

Joint Halton & Warrington Trading Standards Service Specification

Draft 5. August 2007

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Date: 8th August 2008

Section A: BACKGROUND, OVERVIEW, CURRENT KEY STRENGTHS AND OUTCOMES OF TRADING STANDARDS SERVICES IN HALTON AND WARRINGTON

i) This Document outlines the Service Specification for the proposed joint Trading Standards service for Halton and Warrington Borough Councils. This Service Specification details the key objectives and deliverables in the respective Boroughs over the period of the contract between the Authorities. It is a 'higher' level document which sets out the vision and key objectives for the joint Service, but is not the business plan, which when completed, will ultimately set out how the objectives will be delivered.

both services have achieved a great deal.

ii) Both Halton and Warrington Trading Standards services have achieved a great deal since their creation in 1998. Substantial progress has been made in some areas of work such as significantly improving and maintaining consumer engagement in our most deprived communities, reducing the impact of rogue traders,

tackling the perpetrators of doorstep crime, and tackling certain forms of underage sales. Yet there is still a great deal of work to do to ensure that we maximise the positive contribution we can have in the communities in both Halton and Warrington. Table 1 below details some of the key strengths and outcomes of both services.

rationale behind a joint service.

iii) It is vital that in today's environment of diminishing local government resources, and increasing commitments, that we prioritise our activities to those, which have the greatest impact on health, wellbeing, community safety and economic prosperity. Balancing these priorities can be very difficult, as short term needs, such as rogues who are currently preying on the vulnerable, must be balanced against other issues which may take a generation to resolve, such as the rising levels of childhood obesity and alcohol harm. Building upon our commitments to

improve public health and protect the safety of our communities will bring further challenges, as will an increasingly complex and global market place. It is vital for all our stakeholders that the Service continues to modernise and improve so that we can deal with these new challenges.

iv) Currently both Halton and Warrington Trading Standards services deliver an excellent level of service to consumers across North Cheshire. However, we feel that only by merging our respective services and effectively pooling best practice from both departments, will we be able to maintain this excellent level of service, meet our financial constraints and deal with increasing demands.

CURRENT OVERVIEW OF TRADING STANDARDS IN HALTON AND WARRINGTON

v) The Trading Standards teams of both Halton and Warrington are currently split into roughly three 'operational areas, namely Consumer Advice and Education, Fair Trading and Quality, Metrology and Safety.

consumer advice & education

vi) We currently offer a 'comprehensive' consumer advice and education service to all people and businesses, which reside in both Boroughs. Through the provision of advice and assistance we can make a significant difference in people's lives, however, not all consumers have the knowledge, confidence or ability to be able to access our Services. There are numerous complex factors and barriers, which affect accessibility. The problem of limited accessibility is further compounded when one considers that our customers, who potentially need the greatest level of advice and assistance, are the ones

that have traditionally used us the least.

fair trading

vii) Our respective fair trading teams are committed to ensuring that the description and quality of goods and services is satisfactory, that credit is marketed correctly and agreements enforced fairly. The teams tackle 'rogue traders' by a robust intelligence led 'problem traders' processes, whereby we firstly encourage compliance by educating businesses, whilst taking strong action against those who deliberately flaunt the law. The teams also promote further 'self-regulation' through approval schemes such as the 'Approved Motor Trader Scheme', which operates across both Halton and Warrington.

quality, metrology & product safety

viii) Both services are responsible for the enforcement of a wide range of legislation controlling the weight and volume of goods, the quality of foods¹ and the safety of products, both produced, and on sale, in both Halton and Warrington. Weights and Measures Inspectors check the weights and volumes of pre-packed goods and also the equipment used to measure goods, such as petrol pumps and scales. In Warrington Food Safety Officers ensure that food meets UK and European legislation and quality standards by controlling the advertising, production, marketing, distribution and supply throughout the food chain.

ix) Consumer safety officers make checks on goods from the point of production through to the sale. Our respective services also have a responsibility for other specific areas of law enforcement, including security

¹ NB This function is currently carried out by Environmental Health in Halton

and safe storage of explosives, inspection of petroleum storage sites and the enforcement of legislation concerning under-age sales.

The following table summarises some of the current key strengths and outcomes of the trading standards services in both Halton and Warrington:

KEY STRENGTHS & OUTCOMES

Table (1): Key Strengths and Outcomes (Halton & Warrington Trading Standards)	
Customer Base:	<ul style="list-style-type: none"> ▪ Nearly 8000 customers used the Warrington trading standards service in 2007/08, an increase of nearly 50% over five years. During the same period nearly 4000 consumers accessed the service in Halton ▪ Satisfaction ratings remain high with over 92% being either very satisfied or fairly satisfied with the service received and are above the unitary average in both boroughs.
Consumer Direct	<ul style="list-style-type: none"> ▪ In December 2005 Halton consumer protection service linked up with Consumer Direct in the North West (CDNW). The service responds to all Consumer Direct civil and criminal referrals and complaints that reach the Service by other means. ▪ Warrington trading standards successfully linked up with CDNW in January 2007. ▪ The true impact of this partnership has yet to be assessed, however, it has enabled the service to free up vital officer time from dealing with routine 'first-response' enquiries, instead concentrating on higher level cases and proactive consumer advice and education interventions.
Consumer Alert Network (iCAN):	<ul style="list-style-type: none"> ▪ ICAN is a sophisticated message broadcast system, which enables Halton and Warrington trading standards to send out messages on consumer scams etc to a large number of individuals across both Borough's, thus improving protection. ▪ Since ICAN went live in Warrington in 2004 over 1800 members have been recruited in all parts of the town. ▪ Halton trading standards successfully utilised some grant funding to join the ICAN system in 2007. ▪ Since the system went live, over 150,000 individual messages have been sent out, ranging from warnings about rogue traders to advice about junk mail and telephone scams.
Improving Access in Deprived Communities	<ul style="list-style-type: none"> ▪ Through the Ward Contact programme and ICAN system excellent links have been developed in the seven most deprived wards in Warrington. These links continue to enable the service to significantly improve access in these wards. ▪ Halton Trading Standards service is also concerned with raising its profile in the most deprived areas of the Borough. The current Halton service plan included undertaking 5 activities within these

**Table (1):
Key Strengths and Outcomes (Halton & Warrington Trading Standards)**

	<p>Neighbourhood Management Areas (NMA's). 16 activities actually took place within the 3 Neighbourhood Management Areas during 2007/08.</p> <ul style="list-style-type: none"> ▪ Halton Trading Standards service also manages a £36k Budgeting Skills project funded by the Local Strategic Partnership and delivered by Halton Credit Union. It is likely that the project will be funded for a further two years.
Alcohol Harm Reduction	<ul style="list-style-type: none"> ▪ Significant progress has been made over the last few years with the test purchase failure rate in Warrington reducing to 13% at the end of 2007/08 from a high of 55% in 2003. Over this period of time Trading Standards in Warrington have trained over 2000 individuals working in the alcohol industry and issued over 10,000 Validate Proof of Age Cards. ▪ Following the results of primary research with year 11 school children, significant progress has been made in tackling alcohol sales to underage children in Halton. Consequently over the last few years the test purchase failure rate in Halton has reduced to just over 4% during 2007/08 from a high of 30% in 2002. ▪ Following on from this Halton have managed the roll out and repeat of this primary research across the Trading Standards North West Region via 20+ Local Authorities in 2004/5 and 2006/7. This intelligence-led approach directs the work of trading standards across the Region. Following additional work by Liverpool John Moores University renowned Public Health Unit this research has been circulated widely and is referred to at Governmental levels. ▪ Since 2006 Halton Consumer Protection, in partnership with the PCT and using a company Inn Confidence Ltd, have trained over 90 individuals working in the alcohol industry providing them with BIIAB approved certificates and issued over 3,000 Validate Proof of Age Cards since 2004 to years 11, 12 and 13, during one year obtaining a 66% take up rate with yr. 11's. ▪ All off & on licence premises are provided with various advertising materials in both Boroughs to assist them in avoiding underage sales: those that warn adults not to buy alcohol for those under 18, which ID to accept, examples of fake ID, bottle hangers for use in off licences to warn adults against buying for underage. ▪ As a result of this work, underage consumption rates are falling in both Boroughs, an indication that alcohol interventions are starting have a really positive impact.
Tobacco Control	<ul style="list-style-type: none"> ▪ Trading Standards services are at the forefront of tobacco control enforcement strategies in both Boroughs. This work is focussed on restricting underage and counterfeit tobacco

