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| Agenda Item | <b>7</b>         |
| Report No   | <b>RES/13/25</b> |

# The Highland Council

**Committee:** Corporate Resources

**Date:** 5 June 2025

**Report Title:** Trading Standards Performance 2024/25 and Operational Plan 2025/26

**Report By:** Assistant Chief Executive – Corporate

## 1. Purpose/Executive Summary

1.1 This report provides details of the performance of the Council's Trading Standards team in the last financial year and sets out its Operational Plan for the current year. Additionally, there is an update on a developing approach to performance measurement.

## 2. Recommendations

2.1 Members are asked to:

- i. **Note** the performance of the Trading Standards team during the year 2024/25 as laid out in its Annual Report.
- ii. Consider and **agree** the Trading Standards Operational Plan for 2025/26.
- iii. **Note** the steps being taken to modernise performance measurement in relation to Trading Standards.

## 3. Implications

3.1 **Resource:** Highland Council's Trading Standards service is delivered by a team of fifteen officers and all work carried out involves statutory duties which are required of the Council. Resources must be strictly prioritised, with a focus on public health and safety, cases of significant economic detriment and fairness to reputable local businesses. The team are high users of technology to enable more efficient working while still ensuring that all parts of the Highlands receive a good service.

3.2 **Legal:** The team's legal responsibilities and powers come from a wide range of devolved and reserved legislation. All work planning and delivery is done in accordance with legal requirements in the legislation and the principles of both the Scottish Regulators' Strategic Code of Practice and the UK Regulators' Code. Both codes require a reasonable and balanced approach that takes account of the needs of consumers, businesses and society at large. This is summarised in the Scottish Code as "Proportionate, Consistent, Accountable, Transparent and Targeted".

- 3.3 **Risk:** In common with Trading Standards services across Scotland, the team faces resource challenges in tackling increasing and changing demands, e.g. the upcoming legislation on vapes and tobacco sales. This is exacerbated by an ageing workforce and the potential loss of key skills.
- 3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people):** There are no specific health and safety implications from this report (all work activities are routinely risk assessed in line with health and safety legislation).
- 3.5 **Gaelic:** There are no specific Gaelic implications from this report.

#### 4. Impacts

- 4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken
- 4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.
- 4.3 This is an update report and therefore an impact assessment is not required.

#### 5. Background on Trading Standards Team

- 5.1 The team is part of the Legal and Corporate Governance service. It undertakes a wide range of statutory duties in relation to the regulation of trade and protection of consumers and reputable businesses. There are two sub-teams organised on a functional basis and a total of 14 operational officers and a manager. See **Appendix 1** for an organisational chart for the team. Operational activities include investigation of complaints, inspections of business premises, advice and guidance to businesses, and various crime prevention initiatives. Work is largely "intelligence-led" and based on tackling significant economic or physical harm. Work planning and prioritisation is informed by the needs of the Council's Programme for the Highlands and national Trading Standards objectives. See **Appendix 3** for more details.
- 5.2 The specific functions are from a mix of reserved and devolved law. Topics include:
- Fair Trading: a broad category which includes tackling unfair practices such as false claims, and regulation of the basic consumer rights that underpin trade (e.g. product quality, online buying, fair contract terms).
  - Doorstep Crime, Scams and Illicit Trade: tackling organised crime in these areas through a mix of investigation and preventative work.
  - Product safety: ensuring that consumer goods are safe, e.g. toys, electrical products, cosmetics.
  - Petroleum and Explosives: safe storage of these potentially very hazardous products.
  - Weights & Measures: ensuring quantity is correct in both retail and commercial environments.
  - Taxis and Private Hire Cars: promoting quality and safety in this key local industry affecting both visitors and local residents.

- Controls on sales of Tobacco and Nicotine Vapour Products (Vapes) and Age Restricted Sales (including fireworks, spray paints and lighter fuel).
- Animal Feed Quality: both in terms of inland supply to farmers and other users, and importation at Border Control Posts, this is a key intervention for a safe food chain.

## 6. Performance in 2024/25

6.1 In 2024/25, the Team delivered on its Operational Plan across the different topic areas, with a continued focus on issues linked to the ongoing “Cost of Living Crisis”.

Headlines included:

- Detailed interactions with 1172 businesses (e.g. visits, guidance on request, etc)
- 77 full investigations into substantial breaches of trading laws were completed, resulting in a range of formal and informal outcomes.
- A continued response to significant community concerns about the sale of vapes and cigarettes to children: this included 177 interactions with business including advisory visits and “test purchases” using young volunteers. 18 Fixed Penalty Fines were issued, two vape banning orders obtained, two cases reported to the Procurator Fiscal for prosecution and over 3500 vapes seized.
- The initiation of new business-friendly and potentially income-generating initiatives such as Trusted Trader and Primary Authority to foster local economic growth.

