

Cambridgeshire and Peterborough Trading Standards Annual Report

To: Communities, Social Mobility and Inclusion Committee

Meeting Date: 2 December 2021

From: Head of Operations: Trading Standards

Electoral division(s): All

Key decision: Yes

Forward Plan ref: 2021/047

Outcome: That the Trading Standards services delivered within Cambridgeshire are fully scrutinised and that there is continuation of service when the current shared service model ends in March 2022.

Recommendation: The Committee is asked to:

- a) Note and comment on the performance of the service over the previous period and the priorities for the service looking forwards;
- b) Comment on and approve in principle the draft Service Level Agreement that sets out the arrangements for the continuation of Trading Standards services for Cambridgeshire County Council being delivered by Peterborough City Council; and
- c) Authorise the Service Director for Communities and Partnerships, in consultation with the Chair of the Communities, Social Mobility and Inclusion Committee, to approve the final version of the Service Level Agreement.

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1. Background

- 1.1 On 1st April 2017 Cambridgeshire County Council's (CCC) Trading Standards Service entered a collaboration with Peterborough City Council's (PCC) Service to become 'Cambridgeshire and Peterborough Trading Standards'. As part of this agreement entered into by virtue of Section 101 of the Local Government Act 1972, CCC staff TUPE transferred to PCC. The Service also provides the Trading Standards function for Rutland County Council (RCC) under a prior agreement between Peterborough and Rutland.
- 1.2 It was agreed that Trading Standards would bring an annual update report to the Committee to keep Members informed of activities, and to provide the opportunity for Members to steer priorities and direction of the service within Cambridgeshire.
- 1.3 Trading Standards sits within a wider 'Regulatory Services' group at PCC, which in turn is part of the Communities and Partnerships service directorate. Other CCC services within this group are the Coroner Service, and the Registration Service, along with PCC Environmental Health, and Licensing.
- 1.4 Following the local elections earlier this year, it is recognised that there may be Members within the Committee that are not be familiar with the remit of Trading Standards, therefore an overview of the functions of the Service has been prepared and attached at Appendix 1.

2. Main Issues

2.1 Annual Report - Part 1: Looking back

2.1.1 Covid-19: Service response and impact on delivery

Last year was far from a normal year for Trading Standards. Like services across the Authority, the team had to adapt overnight, and subsequently was able to demonstrate its value and strengths in ways never previously anticipated.

Covid-19 put a considerable strain on resources, both in terms of new and increased service pressures and the fact that four members of the team were redeployed for several months to support the wider Covid-19 response. To compound matters further, the Service carried four vacant posts for a large part of the year. These combined pressures meant difficult decisions had to be made about service priorities. Priority was given to a) those matters that could endanger life – product safety, sports grounds safety, petrol forecourt safety, explosives storage inspections, high risk food standards, and serious animal welfare matters; b) trading practices that threatened the vulnerable, most notably rogue trading; c) supporting businesses through the considerable economic challenges through the provision of business advice services. Other activities inevitably reduced in number as a result of resource impacts – routine animal health inspections, medium risk food inspections and food sampling work, and criminal investigations. Certain functions had to stop altogether –

illicit tobacco enforcement, underage sales test purchasing, metrology and all planned project work.

At the time of writing, although the pressures of Covid-19 have subsided and the Service is now back up to full establishment, significant pressures remain which are outlined in section 2.5.

2.1.2 Supporting the local economy through the provision of Covid-compliance advice

The Service played a key supporting role to local businesses, advising them on what the closure requirements and restrictions meant for them, particularly on the grey areas within the legislation – vital information at a time of such uncertainty for businesses. The Service also advised some of its major business clients on the Covid-safe requirements, ensuring these national, customer facing businesses had appropriate measures in place to protect customers and staff. In total 266 businesses were assisted with Covid-19 related advice.

The Service helped Cambridgeshire sports grounds to plan for the safe return of spectators, professionals and sports personnel in a Covid-secure manner, and guided Cambridge United as the first pilot league club in the country to permit fans back into its stands under immense professional and media scrutiny - the pilot was widely regarded as a great success.

The Service also established and managed the corporate Covid-19 business support webpages ensuring businesses could easily navigate to the range of funding sources, operational/strategic support and Covid-compliance advice. There were over 22,100 viewings of the webpages.