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	<p>supply.</p> <ul style="list-style-type: none"> ▪ Following primary research with year 9 students and a groundbreaking project, which analysed discarded cigarettes packets from across Halton in 2007, the service has adopted a joint intelligence sharing and enforcement approach. This approach with HMRC and DWP aims to tackle the supply of counterfeit and non-duty paid tobacco products. Halton trading standards has co-ordinated multi-agency tobacco enforcement days targeting both domestic and retail sellers of illicit tobacco. This is in conjunction with educational messages circulated via direct radio marketing and close liaison with licensees for on and off licensed premises to warn them of the activities of illicit tobacco suppliers in the area. All tobacco premises have been provided with posters about which ID to accept, examples of fake ID, badges for staff to wear advising customers that it's their job to ask for ID. ▪ Warrington trading standards are developing and leading on a Tobacco Control strategy for the town. Halton trading standards is also a stakeholder on the PCT Tobacco Harm Reduction group and has worked closely with the PCT School Tobacco Officer. By February 2008 test purchase failure rate in Halton reduced to 8% from a high of 40% in 2006. ▪ Since the development of the project to look at discarded cigarette packets, there has been considerable interest across the Country and TSNW are now promoting rolling it out across the Region. The Warrington Trading Standards Manager is also leading on counterfeit tobacco agenda in the North West.
<p>Food Health</p>	<ul style="list-style-type: none"> ▪ Trading Standards in Warrington are at the forefront of the development of a Food Strategy for the town. ▪ Work is underway with producers and catering premises to reduce salt sugar and saturated fat content in processed food. In 2007, Warrington trading standards launched the <i>Food Award</i>, a unique initiative, which recognises food premises, which meet both high nutritional and hygiene standards. ▪ Warrington Trading Standards have also worked very closely with the Warrington PCT's Food and Health Team to extensively deliver training on food issues for at risk groups, as well as becoming accredited to run the <i>CIEH Nutrition Course</i>, being the first enforcement body in the North West to achieve this status.
<p>Home Safety and Young Consumers</p>	<ul style="list-style-type: none"> ▪ Last year Warrington Trading Standards visited 16 schools delivering home safety education to over 700 pupils. They have also developed a web based resource for schools to use and are currently developing a series of National Curriculum linked Schemes of Work for Schools to use independently. ▪ Trading Standards in Warrington have also developed a number

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	<p>of web-based, national curriculum linked, schemes of work for primary schools which enable key consumer messages to be taught to young, developing consumers.</p> <ul style="list-style-type: none"> ▪ Halton consumer protection service have run a borough wide Consumer Challenge Quiz every year since 2006. The quiz enables children with learning difficulties and disabilities to gain valuable consumer knowledge. The winning team attends the national final and meet children from all around the country. An often-overlooked group of consumers gain valuable life skills and have fun at the same time. The Service would like to offer the competition to all mainstream primary schools in the 3 Neighbourhood Management Areas (NMAs) when staffing levels permit. ▪ Halton consumer protection service is currently working in partnership with a theatre group in 4 NMA primary schools. The project allows a group of young people the opportunity to work with professional drama facilitators to create a performance on the theme of 'Making the Right Decisions'. The focus of this will be issues arising from trading standards and also more general issues, such as social skills like sharing and being happy with what you have. Children will have the chance to develop drama skills, build confidence and then perform their own piece of theatre at the end of the project to both parents and peers.
<p>Doorstep Crime</p>	<ul style="list-style-type: none"> ▪ Doorstep crime approaches have been further developed and improved. Trading standards have intervened² in all reported cases and consequently saved our communities £100,000's in economic terms. The actual benefit to consumers in terms of independence and fear of crime is also very significant. Through partnership links and the proactive use of the ICAN system in both Boroughs we are preventing more issues from escalating than ever before. ▪ Halton consumer protection service has also set up two No Cold Calling Zones. The aim is to empower residents to be able to say no to cold callers and to reduce doorstep crime and distraction burglary in the zones. We also participate in Rogue Trader days, a police-led Operation. The Operation aims to speak with builders, pavers, gardeners, painters and decorators, and roofers to ensure they are complying with relevant legislation and that householders are happy with any work being carried out.
<p>Informal Economy</p>	<ul style="list-style-type: none"> ▪ Warrington Trading Standards have continued to disrupt traders operating in the informal economy and through working in partnership with Halton Trading Standards recovered their first Proceeds of Crime monies in 2006/07. These proceeds (£22,000) have been used to further prevent and detect crime by being

² Meeting the service standard of intervention within 1 hour in all cases.

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	<p>used to fund a temporary iCAN Project Officer post.</p> <ul style="list-style-type: none"> Through partnership working with other intelligence led agencies, particularly the Fraud Investigation Unit at DWP, Halton have combined investigative resource to tackle informal economy crime with a particular focus on anti-counterfeiting work.
Risk-factored Inspection Programme	<ul style="list-style-type: none"> Warrington Trading Standards has continued to meet its objective to inspect all 'high risk' premises. This includes: food hygiene, health & safety, food standards, fair trading, product safety and weights and measures. Halton consumer protection service undertakes 100% of high-risk and appropriate medium risk visits.
Proceeds of Crime	<ul style="list-style-type: none"> Halton consumer protection service are the regional 'centre of excellence' offering specialist expertise on proceeds of crime for trading standards services in the North West. Halton currently employ a Senior Trading Standards Officer (STSO), who is also an Accredited Financial Investigator (AFI), and have recently contracted a part-time AFI. These Officers provide a Regional Financial Investigation Resource for 21 Trading Standards North West (TSNW). Since POCA's inception training has been provided at TSNW Chief Officers meetings, and two Branch Conferences and a presentation for LACORS Chief Officers Conference. Full day courses have been provided for 90+ Officers within TSNW and 16 Officers in CENTSA (Central Trading Standards Area) with another 2 CENTSA courses scheduled. In addition one to one training has been provided whilst running through live cases with Officers.
Business Improvement	<ul style="list-style-type: none"> Both Halton and Warrington Trading Standards continues to maintain a BVPI 166 rating of 100% and is above average in all the relevant national performance indicators.
Municipal Journal Local Government Achievement Award	<ul style="list-style-type: none"> Trading Standards in Warrington were the winners of the MJ Award in 2006, the first of its kind in the Public Protection Category. The award recognised how Warrington's work to improve contacts with the most deprived members of our community had a positive impact, providing evidence of a; high quality service, an example of a successful partnership between the service, the local authority and the community, and evidence of value for money.

Section B: KEY JOINT SERVICE OBJECTIVES

1. Improving health and well-being and promoting independence in Warrington / Ensuring a healthy Halton.

1.1) The Trading Standards services in Halton and Warrington with their traditional role of ensuring business compliance through vigorous enforcement activities and empowering consumers through targeted consumer education, have a less recognised, albeit important, role to play in maintaining and improving the health and well-being of our communities.

improving health: pressures and drivers

1.2) Improving health pressures and drivers:

- *Children in social class V are five times as likely to suffer accidental death than their peers in social class I – 83 and 16 per 100,000 respectively.*
- *Residential fire deaths for children are 15 times greater for children in social class V compared to those in social class I.*
- *Underage sales can adversely affect health: ¾s adult smokers become addicted before 16 and 90% of 14-17 year olds in the Halton and Warrington area drink alcohol. Smoking causes around 120,000 deaths and the effects of misuse of alcohol costs £20billion each year.*
- *The death rate from coronary heart disease is three times higher among unskilled manual men of working age than among professional men.*
- *Around 16% 2-16 year olds are classified as obese.*

1.3) Trading Standards Services in both Halton and Warrington have strongly embraced the challenges of the Public Health Agenda and contributed to both Councils aims to improve health and wellbeing, especially in terms of alcohol and tobacco control.

1.4) A joint Service will build further capacity in this field and make significant contributions to health improvement and reducing health inequalities in terms of reducing:

- **Underage alcohol harm.**
- **Smoking prevalence, especially amongst underage smokers and those in deprived areas.**
- **Substance misuse**
- **Levels of obesity³**

REDUCING UNDERAGE CONSUMPTION OF ALCOHOL

1.5) A great deal of work has been done in terms of developing and implementing alcohol enforcement interventions over the last four years. Through targeted enforcement the proportion of young people who purchase their own alcohol has fallen from 41% to 22% in Halton and 33% to

³ Warrington Borough Council will continue with its food strategy to improve awareness of healthy food choices, as well as working with producers to reduce salt, sugar and saturated fat content in food.

