

# AGENDA MANAGEMENT SHEET

Name of Committee	Corporate Services and Community Safety Overview and Scrutiny Committee
Date of Committee	14 July 2009
Report Title	Progress and Performance of the Trading Standards Service – 1 April 2008 to 31 March 2009
Summary	This report summarises the progress and performance of the Trading Standards Service for the year 1 April 2008 to 31 March 2009. In line with the focus of the Corporate Services and Community Safety Overview and Scrutiny Committee this report provides Members with achievements in:- Value in Service Delivery, Performance, High Priority objectives.
For further information please contact	Adam Bolton Warwickshire Trading Standards Service Tel. 01926 414074 adamboltonl@warwickshire.gov.uk
Would the recommended decision be contrary to the Budget and Policy Framework?	<del>Yes</del> /No
Background Papers	None
CONSULTATION ALREADY	UNDERTAKEN:- Details to be specified
Other Committees	
Local Member(s) (With brief comments, if appropriate)	
Other Elected Members	Councillors J Appleton, M Gittus, R Chattaway, C Davis, B Moss – for information.
Cabinet Member (Reports to The Cabinet, to be cleared with appropriate Cabinet Member)	X Councillor R Hobbs – for information.

Chief Executive	
Legal	X I Marriott, A Hallworth
Finance	
Other Chief Officers	
District Councils	
Health Authority	
Police	
Other Bodies/Individuals	
FINAL DECISION	YES/NO (If 'No' complete Suggested Next Steps)
FINAL DECISION  SUGGESTED NEXT STEPS:	YES/NO (If 'No' complete Suggested Next Steps)
	YES/NO (If 'No' complete Suggested Next Steps)  Details to be specified
SUGGESTED NEXT STEPS: Further consideration by	Details to be specified
SUGGESTED NEXT STEPS:  Further consideration by this Committee	Details to be specified
SUGGESTED NEXT STEPS:  Further consideration by this Committee  To Council	Details to be specified
SUGGESTED NEXT STEPS:  Further consideration by this Committee  To Council  To Cabinet	Details to be specified

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# Corporate Services and Community Safety Overview and **Scrutiny Committee -**14 July 2009

# **Progress and Performance of the Trading Standards** Service - 1 April 2008 to 31 March 2009

# Report of the Strategic Director for **Environment and Economy**

### Recommendation

That the Corporate Services and Community Safety Overview and Scrutiny Committee considers the progress and performance of the Trading Standards Service for the year 1 April 2008 to 31 March 2009.

### Introduction 1

- This report summarises the progress and performance of the Trading 1.1 Standards Service (TSS) for the year 1 April 2008 to 31 March 2009. In-line with the focus of the Corporate Services and Community Safety Overview and Scrutiny Committee this report provides Members with achievements in:-
  - Value in Service Delivery (i)
  - (ii) Performance
  - High priority objectives (iii)

### Value in Service Delivery 2.

### Introduction

As part of the ongoing commitment to ensure value for money and the 2.1 provision of high quality service the Trading Standards Service is working through a number of key strategies and initiatives. These initiatives will deliver the changes envisaged as part of the corporate Value for Money process and means Trading Standards is on target to achieve 9% (£172,000) efficiency savings over 3 years, this report relates to year 1 of that strategy.

# Impact Assessment of the Trading Standards Service

During 2009 the Trading Standards Service took part in a study by Office Fair 2.2 Trading to evaluate the impact of the fair trading work carried out by local authority Trading Standards Services in the UK. Unfair trading practices, against which Trading Standards take action, includes, for example, the

provision of goods or services without reasonable care and skill, misleading or false claims or omissions, aggressive or coercive selling, use of unfair contract terms, and failure to provide consumers with statutory cancellation rights.

- 2.3 By tackling unfair trading practices, Trading Standards Services help ensure businesses that operate fairly and responsibly do not suffer a commercial disadvantage compared with those that flout the law.
- 2.4 Trading Standards work to tackle unfair trading practices and to advise and assist members of the public delivers direct savings to consumers of at least £347m per year.
- 2.5 In the particular case of Warwickshire's Trading Standards Service the study estimates our fair trading work (during the year 2007) delivered consumer savings of at least £1,944,272, with a benefit cost ratio of at least 8:1. This means on average, for every £1 we spent on fair trading work in Warwickshire we delivered direct consumer savings of at least £8.