6.2 The report in **Appendix 2** provides details of the activities of the team last year.

## 7. Operational Plan for 2025/26

7.1 The Operational Plan for 2025/26 is set out in **Appendix 3**. The main contents are in the table which lists the specific work activities under various topic headings. Progress on each piece of work is monitored at monthly meetings of the two sub-teams, assisted by a “RAG” assessment. The plan has been compiled by the Manager after extensive discussions with staff on what initiatives are necessary and how to prioritise resources most effectively. Some of the activities are entirely local initiatives (e.g. engaging with international food shops in the Highlands), while others involve participation in wider projects, usually overseen by the Society of Chief Officers of Trading Standards in Scotland (SCOTSS) (e.g. a national project on second hand car sales). The team has a strong influence on SCOTSS through the Manager being a longstanding member of its executive (currently Immediate Past Chair) and several other members of the team leading for SCOTSS on specific technical subjects. This ensures that matters of concern to the Highland community are prominent in the national planning for Trading Standards activities. Examples of that from recent years include national initiatives on internet delivery charges, work to protect users of off-grid fuels such as heating oil and activities around rural petrol filling stations. Additionally, SCOTSS has enjoyed very good access to Scottish Government in recent years and has been able to influence policy in a positive way, with Highland inputs to this work prominent.

7.2 All activities included in the plan are key to promoting the goals of the service in the Highlands. Among the more prominent and newsworthy issues are:

- Continued work to tackle illegal vape sales, including tackling the upcoming ban on single use vapes.
- Further development of income-generating services in relation to animal feed, business advice and fee-charging services to neighbouring authorities.

- Continue to implement the post-Brexit checks on animal feed imports as that sector continues to evolve in the Highlands.

## **8. Performance Management**

- 8.1 The diverse and impactful work of Trading Standards enables qualitative reporting on work activities to be carried out without difficulty. It is much more challenging to find meaningful quantitative measures for performance. In the past, these were based either on “inputs” (e.g. number of inspections done, regardless of how effective these were) or periods of time (e.g. number of days to close an enquiry, regardless of how well that enquiry was handled). Neither approach is meaningful or useful.
- 8.2 A more modern approach is to focus on outputs and outcomes and in 2025-26 a new system is being trialled. The first aspect of this approach assesses work activities for the following impacts:
1. Prevention of Financial Detriment
  2. Legitimate business is not disadvantaged through unfair competition
  3. Bring business into compliance with applicable legislation
  4. Safeguard the health and wellbeing of consumers
  5. Prevent inappropriate consumer access to restricted products
  6. Reduce consumer exposure to unsafe products
- 8.3 The second element calculates community impact expressed in financial terms. This is a more challenging prospect as there is not a straightforward mechanism for all work activities. However, there is already a methodology in place for calculating the community impact of fitting “call-blocker” devices (see **Appendix 2** below) and another related to product safety work which, for example, calculated the work done to assist local distilleries to make safe and effective hand sanitiser during the early weeks of COVID to be £74,000. Methodologies for other work activities are being developed and will be applied to 2025-26 on a pilot basis, with a view to implementing fully in future years.

## **9. Proposals for Service Development**

- 9.1 The Trading Standards Manager is working with the Assistant Chief Executive – Corporate and the Chief Officer Legal and Corporate Governance to explore new ways to further improve the services provided and mitigate risks as detailed at 3.3.
- 9.2 The risks associated with an ageing workforce in Trading Standards have been recognised by the Scottish Government and COSLA who are working with SCOTSS to boost resilience and sustainability. One strand of that is the creation of a Modern Apprenticeship for Regulatory Services which has now has its first intake. Successful apprentices may be appointed at a basic Enforcement Officer level or go on to complete the full Chartered Trading Standards Institute (CTSI) qualification and become fully qualified Trading Standards Officers. Options for creating MA opportunities in Highland are being explored.

