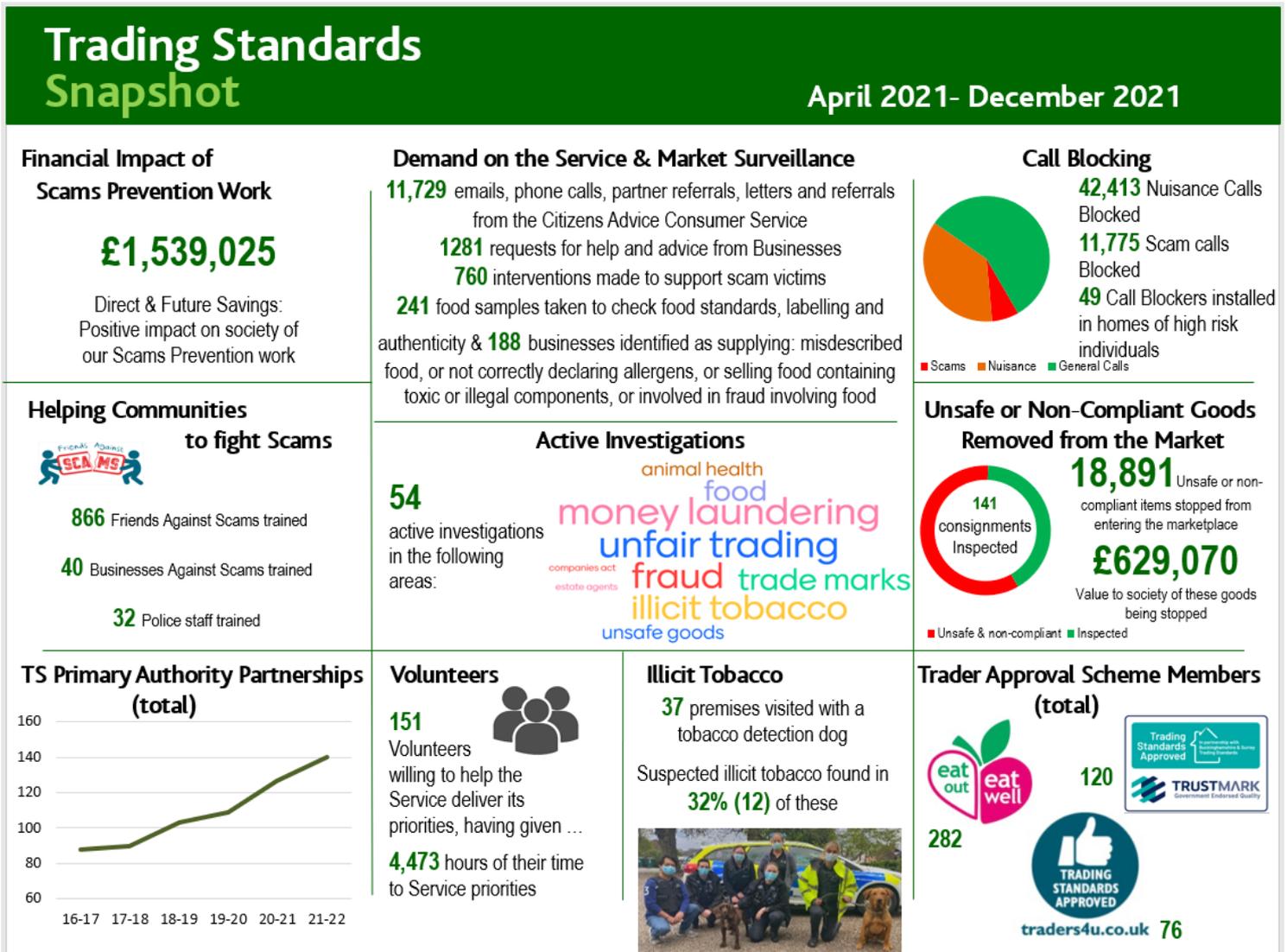


# KEY PERFORMANCE INDICATORS

## Summary - April to December 2021/22



## April to December 2021

This year has seen a return to more 'business as usual' than the last year. Some work related to the Covid pandemic remained in the early part of the year, but not as significant as previously, and this is now completed. We continue to see a significant impact on the court aspect of the criminal justice system with many cases continuing to be substantially delayed. Three trials due to happen in November and December were all postponed due to a lack of available court/jury time. However, due to defendants pleading guilty avoiding the need for trials we have now seen as many convictions this year compared to last year.