(A copy of the report "Trading Standards Impact – An Evaluation of the Fair Trading Work of local authority Trading Standards Services in the UK" is available)

# Development and Implementation of 'Career Development Framework' (CDF)

- 2.6 Based on the Trading Standards Institute National Qualifications framework this modular, accredited approach is based on a mixture of knowledge and skills development for staff. The long-term objective is to increase the overall skill-base of the TSS staff, increasing the flexibility of the workforce.
- 2.7 The first phase of the project to implement a career structure has been completed. This is a significant step towards achieving a more flexible and efficient workforce, delivering better performance; it prepares the Service for the future through improved workforce planning and development of skills.

### Structural Review

2.8 As we build a more flexible and focussed Trading Standards workforce the structure to support this needs to be put in place. Consultation on a proposed structure, including the new ways of working took place during the 3rd quarter of 2008-09. Implementation of the new structure, including adjustments as a result of the consultation is now taking place.

### **Business Process Improvement (BPI)**

2.9 Trading Standards is one of the WCC corporate pilots for introducing a "lean systems" approach to the organisation. With a new structure in place to support a more flexible workforce and a more focussed approach to business planning attention will be turned to BPI. We have already benchmarked this work with other Trading Standards Authorities. We are analysing a number of

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processes from end to end from a customer perspective. Changes will then be made for the benefit of the customer and the overall efficiency of the service.

### Modern and Flexible working

- 2.10 This strategy is based on the effective use of modern technology to deliver more responsive services, removing duplicitous administration and enabling more flexible use of expensive office space and people. Benefits also include an improved work life balance and increased staff satisfaction. The pilot was completed in December 2008.
- 2.11 The outcome of this pilot has given us valuable information in order to implement flexible working arrangements within the Trading Standards Service during the period 2009-2011
- 2.12 This initiative is linked with the corporate modern and flexible working program.

### Customer Focus - National Intelligence Model (NIM)

- 2.13 The National Intelligence Model (NIM) is a business model, utilised by Police Forces in the UK to gather and manage information in order to make the most effective decisions. Essentially, the model is a service planning tool and facilitates the identification of priorities and the allocation of resources.
- 2.14 Integration of the national intelligence model into Trading Standards Service Planning will provide a greater focus of resources on areas of most concern and will thus enhance value for money. By targeting problem areas to produce good outcomes this will enable a greater return for time and resources invested in Trading Standards.
- 2.15 The NIM is being incorporated into the 2009/10 business planning cycle and regional intelligence resources will support our approach.

### Partnership Working

- 2.16 We know partnership working is essential! In the Trading Standards service we have forged a number of key partnerships; with Warwickshire Police, our 13 regional partner trading standards services within the CENTSA region and last, but not least, with Coventry City Council to implement sub-regional working.
- 2.17 Working in partnership we have been able to deliver, 'Yellow Box' community safety packs in partnership with the Warwickshire Police; resulting in a 46% reduction in distraction burglary. Additionally, this partnership is vital to our roque trader and under age sales reduction strategies.
- 2.18 Working with regional groups like CENTSA and promoting sub-regional working with Coventry City Council allows us to promote a consistent to enforcement and advice across the West Midlands region. We do see the

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benefit brought about by economies of scale with regional working in, for example regional sampling and survey work.

### **Calibration Services for Business**

- 2.19 Our Calibration team worked hard in a difficult financial climate, to support their customers with what are clearly valued services. Excellent customer feedback evidences this. Revenue for the calibration of bulk fuel meters increased on the 2007/08 outturn by £13k, generating £30k more than was initially forecasted.
- 2.20 The team also successfully re-launched their mass calibration services to business and other local authorities and generated an income of £10k.

### 3. Performance

### National Indicators

- 3.1 A new National Indicator Set was introduced in 2008-09. This new indicator set replaced the previous performance indicators of the national performance framework.
- 3.2 The new indicator set reflects the 'Rogers Priorities' and Better Regulation initiative. The five 'Rogers Priorities' are, Air quality, Alcohol licensing, Hygiene of food businesses, Fair trading and Animal and public health.
- 3.3 Trading Standards statistics for the submission of NI 182 and NI 183 have been collated:-
  - (i) NI 182, Satisfaction of Business with council regulatory services, **76%** of business customers of the Trading standards Service who responded to our survey say they were treated fairly and / or our contact was helpful.
  - (ii) NI 183, Impact of trading standards services on the fair trading environment, our score of 1.11 is a measure of the outcomes of activities carried out by trading standards in order to create and maintain a fair trading environment for business and consumers. The measure underpins an intelligence-led approach, including the implementation of the National Intelligence Model.
- 3.4 Both indicators give a measure of the contribution of trading standards to the national objective of creating the right conditions for business to succeed.