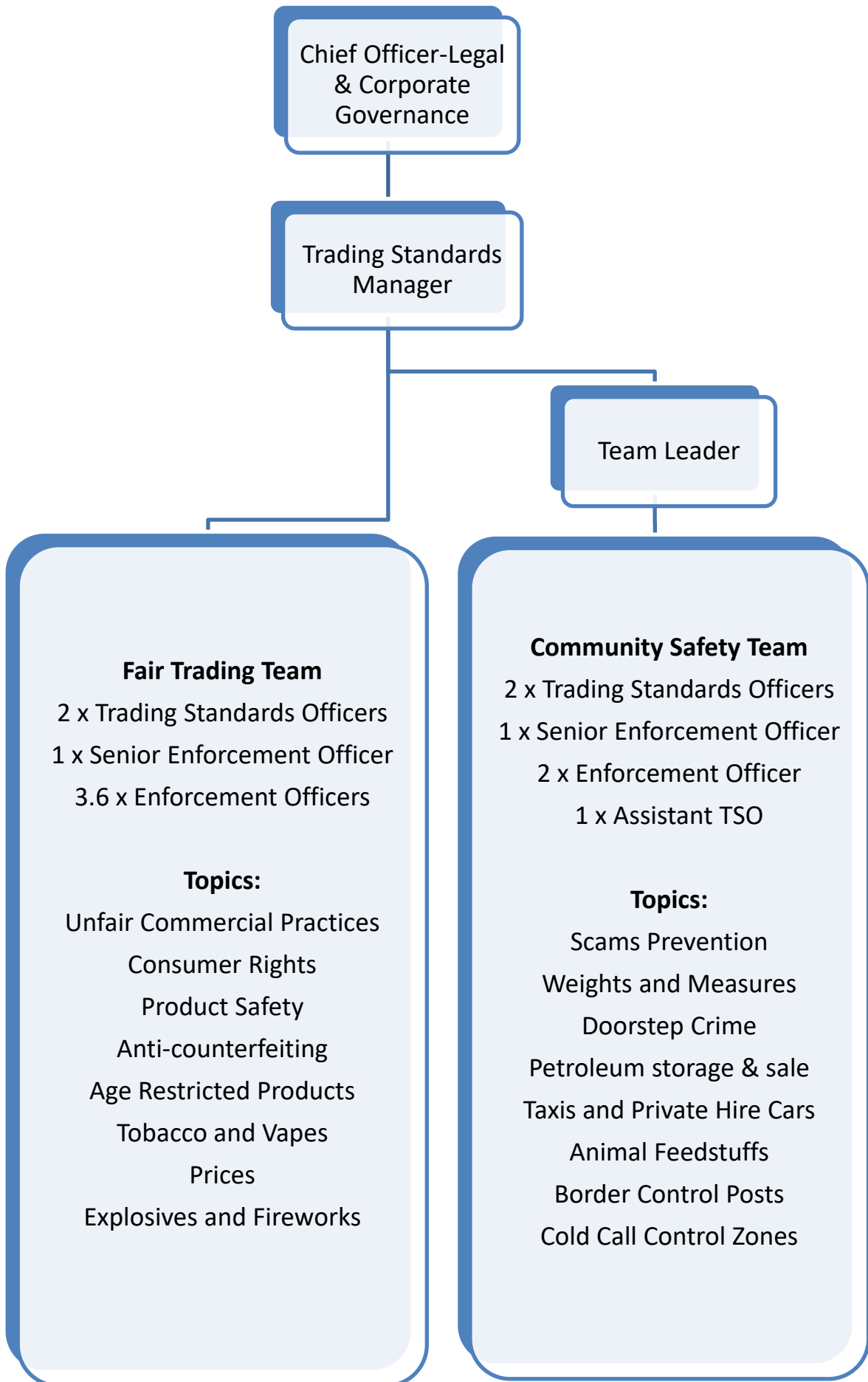
Designation: Assistant Chief Executive - Corporate

Date: 19 May 2025

Author: David MacKenzie, Trading Standards Manager

Appendices: Appendix 1 – Trading Standards Team Organisational Chart  
Appendix 2 – Trading Standards Report for 2024/25  
Appendix 3 – Trading Standards Operational Plan 2025/26

## Appendix 1 – Trading Standards Organisational Chart



# Overview of Activities 2024-25

## Introduction

The Trading Standards Team is part of the Highland Council's Legal and Corporate Governance section under the Assistant Chief Executive for Corporate. It undertakes a wide range of statutory duties in relation to the regulation of trade and protection of consumers and reputable businesses. The Team carries out its functions using a variety of activities including investigations, inspections, advice to business, crime prevention initiatives and formal actions including prosecutions and court orders. There follows a brief summary of each area of work.

## Approved Trader Scheme

The Highland Trusted Trader scheme was set up by the Team in early 2025. It aims to protect consumers from dishonest practices and is part of the national Trusted Trader network. Approved Trader Schemes are initiatives run or endorsed by local council Trading Standards to help consumers find trustworthy and reliable businesses. Officers vet traders against strict criteria, including legal compliance, customer service standards, and fair trading practices. Businesses that meet these standards are included on an approved list, giving consumers greater confidence when choosing services such as builders, mechanics, or home improvement specialists. The scheme aims to protect consumers from rogue traders and promote high standards in local commerce. It also helps prevent unfair competition to good local businesses and promote sustainable growth.

The scheme is fully set up and has had a “soft launch”, with several businesses across various trades already signed up. A full public launch bringing the scheme to the attention of the Highland public is planned for early 2025-26.

## Vapes and Tobacco Control

The significant upsurge in public concerns about the sale of vapes to children continued in 2024-25 and remains a top priority for Trading Standards in Highland. The year saw 125 advisory visits to businesses selling vapes and tobacco and 52 test purchases carried out, involving young volunteers covertly attempting to buy age-restricted products under strictly controlled conditions. Worryingly, 25% of retailers failed the test purchase and 18 Fixed Penalty Fines were issued. During the year, two Nicotine Vapour Product Banning Orders were obtained against retailers who consistently sold vapes to under 18s, and nearly 3,500 vapes were seized from these retailers. The following case studies illustrate this work.

### Case Study 1: Banning Order

Intelligence received from a variety of sources suggested that a local shop was selling vapes to under 18s. The shop had already received an advisory visit, and a test purchase was arranged. The shop “failed” the test purchase (i.e. sold to the young volunteer) and the owner received a fixed penalty fine for that act and another for not having a proper age verification system in place. The steps were repeated and the shop again failed, resulting in further fines. As the shop had received three or more fixed penalties within two years, a banning order was granted by the Sheriff Court, prohibiting the shop from selling vapes at all.

## **Case Study 2: Report to Procurator Fiscal for prosecution**

A shop which was subject to a previous banning order was found to be illegally selling vapes. Over 1000 were seized, some of which were found to be unsafe. The owner was reported to the Procurator Fiscal for prosecution and the case is due in court in early 2025-26.