The snapshot on the previous page shows performance against some of the key activities undertaken in the first 3 quarters of the year.

**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
<p>Increase the financial savings for residents as a result of our interventions and investigations</p>	<p>Savings for residents fluctuate year by year (and quarter by quarter) often due to factors beyond our control. £284,965 of savings occurred in Q1,2&amp;3 compared to a total of £466,586 in the full 20-21 year. Due to delays in the court system there has only been one Proceeds of Crime Act compensation order (which tend to be the largest contributor to these figures) so far this year. This was for a total of £86,391 to be returned as compensation to two victims of home improvement fraud where the criminals had been sentenced to immediate custody back in 2020. Original coverage of this case can be found here: <a href="#">Cowboy builders jailed for seven years after causing major damage to elderly couple's home   Daily Mail Online</a></p> <p>In addition to this £284,965 there have also been £698,448 savings for scam victims in Q's1-3.</p>	<p><b>Red</b></p> 
<p>Actions to stop rogue traders operating in Buckinghamshire and Surrey</p>	<p>The service continues to take actions to tackle and stop rogue trading, despite the ongoing impact of coronavirus on the Criminal Justice System with many trials delayed. Compared to 5 defendants convicted during 20/21, and 16 convicted in 19/20, this year so far has seen a total of 5 defendants convicted through cases led by us, and 2 more convicted where other agencies led the legal proceedings with the preceding investigations carried out in partnership with us. There have been three convictions (following defendants pleading guilty) for fraud and unfair trading offences (all still awaiting sentencing), and (in January) two convictions in relation to the supply of psychoactive substances and illicit tobacco, leading to a fine and 160 hours of community Service. In one of the cases investigated in partnership, the defendant kept over 200 animals, many of which were found to be unnecessarily suffering when a warrant was exercised on his farm. He was also found not to be disposing of animals correctly after they had died, which poses risks to his other animals and the food chain. He was sentenced to 19 weeks immediate custody and banned from keeping animals. Some examples of the press coverage include: <a href="#">Farmer jailed over cruelty that led to 'UK's biggest animal rescue mission' (telegraph.co.uk)</a> <a href="https://www.rspca.org.uk/-/news-man-jailed-after-biggest-rescue-mission-23">https://www.rspca.org.uk/-/news-man-jailed-after-biggest-rescue-mission-23</a></p>	<p><b>Green</b></p> 

	<p><a href="https://thatsfarming.com">Man jailed after 170 animals found in 'poor conditions' - thatsfarming.com</a></p> <p>In the first part of the year the Service was 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. Data from the pilot showed 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. These results led to a further funding application being agreed by National Trading Standards, and we are beginning to install more door cameras in the homes of the most vulnerable.</p> <p>In both areas we are now partners in Multi Agency Approach to Fraud, which is being operated in policing areas. In Buckinghamshire this means we are part of Thames Valley and in Surrey we are working closely with the Sussex area. As part of this we have been successful in obtaining funding from the National Trading Standards Scams Team to purchase more call blocking units. Each call blocker installed in the home of a person particularly vulnerable to phone fraud leads to over £16,000 savings and reduces the stress of unwanted calls. The feedback from residents with these units and their families is overwhelming positive about the impact they have on a person's life.</p> <p>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). This included executing a warrant on a flat that was suspected to be where illicit tobacco was being stored prior to its' sale from a nearby shop, where over £12,000 of tobacco was found during the warrant. The Service also found 36,000 illicit cigarettes hidden in a consignment being imported via Heathrow and have been working with Border Force and the Trading Standards Service for the address they were destined for to stop the goods entering the country and to investigate.</p> <p>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.</p> <p>The Service has numerous cases in the court system with 13 defendants currently scheduled for trial between April and October 2022, and a number of other matters currently earlier in the legal process.</p>	
<p>Impact of our interventions with scam victims, as measured by the NTS Scams Calculator</p>	<p>Scams are an ongoing concern. Many new ones appeared during the pandemic in relation to vaccines, testing and isolating. World and local events, such as storms causing damage to properties, see new iterations of recurring scams pop up. Therefore the Service has undertaken a range of work to prevent as many people as possible from becoming victims of scams.</p> <p>Up to the end of December £1,539,025 has been saved for residents and a further £839,514 in avoided health and social care costs as a direct result of our scams interventions. This compares to just over</p>	<p><b>Green</b></p> 