### Food Standards Agency (FSA)

3.5 Food standards inspections are prioritised according to a nationally accepted risk rating. High risk businesses are scheduled to be inspected once per year. Most high risk inspections are programmed for the second half of the year; we have met our target for these inspections. Other inspections in the low and medium risk category give us no concern from a performance perspective.

Tagged, or programmed, inspection of premises: -

### Risk Number inspected

High 32 (100%)

Medium 46 Unrated 19

Total number of food inspections - 188

### Department for Environment, Food and Rural Affairs (DEFRA)

- 3.6 Diseases of farmed animals such as Foot and Mouth Disease, Rabies and Avian Flu have potentially serious consequences for public health and affect both local and national economics as a result of their impact on trade and tourism. In recognition of these risks, statutory powers exist to control and eradicate them.
- 3.7 Operation Elm, a highly successful trial of our emergency procedures and readiness to deal with an outbreak of an infectious animal disease, was carried out with the help of partners from the Police and Fire Services and local district Councils all of whom actively engaged and contributed to the success of the trial.
- 3.8 In recognition of the national importance afforded to animal health and welfare, and disease control, National Indicator (NI) 190 has been introduced. This indicator measures an authority's ability to manage risk effectively in both its own operations and within the wider area, taking appropriate action where necessary. Local authorities will be rated at Level 1, 2 or 3; 3 being the highest rating. The anticipation is that Warwickshire TSS will be rated at Level 2 when figures are collated at year end 2010.

### **DEFRA Framework agreement**

- 3.9 TSS reported back to Defra on performance against the 2008-09 framework agreement for which we receive funding of c. £131,000. There were no gaps in service delivery, although it has been a challenging time for those officers working in this area. Mainly due to the fact that 3 experienced members of staff have left the service during the current year.
- 3.10 Funding has been secured for the coming year and based on past performance our targets and performance requirements from DEFRA remain unchanged. However, we do expect performance improvement of our own making.

### **Performance Outturn**

3.11 A short summary of our performance in some key areas,

	Target	Achieved	%
High Risk Non Food Inspections	72	63	88*
High Risk Food Inspections	32	29	91*
Prosecution	-	9	-
Simple Caution	_	15	
Informal Caution	-	25	-
Formal Undertaking	-	8	_
Fixed Penalty Notice	-	2	-
Animal Health Market welfare checks	155	155	100
Service requests	-	1281	-
Complaints	Mea	2921	

<sup>\*</sup> A number of premises were no longer trading

## 4. High Priority Objectives

### No Rogue Trader Zones

- 4.1 No Rogue Trader Zones researched and identified as best solution for Warwickshire residents and legitimate traders. Four areas designated as zones based on rogue trader intelligence from TS and Police. (Parts of Bedworth, Rugby, Kenilworth and Warwick). Residents are to receive an information booklet and door sticker, street signage will be erected in the zones. All residents encouraged to" Suspect It Report It" to the Rapid Response Team.
- 4.2 Campaign launched at the Distraction Burglary and Rogue Trader Awareness Conference to an audience of agencies involved in the care and welfare of the elderly and vulnerable. Two Neighbourhood Watch meetings attended to present the campaign and discuss any issues with residents.

# Enforcement Action in support of No Rogue Trader Zones

- 4.3 The Trading Standards obtained an Enforcement Order against Paul Henstone, the file of evidence put before the Court showed a catalogue of complaints from consumers and an earlier prosecution by Solihull Trading Standards, as a result of which Mr Henstone consented to the Enforcement Order being made. The Judge described Mr Henstone as a "Cowboy Builder", remarking that the evidence against him was, on paper, "overwhelming".
- 4.4 An Enforcement order is a type of injunction, and compels Mr Henstone to comply with a number of fair trading laws. If Mr Henstone breaches this order, for example by carrying out shoddy work for consumers in the future, he can be brought back before the Court for Contempt; he could face a fine, or even imprisonment.

