



Chartered Trading
Standards Institute

Trading Standards - Rising to the Challenge of COVID-19

Infographic

Full List of Case Studies

June 2021

COVID-19 Regional Case Studies

The case studies below have been grouped by subject area. Original text provided by individual authorities has been included as much as possible but may have been condensed. Information which may identify particular businesses has been removed. Accompanying images provided have been formatted and included in the infographic, but do not appear here due to their size. CTSI would like to thank everyone who responded.

Contributions received from:

- Trading Standards South East Ltd
- East of England Trading Standards Association Limited
- CEnTSA
- Trading Standards North West
- Trading Standards South West
- Trading Standards East Midlands
- Trading Standards Wales
- Yorkshire and the Humber Trading Standards Group
- SCOTSS
- Northern Ireland Trading Standards Service
- NETSA
- LTS

Case Studies: Personal Protection Equipment (PPE)

Doncaster Trading Standards have created a close relationship with their Local Authority's Procurement Team which has refined and expanded their due diligence system for procuring PPE. Trading Standards analysed declarations of conformity and test certificates for inconsistencies and suspicions of non-conformity. This led to dozens of suppliers and millions of PPE items being rejected for suspected non-conformity and pertinent intelligence has been shared with partner agencies.

Lincolnshire Trading Standards were notified of a hand sanitiser with no traceability and failed other labelling requirements. The product had been tested by the referring authority and also by Lincoln University and the composition found to be satisfactory. However, the business was unable to produce any safety data information. There was no documentation to show that it was safe or that it contained the prescribed amount of ethanol to be effective. A suspension notice was issued. The business had the product tested and certificates were produced with full traceability to be able to identify it from the test report. Trading Standards also advised on the labelling to comply with CLP. Once everything had been addressed, the suspension notice was removed and in total, 280,000 compliant products were put back on the market.

Darlington Borough Council, at the start of the pandemic carried out a sweep of online selling platforms, looking for non-compliant PPE which could potentially put consumers at risk. A Darlington based seller was found to be advertising face masks on eBay, with claims that the masks were 'reusable' and offered 'virus protection'. As such the listing appeared to be a misleading action under the Consumer Protection from Unfair Trading Regulations 2008. Darlington Borough Council liaised with eBay to have the listing

removed, within 48 hours of first identifying the listing and therefore prevent any consumer harm.

The **Brent & Harrow** Team were at the forefront of the COVID-19 Pandemic beginning with the first lockdown. In the first week Officers were out in the field dealing with face mask and hand sanitiser interventions when remote means of dealing with product safety interventions had failed.

Following complaints early in the first lockdown, **South Gloucestershire Trading Standards** took samples of a locally produced hand sanitiser which was found to have significantly less than the required 70% alcohol content and contained methanol, which is poisonous to humans. This case is subject to an ongoing criminal investigation. Recall Notice - <https://secure.tslinkonline.co.uk/templates/documents/document-view.cfm?frmDocumentID=329568>

Between April and December 2020 **Manchester Trading Standards** inspected 67 consignments (some virtually) containing facemasks at Manchester Airport. Nine of those consignments weren't released due to the face masks being non-compliant – in most cases because they bore a description that made them look like PPE when they weren't up to these standards. This related to approximately 476,000 facemasks. Some were able to be reworked so they could be used as face coverings and some had to be destroyed

Sandwell's Trading Standards produced guidance to enable Sandwell Council to broaden its supply chain for PPE. It enabled the procurement team to gain correct assurances and conformity on purchases and proved essential in ensuring the Council did not procure masks that did not have correct testing and therefore protected staff.

EETSA region Trading Standards Imports Teams increased their surveillance checks at points of import and prioritised their work to focus on PPE products including face masks. Officers undertook frontline checks on products coming through both airports and seaports to ensure that unsafe and non-compliant consumer goods did not enter the UK market. Demand at Stansted airport increased significantly overnight at the beginning of the pandemic, with double the usual officer attendance required. Over the first six months of the pandemic 14,700,846 PPE items including face masks, hand sanitiser and gloves were examined by teams from Essex, Suffolk and Thurrock, with over 8,830,401 PPE products being prevented from reaching users in an unsafe or non-compliant condition, with the worst items destroyed at the border.

In April 2020, Council procurement teams were inundated with offers from prospective face mask suppliers, at a time when stocks were running critically low. **Trading Standards across Suffolk, Essex, Norfolk and Cambridgeshire & Peterborough** supported procurement by providing technical assistance to safeguard supplies of compliant PPE. In Suffolk alone, in three months, 56 technical product assessments were completed, with 80% revealing problems such as incomplete, missing or fake documentation. Essex and Suffolk together developed checklists to assist with assessing compliance consistently. This example of best practice was shared nationally with Ports and Borders teams, other LA's and border force, and used in OPSS training webinars.

