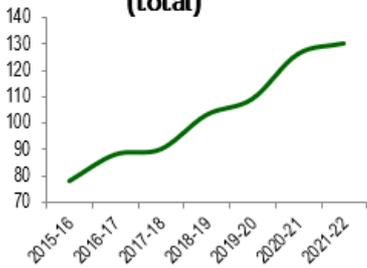


KEY PERFORMANCE INDICATORS

Summary - Quarter 1 (April to June) 2021/22

Trading Standards Snapshot

April 2021- June 2021 (Q1)

<p>Financial Impact of Scams Prevention Work</p> <p style="font-size: 2em; font-weight: bold; color: #008000; text-align: center;">£426,332</p> <p>Direct & Future Savings: Positive impact on society of our Scams Prevention work</p>	<p>Demand on the Service</p> <p>2,204 emails, phone calls, partner referrals, letters and referrals from the Citizens Advice Consumer Service</p> <p>320 requests for help and advice from Businesses</p> <p>18 referrals from partners about Covid related issues</p>	<p>Market Surveillance</p> <p>27 food samples taken to check food standards, labelling and authenticity</p> <p>68 shops, gyms, markets / car boots and events visited to check covid compliance</p>	<p>Call Blocking</p> <div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>14,495 Nuisance Calls Blocked</p> <p>3,994 Scam calls Blocked</p> <p>16 Call Blockers installed in homes of high risk individuals</p> </div> </div> <p style="font-size: 0.8em;">■ Scams ■ Nuisance ■ General Calls</p>
<p>Helping Communities to fight Scams</p>  <p>154 Friends Against Scams trained</p> <p>5 Businesses Against Scams trained</p> <p>12 Police staff trained</p>	<p>Active Investigations</p> <p>32 active investigations in the following areas:</p> <div style="display: flex; justify-content: space-around; font-size: 0.8em; color: #008000;"> secondhand car sales animal welfare </div> <p style="font-size: 1.5em; font-weight: bold; text-align: center; color: #008000;">illicit tobacco</p> <p style="font-size: 1.5em; font-weight: bold; text-align: center; color: #008000;">unfair trading</p> <p style="font-size: 1.5em; font-weight: bold; text-align: center; color: #008000;">doorstep fraud</p> <div style="display: flex; justify-content: space-around; font-size: 0.8em;"> food labelling food fraud counterfeit goods money laundering </div>		<p>Unsafe or Non-Compliant Goods Removed from the Market</p> <div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>8,642 Unsafe or non-compliant items stopped from entering the marketplace</p> <p>£287,779 Value to society of these goods being stopped</p> </div> </div> <p style="font-size: 0.8em;">■ Unsafe & non-compliant ■ Inspected</p>
<p>TS Primary Authority Partnerships (total)</p> 	<p>Volunteers</p> <p>108 Volunteers willing to help the Service deliver its priorities, having given ...</p> <p>1,404 hours of their time to Service priorities</p>	<p>Illicit Tobacco</p> <p>25 shops visited with a tobacco detection dog</p> <p>Suspected illicit tobacco found in 36% (8) of these</p> 	<p>Trader Approval Scheme Members (total)</p> <div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>109</p> </div> </div> <div style="display: flex; align-items: center;">  <div style="margin-left: 10px;"> <p>340</p> </div> </div> <div style="display: flex; align-items: center; margin-top: 10px;">  <div style="margin-left: 10px;"> <p>110</p> </div> </div> <p style="font-size: 0.8em;">traders4u.co.uk</p>



April to June 2021

The first quarter of this year has seen a return to more ‘business as usual’ than the last year. Some work related to the Covid pandemic remains, but not as significant as previously. We continue to see a significant impact on the court aspect of the criminal justice system with many cases now substantially delayed.

The snapshot on the previous page shows performance against some of the key activities undertaken in quarter one.

Service Priority Area 1 - Protecting the most vulnerable. Tackling fraudulent illegal and unfair trading practices, including serious and organised crime.