2.1.3 Increased product safety issues

Covid-19 led to a significant increase in the amount of ‘bedroom sellers’ – those importing products direct from Asia to sell to consumers on various online platforms. This has caused an upward trend in product safety referrals, with many sellers being unaware of safety legislation or the risks their products pose to end users. The Service has three qualified officers in product safety; however, their substantive roles cover other subject matters. It has been necessary to re-assign these officers to focus solely on product safety to respond to these unprecedented, ongoing pressures. The Service has dealt with issues such as highchairs that present a strangulation risk, melting plugs, sunglasses without adequate UV protection, injury from electric fans, unsafe electric fires, unstable trampolines, child’s tents, unsafe vaping batteries, high powered magnets swallowed by young children and cannabidiol (CBD) oils. During 2020, 179 safety referrals were dealt with, 100 of which were consumer reports, and 79 of which were referrals from other regulators – for example the Office for Product Safety and Standards (OPSS), ports and other Trading Standards teams. 1557 items were withdrawn through product recall.

2.1.4 Increased home-based food sector

As a result of Covid there has been an increase in home food production and catering services which are at times difficult to detect and pose a risk in terms of

knowledge gaps in both food standards (allergen labelling in particular) and food safety. Food officers within the Service have been actively contacting them to provide advice at registration stage, helping to ensure they get off to a 'compliant' start.

2.1.5 Increased reports of illegal puppy imports

The Service also dealt with 9 cases of illegally imported puppies, something we have seen increasing over the last three years and particularly over the last 18 months, driven by the demand for puppies as a result of lockdown. Such puppies bring with them a risk of Rabies – a disease we have managed to keep out of the UK since the beginning of the twentieth century. Although numbers are generally low, they have risen and often cases can be lengthy to deal with and regularly involve quarantine at the expense of the owner.

2.2 Additional challenges faced in 2020-21

2.2.1 Avian Influenza

The Service led on the Avian Influenza disease controls following confirmed cases across the UK. Preparations by the Service during the winter meant there was capability to respond swiftly when required to do so, including the ability to be able to provide extensive biosecurity information to those in need of it. This work confirmed the strength of the animal disease contingency plan.

2.2.2 European Union Exit

The Service has played a key part in helping businesses through European Union (EU) Exit challenges, particularly around the Ireland border issues. A dedicated page for EU Exit advice for local businesses was developed and a communications plan to reach out with advice at the key points through the ongoing transition stages is being rolled out.

2.2.3 Consumer complaint numbers doubled

The Citizens Advice Consumer Service (CitA) provides consumer advice nationally. As part of that service, a record of each call and the advice given is sent to the local Trading Standards Service for Intelligence purposes, and, in the case of alleged criminal activity, referred for it to be assessed in terms of interventions. In 2019-20, 2055 cases were referred to the Service. In 2020-21 this number rose by almost 30% to 2897, and figures for 2021-2022 to date would suggest it is likely to continue at this level. The Service has continued to develop its intelligence-led approach in order to target its resources at those matters causing the greatest harm.

2.2.4 Extreme Animal welfare issues

Over the last two winters the Service has seen a leap in the number of animal welfare concerns being reported, the majority of which were being caused by waterlogged land leading to immense suffering to the animals involved. Such issues take a great deal of officer time to resolve, with multiple visits to premises to check

on the improvements being made. Last year 127 welfare issues were dealt with, 131 the year before, up from 62 in 2018/19.

2.2.5 Delays to legal action

Covid-19 has had a significant impact on the judicial system, resulting in 8 prosecutions that should have gone to trial being moved into 2021/22.

2.3 Finance

The total service budget for 2021-22 is £991k, this being split 70:30 between CCC and PCC, the base budget remains as it was last year.

In 2020-21, the service was able to generate income of £95k through advice provided to local, regional and national businesses, despite the pandemic. The previous year saw an income of £120k, it is expected that business advice income will recover to a similar level post pandemic.

Further income generation is seen through testing of weights and measures equipment, generating around £8k a year, £22k through licensing of petroleum and fireworks storage and £12k for inspecting animal feed. The service has also received £25k funding from Public Health for tobacco control work.