Case Studies: SCAMS

Bristol City Council's Trading Standards Service received a number of complaints about a flyer that was being posted through residents' doors. The flyer stated "National Removal of harmful bacteria that attracts COVID-19. All UK homes (kitchen and bathroom areas need to be officially checked and passed for risk of bacteria that can attract the COVID-19 virus. Appointed Corona removal officers are trained to removed and dispose of harmful and deadly bacteria". Officers carried out a swift investigation and identified online adverts and some social media posts by the business that also made similar claims. The business and individual responsible were identified and immediate contact was made. They were brought into compliance. The flyers were disposed of and the online adverts were amended. (Flyer image on infographic).

Derbyshire Trading Standards, as part of their remit to protect vulnerable consumers, have been running a project to help those subject to unwanted sales and scam telephone calls. The Trading Standards Service have provided call-blocker devices that stop these calls getting through and only permit incoming calls from trusted numbers. They are free to the most vulnerable. This work has carried on despite the various lockdown restrictions imposed. Officers have installed a further 32 units during COVID-19, following strict guidance with respect to social distancing and protective equipment, making a total of 99 units installed in County. These units have blocked over 17,000 nuisance calls during a time when vulnerable residents have been particularly isolated, preventing an estimated £70,000 in scams.

South Ayrshire Trading Standards and Environmental Health team received numerous reports about unwanted doorstep calls and leaflets. This was of particular concern for those who were self-isolating. An information door sticker discouraging cold callers and unwanted mail was devised. It also provided the resident with vital contact details of organisations if they needed support. The sticker was offered to all residents including people on the shielding list and distributed to 600 assisted living homes. Regular follow up social media messages warning residents of the emerging scams perpetuated throughout the pandemic were published. All reports of potential breaches of the COVID-19 rules and potential scams were followed up by the Trading Standards and Environmental Health team.

West Yorkshire created the COVID-19 Scam Alert (images displayed on infographic) community newsletter to reach isolated and vulnerable residents at a time when fraudsters began to exploit the pandemic for financial gain. It offers a two-way, real-time communication channel through which to share/receive local intelligence about doorstep crime, scams and other frauds and offers advice on how to avoid falling victim. As with many rogue trader activities, their operations evolved throughout lockdown, finding every opportunity to exploit the increased vulnerability, anxiety and isolation that came with it. Distributed to over 1,000 local partners and communities, and shared on social media to almost 5,000 followers, it also provided a swift mechanism for sharing emerging COVID-19 scams such as the selling of fake PPE equipment, vaccine and miracle cure scams, fake NHS test and trace messages, alongside 'regular' doorstep criminals, evolving their sales patten to include driveway and gardening disinfecting services.

The pandemic saw an explosion of scams in the Middlesbrough area. **Middlesbrough Trading Standards** received 176 complaints of COVID-19 related scams including individuals exploiting the pandemic, and those shielding, by posing as volunteers in person and by telephone, offering to do people's shopping, collect prescriptions or pensions, but then disappearing with the money never to return. In one instance the individuals even arrived in hazmat suits, to prey upon the consumer. Middlesbrough Trading Standards

worked with Cleveland Police and other agencies, sharing intelligence to try and identify perpetrators and stamp out these practices. Using social media to publicise these scams was key to this activity. Ninety posts regarding COVID-19 scams were shared on social media via the Middlesbrough Trading Standards Facebook page, which reached 458,313 people.

The Northern Ireland Trading Standards Service produced a social media video highlighting COVID-19 scams and distributed 45,000 NTS 'Wash your hands of Coronavirus Scams' (NI adapted) leaflets via food parcels in partnership with District Councils, large supermarkets and charities.

Public Protection Partnership (Bracknell Forest, West Berks & Wokingham)

Case 1: Ms A Young foreign national working in the UK. Prior to lockdown in March 2020 she was in her home country visiting her family and was then unable to return to the UK to work. She was able to work from her home country. She returned to the UK in August and commenced working in the UK from her home here.

Whilst at home she received a phone call from the HMRC advising her that she owed taxes due to her employer failing to pay the correct amount and if they were not paid a warrant for her arrest would be executed.

Given that she had been working from abroad she thought this quite plausible and the scammers exploited this fortuitous phone call for their benefit.

This resulted on a day in September in just over two hours transferring monies to the value of over £23,300. This matter was complicated further as she transferred the monies from non-high street banks through her various online accounts eventually transferring it to the scammers.

