---	---	--