

**NATIONAL
TRADING
STANDARDS**

Protecting Consumers
Safeguarding Businesses

**ANNUAL BUSINESS PLAN
2017 – 2018**

Foreword

I am pleased to present the National Trading Standards Business Plan for 2017/18.

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 Energy and Industrial Strategy (BEIS). This work protects consumers and safeguards legitimate business. Since 2014, NTS has also delivered a programme of feed hygiene enforcement on behalf of the Food Standards Agency (FSA), in order to address EU concerns and improve the integrity of feed hygiene enforcement and the safety of the food chain. This year, funding of the NTS Illegal MoneyLending Teams is by an industry levy rather than Government grant. This model was sought by NTS as a better way of ensuring sustainable funding for the good work of the Teams. NTS has agreed, at the request of HM Treasury, to maintain the oversight and governance of this work, until 1/4/18 when it will be fully moved to the Financial Conduct Authority.

The NTS 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 again this year. I am very pleased with the continuing confidence that has been shown in us by Government. Furthermore we were subject to two significant reviews in 16/17, by the National Audit Office and by a review of the feed programme by the FSA. Both reviews found NTS had made a good impact and was delivering good value for money. We have had excellent outcomes to a range of investigations that have been detailed in our annual report for 16/17.

We have confirmed funding of £4.3 million for Illegal MoneyLending. This represents a cash standstill for the Teams. We have £2 million funding from the FSA to deliver our feed programme. This is a reduction of 25% from last year. I am very pleased to say that we have received an increase in funding from BEIS which is set at £13.23 million for 2017/18. 2017/18 will again be a challenging year for NTS with increasingly stretched resources in local authorities meaning increased demand and expectation of NTS. The increased budget from BEIS should help to address some of this.

I was very pleased to be asked to continue my role as Chairman until May 2019, and I would like to extend my thanks to all those organisations and individuals that NTS has worked with for their support, in particular to the local authorities who work with us. Without their commitment and enthusiasm, despite the challenging local authority environment, we would not be in the strong position we are today.



Lord Toby Harris
Chair



Strategic Objectives

This Business Plan sets out how we plan to achieve our objectives. The continuing change and budget cuts in local trading standards services carries on presenting 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 2016/17, 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 eCrime and business to business fraud), 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 2017-18

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 and to Government. This will include:

- Using the experience of the Chairman and Board members to enhance regional support for NTS and the accountability of it.
- Working closely with the Local Government Association and the Welsh Local Government Association to ensure we support their activities where appropriate and to reinforce the message that NTS does not affect the local political accountability for resourcing and prioritising trading standards locally.
- Engaging effectively with Government to influence and educate them in the work of Trading Standards and develop their interest in the NTS' model for the commissioning of 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 NTS and communicating these effectively.
- Providing appropriate access to NTS' information via a public website and via a secure website for local authority officers.
- Being open to scrutiny via agreed mechanisms and reporting against agreed performance outcomes that are set by our funding partners.
- Being 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 2017/18 in relation to its BEIS grant, would be:

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

Work on illegal moneylending will be carried on by the NTS Illegal MoneyLending Teams funded by a levy from the financial services industry.

A work programme to help ensure the integrity of the food chain by ensuring the safety of animal feed will be carried on by NTS in England, delivered via regional groups of Trading Standards Services using funds provided by the FSA.

Detailed actions to address the above priorities are contained in our National Control Strategy which has been supplied to all NTS Teams, local trading standards services and 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.

- The FSA has allocated a budget of £2 million for the feed work. This is a 25% reduction in funds from last year.
- BEIS has allocated a budget to the Board of £13.23 million for 2017/18. This is the same as the 2016/17 grant but represents a real term increase as Illegal MoneyLending is now funded via levy.
- HM Treasury will provide industry levy funds of £4,325,762.

A full breakdown of funding is shown in Annexes 1-3.

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.

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.