The Public Protection Partnership a Shared Service of Trading Standards over West Berks, Wokingham and Bracknell Forest Councils were made aware and their Fraud Victim Support officer became involved. This resulted in him securing £12,000 of the lost money back from the banks. Mrs A was very satisfied with this payment to her, described as a payment of goodwill by the bank concerned in the final transfer of the lost monies.

Public Protection Partnership (Bracknell Forest, West Berks & Wokingham)

Case 2: Mrs B is a Professional British National who was the subject of a particularly complex scam. In simple terms she was contacted and informed her that her Amazon account had been hacked which eventually led to the NCA becoming involved and soliciting her help to investigate this and other similar hacked accounts. This necessitated her transferring monies into the suspect's bank accounts so that the NCA could track the money to its final destination. In all around £192,000 was transferred from her accounts which also resulted in her bank accounts being frozen under FCA rules around money laundering. The banks then ceased communicating with her. The Fraud Victim Support Officer from the Public Protection Partnership helped guide Mrs B through the complex challenges to be made on the bank in relation to the defrauded £192,000 and to date £111,987 has been recovered of the monies she transferred, her account unfrozen and her peace of mind restored.

Public Protection Partnership (Bracknell Forest, West Berks & Wokingham)

Case 3: Mrs C lives alone and had been known to Local Authorities for a number of years. She came to the Fraud Victim Support Officer as it was believed that she was being used as a mule for scammers. Upon involvement it soon became apparent that there were a multitude of issues that no single service had been able to resolve. On intervention by the Fraud Victim Support officer a call blocker was fitted and it became apparent that every phone call she received was of a scam origin except ones from her doctor's surgery this

equated to at least 15 scam calls a day making her life a little less lonely but fraught with danger and financial abuse. Negotiations between Mrs C and the Local Authority were not easy and had been difficult over 2 years with no tangible solutions. The rapport built up with the fraud Victim Support Officer and Mrs C resulted in one month proper assessments including getting her COVID-19 vaccination and a housing assessment which will result in her being moved into a more suitable accommodation. Sometimes supporting a victim of fraud is not always about retrieving funds it is more about the mental wellbeing and being able to take a holistic approach has brought all the necessary agencies together to support Mrs C appropriately and protect her from financial abuse.

Suffolk County Council Trading Standards utilise social media extensively to alert consumers and businesses on issues such as scams, safety recalls and rogue traders. This success has led to a pilot initiative of Suffolk delivering social media coverage across the EETSA region, posting on behalf of other Authorities to increase reach across the region and providing coordinated messages. This has been a great success by sharing resources, increasing resilience and ensuring a 'joined-up' approach across the region. During the pandemic this was especially important when resources were stretched across all Authorities. In April, social media was key in warning of COVID-19 Scams, often targeting the vulnerable and providing information to businesses. Working regionally, we achieved a combined Twitter reach of 5.56m and Facebook reach of 2.42m.

Case Studies: CORPORATE

Following the weekend of the 31st July and 1st August 2020, an outbreak of coronavirus was identified and linked to pubs in Aberdeen city centre. What followed was the first reintroduction of a lockdown in Scotland which was due to end on 26th August. However, in the preceding week the Scottish Government requested that **Aberdeen Trading Standards** and Environmental Health visit all hospitality businesses due to reopen and inspect them to make sure they were COVID-19 compliant. This was a daunting prospect and meant inspecting some 500 businesses in little over a week. Thanks to the spirit of cooperation fostered by the joint Trading Standards and Environmental Health Expert, 21 Scottish local authorities responded to a request for assistance from Aberdeen. TS & EH professionals from these authorities carried out telephone enquires with city businesses using a detailed questionnaire to assess compliance, with issues reported back for follow up by Aberdeen's officers. Over 300 city businesses were assessed using this process, allowing in person inspections of 200 considered a higher risk. The reopening of Aberdeen city hospitality sector would simply not have been possible without this joint work.

Leicestershire Trading Standards in partnership with Environmental Health, Public Health and the Police issued 15 directions against 8 premises. The directions were mainly issued to pubs/restaurants/cafes. The area with the highest spread of infection was identified as a priority and 4 premises received 8 directions.

Concerns about the businesses were brought to Trading Standards attention by Environmental Health Officers and/or the Police. All had failed to follow advice given and their actions posed a serious risk of spreading Coronavirus. The directions;

- Closed a pub playing music where young people were drinking until late
- Prevented people from gathering on a green close to a takeaway, and
- Closed a pub showing football matches prior to a busy sporting weekend.

