

TRADING STANDARDS INPUTS AND OUTPUTS DATA RETURN

Welcome to the first run of the ACTSO Trading Standards Impacts and Outcome Framework and thank you for participating in this important project.

The report produced by Birmingham University's Institute of Local Government Studies (INLOGOV), which ACTSO helped to support financially, and the National Audit Office report 'Protecting Consumers from Scams, Unfair Trading and Unsafe Products' in December 2016 both indicated there was a lack of consistent data being collected to support the picture of what local trading standards services were delivering. Our project is the starting point for putting this right.

In creating a framework of measures, ACTSO is looking to support managers in raising the profile of the service, whilst offering the Association the ability to paint a picture of how services are collectively supporting consumers and honest businesses nationally. If challenged in the future, Heads of Service will be able to point to this piece of work as the first step in addressing the issues raised by the NAO, as well as having something to hand to highlight local performance. It will also allow the identification of good practice that can then be shared with fellow heads of service so we can benefit collectively from the good ideas that many members across the country have.

The LGA have been supportive of our activities because of the voluntary nature of the proposal and the fact that this is local authorities trying to help themselves. This allows ACTSO members to look to our colleagues, neighbours and friends in the profession to support us in making the best of whatever resources we have in these austere times.

The three aims/objectives identified below were chosen as the best way to fit Trading Standards activities into the plethora of local authority priorities that often say the same thing in different ways:

Aim/ Objective 1: Tackling Detriment and Preventing Harm

Aim/ Objective 2: Supporting the Local Economy

Aim/ Objective 3: Promoting Health and Wellbeing

A number of output and outcome measures have also been created that sit below these three pillars of the framework in order to demonstrate the achievements of services.

The second Part of the return records data relating to inputs and demand factors such as budgets, staffing levels, business base, Citizens Advice Consumer Service (CACS) referrals and advice requests etc. Again this will help you to put your service's achievements in context against the financial and other factors faced by your service at a local level as well as data that can be aggregated for the national picture. The third Part covers your Service's adoption of the Trading Standards Intelligence Operating Model. The ACTSO working group felt that it was important for Heads of Service to have a better collective understanding of how far we have adopted the approach.

Please note that guidance is provided in a separate document in order to provide assistance with definitions for each part of this return to facilitate consistent data collection. If the data is consistent it will be so much more powerful when aggregated to paint that national picture.

If we can all commit to this piece of work it will give us the opportunity to start to collate data from local authorities, enabling its review for short, medium and long terms trends or themes. Year one will only ever be a baseline. We appreciate that all the measures in this document are at a “single point in time” and use absolute numbers. Over the time we hope that the framework can be adapted and changed to incorporate developing best practice around outcome measures.

Having the data will also allow us to highlight good practice, which can then be shared with the rest of the membership and helping us all to deliver the best we can with the resources we currently have.

So thank you for taking part in this process, for taking the time to both prepare for this piece of work and, in advance of you sending it to us, for sharing the data that you have recorded. For this to be a success it is important that as many of you participate as possible. By remaining engaged you will allow us to continue to highlight the great things that we do and the difference we make on a daily basis to the people who live and work in the areas we cover.

v.March 2019 (post-pilot_final)

PART 1: OUTPUT AND OUTCOME MEASURES

Region (select from drop-down)	TSSE
Authority name	Buckinghamshire and Surrey Trading Standards
Type of authority (select from drop-down)	Joint Services
Part 1: questions complete*	61 of 63

*Note

OBJECTIVE 1: TACKLING DETRIMENT AND PREVENTING HARM

Stopping Fraudulent, Illegal and Unfair Trading

1.1 Outcomes of investigations and prosecutions			HELP?
1.1.1	Number of defendants taken through prosecution process	16	✓ 1.1.1
1.1.2	Number of offenders to whom simple cautions issued	1	✓ 1.1.2
1.1.3	Number of years imprisonment	4.75	✓ 1.1.3
1.1.4	Number of years for suspended sentences	0.92	✓ 1.1.4
1.1.5	Fines awarded (£)	£35,680.00	✓ 1.1.5
1.1.6	Costs awarded from court cases (£)	£17,620.00	✓ 1.1.6
1.1.7	Total number of Fixed Penalty Notices	2	✓ 1.1.7
1.1.8	Total value of Fixed Penalty Notices (£)	£8,000.00	✓ 1.1.8
1.1.9	Community Punishment Orders (hours)	135	✓ 1.1.9
1.1.10	Proceeds of Crime Act (POCA) benefit ordered to be paid in that year (£)	£74,414.00	✓ 1.1.10

