



London Borough of Hackney

Trading Standards Law Enforcement Service Plan 2023/2024



INVESTOR IN PEOPLE

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1.0 Introduction

This plan sets out the activities identified for the Trading Standards Service in 2023/24.

The Trading Standards service provides advice and regulatory services that protects 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 Trading Standards Manager who fulfils the role as the Chief Trading Standards Officer/Chief Inspector of Weights & Measures and an Accredited Financial Investigator, three Senior Trading Standards Officers, one Business Standards Officer and one Senior Trading Standards Officer funded by Public Health for the Alcohol and Tobacco project.

The Trading Standards Service, as with other council services, faces real challenges to meet the demands placed on it. The number of officers employed by the service has reduced by 27% since 2011. With the continued budget reductions by the Central Government alongside the growing demands for this service, this continues to be challenging in the delivery of the Trading Standards service.

The service is introducing a new database. Arcus is the new system which the new service is introducing. It is a scalable, responsive cloud solution built on the Salesforce platform. It will enable Trading Standards practitioners to manage all aspects of their work including investigations, monitoring and enforcement through reusable core components such as workflow and alerts for managing inspections, providing advice, recording investigations and managing evidence. It will store details of consumer complaints, premises records and inspections records. Staff are currently being trained on using the new systems and there have been initial difficulties in populating the new system. The new database is due to go live at the end of June 2023. As such, it has presented challenges in making analysis of quantitative data stored on these systems. It has also affected the ability to answer Mayoral and other Member enquiries, and data requested under the Freedom of Information Act 2000. To conclude, the service was unable to calculate or provide detailed annual performance data due to the loss of access to the previous Civica APP database. The service has relied on the use of spreadsheets to store data whilst the new database is being implemented.

2.0 Core Functions - Trading Standards Aims & Objectives

2.1 Trading Standards Aims & Objectives

Trading Standards 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 practises;
- 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;
- utilisation of an accredited financial investigator.

The main areas of criminal law enforced are as follows:

- safety of consumer goods,
- false or misleading descriptions relating to goods and services,
- product counterfeiting,
- weights and measures
- failure to display selling prices of goods and misleading price indications,
- consumer credit malpractice and age restricted sales and
- animal feedstuffs and feed registrations.

Looking Back on 2022/2023

- **Tobacco and Alcohol Control**

The tobacco and alcohol work is carried out under a Service Level Agreement. One Senior Trading Standards Officer role is now fully funded by the City and Hackney Public Health team. The work is aimed at reducing the availability of illicit tobacco products, illicit e-cigarettes and nicotine liquids and illicit alcohol in the borough. This is done by carrying out primary education visits to traders to ensure that they are aware of the legislation, enforcement inspections checking on compliance by officers and enforcement inspections accompanied by detection dogs services. There is also a requirement to take part in a joint road show with partners in Public Health to promote the work of the stop smoking service and educate the public around the issues of illicit tobacco. The work to tackle illicit alcohol and vapes goes alongside this with checks being carried out in retail premises when checking tobacco. However, there are also specific visits to premises selling only vapes to ensure they are aware of the legislation and to check compliance. In relation to alcohol there are visits to off licences and visits to public houses checking on spirit substitution. There is a requirement to ensure responsible drinking is encouraged by ensuring traders are using as an example 125ml wine measures, making sure tap water is available and staff training regarding the links between intoxication and sales and preventing sales to minors.

189 licensing matters were assessed and 13 voluntary actions were agreed to vary the application to ensure young people are protected from harm and prevent underage sales.

199 premises were visited for education and compliance/enforcement visits with an increase in the compliance for premises selling Tobacco and Alcohol, unfortunately due to a huge change in the importation of illicit Single use E-cigarettes which were originally destined for the US market there has been a fall in compliance with regard to E-cigarettes. Test purchases have been carried out on age restricted products, single cigarettes and illicit cigarettes across the borough and these have not seen an increase locally in the access to age restricted products by under 18s.

Illegal tobacco, vapes and alcohol have been seized in the borough:-

- 6400 illegal cigarettes have been seized alongside £8Kg of hand rolling tobacco and 3 kg of shisha. The value of these products is £7787.33.
- 3000 illegal vapes have been seized with a value of in excess of £37,000.
- Three litres of spirits and two-1 litres bottles of wine have been seized with a value of £85.00.

- **Age restricted Products**

Trading Standards conducted 71 covert underage test purchases in partnership with the police using underage police cadets. Alcohol, Vapes, fireworks and knives were the main targets, resulting in one sale of a Vape to a 13-year-old. The Vape sale has been dealt with by way of a formal prosecution report recommending a formal caution.