The TS Service were also involved with bringing some events into compliance and stopping some events from going ahead, these included weddings, wakes, pop up markets, firework displays, pumpkin picking and a festival.

York's COVID Marshall Team are monitoring areas where people gather, engaging with groups and individuals to remind them of social distancing, and supporting businesses. The

Marshalls also safely dispose of dropped face coverings which could pass on the virus and hand out masks and anti-bacterial gel where needed.

To date the Marshalls have:

- advised 1,100 groups of people
- supported 775 businesses
- handed out PPE to 161 people
- picked up 1,062 dropped masks
- earned a 98.8% satisfaction rating from people with whom they've worked.

Working with the police, the Marshalls have also been able to alert and advise on matters of public safety. With the Government's roadmap published the team will bring added confidence in the city reopening safely.

Brent & Harrow

The term COVID-19 Marshall had not come in but Brent Officers were, after a slight delay authorised to enforce the first of a seemingly never-ending stream of COVID-19 regulations.

London Borough of Barking & Dagenham

Barking and Dagenham have a small team of four officers but have provided corporate support to the Regulatory Services frontline COVID-19 response by carrying out a series of 2,255 reactive and proactive COVID-19 related visits over the course of the pandemic to close contact, retail, wholesale premises and to workplaces to support colleagues in Health and Safety. We have also coordinating the issue of Directions by making recommendations to the panel (SMT, Public Health) where there has been a serious risk to public health posed by a business. So far, we have issued nine directions to a variety of shisha lounges, places of worship, events and other retailers.

East Sussex and West Sussex County Council's Trading Standards

From March 2020, the Heads of East Sussex and West Sussex County Council's Trading Standards became quickly aware that enforcement and compliance needed to be co-ordinated across Sussex to avoid disjointed and fragmented enforcement if departments kept to their traditional boundaries. As a result, a weekly liaison group was formed, a protocol was designed and intelligence sharing established. The group gained representation on the Public Health Operational Cell weekly meeting ensuring updates on enforcement and compliance were shared and discussed in a timely manner – this led to a clear protocol for considering the issuing of Directions.

As the UK went into the first lockdown Trading Standards and Licensing at **Newport City Council** were handed the responsibility for ensuring customer facing businesses observed restrictions. Initially this meant patrols and phone calls to ensure non-essential businesses were shut and discussions with essential businesses to ensure safety measures were in place. Later, Trading Standards were instrumental in making our city centre roads ready to accept 'outdoor café style' hospitality and assisted with a road closure process and the placement of new council street furniture. On particular music venue refused to comply and evidence from CCTV resulted in a licence review and a three month suspension. Other premises are also subject to licensing reviews.

Ensuring a consistent and efficient approach to the delivery of advice, guidance, and enforcement, **Carmarthenshire Trading Standards** formed a single Business Compliance Team to deliver both proactive and reactive advice and take enforcement action where necessary.

The flexibility of TS staff during the pandemic has been exemplary. At early stages, staff at **Rhondda Cynon Taf CBC** were redeployed as emergency death Registrars or involved in proactive business contact to provide advice and support. With the commencement of Track Trace Protect on 1st June, staff were redeployed as Advisors, Tracers or Professional Leads. Trading Standards led on all coronavirus enforcement and response. Additional staff were deployed to work under the direction of Trading Standards simple checklists were devised for Streetcare Enforcement to gather intelligence to prioritise resource. In September, a COVID Enforcement Team was set up, trained and managed by Trading Standards who have also advised internal council departments throughout, including working with Procurement in respect of face masks and sanitiser; and currently advising on COVID-safe election duties.

Cambridgeshire & Peterborough Trading Standards supported the Corporate response to COVID-19 through redeployment in a range of areas including: Hotels for the 'Homeless'- Working alongside the homeless charity commissioned to run hotels to house the homeless providing food parcels and drinks, room inspections and generally being there to listen and support people; retraining to become support workers for Adult Social Care, visiting extremely vulnerable members of the community to provide personal care and domestic assistance; taking calls from the public, via the COVID hub, needing practical support such as arranging the distribution of medicines, food parcels, personal care and every day matters such as dog walking; and supporting the implementation of the national Test & Trace Pilot, following up with those that had tested positive but whom the national tracing team had been unable to reach to ensure they isolated. "

With the establishment of a joint expert group* by the two societies, **Chief Officers of Trading Standards (SCOTSS) and Environmental Health (SOCEHoS)**, to provide a source of expert advice and interpretation on closure regulations issued by the Scottish Parliament, it was agreed that it would be helpful to also publicise what these services did alongside dealing with pandemic issues. A video was produced outlining a number of enforcement areas relevant to the pandemic and highlighted the work done in connection with the public health emergency such as advising businesses on restrictions and investigating and resolving complaints from consumers. *The Scottish ETC COVID Expert Group won the CTSI Hero Award for the COVID-19 Team category in 2020.