Key Performance Indicator	Comments	Status
Increase the financial savings for residents as a result of our interventions and investigations	Savings for residents fluctuate year by year (and quarter by quarter) often due to factors beyond our control. £54,359 of savings occurred in Q1 compared to a total of £466,586 in the full 20-21 year. Due to delays in the court system there have been no Proceeds of Crime Act compensation orders (which tend to be the largest contributor to these figures) so far this year. In addition to this there have also been £145,324 savings for scam victims in Q1.	Red 
Actions to stop rogue traders operating in Buckinghamshire and Surrey	The service continues to take actions to tackle and stop rogue trading, despite there being no convictions in Q1 due to the ongoing impact of coronavirus on the Criminal Justice System with many cases delayed. In the first part of the year the Service has been actively involved in a pilot project across the South East and London to assess the impact of using video doorbells and other video door technology to support those at high risk of doorstep crime. Early results of the pilot show that installing this technology leads to a significant increase in wellbeing of the householder(s) and a significant reduction in financial loss at the doorstep, with very few being retargeted. The Service has carried out operations to disrupt the supply of illicit tobacco, by using tobacco detection dogs to locate hidden tobacco which is seized pending the full investigation (see area 3 for detail). In Q1 the Service continued to focus on second-hand car dealers that have been generating multiple complaints. This includes ensuring that the car dealers are clear on what the law requires and allows, which has resulted in resolving numerous ongoing disputes between the garages and consumers. The Service has numerous cases in the court system with 13 defendants currently scheduled for trial between November and May, and a number of other matters currently earlier in the legal process. This compares to 5 defendants convicted during 20/21, and 16 convicted in 19/20	Static 
Impact of our interventions with scam victims, as measured by the NTS Scams Calculator	Scams have been a particular concern since the start of the Covid Pandemic so the Service has undertaken a range of work to prevent as many people as possible from becoming victims of scams. In Q1 £431,651 has been saved for residents and in avoided health and social care costs as a direct result of our scams interventions. This compares to just over £1.7m in the previous year so is broadly similar. In Q1 interventions were made with 254 individuals vulnerable to scams.	Green 

Volunteers



Buckinghamshire and Surrey Trading Standards are fortunate to have 108 members of the public who donate their valuable time as volunteers.

Volunteers undertake a diverse range of activities, from purchasing informal food samples to undertaking research projects.

The Prevention Team have a group of dedicated specially trained volunteers. These Scam Champions give their time to raising awareness of scams and encourage their communities to take a stand against them.

Our volunteers have greatly enhanced our engagement and enabled the Service to deliver better outcomes for our residents. Many volunteers bring their own personal knowledge and work experience to not only deliver relevant and engaging training but have also helped to develop both our Friends Against Scams (FAS) and Business Against Scams (BAS) training.

Due to Covid19 security measures volunteers stopped face-to-face community engagement for a time but this did not dampen their passion. Our volunteers have been extremely helpful and willing to move to virtual training, developing and adapting the sessions for an online audience.

The total number of Friends Against Scams, Scam Marshals & SCAMchampions trained:



The diverse activities our volunteers undertake combined with their passion have helped to tackle people's lack of knowledge of scams by providing information to enable communities and organisations to understand scams, talk about scams and convey messages throughout communities about scam prevention and protection.



Case Study

In May 2021 the Prevention Team received a referral from Thames Valley Police regarding a vulnerable male living in the Chesham area of Buckinghamshire who was being targeted by rogue traders.

At the time of the referral the gentleman had already handed over a cheque for £8,000 to an individual claiming to be from his water supplier and withdrawn an additional £1,000 cash from his bank.

Working jointly with police partners an initial wellbeing visit was undertaken. It immediately became apparent that this vulnerable individual was being systematically targeted not only on the doorstep but also via the telephone.

As a matter of urgency a call blocker was fitted to immediately stop the scam and nuisance calls. An appointment was also made to fit a doorbell video camera with the purpose of: 1. Acting as a deterrent to cold callers and 2. Capturing evidence of any criminal activity. Unfortunately before the camera could be fitted the fraudsters struck again, extorting another £650 from the resident.