	<p>£1.7m saved for residents in the previous year. Although this appears to be ahead (as it includes a significant uptick during Q2 due to very high-quality referrals from the National Scams Team, enabling us to deal with residents as they were being defrauded) we have recently seen a dip in referrals from the NTS Scams Team (whilst they are dealing with a large intervention related to a scam being perpetrated from the US) which is likely to reduce the Q4 figures.</p> <p>To the end of December interventions were made with 760 individuals vulnerable to scams.</p>	
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## Door Cameras

Doorstep crime (fraud) refers to rogue traders, bogus callers, and distraction burglary. These crimes can not only have a huge financial impact on their victims but can also lead to both psychological and physical damage. Home Office research shows that the majority of the victims of this type of offending are over 65 and are two and a half times more likely to be in care or die within two years as a result of victimisation compared to their nondefrauded neighbours.

Between April 2020 and April 2021, nationally, there were 3,509 doorstep fraud incidents reported into Action Fraud with losses of £17.2m. This does not take into consideration the incidents reported to the Citizens Advice Consumer Service. The National Trading Standards Scams Team says that scams are under reported with estimates of between only 5-10% reported. The actual figures are therefore likely to be a lot higher than the Action Fraud data conveys.

Effective interventions have been proven to work in relation to phone fraud with the installation of call blockers. Mail redirection services stop scam mail landing on vulnerable consumers door mats. With this in mind the Service took an active role in developing a pilot project in 2021 across London and the South East to assess the impact of installing door cameras in the homes of people particularly vulnerable to doorstep crime. Many of those taking part in the pilot had recently experienced doorstep crimes and their average loss was just over £18,300. The pilot included assessing the householder's wellbeing using a standard scale before the camera was installed and several months after.

### Conclusions from the project

- Consumers who are targeted by doorstep crime are more at risk of suffering from lower wellbeing leading to depression.
- The use of camera technology can dramatically **increase consumer wellbeing** and allow people to live independently for longer. Wellbeing scores went up, and 60% of respondents reported feeling more confident in answering their door.
- The use of camera technology on the doorstep can reduce the chance of being defrauded at the doorstep. (The average financial loss went from £18,300 prior to installation down to £0 after installation)
- The cost: benefit ratio of the project was 39:1 i.e. every £1 spent saves £39.

As a consequence of the pilot, Trading Standards South East made a further bid for funding to National Trading Standards for more door cameras and these are beginning to be installed in vulnerable residents homes.

### **Call Blockers:**



Call blockers are an extremely effective way of stopping criminals accessing vulnerable residents by telephone. 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.

Research into the impact of call blockers show that they decrease the householder's financial losses to phone fraud and they increase the householders wellbeing against a standard scoring methodology. The increase in wellbeing is greatest in those who self-identify as vulnerable. The cost: benefit ratio of the call blockers is 32:1 i.e. every £1 spent saves £32.

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](mailto: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 qualitative feedback on call blockers we have installed includes:

*"The telephone is a necessity, a lifeline. I do become concerned by scammers and tradespeople who are insistent. I have been badly scammed by someone who seemed to know all about my bank, my account and who worked in the bank, even though he wasn't local! My husband & I are much happier now that we have the Truecall device.*

*We don't feel threatened now when we answer the phone."*

*"The Truecall device has made such a difference to my elderly mother (98) and my disabled sister (70) as they can now answer the phone with confidence. As their carer I have peace of mind knowing that nobody can get through who they don't know. They were victims of a scam and the phone is now one thing I do not have to worry about. Thank you."*