## **Case Study 3: Bringing shop into compliance**

A local shop failed a test purchase and was found to not have an age verification system and received fixed penalties. The owner promptly paid the fines and changed his procedures after receiving detailed advice from officers. A later test purchase was “passed”, and the business is now operating lawfully.

## **Public Messaging**

A significant part of modern Trading Standards work is advisory and preventative: to protect consumers from bad purchases and advise businesses on how to comply and be successful through good practice. Posts highlight consumer rights, business advice, product safety information and latest scams. It is also utilised to demonstrate the wide and varied remit of Trading Standards, which this year also included posts relating to Trusted Trader. Statistics:

- Followers of the Highland Council Trading Standards Facebook page rising to 1906.
- Over 800 posts published in the page during the year.
- Reach for year was 28,900 (up from 18,905).
- Nine full news releases issued throughout the year to react to emerging issues.

## **Primary Authority Partnerships**

These income-generating contracts between businesses and local authorities for the provision of detailed “assured advice” on Trading Standards legal compliance are very rare in Scotland with most Trading Standards laws being reserved to Westminster. This two-year project aims to approach candidate businesses with a view to signing up one or more of them to such a partnership. Discussions with appropriate businesses continue into next year.

## **Scams**

Scams have grown in the past year and continue to take many forms, with criminals exploiting the ongoing cost of living crisis. They are frequent and constantly adapting and often target the vulnerable and the elderly. The Trading Standards work on the topic is mainly preventative as the perpetrators can be anywhere in the world. Financial loss is rarely recovered through enforcement: instead, prevention work encourages everyone to take steps to stop the scammers getting to victims through telephone, email, internet and physical mail conduits. The impact of being a scam victim is also felt beyond the financial loss, and Trading Standards plays a part in Adult Protection procedures to address this.

During the year Trading Standards scam prevention work continued with rolling out “call-blocker” devices. These devices prevent vulnerable householders from receiving scam calls, while at the same time permitting contact from family, friends, and trusted professionals such as the GP or care worker. The infographic overleaf details the impact of these devices.



A member of the Team chairs the Highland Adult Support & Protection Community Awareness group, which this year organised a well-attended Highland event in February as part of a national Adult Protection Day focussing on financial harm.

The Team continues its engagement with the UK National Trading Standards (NTS) Scams Team in their Scam Marshal, Scam Mail interceptions, and scam learning programmes. This helps identify community members who can help those who are scam victims and provide them with up-to-date information on how to tackle scams.

## Protecting Vulnerable Adults From Scam Phone Calls

Since 2017 Highland Trading Standards have installed 217 call blockers to protect older and vulnerable people from nuisance and scam phone calls. So far 102,341 calls have been blocked, and we estimate that 166 scams have been prevented.



**16**

average nuisance and scam calls received per unit per month



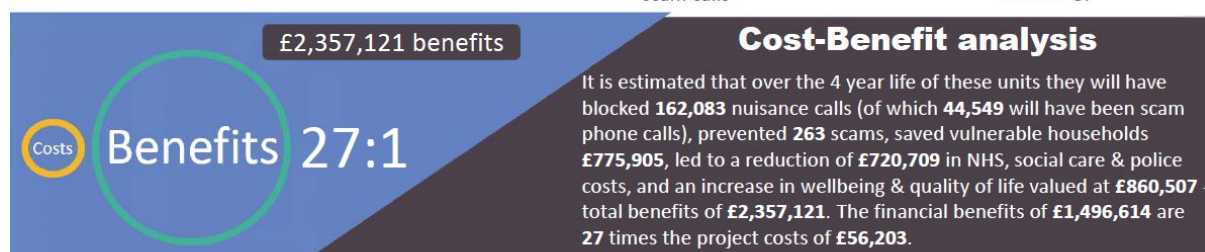
**25%**

of all calls received were nuisance or scam calls



**99%**

of nuisance and scam calls were blocked by trueCall call blocking technology



### Comments from those protected by the trueCall call blockers



This made a huge difference and enable my mother to live in her own home for longer



My mother no longer gets anxious and agitated. I cannot impress on you the positive impact this has made.



Thanks for making my phone my friend again!



01/05/2025

## Product Safety

Tackling the supply of unsafe consumer products is a fundamental part of Trading Standards work. Some examples from 2023-24 are below.

- **Toy Safety:** Brexit continues to present challenges for local businesses and Highland toy suppliers were assisted by the Team to navigate new EU provisions which require a business from a “third country” to have a “Responsible Person” based in the EU.
- **Medical Devices:** Following a complaint about a retail medical device, a project was carried out focusing on the supply of such products. Pharmacies were visited and products checked for compliance, e.g. thermometers, bandages, earplugs and contact lens solution. Compliance levels were good, and advice given to the businesses.
- **Biocidal Products:** A prospective Highland manufacturer of midge repellent found the on-line information confusing, and the Team’s advice helped him to navigate the complex requirements and contact other agencies involved such as HSE. Assisting small local businesses in this way is a key activity for Trading Standards.
- **Knife Dealers:** Trading Standards is responsible for the licensing of knife dealers. There are currently 25 permanent licenses and one temporary licence

in the Highland area. These important public protection requirements are another priority for the Team and last year saw three investigations: one dealer with poor signage and paperwork was brought into compliance; a national chain had to remove all knives from sale until it renewed a licence; an allegation of illegally displaying licensable knives was unfounded as the “knives” were made of shiny “metal effect” soft plastic.