Because the resident had no internet access Trading Standards installed a router as well as a doorbell camera. After installation the householder was targeted yet again. In an attempt to avoid the camera the rogue trader went to the kitchen door at the side of the property rather than the front door where the camera was. Although they managed to get away with another £200 the doorbell camera captured a clear image of the criminal. This evidence is being used by Thames Valley Police as part of their ongoing investigation into the perpetrators.

As part of our prevention strategy and to provide the resident with peace of mind a second unit has been installed at the kitchen door. Since that time there have been no additional incidents reported.

The daughter of the resident explained that her father was extremely trusting of individuals and suffered from memory loss. She expressed her gratitude to Trading Standards and was very pleased by the help and support her father was receiving.

Call Blockers:



Call blockers are an extremely effective way of stopping criminals accessing vulnerable residents. To combat cold call fraud and to give residents piece of mind Buckinghamshire and Surrey Trading Standards provides and installs call blocking technology free of charge to those who are being plagued by nuisance and scam calls.

Since 2014:

- **Over 360 units distributed to vulnerable residents**
- **250,864 nuisance calls blocked**
- **68,774 scam calls blocked**
- **Total savings attributed to the units £2,986,962.**

If a resident feels either they or a relative may benefit from a call blocker they can email this request to us at trading_standards@surreycc.gov.uk. One of our Prevention Team officers will then contact the resident and discuss how the call blocker works and assess whether this would be an appropriate solution for the resident. A simple form will be completed and the fitting of the call blocker will be arranged. In urgent cases our officers are trained to install the units there and then.

Latest feedback on call blockers we have installed includes:

"The trueCall service has been fantastic, it stopped all the nuisance calls immediately. Nothing else worked. Scammers know that this service is the end for them, they don't bother trying. I can't recommend it enough"

"The trueCall machine has been a godsend. Especially considering how many phone calls we used to get"

"...we are delighted with the trueCall device, and it has made an immediate and welcome difference. Thank you"

"...we are very happy with the service. It makes us know he's (father) safe from phone scams"

"I find the scheme invaluable, it saves my disabled husband having to answer nuisance phone calls as well as myself. No electronic nuisance calls come through"

"One of the best decisions, thanks to Trading Standards, that we have made"

"It is a brilliant idea to have a Truecall service. Wonderful gadget"

"Has been great. Disabled husband - don't need him stumbling to take rubbish calls. Truecall is great... Wouldn't be without it"

"I no longer am worried when the phone rings since the device has been installed. I am grateful for the loan of the device & would not like to be without it"

"My husband & I are much happier now that we have the Truecall device. We don't feel threatened now when we answer the phone"

"It's fantastic!! What a great way of stopping the scammers trying to take advantage of my elderly mother with dementia"

In addition to local feedback, the National Trading Standards Scams Team undertook some academic research alongside Bournemouth University into the use of call blockers, including measuring the respondent's wellbeing at the point of installation and 3 months later using the nationally recognised 7-item Warwick-Edinburgh Mental Wellbeing Scale (SWEMWBS) to provide a measurable score of wellbeing. In this research 96% of respondents themselves reported a positive impact on their well-being; the remaining 4% reported little or no impact. No respondents reported a negative impact.

In terms of Wellbeing scores: At the time of application, respondents reported an average overall well-being score of 22 (63%), after three months they reported a significant increase in their well-being, with an average score of 26 (74%). This increase was most notable amongst those respondents classed as vulnerable, who reported a lower average well-being score at installation: 20 (58%) at installation, increasing to 25 (72%) after 3 months.

Sunnybank Trust Recognition

A member of the Prevention Team, Linda Crowley, received an unsung hero award from the Sunnybank Trust, a charity providing assistance to over 200 vulnerable men, women and young people with learning disabilities to lead fuller lives. Linda received the award in recognition of her ongoing work with, and support of individuals who have learning difficulties. Linda is currently working alongside other Prevention Team officers and Sunnybank Trust members to develop advice materials translated into makaton.

Makaton is a language that combines signs, symbols and speech to enable adults and children with learning or communication difficulties a way to communicate.