22% in Warrington in the last two years. However, much work still needs to be done in terms of reducing binge drinking and drinking in public places in both Boroughs.

1.6) A joint Service will build upon current strengths and expertise in terms of reducing alcohol harm by:

- **reducing underage access:**
Continuing to work with partners to further develop our intelligence led enforcement approaches to underage alcohol sales, focussing on test purchase programmes and proxy-sales.
- **business support:** Providing Trader Training programmes, which focus on understanding the legislation, Age Recognition techniques, and *Dealing with Conflict*.
- **proof of age:** Promoting the *Validate* Proof of Age Card in all Halton and Warrington high schools.

TOBACCO CONTROL & REDUCING SMOKING PREVALENCE

1.7) Despite smoking prevalence reducing across both Halton and Warrington, rates amongst certain classes of society remain concerningly high. The Department of Health and Government Office North West have identified in their developing Strategy that if we are to impact on reducing smoking prevalence in our deprived communities then we have to reduce underage access to tobacco, as well as reducing the market in illicit tobacco. This Strategy recognises that Trading Standards services have a key role to play in terms of Tobacco Control in the region.

1.8) Both Halton and Warrington Trading Standards Services have an excellent track record in terms of

tobacco control work, which is currently leading the way for the Region. Halton have conducted excellent work in terms of identifying counterfeit tobacco in the community and Warrington have taken the Tobacco Control lead in the Borough, which has brought a number of partners together to maximise the collected impact of their work.

1.9) Again a joint Service will bring together the respective strengths and as well as helping to reduce smoking prevalence in our respective areas, will be at the forefront of tobacco control policy and strategy development regionally. We will take the lead role for the implementation of a Tobacco Control Strategy in Warrington and ensure that we fully link into the equivalent Strategy in Halton.

1.10) Overall Smoking prevalence will be reduced by:

- **reducing underage access:**
Working with partners to develop intelligence led approach to underage sales.
- **business support:** Alongside our alcohol work helping business by close support and by the provision of *Age Recognition* and *Dealing with Conflict* Training.
- **reducing the availability of illicit tobacco:** Identifying the nature and scale of the illicit tobacco 'market' and working with other law enforcement partners to take strong action against those engaged in the supply of counterfeit cigarettes.

SUBSTANCE MISUSE

1.11) It is anticipated that we will monitor the intelligence and information provided by partners and target underage sales campaigns to address substances and traders that we suspect are linked to substance misuse.

2. Making Warrington's communities safer stronger and sustainable / A safer Halton:

doorstep crime and consumer scams

2.1) It has been often said that an Englishman's home is his castle. The strength of feeling evoked when someone intrudes into the safety and security of another's home can be substantial. However, businesses, legitimate and illegitimate are becoming ever more adept at getting into people's homes, either through direct sales, door to door calling, junk mail, newspapers, the internet and many other means. Many consumers let their guard down when in their own home and, consequently commercial crime in people's homes is on the increase.

2.2) This type of crime can take many forms. It can be the bogus offender offering to undertake unnecessary roof repairs, double-glazing or garden maintenance. It can be home-working schemes, or lottery scams. It can be Internet or mail fraud, loan-sharking or premium rate telephone scams. However, all these crimes have two things in common, they target the vulnerable and they involve often cruel trickery. Half of the UK adult population had been targeted by a scam and every year one in 15 people (3.2 million adults) fall victim. The average amount lost per scam is around £850.

2.3) Trading Standards form the front line in tackling commercial frauds. As many of these offences are low-level and underreported, they don't often feature in crime strategies, but they nevertheless need to be tackled effectively.

DOORSTEP CRIME.

2.4) Trading Standards receive a number of so called 'doorstep crime' complaints, whereby primarily older, vulnerable people are targeted by organised criminal gangs, who charge exorbitant prices for extremely shoddy work, or for work not done at all. These crimes have been rising over the last few years⁴ and are a priority for Trading Standards in both Halton and Warrington, due to the impact on the victim and the likely under-reporting rate⁵. However, the rise may be due to increased awareness. Furthermore, the fact that Trading Standards in Halton and Warrington jointly file more intelligence reports than any other authority in the North West indicates how we have matched resources against our commitments in this area, alongside demonstrating that we have well developed communications channels with the police and other agencies.

2.5) The majority of DSC relates to unscrupulous traders who sell unnecessary, sub-standard or dangerous goods and services. Often these traders 'cold call', that is they visit a home without making a prior appointment. Vulnerable residents such as the elderly are often targeted with strong arm tactics being used regularly. Doorstep sellers may also engage in opportunistic crime including distraction or 'sneak in' burglary.

⁴ However, this may indicate that more crimes are being reported due to improved communications channels.

⁵ A Home Office report published in 2001 estimated that only "1 in 25" distraction burglaries (which are a type of doorstep crime) are ever reported to the police.

2.6) Doorstep Crime Evidence:

- *Cowboy builders have cheated up to 1/5th of householders in the last five years.*
- *The Home Office report that as little as 1 in 15 vulnerable older adults report instances of doorstep crime to the relevant authorities.*
- *The average victim of doorstep crime is 83 year old female living on her own.*
- *Age Concern suggest that bogus callers gain entry to 180,000 homes of the elderly each year (this equates to roughly 3 instances per day in Halton and Warrington)*
- *Doorstep crimes are the most difficult forms of household theft to investigate. Consequently detection rates are far lower than other forms of burglary.*
- *Changes in social policy – with the move away from residential care to towards home-based care – mean that the number of older people living alone is likely to increase by 33% by 2021*

2.7) A joint service will have doorstep crime as one of its key priorities. We will adopt a common service standard whereby we respond to all doorstep crime complaints, intervening where a crime is in 'progress', within 1 hour. This commitment is alongside our other work to reduce doorstep crime, which includes:

- **prompt & effective enforcement**, whereby we react to all incidents of doorstep crime giving support to the victim and taking strong and robust action against the perpetrators where possible.
- **better prevention and education:** We will further develop our educational and prevention approaches using the iCAN system and liaising with a number of

partners to cascade 'training' to potential victims.

- **improved intelligence:** Through improved intelligence gathering and analysis we will be better able to identify offenders, locations and potential victims thus enabling the service to develop proactive interventions which have a greater impact.

CONSUMER SCAMS

2.8) These types of scam include bogus home-working schemes, lottery and premium rate telephone scams. The perpetrators of such scams are rarely locally based and more often these days are based overseas. Consequently enforcement action can very difficult to take. As a joint service will fully utilise our communication channels to ensure that warnings are given to the public as necessary, which may involve press releases, iCAN warnings etc.

informal economy

2.9) Markets work well for consumers when there is vigorous competition between fair dealing businesses for their custom. This competition and fairness is substantially undermined when traders operate in the informal marketplace. Its results in an uneven playing field for legitimate business, substantial costs associated with intellectual property and security protection, consumer detriment and substantial loss to the Exchequer in taxation.

2.10) Many traders operating in the informal economy are also prominent and prolific offenders, linked to crime families, organised crime, and in some cases international terrorism. They can be engaged in product counterfeiting, the introduction of illegal goods or the re-introduction of stolen goods to the marketplace, criminal deceptions, food

adulteration, substitution or fraud or supply chain or long form frauds.

2.11) Trading Standards have shown that, in partnership with industry and other enforcement bodies, effective action can be taken to disrupt and curtail the activities of traders operating in the informal economy.

INTELLECTUAL PROPERTY CRIME

2.12) Intellectual property crime (IPC) is the counterfeiting and piracy of trade marked and copyrighted products and services. Fake products abound in almost all industry sectors including designer fashion, luxury goods, electrical equipment, audio visual, toys, games, drinks, cigarettes, pharmaceutical products and automotive parts. The IP Crime Report reveals that the range of goods being copied and illegally reproduced is growing, extending to such diverse products as counterfeit razor blades, motorbikes and crane spare parts.

the harm caused by IP crime

2.13) IP crime has a multitude of undesirable effects throughout the UK. There is the immediate consequence of a serious threat to consumer safety, where goods have not undergone product safety testing. The secondary consequences are no less important but perhaps are not recognised as having the same immediate impact as the consumer harm problem. Both the UK economy and businesses are suffering. The seriousness of this impact should not be underestimated. There is also the impact on local communities. The UK IP Crime Report indicates that there are numerous examples of a growing association between dishonesty and damaging social trends. People are selling fake goods whilst also engaged in defrauding the benefits system. There

is also evidence that criminals are using illegal immigrants to sell pirated goods. Criminals are also shown to be exploiting children and grooming them into a criminal lifestyle.