*"Since fitting the Truecall filter, unwanted phone calls have virtually ceased! - scams now mostly confined to internet. Since installation I have had NO calls from bogus HMRC, survey groups? Internet "problems" reports. Particularly - overseas computerised calls are now history!!!"*

*"My wife and I find it a comfort that the only people on the call phone system can get through."*

*"We have had 2 or 3 people trying to scam but we are aware now not to give anyone any numbers however convincing they sound and we know that banks never ask or if we want advice we would go to our banks. We are 84 and 82 years old. We have seen how people have been scammed out of a lot of money. It is a brilliant idea to have a Truecall service. Wonderful gadget."*

*"It made me realise how many phone calls a day I was having to deal with. Some of them were very threatening and didn't make any sense as I don't bank with Santander or HSBC and I don't have CCJ's so how can the Bailiffs be after me. The tactics are horrendous. Very reassuring."*

**Multi Agency Approach to Fraud** – this is an initiative being coordinated by the National Trading Standards Scams Team to encourage partners within local police force areas to work together to tackle fraud and scams, including the Police, Trading Standards, Community Safety teams/ partnerships, victim support services and relevant charities. It encourages partners to work together to initially assess whether what they are currently doing is “good”, “better” or “best” in areas such as having a multi-agency approach, victim care, communications and awareness raising, using data and training. The aim is to then find ways to work together to improve in these areas. In both Counties we have strong relationships with partners in this field, however we can see that there are always improvements possible, and we are optimistic that this initiative will assist in delivering those improvements.

## **Volunteers**



Buckinghamshire and Surrey Trading Standards are fortunate to have a number of volunteers who donate their valuable time to the priorities of the Service.

Volunteers undertake a diverse range of activities, from purchasing informal food samples; undertaking research projects; and being Scam Champions to raise awareness of scams and encourage their communities to take a stand against them.

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. 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 Studies** - As part of our prevention work, we may get involved in securing refunds for vulnerable victims. The following two case studies relate to engaging with banks:

**Mr B** received a phone call from unknown individuals purporting to be from the investigation branch of his bank, ringing about a push payment problem. By coincidence the wife of Mr B had been a victim of a previous push payment scam so he believed it was a legitimate call. The fraudsters rang Mr B numerous times and he was subsequently persuaded to make 3 bank transfers totalling almost £26,000. Upon realising what had happened Mr B immediately contacted his bank and submitted a report to Action Fraud.

Mr B subsequently received two letters from his genuine bank. The first letter acknowledged that he had been a victim of authorised push payment fraud but also implied that because it was his

own fault that he had been scammed, he would only receive a 50% refund. A later letter from his bank heralded the “good news” that Mr B would be credited with £5.

Three weeks later, following interventions by Trading Standards, Mr B received confirmation that his bank would be refunding the total amount he lost, £25,743.27.

**Mrs K** received a scam text purporting to be from one of her daughters. The text said that a new number was being used because she had a new phone, that the banks were stopping her account and she needed £1,470 urgently. She tried to ring her daughter but received no reply. The fraudsters had obtained the daughter's date of birth via social media and tricked Mrs K to provide her husband's number. He was then contacted and was instructed to transfer £1,470. The criminals tried to obtain more money which roused suspicion. An attempt to stop the transfer was unsuccessful as Mrs K in her panic couldn't answer the security questions, and Santander refused her request to stop the transfer. All this happened while Mrs K was struggling to look after her mother who was suffering with dementia.

Trading Standards intervened to provide overall advice and support and following engagement with their bank the decision to not refund any of the lost money was reviewed and they decided it would be appropriate to refund the full amount of £1,470.

### **Communication:**

Trading Standards holds a variety of information and expertise which could help or reassure residents and businesses – for example knowledge of what goods are unsafe and are being recalled, knowledge of the latest scams circulating, or knowledge of where doorstep crimes are being committed. We share this information through a range of different channels to engage the residents for whom it would be most relevant. Having an ongoing programme of engagement with residents and businesses enables us to share more information with more people in support of our service priorities.