2.4 Annual Report - Part 2: Looking to the year ahead

2.4.1 Key work streams for this year include:

i. Supporting the economy

- Building relationships with local business organisations to increase their knowledge of advice services, and also to enable the Service to disseminate information to businesses, on EU Exit transitional compliance requirements and new UK legislation.
- Through the Better Business for All partnership there will be engagement with local Economic Development Teams to ensure that we understand business needs at a very local level and can thereby respond to those in a co-ordinated fashion with Environmental Health and Licensing as well as the Growth Hub.
- The Service is keen to provide greater support to the innovation sector, ensuring advice is provided at a timely point in product development. The Service has established a co-ordinated partnership with the St John's Innovation Centre on the Cambridge Science Park and are looking to expand this offer to other innovation hubs and organisations.

ii. Business Support

- Food Standards - the focus will be looking at how support can be provided as well as checking the compliance of new food businesses. A triage system will be used to enable a tailored level of support.

- High risk food inspections will continue, looking in particular at description, composition and labelling.
- The Service plans to deliver a project focusing on allergens, with a combination of sampling and training, some of which will be funded by the OPSS. Communications have been rolled out in relation to 'Natasha's Law' which came into force in October and makes substantial changes to current allergens labelling requirements. We are seeking funding from OPSS to produce an educational animation on the detail of the new requirements with the aim of enabling businesses to help themselves.
- Due to the climate and environmental crisis the Service will be looking closely at environmental related powers associated with the introduction by Government of environmental legislative control.
- An inspection programme funded by the Department for Environment, Food and Rural Affairs (DEFRA), will be delivered and feed complaints, assessed and responded to.
- The Service plans to continue to deliver an Intelligence-led animal health inspection programme and will continue to respond to cases of animal neglect and suffering.
- An explosives inspection programme on the run up to bonfire night will take place, and a petrol forecourt inspection programme. The Service will also continue to review new tank installations and modifications works on petrol sites.

iii. Consumer Protection

- Criminal investigations are driven by complaints. Available capacity determines only a proportion of complaints can be investigated, so they are prioritised. Alongside the reactive work there is also an ongoing project to tackle rogue trading and this will continue to be a strong focus.
- Consumer Safety - the Service had planned extensive proactive project work in this field picking up the areas where Intelligence suggests there are safety concerns: inexperienced, small-scale importers, cosmetics, USB/lithium powered electrical goods, nursery products, part worn tyres, magnetic toys, wax melts and candles, and vinyl transfers for children's clothes and toys. However, resource pressures mean these projects have been paused to enable a response to the unprecedented numbers of safety referrals received.
- Sports Grounds - as well as chairing the Safety Advisory Groups for each of the sports grounds, issuing the safety certificates and carrying out inspections to check on-the-ground compliance, the Service will also be feeding into Cambridge United and Peterborough United's build planning process for their new stadiums, ensuring that safety considerations are paramount.

iv. Service development

- It is envisaged that 8 operational members of the team may be lost in the next 5-6 years due to retirement – almost 40% of operational officers. This is mirrored in Trading Standards Services across the country. There is also an ever-decreasing pool of qualified Trading Standards officers from whom to recruit. There is a need for the Service to 'grow its own' - bringing on trainees to be able to step into vacant posts. It takes around 5 years for an officer to become competent. Two trainee officers have joined the Service and are starting the professional qualification. The aim is to also recruit a Trading Standards Apprentice early-mid next year once this apprenticeship has been formalised, and for this to become a rolling recruitment programme.
- Training will be undertaken to ensure officers are knowledgeable of the latest online investigation techniques and procedural requirements.
- A heightened social media presence is planned, recognising the 'educational' part this can play in consumer safety.

2.5 Increased burdens on the Service

2.5.1 Product Safety

Product safety pressures on the Service have been mounting. In 2018 the Government created a new national body, OPSS to regulate product safety at a national level. As a result, there has been increased sampling as part of their national project work and increased scrutiny of products coming through the ports, both of which have led to increased referrals to the Service for intervention.

There has been a shift in the way products are marketed and sold. According to the National Audit Office online sales have almost doubled during recent lockdowns.

As a result of these factors, numbers of referrals have increased since the commencement of the collaboration.

	Consumer complaints	Referrals from OPSS, Ports and other Trading Standards Authorities	Total
2017	38	25	63
2018	50	32	82
2019	82	32	114
2020	100	79	179
2021 (partial)	35	61	96

Since the UK left the EU single market, imports from or via the EU came within scope for product checks. The UK deferred these checks to January 2022. In practical terms the 2.4 million lorries arriving at Dover and Eurotunnel annually will become subject to checks, currently only those from outside the EU single market

(100,000) are within scope. This will lead to increased referrals from the port teams in relation to non-compliant goods heading for businesses within our jurisdiction.