2.14) Unfortunately there appears to be a general acceptance in parts of the population that IP crime is an easy way to gain an affluent lifestyle. These activities are, in the main, driven by the consumers who demand a bargain.

2.15) There is also the loss of revenue to Government in taxes. This is difficult to quantify, but tax losses range from corporate tax to VAT and excise duties on alcohol and cigarettes. In 2006 Her Majesty's Revenue and Customs reports that an estimate of 2 billion cigarettes were counterfeit and that the total trade of 18.5 billion non-UK duty paid cigarettes cost the taxpayer £2.9 billion.

scope and scale of IP crime

2.16) The true measure of the level of IP crime within the UK is unknown, but the evidence available shows that the problem is significant. The Organisation for Economic Co-operation and Development also encountered similar difficulties when trying to establish a true measure of the problem in their June 2007 study entitled "The Economic Impact of Counterfeiting and Piracy" (the full report from Phase 1 of which is still to come). In their Executive Summary published in June 2007 they indicated that in 2005, the "international trade in counterfeit and pirated products could have been up to US\$200 billion" which referred only to such products seized by Customs at national borders. What is clear is that IP criminals are continuing to develop new ways to make money from crime.

2.17) Criminals are being driven into more underground, diffuse methods, such as the Internet, to reduce the risk of detection. The Internet has also become an important, alternative market and a way to supply fakes on demand. The increased use of the Internet has put many enforcement organisations under pressure to gain additional resources, develop new expertise and evidence securing methodologies.

2.18) As a joint service we will ensure that we tackle IP Crime in both Halton and Warrington by:

- Formally investigating all 'material' complaints about the production and sale of counterfeit products in the Borough.
- Working to designate Halton and Warrington as 'Fake Free' Boroughs.
- Proactively working with informal markets, such as workplaces and occasional markets to both identify and prevent the sale of counterfeit goods.



3. Ensuring all children and young people have the opportunity to reach their potential in Warrington / Children and young people in Halton

3.1) Previous sections of this document have demonstrated that a joint service will endeavour to give a greater level of protection to young people. Objectives around alcohol, tobacco, substance misuse etc demonstrate our commitment to protecting young people. Alongside this work we aim to educate help young people to be confident demanding consumers through a variety of means.

3.2) Examples of some of the initiatives we will deliver as a joint service to young consumers include:

- The promotion of web based schemes of work entitled 'what price chocolate' and 'planning a barbecue' to all schools in both Halton and Warrington.
- The promotion of our web based Home Safety Pack to all schools in Halton and Warrington and a continuance of the Home Safety Quiz offered to all primary schools in Warrington⁶.
- A drama project called 'Making the Right Move', which gives a group of young people the opportunity to work with professional drama facilitators to create a performance around the theme of making the right decisions.
- Budget Skills project in conjunction with the Halton Credit Union.

⁶ The Home Safety function is currently carried out by the Environmental Health team.

4. Improving Warrington's local environment and economy and regenerating its deprived areas / Employment, learning and skills in Halton.

4.1) We will help to ensure the economic prosperity and viability across both Warrington and Halton by working with business to get it right first time and through effective enforcement. Resources will be prioritised around ensuring that so called high risk businesses comply with their legal obligations and a relatively light touch for low risk businesses that have a good history of compliance.

our enforcement approaches and mix

4.2) A joint service will be responsible for a large number of Acts, Regulations and associated Codes of Practice. Our primary role in enforcing the law is to protect consumers and reputable traders. Prosecution is very much a last resort and our primary aim is to seek compliance by education and guidance. To demonstrate our commitment to a balanced approach to enforcement, we will adopt the principles of good enforcement practice set out in the '*Enforcement Concordat*'. We will ensure that both Councils approve a joint Enforcement Policy

4.3) Due to changes to the global marketplace, rise in contact rates etc, the demand for our services will exceed level of supply. Due to resource limitations, we cannot routinely inspect all premises or investigate all complaints to the level the consumer would wish, but have to balance what our customer's demand against activities which will have the greatest impact on consumer protection. This Specification details the activities that our stakeholders and officers believe will better protect the

consumer and allow the reputable trader to flourish. Our **enforcement mix** will influence these activities and helps us to prioritise our work. Stakeholder and staff consultation in both Halton and Warrington has determined a joint enforcement mix. The four elements of our enforcement mix are as follows:

- **proactive led:** This involves us conducting projects or investigations into specific traders or trading practices. An example of proactive working includes problem trader's work.
- **complaint led:** Complaint investigation can be costly and of limited value, hence we will not investigate all minor breaches. Likewise, unless there are exceptional circumstances, complaints will not form the sole basis for a prosecution. Instead, they will provide us with the intelligence to make test purchases. Furthermore, complaints will not be investigated solely as a mechanism for consumers obtaining compensation.
- **inspection led:** It is important that we carry out inspections in the market place, as complaints will not always give a true picture of how the trader is performing. Inspections also enable the trader to check compliance issues with the inspector who, in turn, aims to help the trader comply with the law. It is vital, however, that inspections are targeted at areas of greatest risk, otherwise they are of limited value.
- **education led:** Education and prevention forms an integral part of all the above as, in most cases,

proactive work such as problem traders relies on education to achieve its aims in the first instance. Inspections should also be conducted with the aim of educating business to achieve a level of compliance, which is maintained following the visit. It is vital that we as a Service promote prevention, as merely enforcing the law does not adequately protect the individual. Prevention will be achieved through educational activities, such as developing specific targeted leaflets and by training key community contacts in consumer issues.

Rogers priorities for local government

4.4) In March 2007 Peter Rogers, Chief Executive of Westminster Council, announced five national priorities to help local authorities focus the enforcement of regulation on the greatest risks. A national approach to regulatory enforcement will enable a greater concentration on the most important issues, a more proportionate approach to low risk issues and greater consistency across the country. Businesses will benefit from improved consistency of enforcement and sharper regulatory focus.

The five main priorities are areas where local authorities can make a real difference and control serious risks to peoples' health and the economy. They are:

- Air quality, including regulation of pollution from factories and homes – Air quality problems damage health, enforcement is a priority to citizens.
- **Alcohol**, entertainment and late night refreshment licensing – 1 in 5 violent incidents occurs in or around public houses, and 17 million working days are lost each year to alcohol related causes.
- Hygiene of businesses selling, distributing and manufacturing food and the safety and fitness of food in the premises – each day food-borne disease leads to almost 1 death, 33 hospitalisations and 1,500 cases of illness.
- Improving health in the workplace – 560,000 workers each year experience illness caused or made worse by work.
- **Fair trading** (trade description, trade marking, mis-description, doorstep selling) – costs consumers an estimated £8 billion each year and 3.5 million people become victims of scams. Rogue traders cause severe distress to the elderly and vulnerable who are often targeted.

4.5) As demonstrated by this specification, a joint service has clearly embedded the so-called Rogers priorities into its own key priorities.

TRADING STANDARDS INSPECTIONS

4.6) A joint service will inspect all high-risk premises due for inspection during the year.

4.7) We will also inspect a proportion of medium risk premises that have been identified through a complaint analysis as warranting inspection (see 5.14 for further details).

4.8) Further interventions will be utilised such as self-assessment to ensure that certain classes of medium and low risk premises are aware of their legal obligations etc.

HOME AUTHORITY ROLE

4.9) Due to its location at the centre of the North West motorway network, both Halton and Warrington attract a

large number of companies who use the town as either their national or regional base. Consequently, we have a larger proportion of Home Authority businesses than neighbouring authorities in the region. A joint service recognises that, by actively working with our Home Authority businesses, we are helping them to prosper as well as protecting consumers outside the town. To fully comply with the Home Authority principle we will:

- Visit all Home Authority businesses at least annually and ensure that each business has a named contact.
- Concentrate our sampling consumer products from home authority businesses.
- Where relevant, enter into Home Authority Agreements with businesses in the area. These agreements will specify the level of service business can expect from us as well as their obligations to the Home Authority Principle⁷.
- Always notify the relevant authority where we discover serious breaches of the civil or criminal law originating from another local authority's home authority business.
- Always take into account feedback from the other authority before contemplating formal action against another authority home authority business.

