

**NATIONAL
TRADING
STANDARDS**

Protecting Consumers
Safeguarding Businesses

**ANNUAL BUSINESS PLAN
2016 – 2017**

Foreword

I am pleased to present the National Trading Standards Business Plan for 2016/17

National Trading Standards (NTS) has been in operation since 2012 undertaking a range of regional and national consumer protection functions funded by the Department of Business Innovation and Skills (BIS). This work protects consumers and safeguards legitimate business. In 2014-15, NTS took on the delivery of a £3 million programme, funded by the Food Standards Agency (FSA), to commission trading standards services to deliver a programme of feed inspection, sampling and related projects in order to address EU concerns and improve the integrity of feed hygiene enforcement and the safety of the food chain. We are entering a transitional year in terms of the change of funding of the NTS Illegal MoneyLending Teams to an industry levy. This model was sought by NTS and the Teams as a better method of ensuring sustainable funding for the good work of the Teams. HM Treasury have advised that they want NTS to retain the oversight and governance of this work.

The National Trading Standards Board (“the Board”) directs and oversees the work of NTS. It provides leadership, influence, support and resources to help combat consumer detriment, locally, regionally and nationally. It is formed from a group of senior and experienced local government heads of trading standards, representing all trading standards services across England and Wales.

I believe we have made excellent progress. I am very pleased with the continuing confidence that has been shown in us by Government. In the last two years, we have had to take challenging budget decisions to reprioritise the balance of funding to our priorities. We are very pleased with the indicative cash standstill budget for the spending review period. I feel this shows a great deal of confidence in the impact and value of the work of NTS. However, this is still a real term cut of something in the order of 15% and with increased demands, means a continued focus on effective prioritisation and deployment of resources will be crucial.

2016/17 will again be a challenging year for NTS with increasingly stretched resources in local authorities meaning increased demand and expectation of NTS, and a National Audit Office review due to report in the early autumn.

I was very pleased to be asked to continue my role as Chairman until May 2017, and I would like to extend my thanks to all those organisations and individuals the Board has worked with for their support. In particular to the local authorities who work with us, locally, regionally or nationally in support of, or directly delivering our commissioned work. Without their commitment, enthusiasm and drive, despite the challenging local authority environment, we would not be in the strong position we find ourselves in.



Lord Toby Harris
Chair



Strategic Objectives

This Business Plan sets out how we plan to achieve our objectives. It is presented at a time of continued change and continuing stringent budget cuts in local trading standards services. This continues to present a risk to the work of NTS, which is dependent on the intelligence provided and experience and competence of officers on the ground, beyond those staff it provides and funds directly as part of the NTS Teams.

Our strategic objectives remain similar to those in 2015/16 as they were all long term objectives and functions of NTS. The underpinning activities for each objective change as progress is made.

Objective 1	Objective 2	Objective 3	Objective 4
Provide a framework for the effective and efficient sharing of intelligence in order to identify and tackle emerging threats, and support Trading Standards across England and Wales.	Ensure effective delivery and coordination of national and cross boundary enforcement projects in relation to serious consumer protection crime (including cybercrime), illegal moneylending and mass marketing scams.	Provide and coordinate a network of controls at key border points to identify and tackle the importation of unsafe consumer goods and animal feed.	Deliver a programme of animal feed hygiene enforcement to help ensure the safety of the food chain and protect the UK export market.

Figure 1 – Strategic Objectives 2016-17

Underpinning all the objectives will be effective governance arrangements, which will also enable us to clearly demonstrate the importance and effectiveness of NTS to our partners, Government and the National Audit Office. This will include:

- Using the experience of the Chairman and Board members to enhance regional buy-in for NTS and the accountability of it.
- Working closely with Local Government Association and Welsh Local Government Association to ensure we support their activity where appropriate and to reinforce the message that the NTS does not affect the local political accountability for resourcing and prioritising trading standards locally.
- Engaging effectively with government departments to influence and educate them in the work of Trading Standards and develop their interest in the NTS model for the commissioning those elements of Trading Standards' work that are best delivered regionally and nationally.
- Maximising the benefits of membership of the Consumer Protection Partnership (CPP) to engage key stakeholders, flag issues and respond to concerns of other CPP partners.
- Creating a comprehensive national picture of the achievements of the NTS and communicate these effectively.
- Provide basic information on NTS, its work programmes and governance via the public NTS website.
- Provide improved access to all NTS information for local trading standards staff, in order to share good practice etc.
- Be open to scrutiny via agreed mechanisms.
- Be responsive to external factors when developing policy and approach.

A national Strategic Assessment was undertaken last year and using the evidence provided, the Board agreed that key priorities¹ for 2016/17 would be:

- Doorstep Crime;
- Fair Trading issues
- Mass Marketing Scams;
- Product Safety;
- Illegal Money Lending; and
- Intellectual Property.

The internet and social media are ever increasing as a medium for the trade in unsafe and illicit goods and as a means of perpetrating consumer fraud. **Tackling cyber-crime** is a key underpinning strategy across **all** priority areas.

Detailed actions to address the above priorities are contained in our National Control Strategy which has been supplied to all NTS Teams, all local trading standards services and all partners. This determines how NTS funds will be allocated to deliver specific outcomes and activities.

NTS hopes the National Strategic Assessment and Control Strategy will also inform Regional Trading Standards Groups and local authorities when they are determining what priority areas they will support during the coming year. Local Authority Trading Standards Services will continue to address local threats and those issues under local political control in accordance with the priorities set by individual local authorities.

Following the spending review:-

- The FSA has allocated a budget of £2.7 million for the feed work. This includes a 9% reduction in funds compared to last year.
- BIS has allocated a budget to the Board of £13.24 million for 2016/17. This is the same as the 2015/16 grant.

A full breakdown of funding is shown in Annex 1.

A list of the detailed performance indicators that have been set by BIS, for their areas of work, are contained in Annex 2. To succeed we will need an effective working relationship with key partners and enforcement partners across the UK. This is done both bi-laterally and through the CPP. The CPP has identified some areas of concern for 2016-17 which include nuisance calls and ticketing scams. NTS will lead the work in relation to secondary ticketing scams.

Whilst NTS operates in England and Wales, we will continue to work with our counterparts in Northern Ireland and Scotland and with other enforcement partners across the UK to ensure that the consumer regime is as effective as it can be.

We have developed a series of objectives that underpin our 4 strategic objectives but we will take a flexible approach that focuses on the outcomes of our work and the impact it has made.

¹ These are not listed in priority order, they are all key priorities.

Objective 1

Provide a framework for the effective and efficient sharing of intelligence in order to identify and tackle emerging threats, and support Trading Standards across England and Wales

We will do this by:

- Making informed decisions on our work by capturing, analysing and using all the information and intelligence that is available to us.
- Identifying emerging threats and any gaps in consumer protection enforcement and work with partners to address them
- Using the findings of the National Strategic Assessment to determine the focus of work by the NTS Teams via the National Control Strategy.
- Supporting the CPP's Intelligence work by helping ensure they have up-to-date information.
- Providing an NTS intelligence network that includes a National Intelligence Team and network of Regional Intelligence Analysts to support NTS teams and local authorities.
- Providing continued support to local authorities to use the Intelligence Operating Model locally and use it regionally and nationally to ensure that issues are managed, coordinated and prioritised effectively.
- Producing an updated National Strategic Assessment and Control Strategy ready to be used to plan NTS' work for 2017-18.
- Researching into the basis of complaints for the "Most Complained About Traders" to establish the best means of tackling the detriment being caused with CPP partners.

Objective 2

Ensure effective delivery and coordination of national and cross boundary enforcement projects in relation to serious consumer protection crime (including cybercrime), illegal moneylending and mass marketing scams.