For some time now, the National government in the UK has been pursuing a policy commitment towards 'better regulation' of businesses. Trading Standards have carried out over 150 visits with specially designed underage sales packs and 28 voluntary agreements relating to knife sales to advise traders in relation to illegal sales of Vape, knives, alcohol and tobacco.

- **Intellectual Property**

A number of seizures of infringing goods bearing registered trade marks have been seized by the team. These have included clothing, tobacco, alcohol, mobile phone accessories and electrical equipment such as tablet/phone chargers. The team is currently investigating four traders with the likelihood of formal action being taken against them.

- **Councillors Showcase and Fellowship of the Chartered Institute of Trading Standards**

On Thursday 9th June 2022 Officers from our service attended the new Councillors Showcase to present the work of the service. The service presented goods confiscated from raids and visits. The table had many visitors who were very interested in learning about the service.

- **Letting Agents**

A total of 73 letting agents visits (online and physical visits) were carried out to ensure they were compliant with the property redress scheme (PRS), and to determine if the business holds client money properly, and discover if the business has membership of a client money protection scheme (CMP), and to check any tenant fees - targeting letting agents that fail to comply with the law to safeguard tenants and landlords.

Following these visits Trading Standards contacted five non-compliant letting agents regarding the change to the law in relation to tenant fees. Following the five visits and further checks, 90 % compliance was achieved, with the remaining agent currently being brought into compliance through advice.

- **Birmingham Commonwealth Games - Track Cycling at Lee Valley VeloPark**

Officers from the team participated in enforcement activities over four days in partnership with Trading Standards colleagues from Newham and Waltham Forest, and also the Birmingham Organising Committee.

- **Animal Welfare**

Officers have responded to a complaint about a number of goats being kept at two addresses in Hackney. The specific concerns related to the animals welfare owing to them being kept in cramped pens and tormented by the local children. The Heathrow Animal Reception Centre (HARC) based at Heathrow airport has the responsibility for carrying out animal health inspections on behalf of contracted local authorities in the City of London which includes Hackney.

- **Weights and Measures Inspections**

The team has carried out proactive and reactive inspections of premises where weighing and measuring equipment is being used to sell goods. These have included licensed premises, grocery stores, butchers, jewellers and local markets where fresh produce is being sold. Most of these premises were found to be compliant with weights and measures legislation, however there were a few licensed premises that were not selling alcohol in the measurements prescribed by law or using government stamped equipment.

A test purchasing operation was also conducted to check whether patrons in pubs and bars were being sold correct measures and the businesses visited were found to be serving pint measures of beer within the legal limits.

The team has achieved their target of 72 inspections.

- **London Trading Standards Week**

The Trading Standards Team participated in London Trading Standards Week, which is an annual event aimed at raising the profile of Trading Standards and informing the residents and the media in London of the work carried out by Trading Standards Services across the capital.

This year, the focus was on five key areas. These were the Online Market Place, Lettings Agents and Client Money Protection, Doorstep Crime, Vapes and Illegal Tobacco. Each of these areas of work is actually part of the team's key areas of focus so fits well with local objectives and priorities. There is also a media campaign that has been launched by the central London Trading Standards team which will be fed into by each authority.

- **Visits**

All premises risk rated high and upper medium have been inspected.

- **Illegal fireworks and Vape sales in Hackney**

Trading Standards officers from Hackney Council, joined forces with undercover police officers to carry out joint operations on fireworks and Vape retailers as part of a Hallowe'en and fireworks blitz. Safety checks were also carried out by Trading Standards officers in all shops registered as selling fireworks in Hackney. These included checks on safe storage and illegal fireworks.

The joint test purchasing operations were mounted with the assistance of young under age police cadets. The underlying purpose of this initiative in Hackney is to drive home the message that illegal fireworks and Vape sales and related illegal night time gang behaviour will not be tolerated. The operations were carried out on Saturday 15th October 2022.

Undercover Police officers posed as 'shoppers' to witness any illegal sales from shops suspected of selling fireworks and Vapes to the under 18s. The three cadets visited five shops in Hackney where police intelligence had shown there was a surge in gang related crime. The cadets were refused on four occasions but one shop sold a Vape product to a 15 year old female cadet.

Due to the illegal sale Hackney Trading standards are warning retailers that these joint operations between the Council and the Police will increase. Trading Standards are intensifying efforts to catch out shops that ignore the law on age restricted sales in relation to age

restricted goods. Trading Standards and the police are sending a strong message out to shops and off licences that the Council will not tolerate the sale of age restricted goods to under age children.