Anyone who would like to receive fortnightly trading standards information focused on residents /consumers directly into their in-box and share with others can subscribe to our electronic TS Alert newsletter using the link below:



<https://scc.newsweaver.co.uk/tradingstandards/ywh4mymr502>

Businesses can sign up to receiving Business Bites, our electronic newsletter focused on businesses here: [Business Bites](#)



The Service uses Facebook, both with an open page for general information: <https://www.facebook.com/BucksSurreyTS> and with private groups which help the Service and peers support those trained as Friends Against Scams and Scam Champions. These have high engagement and are a great way of maximising the impact of our Friends Against Scams within their communities.



We continue to run a Twitter account: [https://twitter.com/Bucks\\_Surreys/](https://twitter.com/Bucks_Surreys/) where we can put out information in a timely manner about the latest issues. Recently this has included information on how to donate to charities safely as we have seen scam 'charities' pop up to try to exploit people's desire to support those in Ukraine, and information on how to find reputable traders to fix problems created by storms at the end of February.

**Trading Standards**  
25.4K Tweets

**Trading Standards** @Bucks\_SurreyTS · 22h

Calling #businesses & #thirdsector organisations - join our webinar!

Covering:

- Government grant & tax rebate scams
- CEO fraud
- invoice/mandate fraud
- Tech support scams
- #cybercrime (by guest speaker from @TVPCyber\_Fraud)

[...surreytradingstandards.eventbrite.com](https://www.surreytradingstandards.eventbrite.com)

#scamaware

**Is your business #scamaware?**

Join our free scams awareness webinar for businesses of any size, with guest speaker from Thames Valley Police to cover cyber crime & security.

8 March 2022

**Buckinghamshire & Surrey Trading Standards**  
Published by Hootsuite · 27 February at 10:00

Please check on your neighbours who may be vulnerable after the recent windy weather.

- If they need help in finding someone to repair any damage, ensure they don't entertain traders who have cold called.
- Those that turn up on your front door and offer to start work straight away should be avoided!
- Instead help them follow our advice to find a trusted professional. Be #ScamAware

<https://www.surreycc.gov.uk/.../choosing-a-reputable-trader>



**Buckinghamshire & Surrey Trading Standards**  
Published by Hootsuite · 28 February at 18:00

Scammers use a hook and prey on our vulnerability and generosity in times of crisis. They've recently used the pandemic and the increased energy costs to defraud people and we expect they are now using the invasion of Ukraine to make some money.

If you are looking to help people in Ukraine, please donate wisely – do your research first so you give without getting scammed.

Please protect yourself with the following information:

- Scammers will pretend to be legitimate well-known charities, creating their own charity names, and impersonating people impacted by the war in Ukraine.
- Scammers will be cold-calling, direct messaging and creating fake websites and pages on social media to raise funds. Avoid clicking on links or downloading attachments in unsolicited emails, texts or social media messages. They may attempt to lure you into unwittingly downloading malware onto your device or take you to a fake website to steal your money and personal information.
- Do not donate via fundraising pages on platforms that do not verify the legitimacy of the fundraiser or that do not guarantee your money will be returned if the page is determined to be fraudulent.
- Be careful about crowdfunding requests as these may be fake and also come from scammers. Check the terms and conditions of funding platforms and ensure you are dealing with official organisations. If you are unsure, make your donation to an established charity instead.
- If you think you have paid money to a scammer, please contact your bank immediately.

<https://www.actionfraud.police.uk/charities>

#givesafely #scamaware

**Beware of charity scams**

Buckinghamshire and Surrey Trading Standards is also a member of the **Neighbourhood Alert system**, an online, secure community messaging system. It is used by various agencies such as Police, Fire, Neighbourhood Watch etc to communicate directly with individuals and groups in specific geographic areas. In turn these messages are disseminated by individual Neighbourhood Watch coordinators throughout their local communities. The Service uses this valuable tool to send alerts of doorstep crime incidents, scams, and other imminent threats.

**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 9 to 136 between April and December.</p> <p>Logos of all current partnerships are shown below. Examples of the most recent partnerships are:</p> <ul style="list-style-type: none"> <li>• Stannah – a Hampshire based stair and home lift business</li> <li>• Kallo – a Surrey based food business</li> <li>• Radish – a Hertfordshire based catering business</li> <li>• MSL Solution Providers – a Lancashire based microbiological testing business</li> <li>• Kenwood – a Hampshire based kitchen appliance business</li> </ul>	<p><b>Green</b></p> 
Support to trader approval schemes	<p>This year the Service has continued to run “Eat Out, Eat Well” with the support of Health partners, and in Surrey Public Health committed additional funding during 21/22 for a part time officer to evaluate the scheme and 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><b>Red</b></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.<sup>1</sup> 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.