In 2022, OPSS will become the national regulator for Construction Products, part of the recommendations coming out of the Grenfell tragedy. It is anticipated that when OPSS become the national lead, Trading Standards will start receiving referrals from them for local interventions and product sampling. Currently there is insufficient capacity to pick up this work.

2.5.2 Criminal investigations

There has been a marked increase in criminal allegation referrals coming into the Service via CitA, and looking at referral levels for quarter 1 (726) and 2 (642), these high levels would appear to be continuing, and are likely to exceed referrals received in 2020/21.

2.5.3 Food Standards

The food industry changed during Covid-19, with an increase in businesses run from home and sales made via social media. Whilst many new businesses have registered others have not and are consequently not on the radar. According to the Food Standards Agency, about 44% of new food businesses started since the first lockdown are home-based. This poses a challenge for regulators, not only in terms of the extent of advice such businesses tend to need, but also the difficulties in uncovering such businesses. In addition, there are challenges to allergens labelling requirements resulting from 'Natasha's Law'.

2.5.4 Animal Welfare

There has been a significant increase in the number of animal welfare issues during the winter months, increasingly linked to flooding, leading to terrible suffering for many farm animals. These can take several revisits to resolve, and in some cases lengthy criminal investigations. Last winter alone 9 improvement notices were issued.

Trading Standards responsibilities in this field are expected to increase following the Government's Action Plan for Animal Welfare which includes reforms to animal welfare requirements on farms, the tackling of puppy smuggling, raising animal transportation standards, and improvements to 'welfare at slaughter', and improvements to equine traceability and identification.

2.5.5 Environmental Protection legislation

To enable the 2030 environmental commitments to be achieved there will need to be significant changes made both at a national and local level, some of which will be legislative changes that will be enforced by local authority Trading Standards Services. It is not clear as yet whether there will be new burden funding for such work.

2.6 Service Continuity

The current collaboration agreement between Cambridgeshire County Council and Peterborough City Council commenced 1st April 2017 and is due to expire 31st March 2022.

2.6.1 Background to the collaboration

The main driver to form a collaboration was to add resilience to Trading Standards Service delivery across both Cambridgeshire and Peterborough. Both CCC's and PCC's Trading Standards Services had seen significant service reductions leading up to 2017. In the case of CCC, two thirds of the staffing was lost. This, coupled with regulatory landscape changes, meant to remain effective in future years a single service was the best option. In 2016 CCC was only able to offer a statutory minimum service, and that position would not have remained possible in future years without a council intervention, which the collaboration provided. Service pressures have increased since then due to growth and new regulatory burdens.

2.6.2 Resilience

Operating a statutory minimum service offered very little resilience in terms of major impacts on the Service – large scale investigations, animal disease outbreaks, new burdens or sector-wide compliance issues for example. The collaboration brought together skills from across both teams, creating greater resilience and allowed the team to adapt to respond to pressures and peaks.

In 2019 as part of a major investigation, three officers had to work solidly on the preparation of the crown court criminal investigation file for three weeks. Due to the flexibility provided through the collaboration, it was possible to accommodate this while dealing with incoming criminal matters.

Life Comfort Products Ltd, a business in the county, operated a national mobility product scam that led to victims, predominantly elderly and vulnerable, right across the UK losing many thousands of pounds through pressure selling. After a lengthy investigation, only made possible due to the resources of the collaboration, multiple custodial sentences were obtained for the criminals behind the business operation, victim compensation received, and their proceeds of crime recovered.

The ability to have two dedicated animal health officers, enabled the Service to effectively respond to unprecedented animal welfare reports in the winter of 2020.

Avian influenza is another example, had the Service received notification of a confirmed case in its jurisdiction the strain on resources would be significant, requiring every officer in the team to help deliver a response. Without the collaboration, the response would be hindered by resource pressures.

Trading Standards has seen increasing demands placed on services, with additional burdens on the horizon – greater regulatory activity in the field of Construction Products, Animal Welfare, the Environment and Food reforms. Having a level of resilience will become increasingly critical.

