

Bromley Trading Standards

Control Strategy for priority work areas 2015-17

Bromley Trading Standards is located within the Public Protection Division of Environmental Services. It has adopted the National Trading Standards Intelligence Operating Model as a means to allocate resources and identify priorities for the service.

This Control Strategy has been prepared with regard to the Strategic Assessment which was carried out in 2015 and which provides an overview of the work of Bromley Trading Standards over the previous two years.

The Control Strategy seeks to direct the enforcement work of the service and sets out prevention, intelligence and enforcement work across the priority areas identified as being of greatest local importance. It aims to identify the significant issues causing detriment to consumers in Bromley. It will identify key issues from intelligence available, highlighting emerging trends and opportunities and will make recommendations for consideration.

The document focusses on the following:

- Analysis of 5x5x5 (intelligence reports) entries to MEMEX (a national intelligence database)
- Analysis of Cita data (held by Citizens Advice)
- Analysis of CAPS Uniform (the local case management database)
- Local knowledge and open source data
- Making recommendations for a control strategy

Summary

The data is based on data extracted from CitA between Jan 2013 and February 2015, and local databases in the past 12 months.

- Doorstep Crime and cold calling, Scams and intellectual property crime are the most common primary categories of intelligence submissions across the South East region.
- The most common complaint type within the region and locally is about property maintenance.
- Bromley receives the largest volume of complaints from CitA within the South East region with the highest consumer detriment of £3.5million pounds for the previous 12 months.
- A total of 11,209 complaints were made to CitA in the previous two year period which involved a Bromley resident or business.
- A significant reduction in non-compliance of age restricted product sales has been recorded following a more overt enforcement programme with high risk premises.
- There have been increases in the detection of illicit tobacco products.

- The demographics of the Borough suggest that the numbers of older people in Bromley are rising and health and social care provision needs will increase.

Conclusions and recommendations

The priorities set out in the Control Strategy reflect those issues identified as key issues through local knowledge and demand established through analysis of complaints made by consumers who either live or shop in Bromley. Additional data from CitA has enabled a broader picture to be established based on the demographic spread of the population and the analysis of notifications of enquiries relating to Bromley businesses. Clear themes have been identified in tackling doorstep crime and rogue traders, scams, illicit tobacco, product safety, under age sales and fair trading.

Budget:

The current timetable of budget reductions will see the council seek to make a total of circa £50 million of savings by 2018/19. The impact on trading standards for the year 2015/16 is the reduction of 3 fte posts from a current capacity of 9.7 fte posts.

The proposed staff reduction will impact on the ability to respond to all complaints and enquiries from Bromley residents concerning unfair trading issues. Using the figures from 2013-14, it is anticipated this will equate to:

Fewer cases dealt with;

Fewer enforcement visits to traders;

Fewer visits to consumers to provide support and assistance;

A reduction in expected enforcement actions, such as prosecutions and formal cautions.

A reduction in policing of boot sales and markets

Removal of business advice

Removal of 2nd tier advice

Cessation in the facilitation of No Cold calling Zones

The following have been identified as priority areas over the next 2 years:

	Doorstep Crime & SCAMS	Actions to be taken
Preventative	Raise awareness of doorstep crime (DC) & Mass Marketing Fraud (MMF) (scams) and provide support to vulnerable consumers through advice & education e.g. talks and events	Maintain a programme of education and advice talks to groups across the borough.
	Engage all partners through training and partnership working to ensure information is shared and good support networks exist for victims of DC and scams	Develop a training package for adult safeguarding professionals to assist in developing their capacity to safeguard victims and promote partnership working. Continue to work with the police (to improve joint working) and the financial sector to build relationships and improve their response to safeguarding vulnerable customers. Increasing enforcement opportunities in relation to doorstep crime offenders and to providing intelligence in relation to offenders and victims.
	Engage with the media to publicise successful outcomes and raise profile of doorstep crime and scams by reporting incidents	On-going reporting of incidents and successful prosecutions
	Seek partnership working with an approved trader scheme	Work with local authorities across the south east of England to form alliance with national approved trader scheme
	Continue to engage with the national Scams Hub	Respond to all referrals of potential Mass Marketing Fraud (MMF) victims and visit to advise and support
	Ensure appropriate and timely referrals of all vulnerable adults at risk	Safeguarding champion to arrange further training for all Trading Standards staff on adult safeguarding issues; ensure written procedures are introduced for effective risk rating and audit
== . - 8	Deliver locally the Trading Standards Intelligence Operating Model	Analyse trends, and prioritise resources at monthly tasking meetings