Another important area of product safety for the Team is the regulation of explosives. For example, sellers of fireworks must store the products in an approved safe manner and only sell during specified daytime hours and in quantities under 5kg. A programme of visits was carried out in the lead up to Bonfire Night and most sellers were up to standard, with three found to have non-compliances. These were all followed up to ensure public safety.

## **Fair Trading**

The category “Fair Trading” covers a broad spectrum of matters, including:

- False and misleading descriptions and other unfair commercial practices.
- Enforcement of consumer rights in sales of goods, services and digital content.
- Intellectual property rights including Trademarks, Copyright and counterfeit goods.
- Regulation of online sales including information, cancellation and performance.
- Provisions requiring prices to be marked on goods and all price comparisons to be fair.
- Measures to protect reputable business buyers from unfair practices.
- Unfair contract terms such as denial of liability and unfair penalty charges.

Most of this work is carried out through investigations into complaints and intelligence received about possible and significant breaches of the law. There is a variety of ways that such investigations can be successfully concluded. These can be informal outcomes such as a business changing its practices and giving credible assurances as to future conduct. Where necessary, more formal outcomes are used such as a warning letter, a binding written Undertaking about future conduct, a civil court order or a prosecution. Three case studies give examples of these investigations.

### **Case Study 1: Counterfeit Sportswear sold on Social Media**

A local man was selling a wide range of sportswear such as football and rugby kits suspected to be counterfeit through Facebook selling groups. Surveillance of the online activities gathered enough evidence to apply for a warrant to raid the premises at which the goods were kept. A large quantity of counterfeit products was seized and the individual cooperated and showed remorse, giving credible assurances as to future conduct. A formal Legal Undertaking to not repeat the offending was accepted as an outcome, with seized goods destroyed. This will be closely monitored.

### **Case Study 2: Private Car Park Penalty Charges**

A significant number of complaints were received about a local car park, operated by a national company, alleging unfair penalty charges being imposed. Officers worked with the company and its solicitors to make improvements to its procedures, including the erection of new signage, changes to ticket machines and altered debt collection processes. These changes were quickly implemented and ensured compliance with all consumer protection laws. No formal action was required to achieve this positive outcome for Highland residents.

### **Case Study 3: Deliveries of Internet Purchases**

A change in the approach of a large national delivery company in a particular area of the Highlands was causing problems to residents: e.g. around delays, surcharges and failures to deliver. Although the liability to buyers under consumer law lay with the companies selling the products, officers concentrated their efforts on the delivery company by working with that company's "Primary Authority" Trading Standards Department which was based near the company's head office. The problems were resolved through various changes of approach which brought everything back into line with consumer protection requirements.

The Fair Trading work also included a series of projects and initiatives, including those below.

#### **Events and Markets Project**

This project started in 2023-24 and was continued in 2024-25 to enable a strategic overview of events, shows and markets in the Highland area particularly with many re-starting and expanding after the COVID period. The emphasis was on providing business advice for stall holders and engagement with event organisers. Key information was gathered about major events, organisers, and markets, with actions including market surveillance visits, contact with event organisers and advice to stallholders. Semi-tailored business guidance leaflets were distributed to stall holders and were well received. Key outcomes included:

- Increased compliance through distribution of business guidance to traders via event and market organisers and inspection visits.
- Improved information on those stallholders attending events and markets.
- Collated overview produced of events shows and markets.
- Improved trader terms at events to highlight Trading Standards' involvement.

The business guidance continues to be reviewed to ensure that it is current: e.g. for events this included information on the single use vape ban coming into force in June 2025. An ongoing overview of the events and shows within the Highland area will be maintained.

#### **Illicit Tobacco and Counterfeit Alcohol**

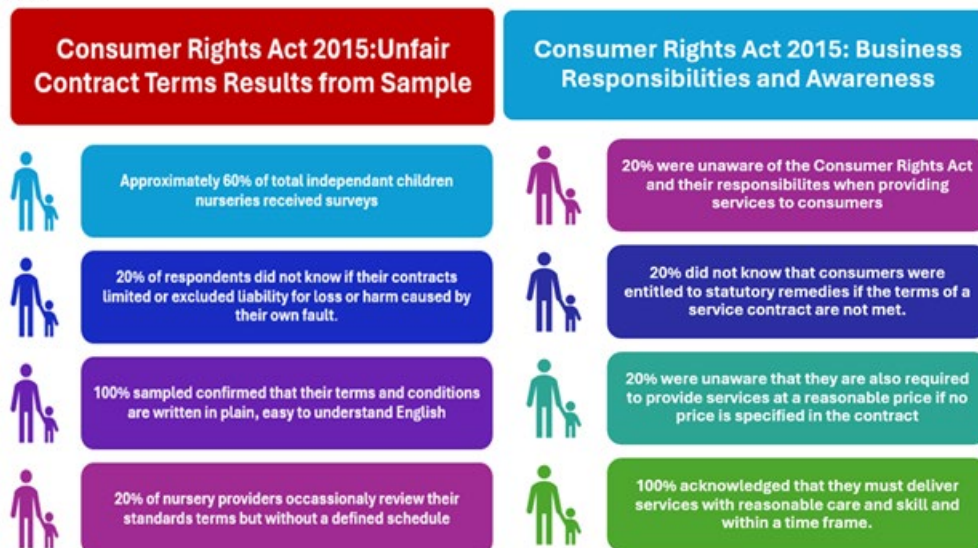
All counterfeit goods cheat consumers but some also threaten their health and safety. Two examples of such products were subject to initiatives in 2024-25:

- **"Operation CeCe"** is a national partnership between Trading Standards and HMRC to tackle sales of illicit tobacco, giving access to HMRC's "Track and Trace" system for tobacco products via a mobile app and enabling rapid checks to be carried out on-site. After test purchases and other intelligence showed that illicit tobacco was being sold in the Highlands, a series of targeted raids were carried out during which officers were assisted by a trained sniffer dog to locate concealed stores of illicit product. Significant quantities were found and seized, and formal sanctions are being prepared.
- **Counterfeit alcohol** is a growing concern in Scotland and after a fatality in the central belt caused by fake vodka, the Team worked with Environmental Health colleagues to visit premises and warn the trade and public about the possible threat.

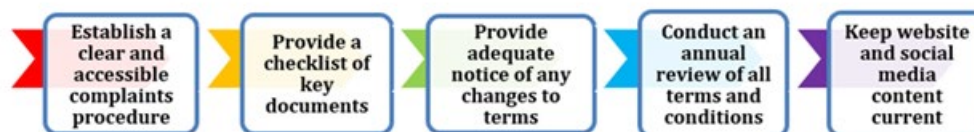
## Children’s Nurseries: Fair Contract Terms

This project involved providing detailed guidance to all independent nurseries in the Highlands to ensure that they treat parents fairly by using fair terms in contracts around for example fee structures, refund policies and changes in service availability. This graphic summarises the work carried out.

### Summary:



### Recommendations:



## e-Enforcement

e-Enforcement encompasses a wide range of activities, from combatting serious and deliberate e-Crime to assisting local e-Commerce businesses to thrive through treating customers well. In addition to reactive work, there were two specific initiatives for 2024/25: build awareness of social media and e-Marketplace “Advertisement Libraries” and e-Enforcement training for local officers. The training has been delivered to the whole team.

## Estate Agents

This Scotland-wide project set out to examine the impact of changing practices in this industry, a sector particularly impacted by changes in technology introducing a diversified marketplace. Online advertising along with existing matters such as Home Reports and redress schemes were considered as part of a combined online and physical visits programme. Nine estate businesses in Highland were examined and overall compliance levels were good. Only one was non-compliant within the terms of the project and advice has been provided.

## Doorstep Crime

Doorstep Crime involves bogus workers cold calling members of the public at their homes. They are often linked to organised crime groups and focus on exterior home maintenance and provide either seriously substandard, or completely non-existent works for ever increasing prices, and often make aggressive demands for payments. Doorstep criminals are very persuasive and go to great lengths to appear legitimate

whilst obscuring their identities to escape detection, often travelling long distances to commit their crimes. Tackling these actions is a national priority for both Trading Standards and Police Scotland.

The Team continues to work in partnership with Police Scotland and the year saw an increase in joint investigation work taking place, including prevention campaigns, news releases, newsletter articles and joint reporting to the Procurator Fiscal. It included an investigation which concluded with a 12-month prison sentence for an individual who continually approached the vulnerable at their homes with a view to obtaining monies for little or no works being completed. The Team continues to be involved in local and national investigations and tactical operations. This work is different from Scams as the perpetrators are present in the area and where possible a “hard enforcement” approach is taken.

## **Petroleum Licensing**

The Team is responsible for ensuring the safe storage of petroleum spirit, mainly at retail filling stations. Petrol vapour is highly explosive, and strict rules protect public safety. Officers worked with site owners and developers during the year on new builds and alterations as well as the ongoing monitoring of existing sites and the decommissioning of old redundant sites. In the past year the Team have engaged productively with the industry and the following are some examples of the types of requests and enquiries that were dealt with:

- Requests from businesses that have decided to upgrade their filling station. Such engagements allow the petrol sites to be upgraded whilst ensuring compliance with the latest safety standards, including EV charging points.
- A request from a community body where an abandoned filling station was the subject of a takeover. Officers were able to provide vital information on the history of the property and provide detailed advice on how to make this site safe.

## **Weights and Measures**

The use of weighing and measuring as a basis for trade transactions underpins consumer confidence and ensures a level playing field for business. Across the UK, these have an estimated value of £262 Billion p.a. with the Highland portion estimated at £100s of millions.