With the Service expecting to lose operational officers through retirement and qualified officers are sparse nationally and therefore difficult to recruit, training to replace these staff is resource intensive. The collaboration between the councils allows the training burden to be spread across a wider service, lessening the impact on officers and increasing the breadth of experience. The collaboration also enables the 'training lead' to take a holistic view of skills and future skill gaps and organise the necessary training and development to meet service needs.

2.6.3 Single management team

The collaboration brings about savings in management costs. It allows the Service to operate with a single Head of Service, Assistant Director and small management team, maximising the budget that can be spent on front line staff.

2.6.4 Shared expertise and specialist posts

Within the Service there are established specialist posts that are shared across Cambridgeshire and Peterborough, without which both Authorities would need to invest heavily in recruiting, training and developing their own specialists, and support officers for resilience. This applies in the fields of Safety at Sports Grounds, Product Safety, Food, Feed, Animal Health, Petroleum, Explosives, Fair Trading, Weights and Measures, Licensing and Proceeds of Crime Investigations.

It has been possible to employ one part-time Intelligence Officer which brings efficiencies and increases the effectiveness of the Service. This is a key post given the service is Intelligence led, and a service required to demonstrate it has met its statutory obligations year on year.

2.6.5 Efficiencies

The single management team manages a single budget, develops a single service plan, issues a single set of policies, oversees a single database, and manages risk and business continuity.

In terms of systems, there is one database, document control system and evidence management systems, creating efficiencies in the management and maintenance of these.

Further efficiencies have also been generated through the reduction in meeting representation, for instance at national meetings and regional subject-matter groups, with one representative now attending from across Cambridgeshire and Peterborough.

2.6.6 Finance

In terms of income generation, because of the close links with Peterborough Environmental Health and Licensing, the Service has been able to create a holistic advice service for business clients, branded 'Regulatory Companion', and this combined offering has enabled the Service to secure major clients, enabling the

collaboration to compete with competitors in the national Primary Authority Scheme business advice market. The client base has increased by 20% since the commencement of the collaboration, with the team generating around £100k a year which funds the advice posts. The team have since been recognised as one of the top ten providers of Primary Authority in the country by the OPSS.

In addition to Primary Authority chargeable work, the Service has continued to pursue the proceeds of crime from those are convicted where there are powers to do so and have also continued to provide chargeable financial investigation services to other Authorities – South Cambridgeshire District Council, Huntingdonshire District Council and Thurrock Council. This function has managed to recover £547,696 from those who have committed acquisitive crime since the commencement of the collaboration, with £168,340 being awarded in incentivisation payments.

The Service has also continued to maximise other income streams, applying each year for national feed inspection funding, public health funding, charging for weighbridge and other weights and measures verification work, and more recently claiming the cost of product safety testing from the OPSS.

Financial savings were not the driver of the collaboration, though Cambridgeshire has seen savings as a result of the arrangement.

2.6.7 Remaining a 'local' service

The Service continues to be driven by local Intelligence. Each month complaint trends are analysed both in terms of sectors and problem traders, and work plans put in place to address these, hence the Service delivery continues to be shaped by what is happening locally. The Service also continues to have a strong local presence with the Cambourne office base from which the majority of the team continue to work. In terms of a media presence, press releases also remain a vital part of the work, both in terms of the role it plays in deterring would-be criminals from committing crimes and educating the public on the latest safety concerns and criminal practices. The Service continues to work closely with the Communications Team to fully utilise CCC's social media and press channels and have thereby also continued to be very 'visible' in Cambridgeshire.

Often the most effective outcomes are achieved through collaboration with others including, public and private bodies, the voluntary sector, local councillors and service users themselves. The Service is committed to doing so, and through service delivery that is also informed by the councils placed based teams, will ensure communities receive the support they need.

That said, the issues we are dealing with, particularly the criminal activities, are often regional if not national, with many being entwined with the activities of organised crime gangs and working with partners elsewhere in the UK is essential in tackling these.

2.6.8 The Committee is asked to consider and agree to the continuation of service delivery by Peterborough City Council on behalf of the County Council. However, in order to fully protect the interests of the County Council and to ensure value for money,

appropriate priority setting, and transparent accountability, it is proposed that this arrangement is taken forward via a formal service level agreement. This agreement will set out the service standards the Council can expect from the service provider, including a series of performance indicators against which we can monitor service delivery. It will also describe the reporting requirements and operational management arrangements.