Communication:

Making people aware of the risks of scams and helping educate people how to protect themselves is integral to the work of the Prevention Team. In Q1, with the help of the Communications team the Service developed a strategy for using different communications channels to reach different audiences and to maximise the impact of our work in this area.

The TS alert newsletter has recently had a makeover to make it more accessible and easier to read. This goes out to a wide range of individuals, community groups, Districts & Boroughs, the Police and charities who then share all of it or relevant articles with their networks. We have started to develop a separate version focused on information that businesses would find helpful and interesting and are looking to build a similar range of interested individuals and groups to receive this.

The Service runs Facebook pages specific to our Friends Against Scams, where not only do we post information but where the community can support each other. These are particularly successful in terms of engagement and therefore we will continue to devote resources to maintaining them as a way of maximising the impact of our Friends Against Scams within their communities.

We continue to run a Twitter account, and put out press releases on significant news stories which are regularly picked up in the local media (press, radio, social media etc)

Service Priority Area 2 - Enabling businesses to get the help and support they need to thrive and grow. Delivering public protection through supporting businesses to comply with their legal responsibilities and ensuring a level playing field.

Key Performance Indicator	Comments	Status
To increase the number of Primary Authority Partnerships	<p>The number of Partnerships we have has increased by 4 to 131 during the quarter.</p> <p>New Partnerships were formed with:</p> <ul style="list-style-type: none"> • Glanbia Performance Nutrition (UK) Limited – performance and lifestyle nutrition products • Johnson and Johnson Ltd – a large and broadly based international healthcare company • Raw Honey Distillery Ltd – a local Surrey business creating products from honey • Skull X Ltd – a local Buckinghamshire business creating alcoholic beverages 	<p>Green</p> 
Support to trader approval schemes	<p>The Service continues to run “Eat Out, Eat Well” with the support of Health partners, and in Surrey Public Health have recently committed additional funding for a part time officer to help roll out the ‘Eat Well, Start Well’ part of the scheme.</p> <p>The service launched Traders4U.co.uk early in 2020 to support local residents and local businesses. Targeted Facebook advertising is being used to attract businesses. The take up of this scheme, in a currently challenging home improvement market, will be reviewed later in the year.</p> <p>We continue to work in partnership with TrustMark and to support their scheme with an option to upgrade to trading standards approved status.</p>	<p>Red</p> 

Research shows that a positive regulatory environment can contribute significantly to economic development and sustainable growth, improving the openness of markets and creating a less constricted business environment for innovation and entrepreneurship. It can protect compliant businesses by enabling fair competition and promoting a level playing field and provide business with the confidence to invest, grow and create new jobs.¹ Supporting businesses to understand what they need to do to be compliant is a vital part of a positive regulatory environment, ensuring that they can confidently focus their resources in the right areas.

At the start of the quarter the business advice line continued to receive enquiries regarding businesses opening post Covid. During the quarter we have seen an increase in requests for advice in relation to home manufacturing of pet foods and pet treats alongside the usual food and product safety labelling, allergens, terms and conditions and product recall enquiries. The business team received 320 enquiries during the first quarter and the subjects discussed encompass a wide range of subjects such as (and not exclusive to) soap, biltong, washing machines, jam, Gin and websites.

During the quarter there has continued to be a significant focus on supporting businesses through the changing Covid restrictions. This has included: Enforcement and proactive advice of Covid related legislation and guidance, including the business restrictions legislation; Advice to businesses who need to amend their operations in light of Covid requirements, restrictions, or the changing commercial environment to continue to be viable and to move into thriving; Advice to help start-up businesses navigate regulatory requirements and particularly those brought about