- **Winter warmer**

The popular Winter Warmer event, which attracts around 500-600 Hackney residents, took place on the 1st of November after a 3 year break following the Covid-19 restrictions. The event is aimed at tenants and leaseholders aged 55 and over who are able to benefit from a wide range of help and advice on staying warm and safe this winter in the face of the cost of living crisis.

Staff from Council services including the Housing Repair and Financial Inclusion teams, and other other stakeholders such as the Citizens Advice Bureau, London Fire Brigade and Age UK were on hand to provide advice and support to residents. Officers from the Trading Standards team also participated in this event and offered advice on doorstep crime and scams which are mainly aimed at the elderly who are at greater risk of becoming victims of fraud. The impact of scams and fraud can have a devastating emotional and financial impact on older victims, seriously damaging their quality of life and wellbeing.

- **Animal Feed Inspections**

Hackney Trading Standards regulates the safety of Animal Feed in the Borough by ensuring that businesses are compliant with *The Animal Feed (Hygiene, Sampling etc. and Enforcement) (England) Regulations 2015*.

The regulation of animal health and welfare is an important area of responsibility for local authority Trading Standards departments. This includes regulation of the quality of animal feed, with potential implications for the food chain to humans; Hackney Trading Standards also carried out 24 visits to check on the safety of Animal Feed visiting a range of supermarkets who supply some of their waste for Animal feed. All the premises were registered by Hackney and provided with the necessary advice with respect to the feed hygiene regulations. Animal feed plays an important part in the food chain and the main aims are to help protect consumer and animal health. Businesses involved in the production, use, transportation, storage or marketing of animal feeds must be registered or approved by Trading Standards. These businesses include: livestock farms, arable farms growing crops for feed use, companies that transport or store animal feed, food manufacturers selling by-products of food production into the feed chain such as bakeries and breweries, retailers and wholesalers of animal feed (excluding pet food) e.g. supermarkets pharmacists who supply mineral and vitamin supplements for animals. Hackney Trading Standards are particularly focussed on high street supermarkets over the last year.

- **Money Shops and Payday lenders**

Trading Standards regulate Money Shops and Payday lenders including pawnbroking. The businesses must comply with the Financial Conduct Authority (FCA) guidelines payday lending cap that was introduced in January 2015. Under the guidelines payday loans offered to borrowers, including if they are 'rolled over', interest and fees must not exceed 0.8% per day of the amount borrowed. Fixed default fees cannot exceed £15, and the overall cost of a payday loan should never exceed 100% of the amount borrowed.

There are only a handful of such businesses that operate within the London Borough of Hackney. Cash Converters, 297 Mare Street, E8 1EJ are one such business. They offer instant cash for items such as smartphones, jewellery, power tools etc which are no longer needed, along with other services such as pawnbroking where an item of value is left as collateral for a secured short-term loan. The cost-of-living crisis has led to more people using payday lenders.

3.0 National Priorities

3.1 NTSB National Strategic Assessment

The National Trading Standards Board (NTSB) is a group of senior and experienced local government Heads of Trading Standards, representing all regions across England and Wales. The Board has been set up by the Government as part of changes to the consumer protection landscape and an enhanced role for Trading Standards.

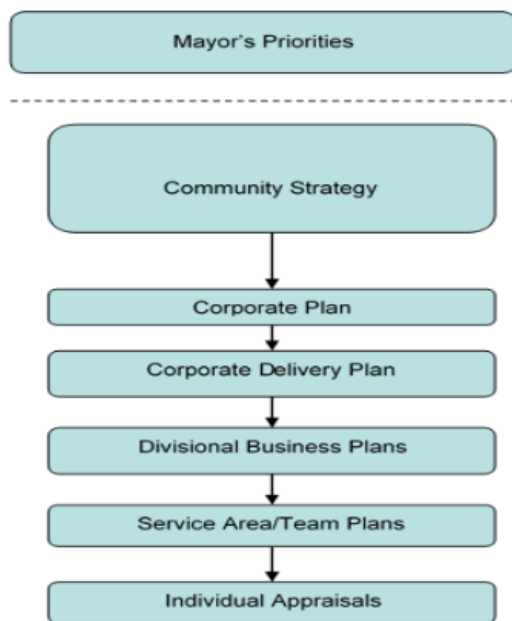
For 2023/24, NTSB has identified the following key priority areas:

- **Mass marketing scams** - This area of work is delivered primarily by the NTS Scams Team through its disruption work and by supporting local authorities to engage with victims across England and Wales.
- **Doorstep crime** - The Regional Investigation Teams and the NTS Scams Team have produced training and guidance for Local Authority trading standards officers to assist them with tackling this wide ranging crime.
- **Underage Sales**- Test purchase will be for alcohol, tobacco, fireworks and knives
- **Fair Trading - used cars** This work is primarily delivered at local level with a number of investigations supported by NTS; focussing on regional most complained about traders. Market disruption activities are focussed on market enablers, for example mileage adjustment service providers at a local level with a number of investigations supported by NTS focussing on the regional most complained about traders.