**Hampshire PAPs** - Alongside our normal recruitment, losses and retention of partnerships, a restructure in Hampshire trading standards led to the regulator largely withdrawing from the field of Primary Authority due to lack of capacity. As a provider in our immediate locality with businesses who trade across county boundaries it was agreed that it would be beneficial to businesses, Hampshire TS and ourselves to work with them to implement a managed exit plan.

Their 46 partnerships were assessed and we took responsibility for working with 26 of them to explore their options. Anecdotally businesses have been relieved to be proactively contacted by Bucks and Surrey officers. Many of these businesses have decided to transfer and we are working through this process with them currently.

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

One of the key roles of the Service is to help **prepare businesses for new legislation**. This year there are two key pieces of legislation coming in. The first (from April) requires larger food catering outlets (over 250 employees) to display calorie information about the food they sell to enable customers to make informed choices. We have been advising relevant partners on this for the past few months. Then in October the Food (Promotion and Placement) (England) Regulations 2021 will come into force, which aim to

- reduce the availability of products high in fat, salt and sugar (HFSS) bought through “volume promotions” like ‘buy one get one free’ offers, and
- to restrict the placement of HFSS product categories in high footfall areas of an affected store, like checkouts, end-of-aisle units, store entrances, and designated queuing areas.

We have been working closely with Primary Authority partners whom this legislation will affect, including the Association of Convenience Stores who have over 30,000 members across the Country. We have worked together to write some guidance for their members which can be found here: [acs assured advice - hfss 2022.pdf](https://www.acs.org.uk/assured-advice-hfss-2022.pdf)

This guidance document contains Assured Advice under the ACS Primary Authority Scheme. For more details visit [www.acs.org.uk/assured-advice](https://www.acs.org.uk/assured-advice)

**ACS advice**

**HFSS PRODUCTS: PROMOTION AND LOCATION REGULATIONS**

The intention of The Food (Promotion and Placement) (England) Regulations 2021 is to a) reduce the availability of products high in fat, salt and sugar (HFSS) bought through “volume promotions” like ‘buy one get one free’ offers, and b) to restrict the placement of HFSS product categories in high footfall areas of an affected store, like checkouts, end-of-aisle units, store entrances and designated queuing areas.

An ACS advice guide for retailers [www.acs.org.uk](https://www.acs.org.uk)

ACS the voice of local shops

ACS the voice of local shops

HFSS PRODUCTS: PROMOTION AND LOCATION REGULATIONS An ACS advice guide for retailers

Convenience retailers' obligations under these regulations depend on the number of employees in their business and the size of their selling space in store(s). ACS' Assured Advice guide will help convenience retailers to understand:

- Which convenience retailers are impacted by the regulations.
- What volume promotions you can and cannot run on HFSS products.
- Where in your store you can and cannot display HFSS products.
- What area of your website and online platforms are affected.
- How you can determine if a product is HFSS.
- How the regulations will be enforced.

**What is a HFSS product?**

The regulations apply to the categories of packaged goods set out in the list below. However, this does not mean every product within each category will be impacted.

Products must be assessed on an individual basis to determine their 'nutritional profiling score' (NPS). Retailers should work with suppliers to establish what products are HFSS. The majority of suppliers will be clearly communicating what products are HFSS.


**1. IS MY BUSINESS IMPACTED BY THE REGULATIONS?**

**STEP 1/3: Restrictions on volume promotions**

Convenience retailers with more than 50 employees must not offer volume promotions on HFSS products. The calculation of your employee numbers could be impacted by your participation in a 'franchise agreement', including membership of symbol groups.

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graph TD
    Q1{Do you have 50 or more employees?} -- YES --> A1[You cannot run volume promotions on HFSS products in store or online.]
    Q1 -- NO --> Q2{Do you operate any part of your business as a franchise or are you a member of a symbol group?}
    Q2 -- YES --> A2[Ask your symbol group or franchise head office whether their advice is that you are included in these regulations.]
    Q2 -- NO --> A3[You are exempt from all parts of these regulations.]
    