During the year Trading Standards continued to respond to complaints, requests for business advice and chargeable service requests. The Team’s activities included the testing of weighbridges, solid fuel supplies and equipment used in the supply of alcohol. All of these are important for the Highland economy; ensuring accuracy is essential as consumers and businesses continue to be subject to difficult economic circumstances. Examples include:

- In licensed premises spirit measuring instruments (optics), beer measuring instruments (beer meters) and capacity serving measures (beer glasses and thimble measures) were tested for compliance. Other checks were included, e.g. for quantity notices for wines/spirits and price displays. Non-compliances found were all rectified, thus ensuring fair measure for the local community and tourist visitors alike.
- As part of a national enforcement project, the Team made checks on solid fuel supplies at independent and national retailers of coal and wood. At a time when

heating homes is expensive it is vital to ensure that weights and descriptions are correct.

## **Taxis and Private Hire Cars (“PHCs”)**

Trading Standards is responsible for the enforcement of the licensing regime for taxis and PHCs. This involves monitoring the safety and standards of the vehicles and their drivers, and the treatment of customers. Trading Standards operates a “penalty points” system – unique in Scotland – whereby failings by drivers and operators are penalised. When a driver or operator reaches a set threshold of points, a report is submitted to the Licensing Committee for possible further action. Serious breaches are dealt with immediately. The Penalty Points System remains an effective way to monitor and control compliance in this trade sector. The Team is also responsible for the testing of taxi meters to ensure suitability and accuracy. In the year a number of licence holders attracted Penalty Points and were dealt with by either advice or officer warning, with one being reported to the Licensing Committee.

The Team works closely with the Council’s Licensing Team and Police Scotland as many of the complaints received require joint working to deal with effectively.

## **Construction Products**

In the wake of the Grenfell tragedy, there is a renewed national focus on the safety of construction products, with a new coordinating role and funding for the Office for Product Safety and Standards (OPSS). Positive engagement with a wide range of Highland-based producers has taken place in previous years and the next phase was to focus on some product sampling and testing. Compositional testing can be complex and expensive, and the Team was able to persuade OPSS to intervene. OPSS have set out proposals to test Category 1 blocks in Highland, as well as Northern Ireland. No results have been disclosed to date.

## **Animal Feedstuffs and Fertilisers**

Officers undertake Official Feeds Controls for Food Standards Scotland, on a commercial contractor basis. The Team met its commercial obligations again in the provision of physical inspections of 88 premises, alongside taking samples of feed and having it tested for nutritional value. These activities provide confidence in compliance, which was found to be high, meaning that the businesses producing, transporting and storing animal feed are responsible. The animals that are provided into the human food chain are receiving feed that is safe and of appropriate quality. The contract has now entered its final year of a two-year extension (3yrs +2yrs) with negotiations to renew planned for later in the year.

## **Border Control Posts (BCP)**

This was a new area of work for the Team in 2023-24 and was developed further in the past year. It involves checks of a phytosanitary nature with document checking, inspection and sampling of products of animal origin being imported into Great Britain at ports in the Highland Council area. The Team have had significant engagement with Central Government and industry in what is very much an industry demand-led border control operation. This post-Brexit duty has resulted in two current BCPs within Highland, the sub-contracting of an Official Veterinarian, and the establishment of a contract with a testing laboratory. The BCPs regularly receive materials used to make animal feed, mainly for the farmed fish industry.

## Appendix 3 – Operational Plan 2025/26

### The Highland Council Trading Standards Team

#### Operational Plan 2025-26

#### Part 1: Policy

##### 1. Trading Standards Team

The Highland Council's Trading Standards Team is part of the Council's Legal and Corporate Governance section of the Corporate service cluster. It undertakes a wide range of statutory duties in relation to the regulation of trade and protection of consumers and reputable businesses. Since a restructure in 2016, the team no longer carries out any non-statutory functions.

##### 2. Statutory Duties

The Council has numerous Trading Standards statutory duties from UK and Scottish sources. The full list of this legislation is contained in Annex D to the Council's Trading Standards Enforcement Policy.<sup>1</sup> The main subject areas are: Fair Trading; Doorstep Crime; Scams and Illicit Trade; e-Enforcement; Petroleum and Explosives; Safety of consumer products; Business Advice and Protection; Weights & Measures; Taxis and Private Hire Cars; Tobacco, Vapes and Age Restricted Sales; Animal Feed & Fertiliser Quality Standards; Border Control Posts – Animal Feed.

##### 3. Work activities

The work of the team is carried out in a number of ways, including:

- Investigation of breaches of consumer and trading laws: taking statements from witnesses, gathering documentary evidence, online research, CCTV, etc.
- Visits to business premises to check goods, equipment, records and procedures.
- Specific advice to individual businesses and general recommendations to trade sectors to ensure future compliance.
- Crime prevention activities targeted at both consumer and business audiences.
- Formal legal actions such as prosecutions, civil court enforcement orders, accepting formal legal undertakings, issuing statutory notices and issuing fixed penalty fines.

##### 4. Priorities

The team has two guiding themes to focus its work activities:

- "Intelligence-led": in previous decades much Trading Standards work was carried out through untargeted cyclical "inspections" of all businesses in the area. This is not an efficient method of operation in the modern world, and, in any event, there are insufficient resources to work in that way. Now, resources

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<sup>1</sup> [www.highland.gov.uk/downloads/file/11630/enforcement\\_policy](http://www.highland.gov.uk/downloads/file/11630/enforcement_policy)

are targeted at areas of trade and specific businesses that have been involved in breaches of consumer and trading law. This approach is heavily dependent on information received from a wide variety of sources including: consumer complaints; information from agencies such as other Trading Standards offices, the Police, local CABs and Citizens Advice Scotland (CAS); “tip-offs” from businesses and the public; observations of officers.