- **Illegal tobacco** - The impact of the illegal tobacco trade is far reaching. It is often part of wider criminality including drug smuggling, people trafficking and illegal alcohol production. The availability of cheap tobacco significantly undermines the effect promoting higher taxation in an effort to reduce the number of people that smoke.
- **Intellectual property** - This work tackles the suppliers of counterfeit products to disrupt supply chains to markets of illicit goods.

3.2 MAYORAL PRIORITIES

How the Service Links to Corporate Priorities



Working Together for a Better Hackney

FOR A FAIRER, SAFER HACKNEY

1. Responding to the housing crisis
2. Making Hackney safer
3. Good Growth: Jobs, businesses and regeneration

FOR A GREENER, HEALTHIER HACKNEY

1. Maximising impact by seeing climate action as an opportunity to improve population health
2. Responding to the climate emergency
3. Improving health and wellbeing and tackling health inequality

FOR EVERY CHILD IN HACKNEY

1. Every child is safe

The corporate plan refresh document can be found at the following link <https://hackney.gov.uk/strategic-plan>

3.3 ENFORCEMENT POLICY

An Enforcement Policy was implemented for the Service and was approved by Cabinet on 21 January 2019 and remains highly relevant.

Officers recognise that whilst businesses want to maximise margins, they also seek in most instances to be on the right side of legal requirements, without incurring excessive expenditure and administrative burdens. So, in considering enforcement action, the service will assist businesses to meet their legal obligations in the first instance, whilst taking firm action that may include prosecution or other formal action, where appropriate, against those who knowingly disregard the law or act irresponsibly.

The Trading Standards 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. The Plan 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 and external boroughs in training trainees.

4.0 SERVICE PRIORITIES

Trading Standards Priorities 2023/2024 Target based on current resources

1.	Counterfeit goods		10.	Age related products
2.	Operation Liberal		11.	Communications
3.	Tobacco Control		12.	Partnership working
4.	Product Safety		13.	Service Improvement
5.	Community Outreach		14.	Financial Investigations
6.	LTS week		15.	Training for traders
7.	Animal Feed		16.	Enforcement actions

8.	Inspections		
9.	Lettings		

5.0 PERFORMANCE INDICATORS

5.1 KPI

Key Performance Indicators	Frequency of reporting	2023/24 Target
High Risk Inspections	Monthly*	100% by 31 st March 2024
Upper Medium Risk Inspections	Monthly	100% by 31 st March 2024
Minimum 6 Animal Feed inspections per month until all completed (Statutory visits under Food Standards Agency)	Monthly	100% by end Q3
Minimum 72 Weights and Measures inspections (Statutory requirement from National Measurement Office)	Monthly	Minimum 72 inspections by 31 st March 2024

5.2(i) LPI

Local Performance Indicators	Frequency of reporting	2023/24 Target
Percentage of complaints investigated concerning serious illegal trading practises in relation to - counterfeit goods responded within 5 working days	Monthly	90%
Percentage of complaints investigated concerning serious illegal trading practises in relation to - sales of unsafe goods responded to within 5 working days	Monthly	90%
Percentage of complaints investigated concerning serious illegal trading practises in relation to - sales of restricted goods to children underage responded to within 5 working days	Monthly	90%
Percentage of licensing consultation comments made within targets	Monthly	95%
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

5.2(ii) New Impacts and Outcomes Framework

Indicator	Frequency of reporting	2023/24 Target
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	Quarterly/Yearly	Reporting only
Number of scam victims supported	Quarterly/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	Quarterly/Yearly	Reporting only
Tackling the availability of illicit tobacco	Quarterly /Yearly	Reporting only
Tackling the availability of illicit alcohol	Quarterly /Yearly	Reporting only

Programmed inspections April 2023-March 2024* Please note figures the same as previous year as a new amended figure not possible due to cyber attack and loss of risk assessment analysis on Civica APP database.