1.1.11	Proceeds of Crime Act (POCA) benefit paid in that year (£)	£6,328.21	✓	1.1.11
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1.2 Enterprise Act Undertakings				1.2
1.2.1	Total number of Undertakings given	0	✓	1.2.1
1.2.2	Number given following court process	0	✓	1.2.2
1.2.3	Percentage of Undertakings breached	0.0%	✓	1.2.3

Detriment and Redress

1.3 Redress obtained for consumers or victims of crime by service actions				
1.3.1	Compensation (£) from court (including POCA compensation)	£48,648.00	✓	1.3.1
1.3.2	(£) not handed over to criminals (e.g. rapid response outcomes)	£156,497.00	✓	1.3.2
1.3.3	(£) achieved through new civil processes	£0.00	✓	1.3.3
1.3.4	(£) achieved through second tier advice or other support provided	£25,249.04	✓	1.3.4

1.4 Detriment to consumers prevented by service actions				
1.4.1	Detriment (£) over the following 12 months prevented by service actions	£3,758,899.00	✓	1.4.1

Supporting Scam Victims

1.5 Number of scam victims supported				
1.5.1	Total number of victims identified in the year in your area by the NTS National Scams Team	485	✓	1.5.1
1.5.2	Number of victims identified by other partners or the TS service itself	270	✓	1.5.2
1.5.3	Total number of victims who are subject to interventions	755	✓	1.5.3
1.5.4	Amount of money saved for scam victims (£)	£536,637.00	✓	1.5.4

1.6 Proportion of victims that feel more confident after Trading Standards intervention		
1.6.1	Percentage of victims who feel safer in their own home following Trading Standards intervention	86.0%

✓ 1.6.1

Narrative: In this section, managers should consider including the info below. This is not exhaustive:

- Case studies that highlight the non-financial/unquantifiable detriment across all cases and impact of trading standards intervention on victims
- Working relationship with police and other enforcers
- Proportion of referrals for intelligence only, proportion on which further action is taken
- % of investigations and case work successfully concluded
- Number of referrals to Adult Social Care and the proportion where additional safeguarding measures were put in place
- Proportion of investigations which met the threshold of seriousness
- Preventative work such as No Cold Calling Zones and Friends against Scams

160 chronic victims of nuisance and scam cold calls have been fitted with call blocking devices. 43,151 nuisance calls were received, of which 43,030 were blocked (over 99%). 9,062 scams were stopped. 59 referrals to Adult Social Care, 55 referrals to the Multi Agency Safeguarding Hub. Feedback on outcomes from ASC and MASH is rare so cannot give the proportion where additional safeguarding took place as a result of a referral. This is being addressed via the Safeguarding Adults Boards.

Op Gull - HT received 15 months imprisonment for three fraud offences in relation to the double sale of a clocked motor vehicle. NK received a 4 month prison sentence suspended for 12 months for 2 offences of money laundering. We were also able to obtain compensation for two victims totalling £48,648 as a result of a POCA confiscation hearing. The case involved joint working with the Metropolitan Police Anti Terrorism team, who also took a successful prosecution against HT in relation to conspiracy to disguise criminal property and conspiracy to acquire criminal property offences

Op Emerald - JT received 30 months imprisonment for fraud and CPRs and a breach of the Working at Height Regulations arising from roofing work he undertook. This case was a joint prosecution with the HSE after we alerted them to possible health and safety breaches.

OBJECTIVE 2: SUPPORTING THE LOCAL COMMUNITY

Businesses Get the Help and Support They Need to Thrive and Grow

1.7 Number of businesses receiving advice			
1.7.1	Number of direct responses to requests for advice by non-Primary Authority/Home Authority businesses	1050	✓ 1.7.1
1.7.2	Number of formal Home Authority relationships	0	✓ 1.7.2

1.7.3	Number of responses to requests for advice from Home Authority businesses	0	✓	1.7.3
1.7.4	Number of Primary Authority relationships	103	✓	1.7.4
1.7.5	Number of hours spent servicing Primary Authority activity	1835.19	✓	1.7.5