METROLOGY

4.10) Accurate, reliable and fair weights and measures are fundamental to a sustainable trading economy. Every week around £1 billion worth of retail goods are sold in the United Kingdom on the basis of the

⁷ A combined service will ensure that we respond to the developing role of the home authority currently being reviewed by the Local Better Regulation Office (LBRO).

measurement of their quantity⁸. Consumers need to be confident that they receive the quantity of goods they have paid for. And businesses need to be confident that they are trading in a fair marketplace⁹.

4.11) Inaccurate weighing and measuring equipment or the consequent sale of goods sold under weight may have only a small effect at the level of individual transactions, but the overall effect across the economy can be considerable. For example, not providing full liquid measures of draught beer and cider allows licensees to sell an estimated 200 million more 'pints' a year than they buy in, at an estimated value of about £130 million at wholesale prices. And, in 2000-01, an estimated 94,700 (five per cent) of the over two million items of equipment inspected in service by Trading Standards Officers were found to be inaccurate.

4.12) To meet its statutory duties under metrology legislation a joint service will have the following objectives:

- **metrology inspections:** We will aim to inspect 100% high-risk and a number of medium risk premises, which have been identified through 'alternative enforcement techniques' as meriting and inspection. We will also give higher priority to inspecting premises in the deprived areas of the joint area.
- **metrology verifications:** We will continue to offer a verification service to businesses in the Borough aiming to complete all jobs within 5 working days of the request.

⁸ Source: National Weights and Measures Laboratory, *National Measurement System: Legal Metrology Programme 1999-2002*.

⁹ Source: National Weights and Measures Laboratory web site: *The importance of legal metrology*.

- **average weight:** We will ensure that we inspect all relevant average weight producers/packers in the Borough.
- **metrology promotion:** We will promote our metrology function through our Petrol Pump 'Sticking' programme. This will improve awareness of what we do as well as promoting the Approved Motor Trader Scheme.

PRODUCT SAFETY

4.13) The joint service will have a statutory responsibility to enforce product safety legislation. To meet this statutory requirement we will be committed to ensuring the safety of goods both produced and on sale, in both Boroughs. This will be achieved through sampling, inspection and advice to traders and consumers. Where we receive evidence of goods on sale, which contravene safety legislation, consideration, will be given on whether to invoke our powers to suspend these goods. These powers will not be invoked lightly, and whilst consideration must be given to the prevention of further sales of unsafe goods to consumers, this will be carried out with due regard made to statutory procedures and professionalism of the joint service.

4.14) A joint service recognises that where possible we must focus our activities to address issues of social inclusion. Priority will be given to work such as the sampling of second hand or reconditioned electrical appliances, with other cheaper products our socially excluded residents often have little choice but to buy these goods

4.15) We will conduct an examination of product safety related complaints to help identify issues and trends, inform our sampling programme and to enable specific warnings to be issued through the media where relevant. Furthermore,

should we identify issues with particular products or classes of product then we will conduct projects to identify the causes of the problems and thus effectively reduce the risk. We will also work with the TSNW Product Safety focus Group to develop regional sampling plan. This will ensure a more co-ordinated strategic approach to sampling.

MOST COMPLAINED ABOUT TRADERS (MCATS)

4.16) Problem Traders have a large impact on consumers in Halton and Warrington by virtue of the volume and nature of complaints they generate. Most of the complaints falling into the MCAT category are generated by traders who generally do not intend to deceive, but fail due to poor systems, including complaint handling methods. Dealing with these types of complaints is time consuming and draws away resources from dealing with potentially more serious issues. It also inhibits the service from proactively addressing the issue of low contact rates amongst the socially excluded sectors of our community. Clearly, it is important that we work with these traders to tackle the causes of these complaints and so free up resources to deal with the dishonest rogue and tackle the social inclusion issues. Work has demonstrated that where we work closely with the majority of MCAT Traders, complaint levels can be significantly reduced.

4.17) A joint service will further refine its approaches to ensure that we effectively identify problem traders each quarter and develop interventions to address the factors, which cause complaints and consumer dissatisfaction.

TRADER APPROVAL SCHEMES

4.18) Trader Approval Schemes achieve benefits to the consumer by the promotion of traders who comply with quality assured standards and who have an effective complaints handling system in place should things go wrong. Schemes benefit traders by the promotion of a positive public image, the provision of training and by the comfort of quality systems being externally audited. Finally, Schemes achieve benefits to the local authority of improved relationships with traders and improved standards within the relevant trade sector.

4.19) We currently operate a joint and very successful motor trade approval scheme across both Halton and Warrington, currently with over thirty members. We will continue to promote and develop this scheme alongside exploring how the current *Shopping with Confidence* Scheme for Warrington Market can be extended to similar locations in Halton

REGIONAL PROCEEDS OF CRIME WORK

background to proceeds of crime

4.20) The Proceeds of Crime Act 2002 (POCA) was introduced by the Government as it recognised that leaving illicitly obtained assets in the hands of criminals was damaging to society and in doing so sent the wrong message, particularly to young people, that crime pays.

current position

4.21) Halton Consumer Protection is currently employs a Senior Trading Standards Officer (STSO) who is also an Accredited Financial Investigator (AFI) and have recently contracted a part-time AFI. These Officers provide a

Regional Financial Investigation Resource for 21 Trading Standards North West (TSNW) Local Authorities, currently charging an hourly rate in order to backfill officer time post. To maintain this function the service has now recovers a proportion of the incentivisation monies available under the asset recovery scheme. A recent investment has been made into the provision of bespoke FI software and hardware in order to increase team capacity and efficiency.

the future for proceeds of crime work in a joint service

4.22) A joint service will aim to be a trading standards Centre of Excellence for Financial Investigation by offering specialist expertise particularly relevant to trading standards and striving to increase team size, capacity and efficiency.

5. Consumer Engagement

consumer engagement: service issues pressures and drivers

5.1) *'Given the importance of consuming in today's world, consumer skills are a pre-requisite for active citizenship and full participation within society'.* (National Consumer Council: 2006)

5.2) Today's marketplace is complex and fast moving. Credit and Internet shopping have all added to the need for all consumers to be knowledgeable and empowered. The so called 'Credit Crunch' also will have a key impact on requests for advice and assistance as consumers shop around for the best deals, consequently falling prey to unscrupulous traders and selling techniques etc. Some of the key issues, pressures and drivers include:

- Consumer detriment each year costs consumers in the UK around £8.3 billion pounds. This equates to around £350 for each household in Warrington. The effect of consumer detriment is magnified three-fold for those on lower incomes
- 1/3rd of consumers each year feel that they have been treated unfairly by providers of goods and services. Consumers who are in the lower social classes are least likely to complain.
- Total UK personal debt at the end of September 2007 stood at £1,380bn, a rise of 10% in the last year. 8.2 million British adults are in serious debt and 2.1 million are struggling with repayments.

CONSUMER ADVICE

5.3) Both Halton and Warrington trading standards services currently

work in partnership with Consumer Direct (CD)¹⁰ to provide consumer advice at all levels to local consumers. CD currently provides consumers with basic advice regarding their statutory and legal rights. Issues requiring enforcement action, liaison with traders or extra support, for example to vulnerable consumers, are currently referred to our respective Trading Standards Services. This would continue in a joint service arrangement, subject to the levels of service provided by Consumer Direct being maintained.

5.4) A joint service will continue to operate a comprehensive consumer advice service to all residents in both Boroughs subject to agreed Service standards (see Appendix 2). With a larger consumer advice resource we will be able to specialise to greater extent to what we both currently do, thus improving the potential level and quality of service to consumers across the joint area. The following points set out the quality criteria for Consumer Advice in the joint area:

- **quality:** we strive to constantly give our consumers and businesses expert, accurate and timely advice and assistance.
- **accessibility:** we ensure that all consumers are able to access the Service with a greater level of assistance being given to those who can help themselves the least up to help with county court cases where necessary. We will also analyse gaps in advice take-up ensuring that we develop policies and action plans to improve contact rates for our vulnerable or

¹⁰ Consumer Direct is a telephone and online consumer advice service operated by the Office of Fair Trading in partnership with Local Authority trading standards Services.

hard to reach consumers, especially those in our more deprived areas.