Risk Category	Category A – High (to be Inspected 2023/24) (e.g. a premises selling products subject to safety legislation such as knives)	Category B1 – Upper Medium (to be Inspected 2023/24) (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	163	209	Total 293 (200 visits and 93 by alternative enforcement action)	665 Annual target
Target for percentage of visits to be completed at end of March 2024	100%	100%*	N/A	

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

Local Performance Indicators	Frequency of reporting	2023/24 Target	Outcome
Percentage of complaints investigated concerning serious illegal trading practises in relation to - counterfeit goods responded within 5 working days	Monthly	90%	Achieved
Percentage of complaints investigated concerning serious illegal trading practises in relation to - sales of unsafe goods responded to within 5 working days	Monthly	90%	Achieved

Percentage of complaints investigated concerning serious illegal trading practises in relation to - sales of restricted goods to children underage responded to within 5 working days	Monthly	90%	Achieved
Percentage of licensing consultation comments made within targets	Monthly	95%	Achieved

Impacts and Outcomes Framework

	Impact	Description	Outcome Q1	Q2	Q3	Q4	Total
1.	No of scam victims supported	Total no of victims identified in the month by the NTS National Scams Team	3	14	14	0	31
2.	Businesses tested for compliance with the law using underage volunteers OR for compliance with mandatory Challenge 21/25 conditions using older individuals	Number of individual premises tested for Alcohol (Only include data for premises for which test purchases have been attempted.)	9	13	5	10	37
3.	Tackling the availability of illicit tobacco	Number of premises from which products were seized Volume of tobacco seized (l) and value (£)	4 seizures 2200 cigarettes 0.75kg Hand Rolling Tobacco Value £1712.50	3 seizures 400 Cigarettes 5 kg HandRolling Tobacco 2KG Shisha Value £2832.00	2 seizures 360 Cigarettes 1.5kg Hand Rolling Tobacco Value £ 900	4 seizures 3500 Cigarettes .75kg Hand Rolling Tobacco 1kg shisha Value £2342.83	13 seizures 6460 Cigarettes 8kg Hand Rolling Tobacco 3kg shisha Value £7787.33

4.	Tackling the availability of illicit alcohol	Number of premises from which products were seized Volume of alcohol seized (l) and value (£)	2 litres of whiskey seized non duty paid £52.50	No illegal alcohol seized this quarter	3 bottles of Wine counterfeit Seized £19.50	No illegal alcohol seized this quarter	2 litres of Whiskey 3 bottles of Wine counterfeit Seize Value £72
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2.3 Inspections Data

Risk Category	Category A – High (to be Inspected 2022/23) (e.g. a premises selling products subject to safety legislation such as knives)	Category B1 – Upper Medium (to be Inspected 2022/23) (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)	Category C– Low (No recommended frequency) (e.g. a trader inspected for Ownership details)	Total
Total number of premises	163	209	293	N/A	665 Annual target
Total Number of visits since April 2022	163	209	293	691	1354

Percentage of visits carried out in each risk category since April 2022	100%	100%	100%	N/A	100%
Target percentage of visits completed at the end of March 2023	100%	100%	100%	N/A	100%

6.0 RESOURCES

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

1 year	52 weeks (260 days)
Annual Leave / Bank holidays	7 weeks (35 days)
Training / briefings etc.	2 weeks (10 days)
Sick leave / dependency / special leave etc.	1 week (5 days)
Number of working weeks	42
Number of working days	210 days
1 FTE	210 days (1512 hours)

6.1 The staffing for Trading Standards function for 2022/23 were as follows:-

0.3 FTE x Regulatory Services Manager
1.0 FTE x Trading Standards Team Leader
4.0 FTE x Senior Trading Standards Officers
1.0 FTE x Business Support Officer
1.0 FTE x Technical Business Support

Total staffing resources = 7.3 FTE

6.2 The staffing for Trading Standards function for 2023/24 is as follows:-

0.3 FTE x Regulatory Services Manager
 1.0 FTE x Trading Standards Manager
 4.0 FTE x Senior Trading Standards Officers
 1.0 FTE x Business Support Officer
 1.0 FTE x Technical Business Support

Total staffing resources = 7.3 FTE

Activity	Calculation	FTE
Inspections	665 inspections at 5 hours including paperwork follow up actions plus inputting data in Arcus Global	3828/1512 = 2.5 FTE
Complaints and Service Requests	827 average 1 hour (Figure based on average of previous years data).	827/1512 = 0.54 FTE
Financial Investigations	5184 hours *	5184/1512 = 3.43 FTE
Projects	2592 hours	2952/1512 = 1.71 FTE
Simple Cautions	4 cautions 144 hours*	144/1512 = 0.1FTE
Prosecutions	4 prosecutions 144 hours*	144/1512 = 0.1 FTE
Alternative Enforcement Actions	100 hours	100/1512 = 0.07 FTE
Technical Business Support	1512	1 FTE
Total requirement		9.45 FTE

*The ambitious target reflects the determination to increase the formal enforcement actions taken by the team. These will in turn be supported by financial investigations taken under the Proceeds of Crime Act 2002. To support this the service is training three further financial investigators.