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, including improving intelligence sharing with CPP partners.
- Identifying emerging threats and any gaps in consumer protection enforcement and work with partners to address them.
- Providing a NTS intelligence network that includes a National Intelligence Team, a network of Regional Intelligence Analysts and ensuring each local authority can have direct access to a Trading Standards intelligence database.
- 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.
- Working with Border Force and HMRC via the Single Point of Contact in Suffolk and the referrals Team at East Midlands Airport, to provide intelligence for the Ports and Borders Teams and share appropriate intelligence with the NTS Intelligence Team and Regional Intelligence Analysts.
- Producing a National Strategic Assessment and Control Strategy ready to be used to plan NTS' work for 2018-19.
- Undertake work to access the Police National Database to ensure the NTS Intelligence Team and each region has access to this intelligence.
- Participating in a pilot with Action Fraud to swiftly identify victims of doorstep crime.
- Sharing the findings of the first threat assessment for risks relating to animal feed with all authorities to assist them with local prioritisation and to ensure they inform the FSA's priorities for 18/19.
- Use Organise Crime Group's mapping to effectively target and tackle criminals engaged in consumer protection crime.

Objective 2

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

We will do this by:

- Providing a network of NTS Regional Investigation Teams as our core resource 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.

- Resourcing other projects to tackle serious 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 eCrime across the NTS' priority areas. This will include a widening of the project into the sale of illegal goods via social media and to get "takedown" procedures agreed with key platforms etc.
- Working with the CMA on issues relating to the secondary ticket market with a focus on key high volume sellers.
- Providing national expertise in the investigation and prevention of eCrime that causes serious consumer or business detriment or harm and to support regions who are tackling eCrime at a regional level. This will include enhanced advisory support to Regional Teams and local authorities.
- Providing a national digital forensic capability to support trading standards related cybercrime enforcement. This will include enhanced forensic support to Regional Teams and key local authority cases
- 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 support safeguarding of such victims. This will include a continuation of the rollout of the "Friends Against Scams" initiative.
- Working with partners to disrupt mass marketing mail activity with enhanced resources focused on disruption.
- Chairing and progressing the Home Office Joint Fraud Task Force, Victims and Susceptibility workstream to improve practices amongst financial institutions, law enforcement and Government to better protect those most vulnerable to becoming victims of fraud.
- Providing an NTS Estate Agents Team to fulfil the statutory functions under the Estate Agents Act 1979 to tackle consumer and business detriment caused by unacceptable practices by Estate Agents. This will include developing a protocol with HMRC's anti-money laundering unit to best use the powers of both authorities to tackle non-compliant estate agents.
- Providing 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.
- Continuing to work with HMRC to help them tackle consumer and business detriment caused by the illegal activities of key fulfilment houses.
- Providing 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.
- 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.
- Promoting illegal moneylending work in England and Wales, the Teams promote the Stop Loan Sharks campaigns. Money confiscated from loan sharks under the Proceeds of Crime Act will be used to fund partner organisations to create a range of awareness raising initiatives across England and Wales.
- Work with HM Treasury and the Financial Conduct Authority to ensure a smooth transition of governance to the FCA as from 1/4/18.

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:

- Working with HMRC and Border Force to provide 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 and business detriment by reducing the amount of unsafe and non-compliant consumer goods into the UK market.
- 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.
- Working with seven major feed active ports to support them to develop and roll out a method to exchange importer and import information when relevant.