- **customer-focus:** we ensure that we regularly consult with our customers to ensure that advice and assistance meets their needs.
- **connected:** we ensure that we do whatever we can to help refer consumers to the most appropriate source of help.
- **effective:** we regularly measure our performance.
- **value:** we will adopt the Quality Mark¹¹ standard for Consumer Advice across the joint area to ensure that our customers and 'funders' are getting the best services available within our resources.
- **proactive:** we ensure that we enable all our consumers to use resources, both 'virtual' or in the form of a 'Support Pack', which may be tailored to their individual needs. Through this we aim to empower our customers to be more knowledgeable and demanding in exercising their rights.

IMPROVING ACCESS

5.5) The joint Service must be accessible, especially to those who need the greatest level of assistance. Policies and programmes will be maintained and developed to improve access to the joint Service, especially in our most deprived areas where there are lower contact rates. We will improve access through:

- **iCAN:** We will develop an extensive network of members across the joint area, ensuring we proactively recruit members especially in our most deprived

areas and target groups such as the elderly.

- **ward contact programme:** The aim of this scheme is to raise the profile of the Service in the most deprived wards, meet informally with community groups on a regular basis to discuss relevant issues and offer advice and information where necessary. Ward Contacts are also able to educate consumers on a wide range of issues from doorstep crime to financial literacy. The Ward Contact Programme will be continued in Warrington and extended into Halton to ensure that strong links are developed and maintained with our most deprived communities.
- **effective partnerships:** We cannot improve and maintain a high level of contact with consumers, especially those in deprived communities, unless we build effective partnerships. Effective partnership approaches will enable a Joint Service to address deep seated community problems and achieve improved outcomes in terms of community safety, social inclusion, consumer detriment and health inequalities. A Joint Service will have the ability to manage its partnerships in a more strategic way thus maximising the beneficial outcomes from such relationships.
- **communications:** Both Halton and Warrington Trading Standards Services currently enjoy a healthy relationship with local media. However, through our ability to specialise more than in our respective services a joint Service will be able to develop more effective relationships with the local media as well as an increased capacity to further develop common web based resources.

¹¹ Warrington trading standards Consumer Advice Team currently holds the Legal Services Commission Quality Mark for Consumer Advice

ICAN

5.6) In 2003 the DTI funded the purchase of an automated message broadcast system to enable messages and warnings to be disseminated to the community. This project has been particularly successful with over 1800 members in Warrington alone receiving messages about the latest scams to hit the town, thus enabling better protection for them and the network of individuals they help to inform. A joint service will aim to further develop our extensive network of consumers across both boroughs.

CONSUMER EDUCATION

5.7) Consumer education equips people with the skills to make discerning choices, to sort out problems effectively and to seek further information and help. Whilst

laws and markets may change, these skills will enable people to move through life as effective consumers.

5.8) Small Trading Standards Services generally do not invest a great deal in educating consumers, due primarily to overly stretched advice resources. Despite this both Halton and Warrington Trading Standards Services have invested resources in consumer education over the last few years. Again a joint service will enable a degree of specialisation to better educate target groups of consumers. The following table indicates how we will educate consumers in the joint area:

**Table (2):
Consumer education approaches by a joint Halton, Warrington Trading Standards Service**

Learning Outcome	Target Group	Method of Delivery
Consumer Values and Behaviour: Helping consumers to make responsible choices and manage their resources	Young People (Key Stage 2)	Through promotion of web based 'Fireworks', 'Chocolate' and 'Planning a Barbecue' resources and schemes of work to all primary schools in the Borough.
	Consumers in Deprived areas with financial literacy needs	Credit Unions
Consumers in the Marketplace: helping people to make effective choices through an understanding of product information,	Young People (Key Stage 2)	Through promotion of web based 'Fireworks', 'Chocolate' and 'Planning a Barbecue' resources and schemes of work to all primary schools in the Borough.

**Table (2):
Consumer education approaches by a joint Halton, Warrington Trading Standards Service**

Learning Outcome	Target Group	Method of Delivery
advertising and sales techniques. Also helping people to understand available sources of information and advice.	Older Consumers	Doorstep Crime workshops to help improve awareness of scams and how to avoid them.
	Consumers with identified low consumer literacy skills	'Understanding Food Labelling' workshops.
Consumer's Rights and Responsibilities: helping people to understand the rights and responsibilities of consumers and of business. Also helping them to develop the ability to communicate satisfaction and dissatisfaction as well as the confidence to seek redress if things go wrong.	Young People (Key Stage 2)	Through promotion of web based 'Fireworks', 'Chocolate' and 'Planning a Barbecue' resources and schemes of work to all primary schools in the Borough.
	Older Consumers	Doorstep Crime workshops to help improve awareness of scams and how to deal with them

6. Transforming our organisation to deliver our outcomes / Halton's corporate effectiveness and business efficiency

CONTINUOUS IMPROVEMENT

6.1) This part of the Specification details how a joint service will develop and monitor performance in order to identify successes and issues. A variety of techniques will be used to measure performance and to help identify areas for improvement. The joint service will be committed continuously improving, providing excellent value for money and being the best in its class. To achieve this aim we will take into account:

- Views of the community of Halton and Warrington;
- Both council's policies and priorities;
- Strategic direction set out by the Government;
- The Government's modernisation programme;
- National, regional and local intelligence and information.
- Officers' views formed by their experiences.

performance management and business planning

6.2) Our key objectives will be reviewed every quarter to help identify progress and areas for improvement. All relevant staff will be involved in this process, hence greater ownership of the objectives as well as better identification of areas for improvement.

¹².

¹² Governance arrangements, business planning and performance management processes will be

consultation

6.3) We will have a fairly extensive consultation programme in place, which will include a joint customer satisfaction survey sent to all customers who use the joint service. We will also consult every 2 years with all ICAN members, all recipients of support packs and continue to survey 15-16 year olds every 2 years to establish access to a consumption of certain age restricted products including tobacco and alcohol.

intelligence analysis

6.4) Each year as part of the business planning process we will complete a Level 1 Strategic Assessment¹³ which will enable the identification of complaint patterns, consumer detriment and risk enabling improved enforcement and prevention outcomes. The benefits of this approach are that it:

- Introduces more rigour into management decision making for both strategic and tactical purposes;
- Ensures that resources are targeted effectively and are intelligence led;
- Identifies priority issues and manages risk effectively;
- Improves partnership working and the ability to share intelligence with other agencies;

detailed in the Heads of Terms contract.

¹³ Strategic Assessment to be produced following National Intelligence Model (NIM) guidelines.

- Achieves greater compliance with the Human Rights Act (1998), Data Protection Act (1998) and Regulation of Investigatory Powers Act (2000).

quality assessment

6.5) A joint service will maintain a comprehensive set of documented quality procedures covering all elements of the service. The Quality Management System will be structured around ISO9001, but a conscious decision has been taken to seek reciprocal peer assessment from neighbouring trading standards services, rather than formal registration or certification from an Award Body, believing that this is the most cost effective way to seek continuous improvement.

WORKING IN PARTNERSHIP

6.6) We recognise that the formation of successful partnerships with other relevant organisations at local, regional and national level is crucial to the successful achievement of our objectives. Strong partnerships have been formed since the creation of the Service, however, the rapidly changing Trading Standards environment has determined that we need to continue to review existing, and develop new partnerships, to address these demands.

regional working

A joint service will participate in TSNW activities through membership of all the established Focus Groups and through Chief Officer participation on the Executive body. Where relevant, we will participate in TSNW projects to enable shared use of resources and increased effectiveness of enforcement initiatives.