1.8 Number of businesses found non-compliant when visited subsequently brought into compliance during the financial year

1.8.1	Number of visits where business found to be satisfactory without requiring advice of any kind to achieve compliance	111	✓	1.8.1
1.8.2	Number of visits where business were non-compliant/ unsatisfactory BUT achieved compliance with advice given at the time of the visit	105	✓	1.8.2
1.8.3	Number of visits where business found to be unsatisfactory in the year and required further intervention to achieve compliance	6	✓	1.8.3
1.8.4	Number of non-compliant/ unsatisfactory businesses identified in 1.8.3 above that were brought into compliance in the relevant period.	6	✓	1.8.4
1.8.5	Percentage of businesses that were either compliant when visited or brought into compliance during the period			1.8.5

Creating and Maintaining a Level Playing Field/Safe and Fair Competition

1.9 Deal with problematic businesses where an intervention is made

1.9.1	Number of individual complaints where the decision was taken, via tasking or other means, to directly investigate the specific case.	1045	✓	1.9.1
1.9.2	Number of businesses reviewed during tasking or similar process in the year.	14956	✓	1.9.2
1.9.3	Number subject to intervention (advice, investigation or action such as referral to another body or local authority).	1045	✓	1.9.3

1.9.4	Of those subject to intervention, the percentage where outcomes was successful (i.e. resulted in compliance being achieved, or investigation outcome was successful).		1.9.4
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1.10 Support for legitimate businesses by trader approval schemes

1.10.1	Do you operate your own local trader approval scheme	Yes	✓	1.10.1
1.10.2	How many businesses are members	1124	✓	1.10.2
1.10.3	If you do not operate your own scheme or are also engaged in schemes beyond your own, are you: (A) Part of a partnership offering a scheme, (B) Partnered with a commercial body? (C) Do not participate in trader approval schemes beyond our own (D) Do not participate in any trader approval schemes	B	✓	1.10.3
1.10.4	In relation to 1.10.3 above, how many businesses in your local area are accredited by you through this method	3755	✓	1.10.4

1.11 Support for legitimate businesses by removing counterfeit goods from the market

1.11.1	Number of items/products removed from or prevented from entering the supply chain	147	✓	1.11.1
1.11.2	Value of other products above (£)	£1,344.77	✓	1.11.2

Narrative: in this section, managers should consider including the info below. This is not exhaustive:

- Description of how new businesses are supported and the value/ impact of partnerships with business or business bodies e.g. BBfA, Links to LEP, Chamber of Commerce, Local FSB reps, etc.
- Case studies with quotes from businesses on the value of trading standards support & the savings or investment benefits for businesses achieved through trading standards advice/intervention
- Where non-business customer satisfaction is surveyed, include results
- Engagement with Business or business organisations
- How you use information from businesses to shape what you deliver

Information from any source can be included, whether or not it is the result of surveys, focus groups, questionnaires etc. conducted/commissioned directly by your own service. It may be information supplied/published by your Economic Development Unit or come from some other reliable source.

Some member authorities have suggested that this type of activity may be skewed to certain types of business such as food or feed businesses, so if this is the case in your authority, say 50% or more of the focus of compliance visits of this type are in relation to one area like food or feed, please indicate this in this section.

Buckinghamshire & Surrey Trading Standards have over 100 Primary Authority Partnerships and continue to deliver a single point of contact arrangement with Environmental Health and Fire Safety. Growth in overall number of partnerships continues, although there has been some movement this year with some businesses merging, moving abroad, closing or moving to alternative regulators. The majority of partnerships include food standards or food hygiene as a significant area for advice. Product safety and recall processes have also been a notable topic of interest. Toward the end of the period enquiries began relating to Brexit and the service attended business briefing events organised by the local Chambers and LEPs in Surrey and a similar engagement event in Buckinghamshire.

"The guiding principles of Trading Standards have always resonated strongly with TrustMark because of the dedication to matters of consumer protection. Critical to achieving these aims was a more formalised partnership with Trading Standards to tackle the problem of logo misuse and deception. A senior Trading Standards officer is now partially based in the TrustMark offices to oversee this project, and we are delighted with the results. Further plans to strengthen the relationship between the two bodies are in development, and I am confident that with our joint vision we will only improve the outlook for consumers in the UK." Simon Ayers, Chief Executive Officer of TrustMark.

"We are really happy with the support given by Bucks and Surrey Trading Standards. The team have been brilliant in implementing and supporting the business processes for Vapour Recovery Permits. Their willingness to be flexible and consider new approaches to address business challenges has been really valuable to us and is the main reason we have asked to extend the service to include petroleum site certificates. The projects have been delivering a genuine reduction in the regulatory burden on our business operations nationwide" Martin Watkins UK Operations Manager Shell UK Oil Products Limited.