We will do this by:

- Providing NTS Illegal Money Lending Teams for England and Wales to tackle consumer detriment caused by illegal moneylenders, ensuring those engaged in criminal activities are punished, victims are supported, and vulnerable consumers and communities are educated and supported not to use illegal moneylenders.
- Work with HM Treasury and the Financial Conduct Authority to implement levy funding for the Illegal MoneyLending Teams as from 2017-18.
- Providing regional NTS Scambuster Teams and resource other projects to tackle regional and national consumer and business detriment and ensuring those engaged in criminal activities are punished and/or their activities disrupted or stopped.
- Providing a NTS eCrime Team to tackle consumer and business detriment caused by cyber-crime across the NTS priority areas, including working with internet service providers and e commerce platforms.
- Provide national expertise in the investigation and prevention of cyber-crime that causes serious consumer or business detriment or harm and to support regions who are tackling ecrime at a regional level
- Provide a national digital forensic capability to support trading standards related cybercrime enforcement.

- Providing a NTS Scams Team to tackle consumer detriment caused by mass-marketing scams by gaining and providing intelligence on repeat victims, advising local authorities on issues in their areas, and working with partners to disrupt activity and safeguard victims.
- Providing an NTS Estate Agents Team to fulfil the statutory functions under the Estate Agents Act to tackle consumer and business detriment caused by unacceptable practices by Estate Agents.
- Provide the Advertising Standards Authority with a backstop enforcement regime to ensure that its current, very successful, self-regulation model is seen to be enforceable where this is required.
- Lead on CPP work relating to tackling enforcement issues in the secondary ticketing market.
- Continue enforcement work to tackle consumer and business detriment caused by the illegal activities of key fulfillment houses
- Provide funding via a National Tasking Group to support any further work required to tackle significant areas of consumer and business detriment in the priority areas.
- Supporting the regional Trading Standards infrastructure to enable them to co-ordinate Trading Standards activities at a regional level.
- To consider what further role, if any, NTS should have in managing and coordinating national Trading Standards incidents.

Objective 3

Provide and coordinate a network of controls at key border points to identify and tackle the importation of unsafe consumer goods, food and animal feed.

We will do this by

- Providing support to key border points across the UK (including Market Surveillance Authorities such as the Health and Safety Executive and Medicines and Healthcare Regulatory Agency among others) to help them target unsafe and illicit imports of goods by means of advice and referrals on imports.
- Providing resources at key ports to prevent consumer detriment caused by the import of unsafe goods by stopping them entering the UK market.
- To pilot new risk assessment approaches at ports and borders to deal with changing market conditions for imported consumer goods.
- Providing resources at key ports to protect the integrity of the food chain by undertaking surveillance on the quality and safety of imported animal feed.

Objective 4

Deliver a programme of animal feed hygiene enforcement to help ensure the safety of the food chain and protect the UK export market.

We will do this by-

- Creating, overseeing and administering an animal feed inspection and sampling programme to ensure compliance with standards across the animal feed supply chain.
- Undertaking other projects to include work to support authorities to develop capacity and better intelligence in relation to feed hygiene.
- Working with FSA to develop annual priorities for animal feed to ensure priorities set for 2017/18 are tackling the key areas of concern.

• ANNEX 1 - FUNDING 2016/17

NTS has a total of £15.94 million in core funds for 2016/17, broken down as follows