**Table (3):
Delegated Responsibilities (joint Trading Standards Service)**

<ul style="list-style-type: none"> ▪ Accommodation Agencies Act 1953 ▪ Administration of Justice Act 1970 ▪ Agricultural Produce (Grading and Marking) Act 1928 ▪ Agricultural Produce (Grading and Marking) (Amendment) Act 1931 ▪ Agriculture Act 1970 ▪ Agriculture (Miscellaneous Provisions) Act 1968 ▪ Anti-Social Behaviour Act 2003 ▪ Bankers Books Evidence Act 1879 ▪ Business Names Act 1985 ▪ Cancer Act 1939 ▪ Children and Young Persons Act 1933 ▪ Children and Young Persons (Protection from Tobacco) Act 1991 ▪ Chiropractors Act 1994 ▪ Clean Air Act 1993 ▪ Companies Act 1985 ▪ Consumer Credit Act 1974 ▪ Consumer Protection Act 1987 ▪ Control of Pollution Act 1974 ▪ Control of Pollution (Anti-Fouling Paints and Treatments) Regulations 1987 ▪ Copyright Designs & Patents Act 1988 ▪ Criminal Attempts Act 1981 ▪ Criminal Justice Act 1993 ▪ Criminal Law Act 1977 (common-law conspiracy to defraud) ▪ Crossbows Act 1987 ▪ Customs and Excise Management Act 1979 ▪ Development of Tourism Act 1988 ▪ Education Reform Act 1988 ▪ Energy Act 1976 ▪ Energy Conservation Act 1981 ▪ Enterprise Act 2002 ▪ Environmental Protection Act 1990 ▪ Estate Agents Act 1979 ▪ European Communities Act 1972 ▪ Explosives Act 1875 ▪ Explosives Act 1923 ▪ Explosives (Age of Purchase) Act 1976 ▪ Fair Trading Act 1973 ▪ Farm and Garden Chemicals Act 1967 	<ul style="list-style-type: none"> ▪ Malicious Communications Act 1988 ▪ Medicines Act 1968 ▪ Motor Cycles Noises Act 1987 ▪ National Lotteries Act 1993 ▪ Nurses Agencies Act 1957 ▪ Offensive Weapons Act 1996 ▪ Olympic symbol etc. (Protection) Act 1995 ▪ Opticians Act 1989 S27 ▪ Osteopaths Act 1993 ▪ Petroleum (Consolidation) Act 1928 ▪ Petroleum (Transfer of Licences) Act 1936 ▪ Poisons Act 1933 ▪ Poisons Act 1972 ▪ Police and Criminal Justice Act 2001 ▪ Prices Acts 1974 and 1975 ▪ Proceeds of Crime Act 2002 ▪ Property Misdemeanors Act 1991 ▪ Protection of Children (Tobacco) Act 1986 ▪ Protection from Harassment Act 1997 ▪ Registered Designs Act 1949 ▪ Road Traffic Act 1972 ▪ Road Traffic Act 1974 ▪ Road Traffic Act 1988 ▪ Road Traffic (Consequential Provisions) Act 1988 ▪ Road Traffic Act 1991 ▪ Road Traffic (Foreign Vehicles) Act 1972 ▪ Road Traffic Regulation Act 1984 ▪ Road Traffic Offenders Act 1988 ▪ Scotch Whisky Act 1988 ▪ Solicitors Act 1974 ▪ Tattooing of Minors Act 1969 ▪ Telecommunications Act 1984 ▪ Theft Act 1968 ▪ Theft Act 1978 ▪ Timeshare Act 1992 ▪ Tobacco Advertising and Promotions Act 2002 ▪ Trade Descriptions Act 1968 ▪ Trade Marks Act 1994 ▪ Trade Representations Act 1972 ▪ Trading Schemes Act 1996 ▪ Trading Stamps Act 1964 ▪ Unsolicited Goods and Services Act 1971 ▪ Unsolicited Goods and Services
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**Table (3):
Delegated Responsibilities (joint Trading Standards Service)**

<ul style="list-style-type: none"> ▪ Fireworks Act 1951 ▪ Fireworks Act 1964 ▪ Fireworks Act 2003 ▪ Forgery and Counterfeiting Act 1981 ▪ Fraud Act 2006 ▪ Hallmarking Act 1973 ▪ Health and Safety at Work Etc. Act 1974 ▪ Insurance Brokers (Registration) Act 1977 ▪ Intoxicating Substances (Supply) Act 1985 ▪ Knives Act 1997 ▪ Licensing Act 1964 ▪ Licensing Act 2003 ▪ Licensing (Young Persons) Act 2000 ▪ Lotteries and Amusements Act 1976 	<p>(Amendment) Act 1975</p> <ul style="list-style-type: none"> ▪ Vehicles (Crime) Act 2001 (Part 2) ▪ Video Recordings Act 1984 ▪ Video Recordings Act 1993 ▪ Weights and Measures Act 1976 ▪ Weights and Measures Act 1985
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**Table (4):
Customer Service Standards (joint Trading Standards Service)**

Objective	Target
1. Telephone Responsiveness	Target: 95% of calls answered within 15 seconds.
2. Initial Response	Target: 100% of general enquiries will receive an initial response within 2 working days of receipt.
3. Updating of Enquiries	Target: 95% of our customers will be updated every 14 days as to how their complaint/enquiry is progressing, unless otherwise agreed.
4. Response to doorstep crime incidents.	Target: Respond to 100% doorstep crime incidents within 1 hour of receipt.
5. Response to Safety Related Matters	Target: 95% safety related matters will receive same day consideration.
6. Customer Satisfaction	Target: 92% of customers using the service either satisfied or very-satisfied.
7. Business Satisfaction (NI 182)	This is a new indicator for which we will set service standards and targets once data for the first year has been collected.
8. Verification Requests	Target: 95% of metrology verifications will be carried out within 5 working days of the request.
9. Licensing	Target: 95% of licensing/registration requests will be processed within 10 days of receipt

Table (5): Key Objectives, Activities and Measures of Performance

Objective	Activities / Key Milestones	Measures of Performance	Target Dates
<p>Reducing Underage Consumption of Alcohol</p> <p>We aim to work with businesses and other partners to limit underage access to alcohol and thereby help to reduce the health and anti-social behaviour effects associated with such consumption.</p>	<ul style="list-style-type: none"> ▪ Conduct an intelligence led test purchase programme. ▪ Take formal action against those selling alcohol to underage young people. ▪ Target premises where intelligence has identified an incidence of proxy sales. ▪ Provide bespoke trader training programmes, which focus on age recognition techniques, and <i>dealing with conflict</i>. ▪ Provide Validate Proof of Age cards to all year 10 pupils 	<ul style="list-style-type: none"> ▪ Conduct 100 test purchase operations (alcohol) in Warrington and 60 in Halton. (NB We will set targets for the reduction in sales across a joint service area from April 2009 onwards). ▪ Supply Validate Proof of Age Cards to at least 75% of Year 10 school pupils across Halton and Warrington 	<p>Test purchase programmes and proof of age card work to commence from April 2009 onwards.</p>
<p>Reducing Smoking Prevalence</p> <p>We aim to help reduce smoking prevalence in both Halton and Warrington by; reducing underage access to tobacco and develop interventions to disrupt the informal economy in tobacco.</p>	<ul style="list-style-type: none"> ▪ Conduct an intelligence led test purchase programme. ▪ Target premises where intelligence has identified an incidence of proxy sales. ▪ Provide bespoke trader training programmes that focus on age 	<ul style="list-style-type: none"> ▪ Conduct 100 test purchase operations (tobacco) in Warrington and 60 in Halton. (NB We will set targets for the reduction in sales across a joint service 	<p>Test purchase programmes and proof of age card work to commence from April 2009 onwards.</p> <p>Intelligence</p>

Table (5): Key Objectives, Activities and Measures of Performance

Objective	Activities / Key Milestones	Measures of Performance	Target Dates
	<p>recognition techniques and <i>dealing with conflict</i>.</p> <ul style="list-style-type: none"> ▪ Provide Validate Proof of Age cards to all year 10 pupils. ▪ Identify the nature and scale of the 'illicit' tobacco market and work with partners to take strong action against those selling counterfeit tobacco in Halton and Warrington 	<p>area from April 2009 onwards).</p> <ul style="list-style-type: none"> ▪ Supply Validate Proof of Age Cards to at least 75% of Year 10 school pupils across Halton and Warrington. ▪ Availability of counterfeit tobacco in target wards across Halton and Warrington. 	<p>gathering on incidence of counterfeit tobacco to commence from April 2009 onwards.</p> <p>We will set local targets for the reduction in availability of counterfeit tobacco from April 2010 onwards to be achieved by March 2013.</p>
<p>Doorstep Crime</p> <p>We will ensure that we will take action to prevent people being victims of so-called doorstep crime. We will also ensure that we actively respond in a timely manner to any identified doorstep crime to reduce the impact on</p>	<ul style="list-style-type: none"> ▪ We will react¹⁴ to all reported incidences of doorstep crime in a timely manner (rapid response) to help reduce the impact of so called doorstep crime. ▪ We will ensure that we actively gather and analyse intelligence about all instances of doorstep crime in both 	<ul style="list-style-type: none"> ▪ We will react to all instances of doorstep crime across Halton and Warrington within 1 hour of receipt. ▪ Our annual Strategic Assessment will contain details of our doorstep 	<ul style="list-style-type: none"> ▪ Rapid responses to doorstep crimes from November 2008 onwards. ▪ Intelligence strategy from April 2009

¹⁴ This includes attendance at the scene of an ongoing doorstep crime and victim support in all cases.