"Facing a potential product recall can be a stressful time for any business. However, having previously worked through PAS7100 in detail with our Primary Authority - Buckinghamshire and Surrey Trading Standards, we had created our own in-depth Product Recall Procedure, tailored specifically to our business." David Watts, Product Manager Solution EU Ltd

OBJECTIVE 3: PROMOTING HEALTH AND WELLBEING

Ensuring The Safety Of Consumer Products

1.12 Unsafe or non-compliant goods prevented from entering or removed from marketplace			
1.12.1	Number of items/products removed from or prevented from entering the supply chain	42682	✓ 1.12.1
1.12.2	Value of products above (£)	£213,410.00	✓ 1.12.2

Protecting The Food Chain

1.13 Businesses involved in breaches of food standards legislation				
1.13.1	Number of businesses identified as supplying: misdescribed food, or not correctly declaring allergens, or selling food containing toxic or illegal components, or involved in fraud involving food	41	✓	1.13.1

Reducing The Risk Of Children Accessing Age Restricted Products

1.14 Businesses tested for compliance with the law using underage volunteers OR compliance with mandatory Challenge 21/25 conditions				
1.14.1	Number of individual premises tested for Alcohol	0	✓	1.14.1
	Failure rate (%)	0.0%	✓	
1.14.2	Number of individual premises tested for Tobacco	0	✓	1.14.2
	Failure rate (%)	0.0%	✓	
1.14.3	Number of individual premises tested for Other Products	13	✓	1.14.3
	Failure rate (%)	7.7%	✓	

Reducing The Availability Of Illicit Products

1.15 Tackling the availability of illicit tobacco				
1.15.1	Number of premises from which products were seized	8	✓	1.15.1
1.15.2	Number of cigarettes seized; and value (£)	771	✓	1.15.2
		£8,018.40	✓	
1.15.3	Weight of Hand Rolling Tobacco seized (g); and value (£)	1250 g	✓	1.15.3
		£550.00	✓	
1.15.4	Number of niche tobacco products seized; and value (£)	120	✓	1.15.4
		£120.00	✓	

1.16 Tackling the availability of illicit alcohol

1.16.1	Number of premises from which products were seized	0	✓	1.16.1
1.16.2	Volume of alcohol seized (l); and value (£)	0 l	✓	1.16.2
		£0.00	✓	

Narrative: in this section, managers should consider including the info below. This is not exhaustive:

- Evidence of increased wellbeing from Trading Standards work
- Potential impact of products which failed tests/were removed from market
- Value and impact of partnership working e.g. public health, Community Alcohol Partnerships
- Case studies
- Identifying “other” products so trends can be captured e.g. growing work on knives, etc.

1.15: Illicit Tobacco visits carried out with tobacco dogs. Resulted in 3 Investigations and successful prosecutions. SCC v Mr N and Simran Mini Supermarket Ltd fined a total of £2,160 for 11 packets of tobacco. This included full costs awarded of £1,480 which the Magistrates themselves commented was only fair considering that the fines they have imposed are very low and in fact he had 'gotten off lightly'. SCC v KH, trading as Pick n Buy fined a total of £1,830 for 12 packets of cigarettes. SCC V CM received an 8 week jail sentence suspended for 12 months for 237 packets of tobacco and ordered to pay £1500 prosecution costs

1.14.3 Joint working with Surrey Police on Operation Sceptre. Comprised of 15 advice visits and 13 test purchases of knives using cadet volunteers. 1 Major supermarket premises failed the test purchase and sold via a self service till. Internal investigation carried out resulting in the employee being dismissed, and the store being placed on 12 week emergency 25 verification measure, including internal test purchases.

1.12 Prosecution of importer, wholesaler and retailer in relation to the supply of an unsafe camping stove. The three companies in the supply chain were each fined £10,000 and the consumer, who suffered serious burn injuries from the product, was awarded £4,500 in compensation.