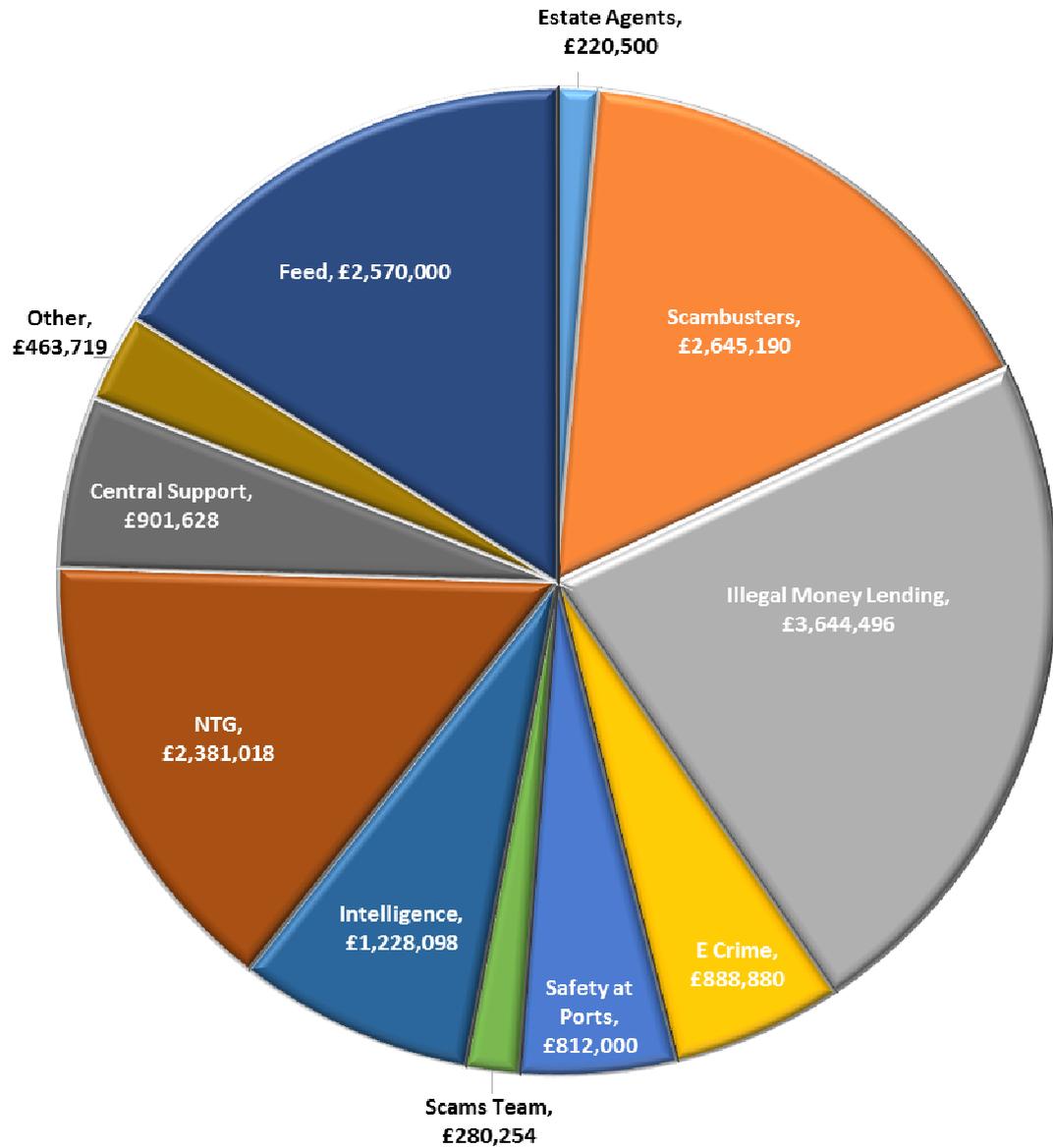


Figure 2 – Total NTS Funding 2016/17

The grant from BIS is £13.24 million, broken down as follows

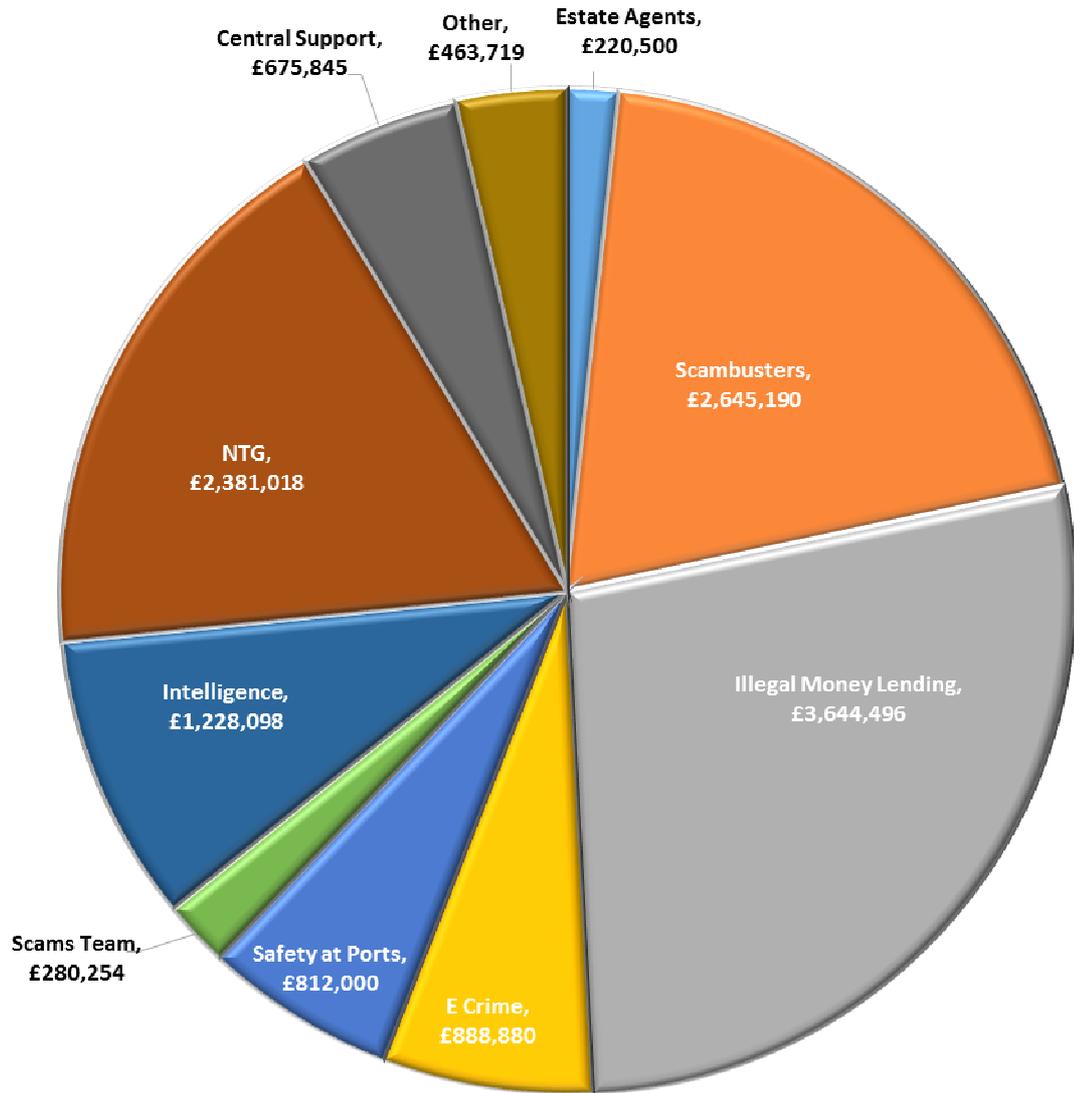


Figure 3 – BIS Grant funding 2016/17

Other	£	Central Support	£	Intelligence	£
Sanctions database	27,000	Programme Office	513,305	NTS Intelligence Team	512,458
ASA Liaison	18,400	Chair Costs	50,000	Regional Intel Analysts	392,700
TSI Conference	4,000	TSI Finance	112,540	Other Intelligence	37,840
Contingency	14,486			Local Intelligence Dbases	82,600
Communications	142,283			Memex/12/IDB/PNC/Crimson	202,500
Regional Coordination	257,550				
	£463,719		£675,845		£1,228,098