- 2.6.9 A draft version of the proposed service level agreement is attached at Appendix 2. This is subject to further development following feedback from the Committee, legal and other advice, but Members are asked to comment on and approve the draft version in principle, and delegate the approval of the final version to the Service Director for Communities and Partnerships, in consultation with the Chair of the Communities, Social Mobility and Inclusion Committee, in order for it to become effective from 1 April 2022.

3. Alignment with corporate priorities

3.1 Communities at the heart of everything we do

There are no significant implications for this priority, though this principle remains embedded in the work of the Service.

3.2 A good quality of life for everyone

There are no significant implications for this priority, though equality of access to services is something the Services strives to ensure.

3.3 Helping our children learn, develop and live life to the full

There are no significant implications for this priority

3.4 Cambridgeshire: a well-connected, safe, clean, green environment

There are no significant implications for this priority

3.5 Protecting and caring for those who need us

There are no significant implications for this priority

4. Significant Implications

4.1 Resource Implications

If the arrangements with Peterborough City Council were not continued, there would be unsustainable resource pressures as the Service tries to deal with increased demands with what was already statutory minimum staffing levels. The pressure and lack of impact would likely lead to the loss of experienced team members, and with

the pool of officers shrinking, recruitment may well be impossible. Current efficiencies would be lost, and income reduced as the business advice agreements with national companies could no longer be met, and the unique selling point, the link with Environmental Health, lost.

4.2 Procurement/Contractual/Council Contract Procedure Rules Implications

There are implications to the extent that any new agreement with Peterborough City Council would need to be entered into, based on comparable terms as previously.

4.3 Statutory, Legal and Risk Implications

There are statutory and potential liability implications if the service delivery arrangements were not renewed, as the council would not have the resources to be able to meet its statutory obligations. This would have a direct impact on public safety and welfare.

4.4 Equality and Diversity Implications

There are no significant implications within this category

4.5 Engagement and Communications Implications

There are no significant implications within this category

4.6 Localism and Local Member Involvement

There are no significant implications within this category

4.7 Public Health Implications

Trading Standards make an invaluable contribution to Public Health outcomes as described in the report.

4.8 Environment and Climate Change Implications on Priority Areas

4.8.1 Implication 1: Energy efficient, low carbon buildings.

Positive/neutral/negative Status: NA

Explanation: There are no significant implications for this category

4.8.2 Implication 2: Low carbon transport.

Positive/neutral/negative Status: NA

Explanation: There are no significant implications for this category

4.8.3 Implication 3: Green spaces, peatland, afforestation, habitats and land management.

Positive/neutral/negative Status: NA

Explanation: There are no significant implications for this category

4.8.4 Implication 4: Waste Management and Tackling Plastic Pollution.

Positive/neutral/negative Status: NA

Explanation: There are no significant implications for this category

4.8.5 Implication 5: Water use, availability and management:

Positive/neutral/negative Status: NA

Explanation: There are no significant implications for this category

4.8.6 Implication 6: Air Pollution.

Positive/neutral/negative Status: NA

Explanation: There are no significant implications for this category

4.8.7 Implication 7: Resilience of our services and infrastructure, and supporting vulnerable people to cope with climate change.

Positive/**neutral**/negative Status: NA

Explanation: There are no significant implications for this category

Have the resource implications been cleared by Finance? Yes

Name of Financial Officer: Martin Wade

Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by the LGSS Head of Procurement? Yes

Name of Officer: Henry Swan

Has the impact on statutory, legal and risk implications been cleared by the Council's Monitoring Officer or LGSS Law? Yes

Name of Legal Officer: Fiona McMillan

Have the equality and diversity implications been cleared by your Service Contact? Yes

Name of Officer: Adrian Chapman

Have any engagement and communication implications been cleared by Communications? Yes

Name of Officer: Christine Birchall

Have any localism and Local Member involvement issues been cleared by your Service Contact? Yes

Name of Officer: Adrian Chapman

Have any Public Health implications been cleared by Public Health? Yes

Name of Officer: Val Thomas

If a Key decision, have any Environment and Climate Change implications been cleared by the Climate Change Officer? Yes

Name of Officer: Emily Bolton

5. Source Documents

5.1 ['Protecting consumers from unsafe products', National Audit Office \(NAO\) Report](#)

['Our Action plan for Animal Welfare', published by DEFRA](#)