PART 2: INPUTS AND DEMAND FACTORS

Region	TSSE
Authority name	Buckinghamshire and Surrey Trading Standards
Type of authority	Joint Services
Part 2: questions complete	30 of 30

2.1 Budget			HELP?
2.1.1	Revenue Budget	£2,726,481.00	✓ 2.1.1
2.2 Externally generated income as a proportion of revenue budget			
2.2.1	Income from metrology activities	£0.00	✓ 2.2.1
2.2.2	Income from TS related licences	£46,910.00	✓ 2.2.2
2.2.3	Income from Primary Authority support activity	£208,704.15	✓ 2.2.3
2.2.4	Income from other business advice	£4,601.99	✓ 2.2.4
2.2.5	Income from National Trading Standards grants	£55,746.00	✓ 2.2.5
2.2.6	Income from other sources	£252,942.58	✓ 2.2.6
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2.2.7	Total Income (excluding court costs & POCA)	£568,904.72	2.2.7
2.2.8	Income as a percentage of revenue budget	21%	2.2.8

2.3 Operational Trading Standards staff numbers				
2.3.1	Total number of staff within the TS service (FTE)	67.31	✓	2.3.1
2.3.2	Total number of operational staff (FTE)	58.81	✓	2.3.2
2.3.3	Total number of support staff directly attached (FTE)	8.50	✓	2.3.3
2.3.4	Number of operational staff per 100,000 population	3.42	✓	2.3.4
2.3.5	Number of operational staff per 1,000 PAYE and VAT registered business	0.55	✓	2.3.5

2.4 Training of operational and managerial staff to maintain competence				
2.4.1	Average number of hours spent per officer on training that relates to the knowledge and skills required to undertake Trading Standards work	23.35	✓	2.4.1

2.5 Functions discharged by the Trading Standards team that are beyond the Department for Business, Energy & Industrial Strategy core activities of weights & measures/product safety/fair trading, which will include consumer civil law advice:				
2.5.1	Animal Health	Yes	✓	2.5.1
	Food Standards	Yes	✓	
	Feeding stuffs and fertilizers	Yes	✓	
	Petroleum licensing	Yes	✓	
	Explosives/ fireworks licensing	Yes	✓	
	Safety at Sports Grounds	No	✓	
	Public Health	No	✓	
	Others	No	✓	2.5.1

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2.6 Number of businesses

2.6.1	Number of businesses (VAT and PAYE registered. See guidance.)	106595	✓	2.6.1
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2.7 Population

2.7.1	Total population	1721218	✓	2.7.1
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2.8 Service Requests and referrals received

2.8.1	Number of Citizens Advice Consumer Service Notifications	11096	✓	2.8.1
2.8.2	Number of Citizens Advice Consumer Service Referrals	3860	✓	2.8.2
2.8.3	Total value (£) of detriment identified in Citizens Advice Consumer Service data supplied by residents	£974,595.00	✓	2.8.3
2.8.4	Number of referrals from other local authority services	295	✓	2.8.4
2.8.5	Number of referrals from Police and other service partners	251	✓	2.8.5
2.8.6	Number of referrals generated by officer intelligence	246	✓	2.8.6
2.8.7	Number of requests/ referrals from other sources including businesses	2450	✓	2.8.7

Narrative: in this section, managers should consider including the info below. This is not exhaustive:

- Trends relating to staffing levels and demand for services/complaint numbers/businesses requesting advice
- Training information and the need to be able to maintain competences
- Trends relating to operational budgets

We have had noticeable difficulties in recruiting qualified staff to vacant roles, with some posts being advertised for 9 months of the year and still with no suitable applicants. Whilst some roles can be filled by candidates with equivalent experience (such as investigators) this is not possible for all roles and therefore we have decided that the only way to address our staffing challenges longer term is to 'grow our own'. As a large service we also feel a responsibility towards the profession to invest in training.

We now have 2 apprentices, 2 others undertaking apprenticeships alongside their usual roles and 8 officers undertaking either Stage 1 or 2 of the CTSI qualification this year. As well as the significant financial burden of this, having 12 officers training in our service will create more demand on supervisors and other qualified officers for mentoring and support in achieving the new CTSI qualification. This will be especially the case when studying for Stage 2 where specific support in specialist subject areas such as Metrology, Product Safety, Food Standards and Feed will be needed. We will need to rely on Officers who are specialist in certain subjects, with metrology being an area we may struggle with, despite our large size.

We continue to be committed to all our staff maintaining their continuing professional development (CPD) and the majority of our operational team have CTSP status. The average hours of training per officer is likely to be higher but these are the hours evidenced for CPD purposes.

