

**NATIONAL
TRADING
STANDARDS**

Protecting Consumers
Safeguarding Businesses

ANNUAL BUSINESS PLAN 2018 – 2019

Foreword

I am pleased to present the National Trading Standards Business Plan for 2018/19.

National Trading Standards (NTS) delivers national and regional consumer protection enforcement. Its Board is made up of senior and experienced heads of local government trading standards from around England and Wales with an independent Chair. Its purpose is to protect consumers and safeguard legitimate businesses by tackling serious national and regional consumer protection issues and organised criminality and by providing a “safety net” to limit unsafe consumer goods entering the UK and protecting food supplies by ensuring the animal feed chain is safe.

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, responsibility for the Illegal Money Lending Teams has moved entirely to the FCA. The Ministry for Housing Communities and Local Government (MHCLG) has taken over responsibility for estate agency work and is commissioning NTS to provide the Estate Agency Team.

I am very pleased with the continuing confidence that has been shown in us by Government with the continued funding of NTS to commission and deliver this work. In addition we are working with other Government partners such as HMRC, the Home Office, DCMS and Defra on various specific projects.

We have £2.1 million funding from the FSA to deliver our feed programme. This is a welcome 5% increase from last year. I am very pleased to say that we have received an increase in funding from MHCLG to £332,500 for Estate Agency work. The BEIS grant is again set at £13.23 million which is the same as it was in 2017/18.

I have no doubt that 2018/19 will continue to be a challenging year for NTS with increasingly stretched resources in local authorities meaning increased demand and expectations of NTS. We are also trying to plan for the changes that may be needed once the post-BREXIT landscape is better understood.

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.

A handwritten signature in black ink that reads "Toby Harris". The signature is written in a cursive style with a large, stylized 'h' at the end.

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 2017/18, 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) 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 2018-19

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 them and raise the profile of the work of Trading Standards and to offer 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 raise issues, share thoughts, 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 2018/19 in relation to its BEIS grant, would be:

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

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. Following changes in governance last year, the NTS role will be to deliver the work programme set by the FSA. This work programme is informed by the findings of the feed threat assessment produced by NTS.

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

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.

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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.

NTS will also respond positively wherever appropriate, to requests from Government Departments and Agencies should they want new areas of Trading Standards related work undertaken and where the NTS model would be effective.

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 protection regime is as effective as it can be.

We have developed a series of objectives that underpin our 4 strategic objectives.

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 2019-2020.
- Undertake work to access the Police National Database to ensure the NTS Intelligence Team and each region has access to this intelligence.
- Arrange for a refreshed feed threat assessment to inform future feed priorities.
- 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) and mass marketing scams.

We will do this by:

- Providing a network of NTS Regional Investigation Teams and resourcing 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 eCrime across the NTS' priority areas. This will include a widening of agreements to take down unlawful websites.
- 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.
- Providing 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 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.
- 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 Agency 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.

- Discuss with MHCLG any role that NTS can play in providing a lead authority for lettings agency related work.
- 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.

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.

