



## TRADING STANDARDS SERVICE DELIVERY PLAN 2024/25

### Introduction

Trading Standards Services enforce consumer protection legislation and other measures to reduce consumer detriment and assist honest businesses.

Our practitioners provide protection from unsafe, unfair, and illegal practices carried out locally and nationally, in the retail environment, online and in consumers' homes.

We focus on delivering responsive, high-quality services to employers, employees, and the general public, in line with the following Council's Priorities from the [Corporate Delivery Plan 2022-2024](#):

**Theme 1: Resident experience, collaboration and participation** - Our ambition envisions a borough where we tackle complex challenges and address inequalities by working together.

**Theme 2: Responding to Climate Change:** The vision for Haringey is a borough which successfully meets the challenges presented by a changing climate.

**Theme 3: Children and Young People:** To do this, we will invest in activity to help us achieve the three high level outcomes of 'Best Start to Life', 'Happy, healthy and secure childhoods', and 'Successful Futures'

**Theme 4: Adult Health & Welfare:** The vision is for Haringey to be a place where everyone can live healthy and fulfilling lives and feel connected and safe in communities where people support each other.

**Theme 6: Safer Borough** – The vision is that Haringey is a borough where all residents and visitors feel safe and are safe. To make this vision a reality, we will use the full range of levers available at our disposal to facilitate the underlying conditions for greater community safety.

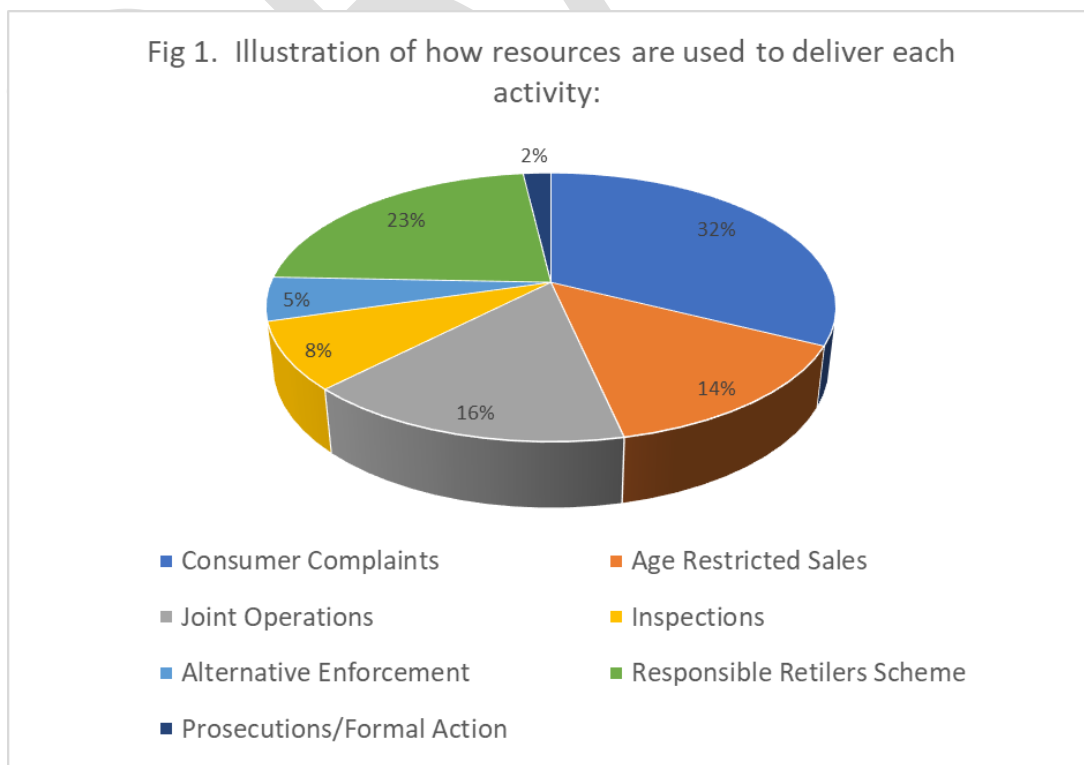
**Theme 7: Culturally Rich Borough** – The vision is for Haringey to be a place where arts, culture and heritage is celebrated, inspiring our residents and visitors by connecting them to our place and each other. Arts, culture, and heritage will be woven through everything the council does including the way we work with our schools, businesses, and communities.