Figure 4 – Additional Breakdown of Costs

The funding from FSA for feed work £2,698,840 and is broken down as follows:

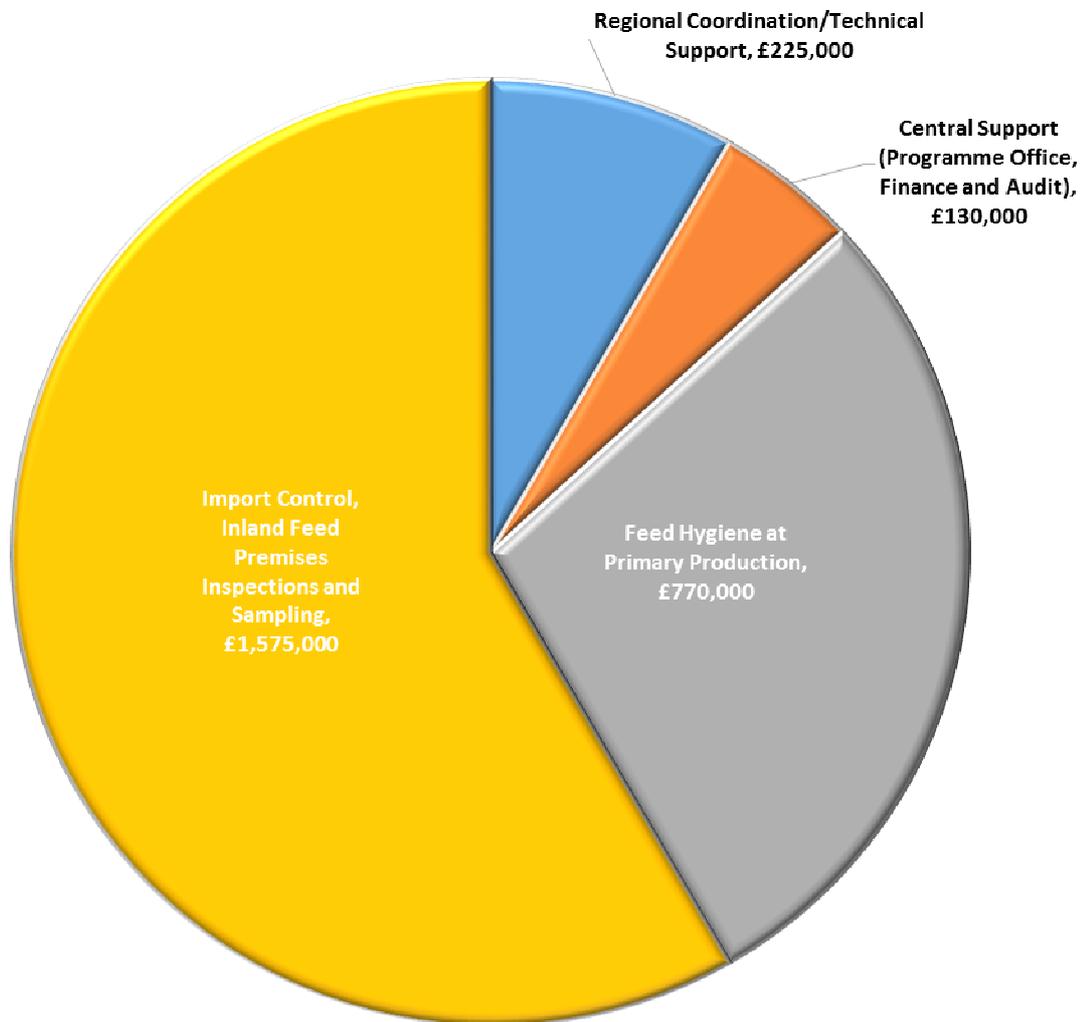


Figure 5 – Feed Funding 2015/16

ANNEX 2 – Impacts and Outcomes

BIS have set the following performance framework for NTS for 2016-17

Objective	Outcome	Key Performance Indicator
<p>GOVERNANCE AND, TRANSPARENCY:</p> <p>Activity: Ensure and demonstrate effective governance transparency arrangements for the work of NTS - to our partners, the UK Government and the National Audit Office.</p>	<ul style="list-style-type: none"> • NTS activities are transparent, accountable, due to robust governance procedures and activities. • Each work-stream and enforcement project has efficient and effective oversight – allowing for optimum performance. • Risks and issues which may negatively affect NTS overall performance and/ or reputation prevented from materialising through active management. 	<ul style="list-style-type: none"> • NTS role, activities and governance are clearly presented through NTS website. • Business Plan and Annual Report: <ul style="list-style-type: none"> (a) Sets out objectives to protect consumers (b) Reports measurable performance against objectives (c) Highlights effective governance of NTS/ Projects. • Evidence of effective and proactive risk/ issue management. • Annual report to demonstrate positive cost/ benefit ratio of NTS work for each major work-stream.

Objective	Outcome	Key Performance Indicator
<p>INTELLIGENCE:</p> <p>Activity: Monitor and enhance the framework for sharing intelligence, and the use of intelligence in order to identify and tackle emerging threats more efficiently and effectively.</p>	<ul style="list-style-type: none"> • Intelligence gathering systems are fit for purpose, leading to reduction in size of intelligence gaps, and accurate identification of detriment picture. • NTS use accurate intelligence to effectively prioritise action against areas of emerging/ high detriment. • High quality intelligence is shared with local and regional Trading Standards – enabling them to effectively tackle non-national threats. • NTS Intelligence systems/ usage are secure and compliant with data protection legislation. 	<ul style="list-style-type: none"> • Constructive partnership with Trading Standards Scotland to ensure effective use of MEMEX. • Evidence/ examples of how intelligence gaps have been reduced during reporting year. Nature of existing gaps shared with CPP to consider further action. • Clear alignment between control strategy and strategic assessment and majority of resources applied to those priorities • Evidence of examples of subject and problem profiles that have been shared via the Regional Intelligence Analyst Network. • Evidence of testing intelligence databases (and the use of) to ensure:

		(a) Information is stored securely in line with law. (b) Effective remedial action is taken to address issues.
--	--	---

Objective	Outcome	Key Performance Indicator
ENFORCEMENT		
Activity: Ensure effective delivery of national and cross boundary enforcement projects		
a. Operational delivery of the regional Scambuster Teams to tackle consumer detriment	<ul style="list-style-type: none"> Consumer detriment is being tackled as Scambuster Teams take effective action against rogue traders whose regional/ cross-regional activities are beyond the reach on individual local authorities. 	<ul style="list-style-type: none"> Number of operations commenced in the period. Number of consumers affected. Number of successful prosecutions. Value of detriment avoided.
b. Operational delivery of ECrime Unit to tackle consumer detriment.	<ul style="list-style-type: none"> ECrime Unit addresses detriment through monitoring, investigating, and tackling online consumer and business frauds – through proactive unilateral action, and in partnership with/ on behalf of other stakeholders. 	<ul style="list-style-type: none"> Number of operations commenced in the period. Number of operations where the team gave assistance to another local authority/ agency. Number of successful prosecutions. Value of detriment avoided.
c. Provide support to local authorities to identify Mass Marketing Scams and work with victims.	<ul style="list-style-type: none"> Scams Team tackle detriment caused by mass marketing scams through: <ul style="list-style-type: none"> (i) Disrupting the operations of perpetrators behind mail scams. (ii) Working in partnership with agencies across the country to identify and support victims of mass marketing fraud. (iii) Providing guidance, best practice and acting as a centre of excellence to assist local authorities in supporting local victims and taking local enforcement action. 	<ul style="list-style-type: none"> Number of successful disruptions/ enforcement actions. Number of pieces of advice provided to local authorities/other organisations. Value of detriment avoided. Annually report level of victims support provided by local authorities and flag key issues of concern
d. Operational delivery of Illegal Money Lending	<ul style="list-style-type: none"> Consumer detriment is tackled through disruption 	<ul style="list-style-type: none"> Number of operations commenced in the period.