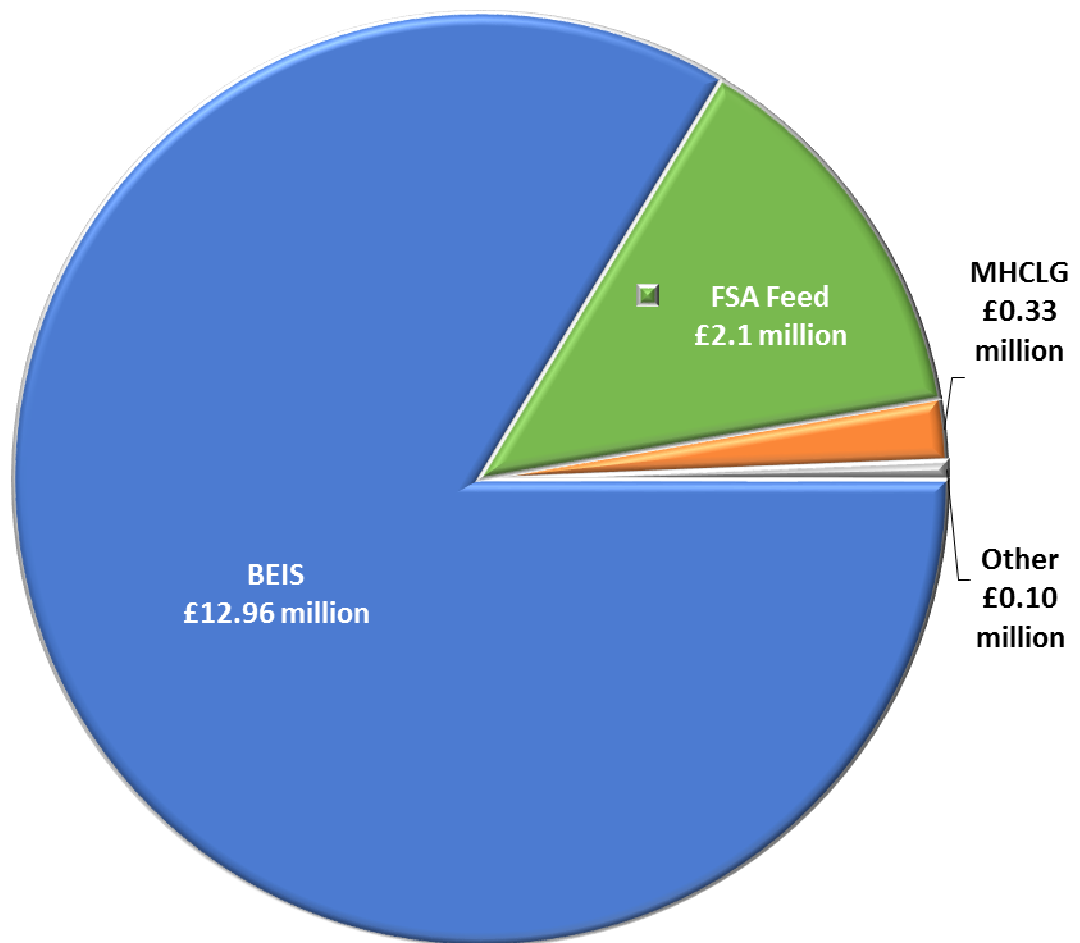
Objective 4

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

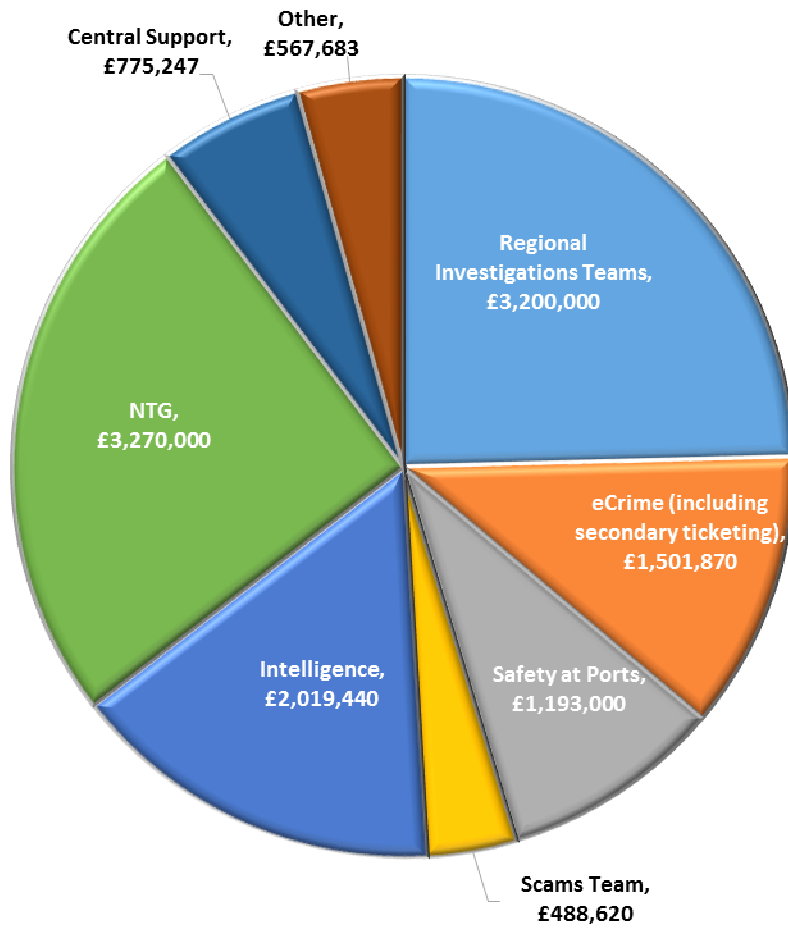
We will do this by:

- Overseeing and administering an animal feed inspection and sampling programme to ensure compliance with standards across the animal feed supply chain.
- Working with FSA to refresh the UK wide feed threat assessment to help inform future priorities for this work
- Supporting local authority expert panels on feed to develop guidance and help ensure consistency and best practice in feed enforcement.
- Develop a new national priority inspection approach designed to focus activity on known risks and increase compliance.
- Support authorities to embed 'earned recognition' by producing guidance and training on database management and validation.
- Work to better understand the national intelligence requirements in relation to feed hygiene.

Annex 1
Overall Funding to National Trading Standards 2018/19

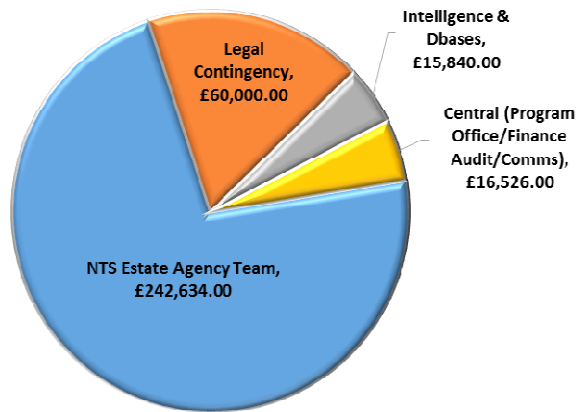


Annex 2
BEIS Grant Funding to National Trading Standards 2018/19

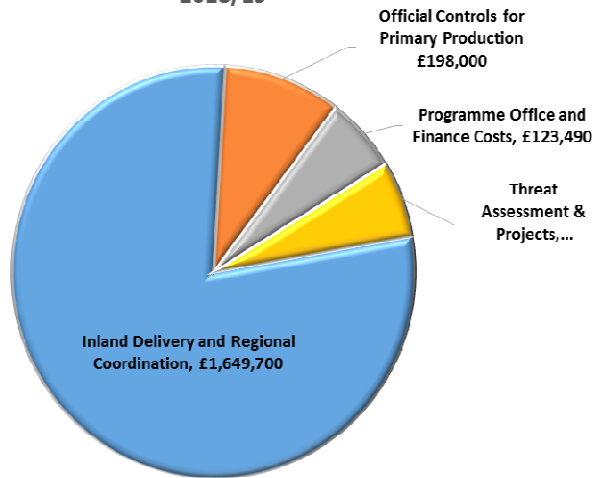


Other	£	Central Support	£	Intelligence	£
Regional Coordination	£306,000	Programme Office	£590,000	NTS Intelligence Team	£592,000
ASA Liaison	£52,000	Chair Costs	£53,045	Regional Intelligence	£810,000
TSI Conference	£4,000	TSI Finance	£132,202	Other Intelligence	£20,000
Contingency	£50,000			Local Intelligence Databases	£164,000
Communications	£140,683			Memex/12/IDB/PNC/Crimson/PND	£433,440
elearning	£15,000				
	£567,683		£775,247		£2,019,440

**Annex 3
MHCLG Grant to National Trading Standards for Estate
Agency 2018/19**



**Annex 4
FSA Funding to National Trading Standards for Feed Delivery
2018/19**



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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.