PART 3: ADOPTION OF THE TRADING STANDARDS INTELLIGENCE OPERATING MODEL

Region	TSSE
Authority name	Buckinghamshire and Surrey Trading Standards
Type of authority	Joint Services
Part 3: questions complete	8 of 9

3.1 Strategic Assessment

3.1.1	Are you able to commission or create a strategic assessment within the relevant timescales to provide a strategic picture of the issues faced by your service?	2	✓
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Using the drop down box, select the closest response to your approach.

1. We prepare a full strategic assessment each year which determines what we will and won't plan to tackle and this is reflected in our annual service plan
2. We do not create a strategic assessment, but produce an annual service plan linked to corporate objectives and driven by our own intelligence, problem profiles and priorities in our area.
3. We are not intelligence led but we have a formal annual service plan created from requirements communicated to us by senior management, elected members or central government bodies.
4. We have no formal service plan and are completely reactive, responding to issues as and when they arise through complaint data and other local pressures
5. The service is so small that we can only focus on one or two core subjects and can deliver

3.2 Tasking

3.2.1	Do you operate a regular, scheduled tasking process to identify and allocate suitable work?	1	✓
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Choose an option that most applies and select the number in the drop down box

1. Yes, we carry out regular, scheduled tasking, together with a tactical assessment, that is used to identify and allocate work
2. Yes, we use a tasking model to identify and allocate work, although it is ad-hoc in terms of frequency
3. No, work is allocated to officers by a team leader as it comes into the service

3.3 Tactical Assessment

3.3.1	Are you able to commission or create a tactical assessment within the relevant timescales to help drive your operational business?	1	✓
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Using the drop down box, select the closest response to your approach.

1. We create a tactical assessment on a regular, scheduled basis (monthly, bi-monthly, quarterly,) that is used to drive operational activity
2. We create a tactical assessment a few times a year which is used to adjust planned operational activity to meet identified problem
3. We do not create a tactical assessment, but use intelligence to assist with tasking and direct some operational activity
4. We do not create a tactical assessment, but follow a pre-planned team plan and respond to complaints and other issues as they arise

3.4 Intelligence Products

3.4.1	Are you able to commission intelligence products (problem profiles and target profiles) to help your service better understand the problems it faces?	1	✓
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Using the drop down box, select the closest response to your approach.

1. Yes, we have a dedicated Intelligence Officer who is able to produce a range of intelligence products.
2. Yes, we have an officer within the service who divides his/her time between that of Intelligence Officer and another role and is able to provide some products
3. Yes, although we do not have our own Intelligence Officer resource within the service, we are able to commission another service to provide products from time to time
4. No, we have no resource to provide us with intelligence products

3.5 Intelligence Logging

3.5.1	Do your staff have relevant access to an intelligence database?	1	✓
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Using the drop down box, select the closest response to your approach.

1. Yes, access is through a direct login through our own IT systems
2. Yes, although we do not have direct access, access is available a neighbouring authority
3. Yes, although we do not have direct access, access is available through the Regional Intelligence Officer
4. No, we do not have access to an intelligence database

3.5.2	Are they trained in preparing and submitting logs and is that competence maintained?	1	✓
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Using the drop down box, select the closest response to your approach.

1. All enforcement staff are trained in preparing and submitting logs. They either input them directly or give them to a person who inputs them
2. Although not all enforcement staff are trained in preparing and submitting logs, there is at least one officer who is within the service who is able to review work and submit logs based on this
3. Staff can and do prepare logs but we have to arrange for access via another authority
4. None of our officers are trained to submit intelligence logs and we don't generally refer to them.

3.5.3	If you answered 1-3 to the question above, Do you have adequate sanitising capacity? Otherwise please select 'not applicable'.	
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Using the drop down box, select the closest response to your approach.

1. Yes, sanitising is carried out by staff trained within our service in a timely fashion
2. Yes, because sanitising is carried out on our behalf by a neighbouring authority, which has sufficient capacity
3. Yes, because sanitising is carried out on our behalf by our Regional Intelligence Officer or their team
4. We struggle with capacity and, at times, logs take longer than we would like to go live on the

3.6.1	Do you have suitable intelligence links/sharing protocols in place with partners to enable the service to benefit from intelligence from external sources?	Yes	✓
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3.7.1	Does your authority have access to the sanctions database*	Yes	✓
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**(Sanctions database run by National Anti-Fraud Network)*

Narrative: Please use this to further explain anything that you may wish to add.

We are developing our strategic assessment, so whilst we aren't quite there we are striving to have one.