<p>teams to tackle consumer detriment.</p>	<p>of Illegal money lending activities and prosecution of loan sharks.</p> <ul style="list-style-type: none"> • Victims of loan sharks are provided with support. • Awareness of the dangers of loan sharks is raised via educational initiatives within local communities. 	<ul style="list-style-type: none"> • Number of illegal lenders identified. • Value of detriment avoided. • Number of victims affected. • Number of victims supported & description of general support given • Number of successful prosecutions. • Evidence of increased awareness of dangers of loan sharks following IML educational events
<p>e. Provide resources at key Ports and Borders to prevent consumer detriment caused by the import of unsafe and non-compliant goods.</p>	<ul style="list-style-type: none"> • Dangerous/ non-complaint goods are prevented from entering the country and causing harm in the consumer market. 	<ul style="list-style-type: none"> • Number of samples taken. • % of samples found to be unsafe/ non-compliant. • Number of unsafe and non-compliant products removed from UK market. • Value of potential harm prevented by ensuring unsafe and non-compliant goods not released into supply chain. • Evidence of supporting stakeholders through SPoC and East Midlands Airport • Number of lives saved, fires prevented, serious injuries avoided
<p>f. Managing the National Tasking Group to assess and resource appropriate cases.</p>	<ul style="list-style-type: none"> • NTG supports consumers and businesses through supporting and funding work in areas where the can the biggest impact can be made, or where there is greatest need for action. 	<ul style="list-style-type: none"> • Evidence how the Board is more effectively taking on large, complex and national investigations and assessing by costs and risks involved. • Annual assessment of impact to demonstrate that the resource invested providing good value for money. • NTG tasking aligns with control strategy and strategic assessment and majority of resources applied to those priorities
<p>g. Provide enforcement of the Estate Agency Act.</p>	<ul style="list-style-type: none"> • Consumers and businesses by are protected through effective oversight of the Estate Agents Act (1979). 	<ul style="list-style-type: none"> • Number of warning and prohibition orders issued. • Number of redress schemes approved/ approval withdrawn. • Demonstrate that Powys is effective monitoring the estate agent redress schemes. • Evidence of provision of advice, guidance and expertise in the application and interpretation of estate agency legislation - shared with colleagues across the enforcement community.

Objective	Outcome	Key Performance Indicator
<p>STRENGTHENING THE CONSUMER LANDSCAPE Activity: Leading the coordination, collaboration and communication of local, regional and national Trading Standards enforcement.</p> <p>Supporting the Consumer Protection Partnership and the wider consumer landscape.</p>	<ul style="list-style-type: none"> • Local authority trading standards services are supported through national tasking and intelligence to tackle NTS identified national enforcement priorities within their communities. • The CPP is stronger as a result NTS membership and contributions - more able to identify, prevent and tackle consumer detriment. • Collaboration with stakeholders across the landscape (this might be individual ASA, FSA, CPP members, NFIB, and others) tackles rogue traders. 	<ul style="list-style-type: none"> • Evidence NTS coordination ensures Trading Standards Community work effectively together to tackle harm occurring: <ul style="list-style-type: none"> (a) Nationally (b) Regionally (c) Locally • NTS is bringing worthwhile issues and intelligence to the CPP for consideration, and feeding in the work of non-members. • NTS is taking individual and collective responsibility for effective delivery of CPP work. • Evidence of effective work with non-CPP members to strengthen landscape and tackle consumer harm. <p>NB. This might be through a mix of case studies, and a stakeholder perception survey</p>

Published 1 April 2016.

For any enquiries about the content of this report

Please email nationaltradingstandards@actso.org.uk or call 0345 608 9515. Alternatively, you can write to National Trading Standards, 1 Sylvan Court, Sylvan Way, Southfields Business Park, Basildon, Essex SS15 6TH