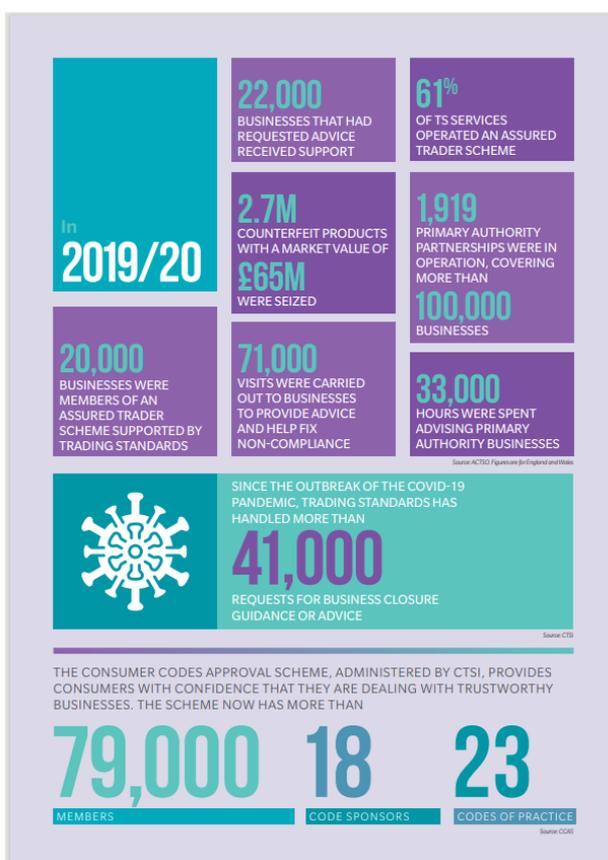
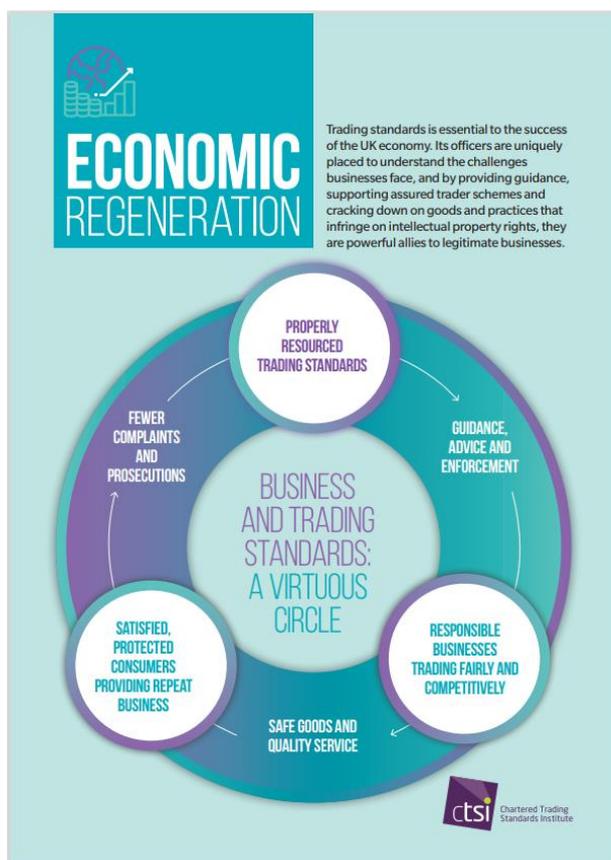
¹ [Regulation and Growth \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

by Covid legislation. In Q1 107 reports of a wide range of covid related problems were received through Surrey's online reporting tool. These were either dealt with by our officers or the information was passed to an appropriate partner for their consideration.

The Service has been fortunate to obtain funding from Surrey's Contain Outbreak Management Fund to assist with managing this work within Surrey which has enabled dedicated resource to be put to this work in that area. As well as engaging with businesses, they have been working closely with the District and Borough Environmental Health teams, at times doing work at their direction to ensure covid compliance and give advice at events such as car boots and newly re-starting markets. As with all rapidly changing environments, more recently the work in this area has changed again and they have been looking into the transparency and accuracy of pricing and contract terms for private Covid tests (required for travel and to attend some events).

In October new food labelling laws known as "Natasha's law" will come into effect. This requires ingredient and allergen labelling for foods which are prepared and packaged where they are sold (for example sandwiches from a canteen) which were previously exempt. We have been working with Primary Authority Partners and Schools/education settings to support them to prepare for this change and ensure this important information is given to people so they can make safe informed choices.