Table (5): Key Objectives, Activities and Measures of Performance

Objective	Activities / Key Milestones	Measures of Performance	Target Dates
any victim and to take the strongest possible action against the perpetrators.	<p>Halton and Warrington to enable potential victims, locations and offenders to enable proactive interventions that have a greater impact to be developed.</p> <ul style="list-style-type: none"> ▪ Warnings regarding all relevant incidences of to be broadcast via the ICAN system. 	<p>crime intelligence and enforcement strategy.</p> <ul style="list-style-type: none"> ▪ We will report on the number of messages distributed. ▪ NB we are currently developing a measure of the proportion of reported doorstep crimes where we successfully intervene. We will have a meaningful measure in place by 1st April 2009. 	<p>onwards.</p> <ul style="list-style-type: none"> ▪ ICAN messages from November 2008 onwards.
<p>Intellectual Property Crime</p> <p>We will work towards designating both Halton and Warrington a 'fake-free' zone.</p>	<ul style="list-style-type: none"> ▪ We will formally investigate all reported incidences of intellectual property crime (IPC) ▪ We will ensure that we actively gather and analyse intelligence about all instances of IPC in both Halton and Warrington to enable potential victims, locations and offenders to enable proactive interventions that 	<ul style="list-style-type: none"> ▪ An assessment of all markets in both Halton and Warrington to establish the scale of infringing products available for sale. ▪ Availability of counterfeit tobacco in target wards across 	<ul style="list-style-type: none"> ▪ Fake free designation to be launched in 2009 ▪ Annual assessments of the scale of infringing product

Table (5): Key Objectives, Activities and Measures of Performance

Objective	Activities / Key Milestones	Measures of Performance	Target Dates
	<p>have a greater impact to be developed.</p> <ul style="list-style-type: none"> ▪ We will launch the designation of fake-free Halton and Warrington, working closely with the communities and media to raise the profile of the crime and tackle the remaining informal markets such as the workplace and car boot sales. 	<p>Halton and Warrington.</p>	<p>available for sale from markets to be carried out from April 2009 onwards. Subsequent targets to be set.</p>
Trading Standards Inspections	<ul style="list-style-type: none"> ▪ Inspect high-risk premises across both Halton and Warrington. 	<ul style="list-style-type: none"> ▪ Aim to inspect 100% high-risk premises that are due for inspection. 	<ul style="list-style-type: none"> ▪ April 2009 onwards
Satisfaction of business with local authority regulatory services	<ul style="list-style-type: none"> ▪ We will conduct monthly surveys to measure compliance with this national performance indicator (NI 182) 	<ul style="list-style-type: none"> ▪ NI182: The percentage of business customers of regulatory services who respond that they have been treated fairly and /or the contact has been helpful (NI182). 	<ul style="list-style-type: none"> ▪ Aim to be in top quartile for Unitary authorities by March 2011.
<p>Most Complained About Traders</p> <p>We aim to reduce the impact rogue traders have on the citizens of Halton and Warrington by</p>	<ul style="list-style-type: none"> ▪ Most Complained About Trader intelligence analyses will identify problem traders. ▪ Enforcement interventions will be 	<ul style="list-style-type: none"> ▪ NI183: Impact of local authority Trading Standards services on the fair trading 	<ul style="list-style-type: none"> ▪ We will set targets for a reduction in so-called 'category

Table (5): Key Objectives, Activities and Measures of Performance

Objective	Activities / Key Milestones	Measures of Performance	Target Dates
<p>taking strong enforcement action where necessary and by promoting awareness of legal obligations through education.</p> <p>Targeting problem traders increases confidence in markets and provides a level playing field for business to compete fairly. Increasing consumer confidence and knowledge empowers consumers as citizens and encourages business to innovate.</p>	<p>developed to address the cause of problems and to take formal action where relevant.</p>	<p>environment. The indicator measures outcomes of activities carried out by local authorities in order to create /maintain a fair trading environment for business and consumers</p>	<p>x' traders that will enable us to be in top quartile for Unitary authorities by March 2011.</p>
<p>Consumer Advice</p> <p>We will provide a 'quality assured' and accessible Consumer Advice Service to all residents and businesses in Halton and Warrington.</p>	<p>In delivering a high quality consumer and business advice service, we will:</p> <ul style="list-style-type: none"> ▪ Strive to constantly give our consumers and businesses expert, accurate and timely advice and assistance. ▪ Ensure that all consumers are able to access the service with a greater level of assistance being given to those who can help themselves the least up 	<ul style="list-style-type: none"> ▪ Each month we will distribute <i>How Did We Do</i> customer satisfaction surveys to all customers that have used the consumer advice service. ▪ We will survey consumers that have received advice 	<ul style="list-style-type: none"> ▪ Target to achieve a customer satisfaction rating of 95% by end March 2012

¹⁵ We currently hold the Legal Services Commission Quality Mark for Consumer Advice

Table (5): Key Objectives, Activities and Measures of Performance

Objective	Activities / Key Milestones	Measures of Performance	Target Dates
	<p>to help with county court cases where necessary.</p> <ul style="list-style-type: none"> ▪ Ensure that we regularly consult with our customers to ensure that advice and assistance meets their needs. ▪ Ensure that we do whatever we can to help refer consumers to the most appropriate source of help. ▪ Regularly measure our performance. ▪ Maintain the Quality Mark¹⁵ standard for Consumer Advice to ensure that our customers and 'funders' are getting the best services available within our resources. ▪ Ensure that we supply all our relevant customers with a 'Support Pack' which gives general advice as well advice tailored to their needs. Through this we aim to empower our customers to be more knowledgeable and demanding in exercising their rights. 	<p>directly from the service and not consumers that receive only first response advice from Consumer Direct. However, consumers experiences of Consumer Direct will be surveyed as part of the How Did We Do process, hence we will have processes in place to monitor the quality of advice being provided by this external provider.</p>	

Table (5): Key Objectives, Activities and Measures of Performance

Objective	Activities / Key Milestones	Measures of Performance	Target Dates
<p>Improving Access</p> <p>We will improve access to consumer advice, assistance and education especially amongst the vulnerable, elderly, young and minority groups</p>	<ul style="list-style-type: none"> ▪ We will provide named officer support in each of the six most deprived wards in Warrington and the four most deprived wards in Halton. Each officer will complete a ward plan that demonstrates how we best link into the relevant wards. ▪ We will actively recruit ICAN members in the 10 target wards. ▪ We will develop a Communications Strategy with a focus on improving awareness in our most deprived wards. 	<ul style="list-style-type: none"> ▪ We will set targets to raise contact rates for the 10 most deprived wards in Halton and Warrington to the top quartile contact rate for all wards. 	<ul style="list-style-type: none"> ▪ Aim to raise contact rates in target wards to top quartile contact rate for all wards by end March 2012
<p>ICAN</p> <p>We will develop the Warrington – iCAN to enable communities to be promptly alerted to issues, whilst empowering them to report back with details of problems in the communities</p>	<ul style="list-style-type: none"> ▪ We will actively recruit ICAN members across both Halton and Warrington. ▪ We will ensure that we distribute messages to members to warn about scams and other consumer issues in a timely manner. ▪ We will distribute newsletters to members and hold an annual ICAN conference. 	<ul style="list-style-type: none"> ▪ We will measure the contact rates per 1000 population across both Halton and Warrington. ▪ We will measure how well protected ICAN members feel across both Halton and Warrington. 	<ul style="list-style-type: none"> ▪ Target to raise ICAN membership rates to 12.95 per 1000 population by end March 2012. ▪ Surveys of How Well Protected ICAN members

Table (5): Key Objectives, Activities and Measures of Performance

Objective	Activities / Key Milestones	Measures of Performance	Target Dates
			feel to be conducted biannually from 2009 onwards. Target 90% of ICAN members to feel well protected from consumer scams