The implication of under resourcing with 7.3 officers

The contraction in budgets and staffing levels have led to changed ways of working and priorities and a reduced portfolio which has resulted in stopping various special initiatives, such as the administration of our 'proof of age' and 'approved trader' schemes, reduced product testing and fewer enforcement projects.

There has been a shift from proactivity and prevention to a more reactive and responsive approach. The tradition of routine inspections and sampling work to check compliance levels among businesses has in part given way to a work pattern that is much more driven by referred complaints from consumers and other intelligence reports.

There have been significant cuts to the trading standards department over the past fifteen years and decisions about budget cuts have often been based on monetary considerations rather than an understanding of the performance, outcomes and impact of the work of trading standards.

To combat the danger of not fulfilling statutory obligations for weights and measures and animal feed the management have replaced staff who have left with officers who hold the relevant qualifications for weights and measures and animal feed. Previously the bulk of the enforcement work was carried out by Enforcement Officers. However they could not conduct the statutory work of animal feed and metrology. In future there may be a problem of retaining qualified staff particularly if they qualify as accredited financial investigators.

There has been no year to year change in the number of officers from last year however the drive to train POCA (proceeds of crime officers) has implications on current work capacity.

The service has officers with strong professional reputations in Tobacco enforcement and Underage Sales however under resourcing could make Hackney less attractive in terms of the retention of experienced staff. This in turn could lead to the loss of reputation Hackney has currently in having staff who are recognised as leaders in their respective fields.

A service which is under-resourced can lead to an increase of staff stress and a lowering of morale. Finally, there is a danger of creating a service which has a lowering of enforcement actions, a reduction of routine inspections and a reduction of test purchases for age restricted products or product safety.

Trading Standards Priorities 2023/2024 Target based on an extra 2.15 officers

The resources required to fulfil the plan for 2023/24 are 9.4 FTE, the actual FTE available is 7.3 FTE. This service is under-resourced by 2.15 FTE which will provide challenges in the delivery of the service plan for 2023/24. In addition, three FTE officers are currently training to become Accredited Financial Investigators. Great challenges are also presented by the implementation of the Arcus database with staff fully adapting to this system. The extra work that could be undertaken by the service is seen in the table below. Additional tasks appear below.

Work activity	Link to mayor's priorities	Desired Outcome	Target	Performance Indicator / Measure with extra 2.15 officers	Timescale
Projects					

Tackling Counterfeit Good	For a fairer,safer Hackney	<ul style="list-style-type: none"> • Reduce the level of non-compliance and raise awareness through appropriate publicity. 	<ul style="list-style-type: none"> • A minimum of four visits to Hackney markets to carry out market surveillance and robust action to address non-compliance. • Increased liaison with the Markets Team regarding the redevelopment of the Indoor Market at Ridley Road, with appropriate formal action to be taken against non-compliant traders. • Minimum of 4 targeted visits to markets as opposed to 3. 	<ul style="list-style-type: none"> • Non-compliance will be addressed by a graduated approach to enforcement. Minimum 4 targeted visits to markets • Reduction in referrals from consumers, businesses, brand representatives and other stakeholders concerning infringing goods. 	Ongoing from April 2023
Operation Liberal (doorstep crime) Scams	For a fairer,safer Hackney	<ul style="list-style-type: none"> • To raise awareness of the different types of scams. • To educate and empower individuals to recognise any potential scams. • Partnership/joined up working with the adult services and the ageing well team to share intelligence and highlight vulnerable groups of individuals. • Joined up working with the NTS Scams team and Friends against scams • To take enforcement action when necessary • Operation Broadway 	<ul style="list-style-type: none"> • Provide advice/target hardening to vulnerable groups and Hackney residents. • Attend group meetings aimed at the elderly and vulnerable. • Specific I events • Publication of current scams via social media, websites, local magazines. • For Operation Broadway.The service will work together with Officers from the City of London Police, which acts as the national policing lead for fraud, the team visited a number of mail forwarding companies 	<ul style="list-style-type: none"> • Provide scams advice ongoing/ as required. • Attend 1 group meeting and/as required. • Ongoing publication as required. • Deliver 1 outreach event such as talk and or play at Older Residents Centre using materials from Scambusters and CTSI. • Deliver 1 radio interview • Operation Broadway 1 joint operation with the police visiting a number of mail forwarding companies and serviced offices in the borough that were being used by a number of fraudulent businesses. • Looking at fake cryptocurrency offers or fake wine investment of 	Start Q1 2023/24