	Share information with partner agencies to ensure victims and potential victims receive support	Sign up to LBB and police information sharing agreement
	Raise awareness of DC and scams in the community to encourage reporting	Continue with the “Safeguarding is everyone’s responsibility” campaign to deliver key messages via local businesses, Neighbourhood Watch, Residents Associations and Safer Neighbourhood Panels to encourage reporting of suspicious activity relating to DC and scams.
	Sign up to regional and national intelligence database MEMEX	Continue to submit intelligence reports via Memex; ensure staff are trained to input data
	Ensure quality intelligence submissions are made to regional intelligence hub	Review quality reports Memex as they apply to LBB
	Produce analytical products through analysis of all available intelligence in order to identify potential areas or groups for disruption activities or to create hostile environments through publicity and awareness raising	Undertake local and regional analysis for the tasking meeting
Enforcement	Provide a rapid response service to all level 1 complaints	Ensure all calls to service are responded to, engaging police support where necessary
	Undertake robust enforcement of all DC incidents where there is a good investigative opportunity	<p>Ensure the enforcement strategy is followed in all cases, namely:</p> <ul style="list-style-type: none"> • Investigate the criminal not the crime • Work with partners • Consider all legal avenues <p>Engage the financial investigator at every opportunity</p>
	Carry out pro-active operations which are intelligence led	Participate in Operation Liberal day and Borough days as directed by intelligence products and combine with awareness raising events
	Take proportionate action against locally based scams	Respond to complaints/enquiries from older/vulnerable consumers concerning mass marketing and other scams and ensure appropriate action is taken where victim is an adult at risk

Fair trading, product safety & counterfeiting		Actions to be taken
Preventative	Provide advice and support to vulnerable consumers who are in dispute with businesses, including mediation where cases are complex	Respond to complaints/enquiries from older/vulnerable consumers concerning and ensure appropriate action is taken where victim is an adult at risk
	Provide advice to local businesses	Maintain access of the consumer and business advice portal on the Bromley website and provide follow up advice as appropriate

	Prepare service for impact of the expected Consumer rights bill, through media and other business partnerships	Ensure staff receive appropriate training on new legislation
Intelligence	Submit intelligence reports on all local safety issues	On going
	Identify complaint trends to target problem areas	On going via tasking meetings
	Continue to maintain a regular overview of intelligence on safety matters	Continue timely interrogation of intelligence via the TS Link information sharing, national Intelligence Hub and RAPEX and the South East London Intelligence Tobacco Network
Enforcement	Target traders who consistently cause consumer detriment	Undertake effective and proportionate interventions in accordance with the Intelligence Operating Model. Conduct compliance visits to business within chosen trade sectors with the aim of minimising consumer detriment and promoting a fair trading environment
	Target traders who are suspected of trading within the informal economy	Undertake visits to high risk premises suspected of trading within the informal economy (including multi agency where appropriate) Undertake effective policing of occasional sales and markets to deter traders selling counterfeit goods and illicit tobacco
	Respond to complaints of a safety matter in order that consumers are not put at risk	Consider the appropriate response by risking the nature and extent of the non-compliances and assess the level of risk posed by the product
	Maintain statutory registers for explosives and animal feed hygiene premises	Undertake inspections to all high risk businesses who register to stock and sell explosives. \Participate in regional animal feed inspection programme to support businesses to improve awareness and compliance with feed hygiene legislation.

	Under age sales	Actions to be taken
Preventative	Provide advice and guidance to local businesses	Provide Fair Trader Award training sessions for independent traders identified as high risk through local knowledge or audit visits. Provide Challenge 25 advice packs to new businesses and traders identified as lacking in due diligence systems. Carry out audit visits to all high risk and new premises improve.

		awareness and compliance with related legislation and help ensure effective diligence exists. Provide information and guidance on new legislation by way of mail outs and media releases.
	Prepare press releases at key periods of the year to raise the profile of under age sales and information items on new legislation	Prepare and distribute timely releases highlighting activity or legislative changes as they arise.
Intelligence	Share intelligence with partners, especially police and licensing and community safety to identify problem traders	On going
	Share intelligence with Regional Intelligence Analyst	Submission of 5x5x5 (intelligence reports)
	Gather intelligence of premises most likely to sell age restricted products	Undertake Challenge 25 visits to measure compliance with due diligence systems and use intelligence to target follow up visits
Enforcement	Undertake enforcement activities to test compliance	Respond to all allegations of under age sales Undertake under age test purchasing campaigns using Challenge 25 visit intelligence and other intelligence and take appropriate action where non-compliance is recorded