**Theme 8 – Placemaking and Economy** - The vision is for Haringey to be a borough which is a fair, healthy, sustainable, and a resilient place for all residents. To make this vision a reality, we will need to capitalise on Haringey's potential to deliver an inclusive economy that works for all.

We will contribute to these priorities by:

- **Resident experience, collaboration, and participation** - Complying with our [service standards](#), reducing inequality and making Haringey a fairer place by ensuring consistent regulation of all businesses.
- **Responding to Climate Change:** Ensuring all relevant privately rented non-domestic premises have an Energy Performance Certificate of at least E rating. We will also investigate complaints relating to the sale of single use plastics.
- **Children and Young People** – We will carry out underage test purchasing to prevent the sale of age restricted good to young persons.
- **Adult Health & Welfare** – We will encourage membership of our Responsible Retailers scheme to prevent the sale of illicit tobacco and alcohol, both of which are known to pose a risk to health.
- **Safer Borough** - Tackling crime by taking enforcement action against all serious breaches of consumer protection and fair-trading legislation.
- **Culturally Rich Borough** - Ensuring that all events within the borough are safe and fair-trading environments.
- **Placemaking and Economy** - Building and retaining wealth in our community by offering free business advice on how to comply with Trading Standards Legislation

The Trading Standards Team has recently undertaken a mini reorganisation resulting in an increase in staffing levels from 2.8 FTE Enforcement Officers to 4.5. Haringey currently employs 0.6 FTE officers and due to a national shortage of Trading Standards Officers recruitment and retention of such officers has been challenging. However, we will prioritise implementing an extensive recruitment drive in the first 2 quarters of the year. See Fig 1 for illustration of how resources were used in 2023-24.



## Our Key Achievements in 2023/24

**Consumer Complaints and Enquiries:** We continued to see emerging trends in the sale of counterfeit and unsafe products such as alcohol, tobacco, e-cigarettes, and e-bike/scooter batteries. We dealt with 241 consumer complaints and enquiries concerning breaches of consumer protection legislation.

**Age Restricted Sales:** We carried out 105 age restricted test purchases with the assistance of local school children and Police Cadets. Nine businesses were found to be non-compliant and sold 7 vapes and 2 alcoholic beverages to volunteers under the age of 17. Overall, the rate of underage test purchase sales in 2023/24 reduced to 10% against a rate of 14% positive sales in 2022-23.

**Joint Operations:** We carried out 117 joint enforcement visits with Metropolitan Police Licensing officers and other Council Officers. Altogether 4.5 Kg of hand rolling/chewing tobacco, 17,160 cigarettes and 3500 illegal vapes were seized. 45 of these visits were carried out in partnership with the Mayor's Office for Policing and Crime as part of a project to disrupt after school burglary and crime. We visited a range of second-hand shops including jewellers, mobile phone, bicycle repair shops and market stalls to provide guidance on preventing the sale of stolen goods. These visits resulted in the recovery of two stolen mobile phones with a street value of £1500.

**Scam Victims Support:** We visited and returned a total of £340.00 to victims of scams. £290 of this was returned to one pensioner who has responded to 4 different scams.

**Inspections:** We completed 60 enforcement inspections, this included:

- 30 General Complaint investigations relating to consumer rights and counterfeit products.
- 29 Primary Inspections to check compliance with weights and measures legislations.
- 1 Revisit to ensure compliance.

**Alternative Enforcement Interventions:** including issuing:

- 1 Verifications of third-party fuel pump audits.
- 12 Introductory letters for the Responsible Retailers Scheme to new businesses applying for a premises licence.
- 26 Remote investigations of Letting agents to confirm registration with a redress scheme and the provision of clear information on compliance with client money procedures.