4.5 The Trading Standards Service will be closely monitoring complaints received to ensure the Order is complied with.

### Financial Inclusion and Well-being

- 4.6 Concerns were raised regarding the ability of citizens to protect themselves against loan sharks and access affordable credit and financial advice in the current economic downturn.
- 4.7 A proposal was made to establish a Financial Inclusion Partnership in Nuneaton and Bedworth, which is the most deprived part of Warwickshire. The Financial Inclusion Partnership would tackle the problem of financial exclusion by working in partnership with key organisations such as Warwickshire County Council, Nuneaton and Bedworth Borough Council, Trading Standards (WCC), Citizens Advice Bureau, Warwickshire Welfare Rights Advice Service, Job Centre Plus, Credit Unions, banks, utility companies and other appropriate organisations. These other agencies could include welfare rights and carers support services (Guideposts).
- 4.8 Following from this in the summer of 2008, the Committee decided to conduct an in-depth scrutiny review into individual financial well-being in Warwickshire.
- 4.9 A Benchmarking exercise has been organised for 4th August 2009 and a Financial Wellbeing awareness day on the 1st October 2009.

### **Animal Health and Welfare**

- 4.10 The number of farm livestock animal welfare cases appears to be on the rise. A number of cases are still ongoing but in one case last year a farmer was successfully prosecuted for causing unnecessary suffering to a cow. The cow was found in an emaciated state and unable to rise; she had to be humanly destroyed. The courts banned the farmer from keeping all types of livestock for 4 years.
- 4.11 A great cause for concern is the prevalence of Bovine tuberculosis (TB) in Warwickshire. We are working closely with DEFRA Animal Health on a 'Zero Tolerance' approach to control the spread of the disease and to ensure the law of disease control is not breached.

Underage Sales

- 4.12 Effective enforcement requires a multi-agency approach. As a result test purchasing operations are planned using intelligence from Trading Standards, the Police and colleagues in the district councils; operations themselves have been carried out in partnership with Warwickshire Police.
- 4.13 Some 23 test purchase operations were carried out across the county, 222 test purchase attempts have been made in all, resulting in 20 sales. Sellers have received £80 penalty notices. Sanctions against the premises range from prosecution, licence review, formal caution right through to voluntary amendments to licences and in-store procedural arrangements.
- 4.14 Continuing the partnership approach, multi-agency meetings are held on a regular basis to discuss current issues about licensing. Problems with particular licensed premises are assessed at these meetings and appropriate actions agreed with partners.
- 4.15 In support of business retailers have been advised about the issue of underage sales and of the growing problem of proxy sales. Retailers have been asked to be vigilant and to refuse a sale when they suspect a buyer is underage. To reinforce our message we have carried out leaflet drops in residential areas identified as having a problem with proxy sales to raise awareness of the illegality of this practice.
- 4.16 Partnership working has enabled resources to be used more effectively and efficiently and has provided opportunities for external funding via the Crime and Disorder Reduction Partnerships (CDRPs).

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# The "Top 20" Trading Standards projects and initiatives for 2008-2009 Ŋ

The table below shows the "Top 20" Trading Standards projects and initiatives for 08-09. This activity demonstrates the hugely complex and varied workload undertaken by this service. The commentary and information provided in this section has been provided by the project leads and is designed to give an over view of activity. More detailed reporting on any of this work can be made available upon request. 5.1

Objective	MOL	Curput
4.1. Animal disease prevention	<ul> <li>Inspection of Critical Control Points</li> </ul>	<ul> <li>Submission of version 17 of the Defra Framework</li> </ul>
and readiness	(CCPs)	<ul> <li>Preparation for rating under National Indicator 190</li> </ul>
	<ul> <li>Completed plans for the control of</li> </ul>	<ul> <li>Emergency planning 'Operations Elm' completed in</li> </ul>
	outbreaks of exotic diseases of animals	conjunction with Defra and District Council Partners
4.2. Consumer and worker	<ul> <li>Inspection of explosives stores, including</li> </ul>	<ul> <li>Complete interventions on 90% of registered fireworks</li> </ul>
protection re: explosives and	but not limited to firework retailers.	storage premises.
fireworks	<ul> <li>Administer registration and licensing</li> </ul>	<ul> <li>Approximately 140 retailers and 7 major firework</li> </ul>
	scheme for the same.	storage facilities liable to intervention.
	<ul> <li>Run safety campaign about firework</li> </ul>	<ul> <li>Safety campaign with participating primary schools</li> </ul>
	safety	completed
4.3. Protection from the personal	Respond to joint intelligence on alcohol	<ul> <li>97 Test Purchases</li> </ul>
and community effects of	related incidents.	9 sales - Fixed Penalty Notices issued
underage drinking	<ul> <li>Identify priority targets and areas based</li> </ul>	<ul> <li>9 on-going investigations</li> </ul>
	on shared intelligence.	<ul> <li>2 Retailers advised to use Age check 21 policy</li> </ul>
	<ul> <li>Work with Crime and Disorder</li> </ul>	<ul> <li>Continuing partnership working with Police and</li> </ul>
	Reduction Board, Police and District	CDRP's and community forums to identify hot spots
	conncils	and take action as appropriate
	<ul> <li>Develop use of Fixed Penalty notices or</li> </ul>	<ul> <li>The first "leaflet drops" where there is evidence of</li> </ul>
	other alternatives	"proxy sales"
	<ul> <li>Includes advice to business and media</li> </ul>	Inis work has been the subject of a detailed report to
	campaign	Overview and octuliny committee
4.4 Protection from potentially		<ul> <li>70 alerts that have required action</li> </ul>
harmful food		
	enforcement and advice to business	
4.5. Work with schools to raise	Working with county caterers and individual	<ul> <li>Samples from 6 schools taken</li> </ul>
nutritional value meals	schools on menu sampling, looking to extend	<ul> <li>Re-sampling and feedback with advice re failures</li> </ul>
	this work in to preschools and nursery care.	