A national view of the Impact of Trading Standards on the Economy:



Current Primary Authority Partnerships:



New Primary Authority Partners in Q1



Advertising Standards Authority 'backstop' work

In January 2019, Buckinghamshire and Surrey Trading Standards were appointed by National Trading Standards (NTS), to perform the legal backstop function for the Advertising Standards Authority (ASA). It has been an opportunity for us to build an effective working relationship with the UK's independent advertising regulator in relation to enforcement of misleading non-broadcast advertising.



Our role has involved a wide range of referrals from the ASA regarding anything from subscription traps, copycat websites, to misleading efficacy claims on health services/products. We work with a number of enforcement partners on such matters, including HMRC, MHRA, NTS (Scams, eCrime and Estate Agency & Lettings teams), Phone-Paid Services Authority and most recently

the Competition and Consumer Protection Commission to use a range of sanctions to gain compliance. Our most recent work has involved an online education service which generated hundreds of consumer complaints about the 'not so free' free trial, as well as working with other organisations, such as the Humane Society International UK regarding misleading claims on faux fur products sold online. Working with the ASA as their enforcement partners has proven to be an invaluable tool.



Eat Out, Eat Well

Eat Out, Eat Well is an important part of the Service's work to tackle poor food quality and nutrition. Developed with colleagues in Surrey's Public Health team and supported by Environmental Health the Eat Out, Eat Well Award has been developed to reward caterers who make it easier for their customers to make healthy choices when eating out.

The Award aims to encourage food businesses to provide healthier options to customers, through the use of healthier catering practices, increasing fruit, vegetables, and starchy carbohydrates, and decreasing fat, especially saturated fat, sugar and salt. It also recognises provision of healthy options for children, and rewards staff training and promotion and marketing of healthier options.

The Eat Out Eat Well award is an integral part of the Surrey Healthy Weight Strategy, Whole Systems Approach; which is included in the Surrey Heartlands STP Prevention Plans.

Eat Out Eat Well was a finalist in the Royal Society for Public Health Awards in 2018.

There are a variety of types of members of the scheme in Surrey and Buckinghamshire, including an NHS Hospital, leisure centres, National Trust properties, prisons, non-local authority schools, workplace restaurants and chain and independent sandwich bars.

The most recent development of the scheme is "Eat Well, Start Well" for Early Years settings which is based on Public Health England's Healthy Eating Guidelines for under 5's. Surrey Public Health have recently funded a part time post to focus on rolling this scheme out to early years settings across Surrey due to the links which are now known between obesity and poorer outcomes for those who get Covid-19.

Service Priority Area 3 - Improving wellbeing and public health; tackling the supply of unsafe, dangerous or age restricted products and working to maintain the integrity of the food chain, including food quality, nutrition, and animal health.

Key Performance Indicator	Comments	Status
Number and estimated value of unsafe/non-compliant goods removed from or prevented from entering the supply chain.	43 consignments of goods were examined in Q1, leading to stopping 8,642 unsafe or non-compliant goods entering the country. with an estimated impact to society of over £287,000. These products included electrical items, unsafe toys, DIY items, pillows and decorations among others. This number is lower than 20/21 when the Service did a significantly increased amount of work on the air freight import of PPE at the start of the Pandemic.	Red 
Number of premises tested for selling illicit or age restricted products inappropriately, and approximate value of seized goods.	25 premises have been visited with tobacco detection dogs, with suspected illicit tobacco or illicit alcohol found (and seized) at 9 (36%). A conservative estimated value of the seized goods, based on HMRC data is £1,797.	Green 
Market surveillance projects carried out, including in relation to food	In quarter one, 4 food market surveillance projects were carried out, identifying 72 businesses selling misdescribed food, or not correctly declaring allergens, or selling food containing toxic or illegal components, or involved in food fraud (can we narrow this down) In addition we have been working on 3 non food market surveillance projects related to Illicit Tobacco, unsafe goods and Lettings Agents (following up a piece of regional work, we are just starting on a project to tackle very low compliance levels in the lettings agents industry which are causing economic detriment to consumers and unfair competition and will report on this in more depth in the next report).	Green 