```

**Franchise agreements and symbol groups**

Convenience retailers that are deemed to have a 'franchise agreement' will have to calculate their employee numbers based on **all employees within the whole franchise business or symbol group they are part of**, not just the people directly employed in store(s).

Convenience retailers will need to consult their symbol group supplier or franchise partner to discuss whether their agreement is considered to be a 'franchise agreement' as defined in the regulations. The regulations define a 'franchise agreement' based on the following criteria:

1. You agree with another party to the sale or distribution of food.
2. You agree with another party to the supply of particular food products specified in an agreement.
3. You agree with another party to comparable contractual arrangements as other businesses to:
  - a) products provided by the franchisee;
  - b) the internal or external appearance of the premises;
  - c) the business model used for the operation of the business.

**Retailers should gain access to legal advice on the status of their contracts, either:**

- a) advice provided by their symbol or franchise head office, or;
- b) advice the retailer has sourced themselves.

Source: The Food (Promotion and Placement) (England) Regulations 2021, Section 4: Qualifying Business

## Current Primary Authority Partnerships:



## New Partnerships since January 2022:



## **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 the Competition and Consumer Protection Commission to use a range of sanctions to gain compliance.

Following issues observed through our activity with the ASA we have been working with the Association of Chief Trading Standards Officers (ACTSO) who have recently written to the Ministers for BEIS and DHSC highlighting the limitations of the current legal framework to deal with complementary health products and therapies.

**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.	<p>141 consignments of goods to be imported via Heathrow were examined to the end of December, leading to stopping over 18,000 unsafe or non-compliant goods entering the country. with an estimated impact to society of over £625,000. These products included electrical items, unsafe toys, DIY items, pillows and decorations among others.</p> <p>The number of consignments is higher than at this stage last year, but the number of stopped unsafe/non-compliant goods is lower than 20/21 when the Service stopped large consignments of unsafe/non-compliant PPE at the start of the Pandemic.</p>	<p><b>Static</b></p> 
Number of premises tested for selling illicit or age restricted products inappropriately, and approximate value of seized goods.	<p>Following 46 unannounced test purchasing visits, 37 premises have been visited with tobacco detection dogs, with nearly 70,000 cigarettes, over 5kg of hand rolling tobacco and various shisha packages suspected of being illicit and/or illicit alcohol found (and seized) at 12 (32%). A conservative estimated value of the seized goods based on HMRC data is over £17,000.</p> <p>In Surrey this has been assisted with funding from the Covid Outbreak Management Fund to investigate and carry out additional illicit tobacco operations during 21/22 due to the high levels of tobacco found early in the year and the link between illicit tobacco, poor lung health and covid outcomes.</p> <p>This year we are also regularly finding small quantities of illicit alcohol at shops when we visit for other purposes.</p>	<p><b>Green</b></p> 
Market surveillance projects carried out, including in relation to food	<p>To the end of December, 13 food market surveillance projects were carried out, identifying 188 businesses selling misdescribed food, or not correctly declaring allergens, or selling food containing toxic or illegal components, or involved in food fraud.</p> <p>In addition, we have been working on six non-food market surveillance projects related to: firework storage; illicit tobacco; unsafe goods; lettings agents; vapes; and looking at the safety of Halloween costumes.</p> <p>The safety of Halloween costumes was covered in the press – here is a link to our video and a couple of the articles:  <a href="https://www.youtube.com/watch?v=OpLhVdw6lls">https://www.youtube.com/watch?v=OpLhVdw6lls</a>  <a href="https://www.dailymail.co.uk/news/article-10071963/Flammability-tests-kids-Halloween-costumes-going-flames-SECONDS-fire-experts-warn.html">https://www.dailymail.co.uk/news/article-10071963/Flammability-tests-kids-Halloween-costumes-going-flames-SECONDS-fire-experts-warn.html</a>  <a href="https://www.getsurrey.co.uk/news/surrey-news/kids-halloween-costume-enqufled-flames-21797227">https://www.getsurrey.co.uk/news/surrey-news/kids-halloween-costume-enqufled-flames-21797227</a></p>	<p><b>Green</b></p> 