<ul> <li>and A sampling program has been devised to baseline current nutritional standards in WCC homes</li> <li>Work is being extended to commissioned, private sector homes. Work for completion in Q4 and Q1 in 09-10</li> </ul>	meals on # 456 electric blankets ntact # 376 passed and 80 failed to get # In total we identified and destroyed 80 dangerous electric blankets were destroyed and their owners no would # Failed blankets were destroyed and their owners offered discount vouchers towards the cost of a new electric blanket move for education, advice and outreach work nusly	<ul> <li>d by</li> <li>Row working arrangements put in place with Age Concern to enhance Trading Standards input</li> <li>66 traders vetted for inclusion in the Tradeline scheme</li> <li>Sub-regional working with Coventry TS initiated with the objective of improved efficiency/ effectiveness of this service in the future</li> </ul>	sales/ sales/ saved Improved intelligence gathering is leading to more focused enforcement  E10K funding secured to promote 'Rogue Trader Free Zones' across the County Partnership working with Warwickshire Constabulary and other partners. This includes the continued distribution of the Home Safety Packs. The "yellow box" has contributed to a reduction in distraction burglaries of 46% in 2008. 1,100 of these have been distributed by TS and many more ny other agencies,
<ul> <li>Working with managers of homes and suppliers to raise awareness of nutritional issues</li> <li>Supporting AHCS colleagues to develop an action plan to raise profile of nutrition in homes and share best practice.</li> </ul>	This year, in partnership with carers, meals on wheels and others who have daily contact with elderly people who find it difficult to get out and about, we were able to offer a collection service for those people who would have struggled to get their electric blanket to a test centre  By doing so, we have been able to remove more dangerous electric blankets from circulation than we would have previously hoped to do	Scheme is managed and traders vetted by Trading Standards	<ul> <li>Provide 'rapid response' support/ assistance to victims of doorstep sales/ rogue trading.</li> <li>Provide early warning to local residents of rogues operating in their neighbourhood.</li> <li>Share intelligence re doorstep rogues with partners in the region</li> <li>Provide a high level of consumer education via website, local media and campaigns and events</li> </ul>
4.6. Work with care homes to raise nutritional value of meals	4.7. Electric blanket testing for local residents, removal of unsafe domestic appliances from the home	4.8. "Tradeline" – provides access to reputable traders reducing the chances of vulnerable people being caught out by rogue traders	4.9 Protect vulnerable people against doorstep crime



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as well as many other relevant leaflets, i.e. doorstep stickers	Rapid response incidents attended include:-	1 Doorstep intervention at a farm. Unauthorised work by driveway gang. Attempts being made to extract £10,000. Prevent any payment being made and identify two alleged offenders with Police assistance	2 Arrested following doorstep intervention. "Roofers" attempting to obtain work on elderly couples house. Suspected Fraud and failure to give cancellation rights from a previous case. Investigation ongoing	Doorstep intervention saved lady in 80's £800 for potentially unnecessary damp proofing work following report of concerns from Local builder and WCC Highways	Investigation ongoing into local trader failing to give cancellation rights and making false misleading statements to regarding roofing, following failure to give cancellation rights for jet washing driveway. Report being obtained from expert	3 Further Rapid responses	<ul> <li>New intakes of Police Community Support Officers to receive training from TSS.</li> <li>1 session completed more scheduled.</li> <li>Intelligence exchange now taking place with trained PCSOs.</li> </ul>	<ul> <li>6 cars submitted for service</li> <li>3 reports submitted</li> </ul>
							<ul> <li>Provide training to each new intake of Police Community Support Officers.</li> </ul>	<ul> <li>Submit cars for servicing under controlled conditions</li> </ul>
							4.10. Increase protection of vulnerable people by ensuring new Police Community Support Officer recruits are geared up to deal with incidents of distraction burglary/ doorstep crime	4.11. Increase the assurance that consumers have of getting a