<https://twitter.com/socotss/status/1369276136090443777>

In Staffordshire Trading Standards, the true resilient skills of trading standards staff were witnessed as the pandemic became established with staff taking up multiple roles across the county including not only delivery of food parcels and ensuring vulnerable members of society were protected, but also in the darkest moments of the pandemic, staff were trained up and prepared for mortuary management of the excess death store. The resilience of the team has shone through with partnership working across all responders to the disease, with shared intelligence between districts, county and the police aiding in ensuring compliance and robust enforcement. On advice from the Director for Public Health, multiple Direction Notices have been served on premises where there was a serious and imminent risk to public health, including a hotel, barbers shops and a working men's club in a bid to prevent the spread of disease.

Salford Regulatory Services including Trading Standards and working in partnership with Greater Manchester Police delivered coronavirus related business compliance activity on a weekly basis. They've worked with their audit team reviewing businesses that have applied for business support grants and have flagged suspected fraudulent applications and businesses that have breached coronavirus regulations. They have assisted the grants team in communicating funding opportunities to businesses

Blackburn with Darwen Trading Standards took charge of surveillance operations on persistent non-compliant gyms breaking the lockdown regulations. Their investigative skills and knowledge of requirements under RIPA made them ideal to support the Local Authority to tackle businesses which did not feel they should contribute to the protection of their communities by remaining closed when required to by legislation

Trading Standards South West officers were involved in the BCP “together we can” scheme which contacted vulnerable people to offer assistance with shopping, delivering prescriptions etc. The TS officers were the contactors, and linked the shielding people with volunteers. General corporate support work was also carried out such as: involvement in food deliveries, track n trace, supporting Environmental Health work, and acting as COVID-19 Marshalls.

Case Studies: Fair Trading Issues

COVID -19 related fair trading matters quickly became a most complained about sector in for **Norfolk Trading Standards** with complaints being received around wedding venues and holiday accommodation, particularly around terms and conditions and frustration of contract. Template letters were developed with applicable advice and signposting information to Business Companion and CMA resources as well as local sources of help for businesses set up as part of the COVID-19 response work. These letters were sent to each Norfolk trader flagged as part of this process, opening conversations up on how to make their terms and conditions fairer and resolving complaints.

Officers from **Durham County Council trading standards** dealt with a holiday let business following complaints that consumers were not receiving refunds for holidays they had booked but could no longer take. The business was of the view that, irrespective of the regulations, they were open, customers could take their holidays and so refunds were not due. The business operator was given two prohibition notices under the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020, but continued to operate. In March 2021 a closure order was applied for by Durham County Council which was granted by the court, closing the business for two months. Breach of this order would be contempt of court.

Since March 2020, the **Northern Ireland Trading Standards Service (TSS NI)** received 1,355 consumer complaints against airlines and tour operators following cancellations of holidays as a result of the pandemic. TSS NI issued enforcement notices to 29 travel businesses in Northern Ireland advising them to pay refunds for cancelled holidays or face possible enforcement action. Within the same timeframe, TSS NI has received over 230 consumer complaints against wedding service providers following cancellations of weddings as a result of the pandemic. Couples have complained to TSS NI's complaints and advice line - Consumerline about being misled about the level of refund they are entitled to or being offered the opportunity to rebook but only at a higher price. One business is causing a considerable amount of consumer detriment, with consumers being refused refunds for deposits and payments totalling approximately £100,000, with couples being denied sums of money ranging from £300 to £10,000. This is currently under investigation with civil and or criminal enforcement action being considered. TSS NI has secured approximately £30,000 in refunds for consumers from other wedding providers.

At the outset of the pandemic panic buying was prevalent and some traders took advantage of the heightened demand. Working jointly with, **Westminster Trading Standards**, eBay placed restrictions on certain items to stop panic buying of online sales. eBay prohibited non-business sellers from reselling and thereby profiteering from human tragedy or suffering. Restrictions were placed on the sale of baby formula and milk, toilet

paper, tampons, baby wipes and nappies, with only business sellers being allowed to sell such products upon the first lockdown. Utilising their Disaster and Tragedy Policy, eBay were able to also combat price gouging introducing a new policy to address the COVID-19 situation specifically. Furthermore, eBay set up and gave customers the ability to report price gouging through a dedicated page for price gouging and a separate 'price gouging' option in the "report this item" tool which is found on each and every listing.