**Responsible Retailers Scheme:** The team signed up 12 new businesses to the scheme and completed 177 compliance visits to ensure new and existing members continued to comply with the schemes criteria.

**Prosecutions and Formal Action:** We took the following:

- 2 successful prosecutions, resulting in fines of more than £3,500 for the sale of alcohol and e-cigarettes to persons under the age of 18 years old.
- 1 licensing review resulting in the license being suspended for 5 weeks for the sale of illegal vapes, erectile dysfunction medication and the sale of a e-cigarette to a person under the age of 18.
- 9 Simple Cautions (6 for sale of an e-cigarette and 1 for the sale of alcohol to a person under the age of 18), and
- 2 warning letters.

### Our Priorities for 2024/25

**Product Safety & Counterfeits:** We will respond to all referrals relating to sales of unsafe products within the borough of Haringey, giving priority to those that present a high risk to health e.g. faulty e-bike/scooter batteries, to ensuring they are swiftly removed from sale. We will take enforcement action in accordance with our enforcement policy against anyone found to have a blatant disregard for consumer safety.

**Responsible Retailer Scheme:** The scheme continues to try and improve business compliance with respect to age-restricted sales, supply of illicit tobacco and alcohol and to promote associated public health messages. There are currently 235 premises registered to the scheme and we will continue introducing it across the borough with a view to recruiting a further 20 retail premises especially those selling vapes, knives and corrosive products as there is a growing concern of the risk to health from these products to the young people within the borough. We aim to carry out compliance checks at all premises, which have been members of the scheme for more than a year, and all newly signed up businesses to ensure that they are fulfilling their obligations as well as revisiting those that refuse to sign up.

**Age Restricted Sales:** We will engage with business to ensure they are aware of their legal obligation with regards to restricted products, by sending advisory letters. We will continue to carry out test purchase attempts at businesses to reduce the incidence of sales of dangerous products to young people, including alcohol, tobacco, e-cigarettes, fireworks, and knives. We aim to reduce the current level of sales and will take hard hitting enforcement action such as a Licensing Review, Simple Caution or Prosecution where positive sales are made.

**Consumer Protection:** We will investigate the ten most complained about businesses in the borough. Where contraventions of consumer protection law are found we will take swift action in accordance with our enforcement policy.

**Interventions:** We will carry out interventions i.e., inspections in person or remotely at premises that represent the highest level of risk to the public. This may include weights and measures and food composition/labelling work that may also contribute to the Food & Feed Food Law Enforcement Plan.

**Projects based work:** We will participate in London Trading Standards proactive project-based work. This may include the following themes: Illicit Alcohol and

tobacco, Letting Agents, Minimum Energy Efficiency Standards (MEES) in commercial premises, Jewellery Hallmarking, and Shisha.

**Fireworks Safety:** We will regulate newly registered outlets to ensure that goods are stored safely and appropriately. Where possible we will carry out compliance visits and a programme of targeted test purchases aimed at preventing the sale of fireworks to children.

**Weeks of Action:** We will participate in weeks of action, the council's area-based initiatives, working in conjunction with other regulatory services such as Environmental Health and the Antisocial Behaviour and Enforcement Team.

**Formal Actions:** We will take formal action i.e., Simple Cautions and Prosecutions where appropriate in accordance with the current enforcement policy. We will seek to recover the proceeds of crime from offenders where possible to demonstrate our service is value for money.

### **Our Partners**

We will participate in partnership working to enhance the effectiveness of our actions. Our current partners include:

**Police** - working with Police Cadets to carry out underage sales operations and Licensing Officers in relation to illicit tobacco and alcohol sales.

**HMRC (HM Revenue and Customs)** - Carrying out joint operations to reduce illicit and counterfeit alcohol and tobacco in Haringey.

**Public Health** – to contribute towards an agreed action plan with respect to reducing negative impacts of tobacco and alcohol.

**Northwest London Trading Standards Authorities** - to carry out agreed projects throughout the region for example, product safety.

**London Trading Standards (LTS)** - to participate in London-wide projects – accessing funding as and when available.

**The Office of Product safety and Standards (OPSS)** - to collaborate in projects to remove unsafe products from the market.