				fraudulent land purchasing offers	
Tobacco Control Work	For a fairer,safer Hackney For a greener healthier Hackney	<ul style="list-style-type: none"> Work to support City of London Trading Standards in Tobacco control and E-cigarettes work. 	<ul style="list-style-type: none"> Q1, Q2 and Q4 events. Targeted visits with the sniffer dogs. At least 4 Action Days. At least one operation each quarter to carry out inspections alongside the city of London, supporting the joint public health activity. 	<ul style="list-style-type: none"> To measure the effectiveness of the project at the start and end of Q1,Q2 and Q4 to measure improvement. To maintain Service Level Agreement with Public Health. 	Start Q1 2023/24
Product Safety Work	For a fairer,safer Hackney	<ul style="list-style-type: none"> To ensure products sold in Hackney are safe and meet the relevant legislative requirement. 	<ul style="list-style-type: none"> Develop 2 intelligence-led safety projects for the area. Participate in regional and sub- regional safety specific projects that are relevant to the area such as the LTS Used Car safety project. Inspections of premises which sell fireworks to ensure storage safety. Investigation of consumer complaints and referrals from OPSS and Port Authorities To provide advice to businesses on new legislative requirements following Brexit. 	<ul style="list-style-type: none"> Test purchases carried out based on an INTEL report. At least 2 test purchases. This project is part of a London Trading Standards joint initiative. The theme to be determined by a regional group. 	By end Q3 2023/24
Community Outreach	For a fairer,safer Hackney	<ul style="list-style-type: none"> To undertake a Winter Warmer Event.(Subject to cancellation) Conduct Chartered Trading Standards Institute 'Do you PASS?' training to traders who infringe legislation as alternative enforcement action. (Subject to sales and previous history) 	<ul style="list-style-type: none"> Trading standards will provide advice to minimise the risk of our elderly citizens from becoming victims of scams and rogue traders. Supply training to at least 15 traders(subject to sales and previous history) 	<ul style="list-style-type: none"> Conduct tests for traders following training. Follow up test purchases to be carried out to check compliance levels. Obtain at least 15 traders to train 	By end Q3 2023/24 By the end of Q4.

LTS week		<ul style="list-style-type: none"> Participation in LTS week 	<ul style="list-style-type: none"> To set up project plan once subject areas are chosen 	<ul style="list-style-type: none"> Participate in at least two LTS projects. Complete project plan 	By end of Q3 2023/24
Ongoing work streams					
Animal Feed	For a fairer,safer Hackney	<ul style="list-style-type: none"> Ensure any animal feeding stuff issues are dealt with effectively and efficiently. 	<ul style="list-style-type: none"> Register or approve premises as required Visit all registered premises 	<ul style="list-style-type: none"> List of registered premises created To visit all registered premises by the end of Q3. 	By end Q3 2023/24
Visits	For a fairer,safer Hackney	<ul style="list-style-type: none"> To visit a range of premises including High; Upper Medium, Lower Medium and Low risk premises 	<ul style="list-style-type: none"> 100% of High risk premises 100% of Upper Medium 100% of Low Medium Alternative Enforcement strategy for low risk premises 	<ul style="list-style-type: none"> Measures will be taken each month and quarterly to ensure the targets are achieved. 	By end Q4 2023/24
Lettings	For a fairer,safer Hackney	<ul style="list-style-type: none"> To visit both Letting and Estate agents in Hackney. website checks to reduce levels of non - compliance. 	<ul style="list-style-type: none"> Check 5 premises online per month. 	<ul style="list-style-type: none"> Non - compliance will be addressed by a graduated approach to enforcement 	Ongoing from Q1 April 2023.
Age Restricted Goods	For a fairer,safer Hackney For every child in Hackney	<ul style="list-style-type: none"> To conduct at least 5 test purchase operations. 	<ul style="list-style-type: none"> Test purchase will be for alcohol, tobacco, fireworks and knives Test purchase operations will be subject to the extent of the pandemic 	<ul style="list-style-type: none"> Non - compliance will be addressed by reference to the enforcement policy 	Ongoing from Q1 April 2023.
Use of communications to raise awareness of work of the service and provide improved information for	For a fairer,safer Hackney	<ul style="list-style-type: none"> Contribute articles to suitable internal publications.Website information to be maintained and updated as necessary. 	<ul style="list-style-type: none"> A minimum of 3 articles in identified local/internal publications.Website reviewed/updated. Participation in ongoing workshops to improve business experience of 	<ul style="list-style-type: none"> Articles in publication. Min 3 Articles in Press. Website update 	By end Q4 2023/24