Food Standards

An important role for the Service is ensuring that consumers have confidence in their food, so it is correctly described, not being sold fraudulently and is not dangerous. This includes ensuring accurate allergen labelling and also that naturally occurring toxins are not present in levels that pose a threat. Undeclared allergens can kill very quickly, however serious illnesses can result from excessive mycotoxins, aflatoxins etc. For example patulin, a naturally occurring food contaminant, is mutagenic, genotoxic, immunotoxic and neurotoxic. Patulin can be responsible for acute effects including nausea, vomiting and other gastrointestinal issues.

It can be impossible for consumers to know when there are problems with food so we carry out a range of market surveillance projects each year. Some examples of the projects in Q1 this year have been to check what meat species is present compared to how the product is sold; checking the level of mycotoxins in beer; and assessing the nutrition information accuracy and the front of pack traffic light indication based on portion size.

As with many areas of our work, working to maintain food standards requires working with partners. On a day to day basis we work with the Public Analysts, Food Standards Agency (FSA) and Trading Standards colleagues across the region and nation to coordinate our sampling work so that it is as effective as possible. Currently we are working with the FSA on a national pilot to develop an enforcement system that is fit for purpose as the food market place evolves. This will run for 12 months. We are also working with the National Food Crime Unit (part of the FSA) to investigate a case of potential food fraud after receiving intelligence from the NFCU

As well as carrying out market surveillance projects, looking at the food products which are already available to buy, we also work closely with our Primary Authority Partners who are food businesses to support them to get things right before products reach the shelves, to appropriately/legally manage disruptions in supply of ingredients and to prepare for impending changes in legislation which will affect their business (e.g. Natasha's law).

Unsafe Goods & Safety of imported goods at Ports and Borders

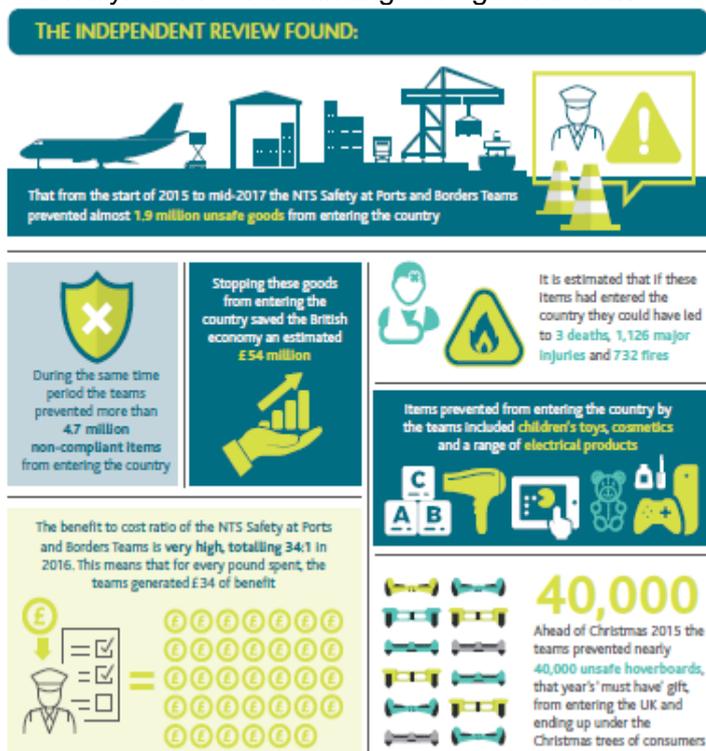
Detaining unsafe goods at the point of entry saves considerable additional work once unsafe or non-compliant goods are spread across multiple wholesalers or retailers nationwide and is an efficient and effective way to protect consumers from dangerous products. During the early stages of the Pandemic this work was extremely busy due to the high number of air imports of PPE, including face masks. Because of the national impact of the work, funding is allocated by the Office of Product Safety and Standards (part of the Department for Business, Enterprise and Industrial Strategy, BEIS).