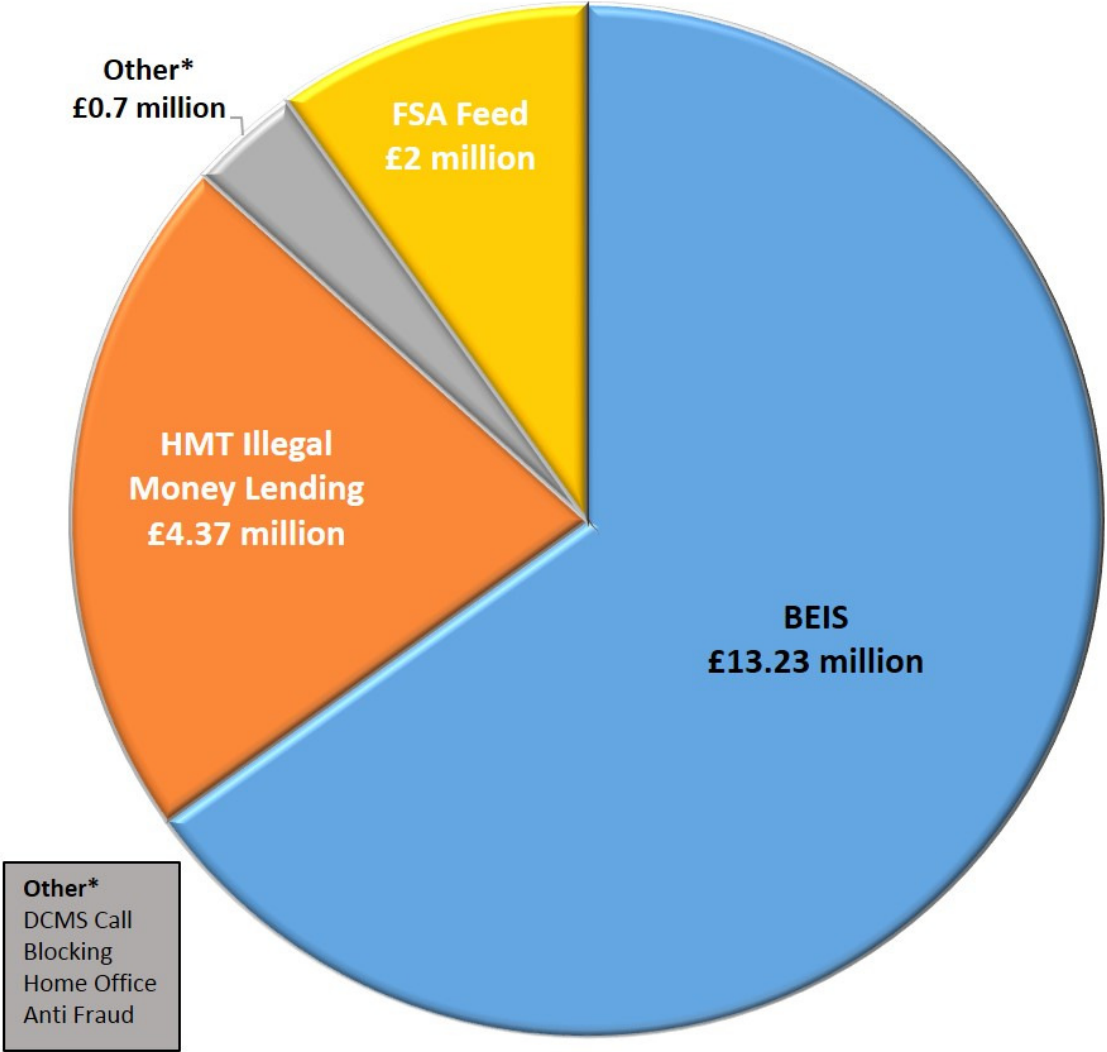
Objective 4

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

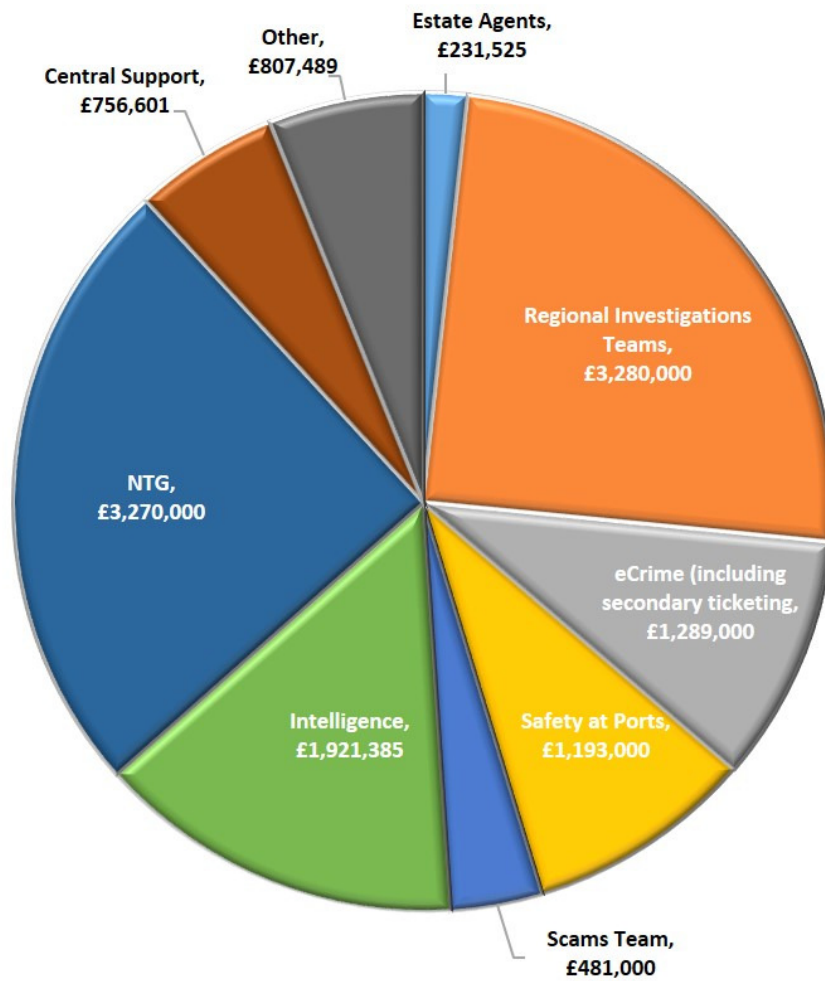
We will do this by:

- 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 in the further embedding of earned recognition for compliant businesses.
- Working with FSA “to develop a UK wide feed threat assessment” to support development of annual priorities for animal feed to ensure priorities set for 2017/18 are tackling the key areas of concern.
- Undertaking an evaluation of regional costs for inland inspections work to ensure value for money and effective targeting of resources.
- Working with the FSA to develop and pilot a more risk based approach to funding food hygiene at primary production businesses.
- Supporting local authority expert panels on feed to develop guidance and help ensure consistency and best practice in feed enforcement.

Annex 1
Overall Funding to National Trading Standards 2017/18



Annex 2 BEIS Grant Funding to National Trading Standards 2017/18

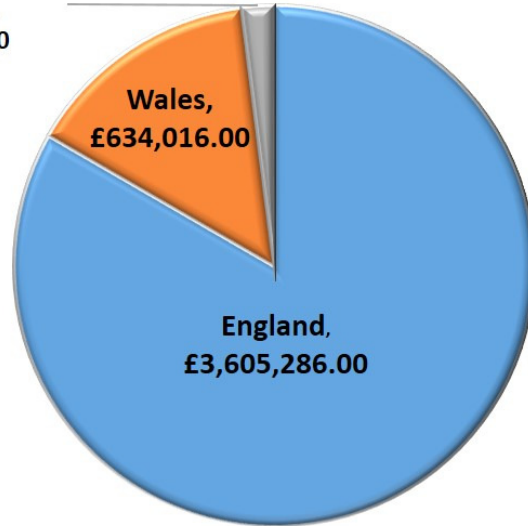


Additional Breakdown of Costs

Other	£ Central Support	£ Intelligence	£
Regional Coordination	£300,000	Programme Office	£590,000
NTS Intelligence Team			£592,000
ASA Liaison	£19,000	Chair Costs	£51,500
Regional Intelligence			£810,000
TSI Conference	£4,000	TSI Finance	£115,101
Other Intelligence			£37,000
Contingency	£333,673	Local Intelligence Databases	£165,000
Communications	£150,816	Memex/I2/IDB/PNC/Crimson	£317,385
	£807,489	£756,601	£1,921,385

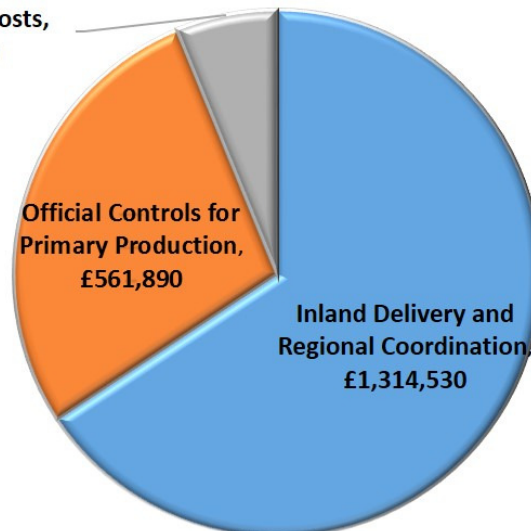
Annex 3
HM Treasury Grant to National Trading Standards for Illegal Money Lending 2017/18

Programme Office and Finance Support, £86,460.00



Annex 4
FSA Funding to National Trading Standards for Feed Delivery 2017/18

Programme Office and Finance Costs, £123,490



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