residents and businesses.			using Trading Standards webpage.		
Partnership working – opportunities to be identified for joint working with external stakeholders.	For a fairer,safer Hackney	<ul style="list-style-type: none"> Raise service profile by conducting relevant regional projects. 	<ul style="list-style-type: none"> A minimum of 3 regional projects to be carried out. 	<ul style="list-style-type: none"> Highlights to be reported through the submission of the monthly reports 	By end Q4 2023/24
Service Improvement	For a fairer,safer Hackney	<ul style="list-style-type: none"> Improved internal processes 	<ul style="list-style-type: none"> Improve use of intelligence from both internal and external sources to prioritise proactive work of the service. Fully engaged with London Trading Standards Regional Intelligence Officer. Re-drafting of working procedures/instructions lost due to cyberattack. 	<ul style="list-style-type: none"> New Process/Procedure Resources directed at most significant identified problems. Increase in the number of intelligence reports submitted to the IDB Intel database. Minimum 3 submissions per quarter per officer. 	By end Q4 2023/24
POCA / Financial investigating and confiscation	For a fairer,safer Hackney	<ul style="list-style-type: none"> Completion of financial investigation 	<ul style="list-style-type: none"> To have conduct of financial investigations within regulatory services. Support planning confiscations 	<ul style="list-style-type: none"> Monthly reporting At least three financial investigations/confiscations. 	By end Q4 2023/24
New work Stream					
Training for Traders who sell Age Restricted Goods	For a fairer,safer Hackney	<ul style="list-style-type: none"> To help reduce the number of traders supplying age restricted goods to minors 	<ul style="list-style-type: none"> To train a minimum of 20 people. 	<ul style="list-style-type: none"> At least 20 people trained by end of financial year 	By end Q4 2023/24
Enforcement Actions	For every child in Hackney	<ul style="list-style-type: none"> Min 2 formal actions per officer 	<ul style="list-style-type: none"> Min 2 formal actions per officer 		

Outcomes with extra target with 2.15 officers in bold*

Indicators	Key Performance	Frequency of reporting	2023/24 Target	Results
High Risk Inspections		Monthly*	100% by 31 st March 2024	Achieved
Upper Medium Risk Inspections		Monthly	100% by 31 st March 2024	Achieved

Low Medium*	Monthly	100% by 31st March 2024	Achieved
Minimum 6 Animal Feed inspections per month until all completed (Statutory visits under Food Standards Agency)	Monthly	100% by end Q3	Achieved by Q3
Minimum 84 Weights and Measures inspections(Statutory requirement from National Measurement Office)	Monthly	Minimum 84 inspections by 31 st March 2024	Achieved

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

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. CTSI 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.

8.0 STAFF DEVELOPMENT PLAN NEW REQUIREMENTS OF THE CODE OF PRACTICE

The Check In system is used throughout the year. At the same time, a 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 meetings whereby competencies and development needs are discussed and assessed and adjustments are made to the training plan where possible and appropriate. The service subscribes to all the services offered by the Chartered Trading Standards Institute.

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).

9.0 QUALITY ASSESSMENT

9.1 Internal Arrangements

Arrangements include:

- Monitoring arrangements to assess the Trading Standards enforcement work and compliance with the guidance from the Chartered Trading Standards Institute;
- Minuted 6 weekly team meetings;
- Development needs assessments and training plan as part of the check-in process and completion of competency framework
- Cascade training and team briefings;
- Accompanied/validation inspections;
- 4-6 weekly Check-In meetings.
- Completion of individual competence framework questionnaires

9.2 External Arrangements

- The service will submit the annual Weights and Measures and Animal Feed returns to the National Measurement Office and the Food Standards at the beginning of September 2023
- Periodic review of practices and procedures will be discussed at the regional London Trading Standards meetings held three to four times a year respectively.
- Periodic reviews of Trading Standards procedures as compared to peers in London.

9.3 Review against the 2023/24 Service Plan

- Performance is reviewed through a variety of mechanisms which include regular check-in meetings, and 6 weekly team meetings. Monthly and six monthly performance reports are produced for review by the Head of Service, Strategic Director and Cabinet Member.