This money funds trading standards teams located at several sea ports, airports and postal hubs across England, including the transit sheds located in Surrey for Heathrow.

Our role as part of the Safety at Ports and Borders Teams is to prevent unsafe and non-compliant goods coming into the country. The work helps protect consumers by preventing injuries, deaths and fires, and safeguards reputable business.

For each unsafe/non-compliant item stopped at the port, research has shown this saves society £33.30. The benefit to cost ratio of Safety at Ports and Borders work was estimated at 34:1 in 2016 i.e. every £1 spent saved the economy and average of £34.

An independent review was undertaken into this work nationally. Some of the findings are given below.



In addition to our work at Heathrow, we also carry out market surveillance to check on the safety of goods being sold in Bucks and Surrey. With funding from the Office for Product Safety and Standards we have been carrying out test purchases and experts have been testing the safety of a wide variety of products such as electric scooters, bikes and skateboards; PPE – in the form of a bike helmet and safety shoes; toys aimed at very young children; nursery bedding/cot bumpers; high chair; After tattoo lotion; hand sanitiser & face masks.

Outcomes of the testing have shown a number of safety issues across a range of products which we are following up on. Follow up is varied depending on the severity of the problem found and what risk is posed by the goods. Follow up may include helping a company to update instructions so that they allow a product to be used safely through to instigating a recall for the most dangerous of products.

An example of an item found to be unsafe is “Safety shoes” advertised as “specifically designed to keep you safe in a workplace environment. With heavy duty steel toe caps and soles will ensure you don’t injure yourself”. One of the seller’s images suggests the shoes would protect from nails and a hammer:



The shoes were not CE or UKCA marked and, on testing, failed tests for both impact and penetration, not providing the protection they claimed and putting any wearer at risk of serious injury.

Another item found to be unsafe was a foldable electric bike, which was missing technical documentation.

Testing showed that it was able to operate without being pedalled and it could exceed the maximum allowed for electrically power assisted cycles (25km/h). This means that it should be considered a road vehicle, such as a moped, and therefore subject to further vigorous requirements.



Illicit Tobacco

A significant concern for the service is the supply of illegal tobacco. This is often brought in illegally from other countries, does not bear the appropriate warnings or have the right packaging, may be infringing Trade Marks and is unlikely to have had the duty paid correctly. The contents of counterfeit tobacco are unknown and may be even more harmful than legal tobacco. Illicit tobacco is usually significantly cheaper than legal tobacco, making its sale and use more accessible to children and generally more affordable. As it is cheaper than legal tobacco, the sellers also gain an unfair trading advantage over those businesses choosing to comply with the law.

In the UK increasing tobacco prices is one approach to encourage smokers to quit and discourage young people from starting smoking. Illegal tobacco undermines this because it is cheaper and in many cases can be purchased from alternative sources making it easier for children to purchase.

Public Health and HMRC also have an interest in reducing the amount of illicit tobacco available and we often work in partnership to try to reduce its availability. This year HMRC are directly funding work to tackle illicit tobacco by Trading Standards and this has paid for specialist tobacco detection (sniffer) dog days which we use to help find hidden tobacco as well as some forensic

support and intelligence development. One of the places where we found tobacco hidden during these exercises was in sweet boxes:



The recent Public Health England umbrella review reported that current smoking was associated with a 1.8 times higher risk of severe COVID-19. In addition to increased risk of severe COVID-19, smoking remains the biggest single cause of preventable mortality and morbidity. Furthermore, because smoking is so harmful, differences in smoking prevalence across the population translate to health inequalities.

Following work to develop intelligence about which shops are selling illicit tobacco, the Service used a tobacco detection dog in May and June to visit 24 premises. This resulted in 9 seizures, 8 of which included tobacco that we are now investigating as suspected illicit and/or counterfeit. Overall, this is unusual by comparison to sniffer dog days pre-pandemic, and on one day 4 out of 5 premises visited in a town had suspected illicit tobacco which is a concerning high rate of seizures. Public Health in that County are funding additional work to establish whether this pattern is repeated and to tackle it.