good deal when having their car	<ul> <li>Publicise results to encourage</li> </ul>	<ul> <li>2 traders advised following poor quality workmanship</li> </ul>
DDOIN DO	compliance publicised and emorcement action to be taken in appropriate cases	Itadel complimented on good quality worklinding     Multiple modio bits promoting this work and woming
		Munipid mode into, promoting the work and warming
		CONSUMERS OF THE DIT IONS ASSOCIATED WITH THIS GIVES OF
4.12. Reduce the amount of	Identify and tackle those market	<ul> <li>Significant reduction in trading in counterfeit goods</li> </ul>
criminal activity at regular and	organisers who allow illegal activity to	following our sustained efforts during the summer. At
occasional markets, particularly	take place on their sites	the stage now of working with market organisers to
in relation to counterfeit goods.	<ul> <li>Working in partnership with relevant</li> </ul>	secure future compliance
Protecting the interests of	agencies, conduct both overt & covert	<ul> <li>Some difficult and significant barriers to overcome to</li> </ul>
legitimate business and	operations at weekend markets to	make a real sustained difference in this area
reputation of Warwickshire	highlight & gather evidence of sales of counterfeit goods	<ul> <li>This work has been the subject of a detailed report to Overview and Scrutiny</li> </ul>
	to right of the control of a first	* 34 000 counterfeit articles have been seized with a
	nare emolyement action against	street value of £210,000. Had this articles been
		genuine their value would have been c. £1.2 million
4.13. Support people, particularly	Delivering a Consumer Advice & Information	■ 1654 Complaints and service requests in total
the most vulnerable in resolving	Service, working alongside CDWM.	
contractual disputes		
4.14. Provide home visits for	Take advice service to peoples homes, when	<ul> <li>9 Visit made during Quarter 3</li> </ul>
immobile consumers	consumers are unable to travel or deal with	
4 15 Provide exfended advice	Assist with county court claims where	■ 252 second stade complaints in total
(2 <sup>nd</sup> Stage) up to county court	necessary.	-
level to vulnerable consumers		
4.16. Provide protection for	Monitor all complaints relating to debt	29 Cases in total
consumers against the practice	collection/ harassment of debtors and	
of harassing debtors.	intervene where appropriate	
4.17. Supporting economic	To advise and support business to develop,	<ul> <li>Multiple business supported</li> </ul>
prosperity by working with local	implement and maintain appropriate	* £22,000 surplus
business and deliver calibration	management systems through EQUIP	-
services to business	supported activities. Provide calibration	
	services to business	
4.18. Financial Inclusion - Living	To build a financial inclusion strategy with	<ul> <li>Lead on the development of a financial inclusion plan</li> </ul>
without financial products is a	partners and in doing so promote a financial	<ul> <li>Active membership of the Financial Well-being Panel</li> </ul>
significant disadvantage in a	inclusion plan, offering positive and practical	<ul> <li>Consumer education and assistance</li> </ul>



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time where cash is being	options in tackling access to financial	#	Active enforcement and partnership working to impact
replaced by debit cards,	products, whilst controlling the exploitation of		to stamp out loan sharks
automated transactions and	the financially excluded by sub-prime lenders	***	Development of a Financial Inclusion Strategy though
living on credit is the norm.	and loan sharks		partner ship working
Discounts on utility bills are			
inaccessible. Affordable credit is			
replaced by sub-prime lending,			
pawn brokers and of course loan	-		
sharks			
			-
4.19. Sub-regional working -	To work with local partners in areas of overlap	2	"Tradeline" approved trader scheme
partnership working, which is	to promote a greater impact of our services	瞬	Campaigns and media liaison
increasingly important, is	and to exploit economies of scale where they	₩.	Business advice
underway in particular with	exist.	#	Training, coaching and mentoring
Coventry City Council and with		<b>E</b>	Animal Health – exotic disease control contingency
other neighbouring authorities in			
respect of our animal health			
functions			
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26 June 2009