**Fireworks** - To ensure that fireworks are being stored safely and in accordance with the requirements of their licence, our team carried out 96 visits in October/ November in the run up to and around fireworks night. Some of these visits are carried out together with the local Fire Service. Eight visits identified issues that required rectification, including one where an excessive quantity was being stored in premises without fire detection and with a residential flat above. Because of the risk, where issues are found officers will usually require rapid rectification

to bring the premises back in line with the licence conditions to be safer. More serious non-compliances are considered for further enforcement action and will affect whether we will grant the premises a licence in the future.

**Natasha's Law** – In October new requirements for businesses to provide ingredients and allergen information with food that has been packaged on the premises it is sold from came into force. We have been providing support for food businesses through our business advice line, Primary Authority Partnerships and when visiting food businesses. In addition to providing advice through these routes, volunteers are helping us understand the wider level of compliance, allowing us to target further advice on the businesses that need most support to comply with the new requirements.

**Avian Flu** - Avian flu is an infectious type of influenza that spreads among birds. In rare cases it can infect humans if they are in very close contact with infected birds. There have been many reported cases in England this season with the Chief Vet describing cases at a “phenomenal level”. One of the controlled zones around an infected premises in Eton affected a small part of Buckinghamshire at the beginning of January and, liaising closely with the Animal Health and Plant Agency as well as the other Local Authorities affected, our officers were involved in giving advice to households within the zone who had captive birds.

## **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 information is provided and 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. Examples of the projects in 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; the levels of aflatoxins in nut butters; battered fish products to check the declared fish content is correct and levels of colours in cakes and biscuits marketed at young children.

We have also participated in the FSA imported food sampling programme taking samples of tinned peas, jam and snacks, cereals and bakery products originating in certain countries to check for levels of allergens and compliance with compositional standards

As with many areas of our work liaising with partners is important and we do this to support the maintenance of food standards.

On a routine basis we work with the Public Analysts, Food Standards Agency (FSA), Public Health, Trading Standards and Environmental Health colleagues across the region and nation to coordinate our work so that it is as effective as possible.

We have been working with the FSA on a national pilot to develop an enforcement system that is fit for purpose as the food marketplace evolves. This will end on 31 March 2022 but we will continue to use the pilot risk scheme as agreed with the FSA to target our interventions. The FSA will evaluate the data from the pilot scheme before making a final decision with the intention of any changes being made in 2023. However as we are of the opinion that the pilot scheme enables us to more effectively regulate and target interventions we will continue to use it and will liaise with the FSA to ensure they are aware of what we are doing.

Part of the pilot scheme also involved us in taking samples as directed by the FSA intelligence unit. These were pork products and vegan products and imported food

**Unsafe Goods & Safety of imported goods at Ports and Borders** - Detaining unsafe and non-compliant 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. The work helps protect consumers by preventing injuries, deaths and fires, and safeguards reputable business. In December we expanded this work (which is funded by the Office for Product Safety and Standards) to include some of the storage sheds situated in Slough.

Examples of unsafe/non-compliant products prevented from entering the country include:

- Carbon monoxide alarms that didn't 'alarm' when excessive levels of carbon monoxide were reached
- Power inverters with accessible live parts
- Fidget sensory toys packaged in bags that posed suffocation risks
- Counterfeit cigarettes, concealed under mobile phone cases that were declared on the consignment information (see the top two pictures below – the cigarettes are wrapped in black plastic)
- Unsafe cosmetic products which also made unsubstantiated claims about the effect it can have-the example below is a skin lightening cream that claims it "Fights against discoloration"
- Swimming floats aimed at parents to use with babies that were highly unstable posing a drowning risk(see picture below)





In addition to our work at Heathrow, we continue to carry out market surveillance to check on the safety of goods being sold in Bucks and Surrey using funding from the Office for Product Safety and Standards to test purchase and send to experts for testing a wide variety of products.

Outcomes of the testing have shown a number of safety issues across a range of products which we are following up on, including by requiring recalls of the most unsafe products.