- “Detriment”: work is focused on breaches of the law that cause significant harm. Consumer detriment is judged in a variety of ways, including: the amount of money involved in related transactions; level of physical danger to consumers; effect on vulnerable consumer groups; effect on rural consumers; effect on young people (e.g. age restricted products). Business detriment includes: high-value losses by local businesses; non-compliant companies gaining an unfair advantage over their law-abiding competitors; negative reputational effects on key Highland industries, e.g. tourism.

The analysis of intelligence and detriment is central to all apportioning of resources in the team on the basis of priority topics. The detailed priorities of this Operational Plan are guided by two authoritative goal-setting sources:

1. “Our Future Highland” Programme of The Highland Council 2022-27<sup>2</sup>, in particular relating to the following high-level aims to promote:
  - A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.
  - Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.
2. “Four Nations Priorities”<sup>3</sup>, published by the Chartered Trading Standards Institute (CTSI) originally for 2022 but carried over to 2025.

The work activities that put the priorities into practice in 2025-26 are in Part 2.

## **5. Regulators’ Codes**

The contents of the Plan and all work carried out under it must be in accordance with the requirements of the UK Regulators’ Code<sup>4</sup> and the Scottish Regulators’ Strategic Code of Practice.<sup>5</sup> These are governed by the “five principles of Better Regulation”, i.e. work done is: Proportionate, Consistent, Accountable, Transparent and Targeted.

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<sup>2</sup> [https://www.highland.gov.uk/downloads/file/4611/programme\\_of\\_the\\_highland\\_council\\_2022-27\\_-\\_english](https://www.highland.gov.uk/downloads/file/4611/programme_of_the_highland_council_2022-27_-_english)

<sup>3</sup> <https://www.tradingstandards.uk/media/documents/news--policy/research/4-nations-priorities-infographic-final.pdf>

<sup>4</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/300126/14-705-regulators-code.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf)

<sup>5</sup> <https://www.gov.scot/publications/scottish-regulators-strategic-code-of-practice/>



## **6. Partnership Working**

The desired outcomes of this Plan can only be achieved through a series of well-established and confident partnerships with other organisations. There are a number of these, the most prominent of which are:

- Joint working and liaison with other local authority Trading Standards services and the specialist team at Trading Standards Scotland. These partnerships are long established and effective, including bilateral arrangements with individual authorities and wider networks that are often overseen by the Society of Chief Officers of Trading Standards in Scotland (“SCOTSS”).
- Police Scotland: Highland Trading Standards has a close partnership with “N” Division of Police Scotland. This is particularly important in tackling the serious crime elements of Trading Standards work such as doorstep crime, scams and anti-counterfeiting. The partnership encompasses both intelligence sharing and operational matters and is one of the closest in Scotland.
- CAB/CAS: the Highland Consumer Partnership brings together Trading Standards with CAS and the eight Highland CABs to work jointly on cases, crime prevention campaigns and other initiatives. It plays a crucial part in connecting Trading Standards to Highland communities.
- NHS Highland: the Highland Tobacco Strategy brings the Council together with the NHS to tackle tobacco use in Highland. Trading Standards take the lead on enforcement of retail tobacco and NVP (“vaping”) laws, including combatting underage sales. In a separate topic area, the team works closely with NHS Highland on adult protection matters, such as providing call-blocking devices to protect vulnerable adults from scam calls.
- National bodies: very regular contact with Competition and Markets Authority (CMA), Office for Product Safety and Standards (OPSS), Advice Direct Scotland, Food Standards Scotland, the Chartered Trading Standards Institute, and the business departments of both Scottish and UK Governments enables Highland Trading Standards to influence national policy in favour of Highland interests and be well-informed of current practice and future developments.

## **7. Details**

The individual initiatives and work activities are listed in Part 2. Many of these are Highland-specific although several involve collaboration with other local authorities (through SCOTSS). The “economies of scale” created by such joint working can be more effective in bringing about the outcomes desired. The team only participates in initiatives that are relevant to the objectives of the Highland Council Programme. The ongoing “Cost Crisis” affecting both consumers and businesses is a prominent part of the planning for the year ahead and initiatives to tackle it in the Highlands are spread across various work activities.

## Part 2: Detailed Work Activities

| Topic             | Fair Trading  |
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| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul> <p>CTSI Priorities<br/>           P(i) Protecting those at risk of the highest harm from the worst impacts of financial hardship.<br/>           P(iii) Supporting businesses to diversify and adapt to new circumstances.<br/>           P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p>  |
| <b>Objective</b>  | <p>To ensure that Highland consumers are treated fairly by assisting legitimate businesses and taking firm action against rogue traders.</p> <p>To target resources on areas of highest consumer detriment and on topics for which intelligence shows that consumers are being treated unfairly.</p> <p>To reduce the supply of illicit goods in the Highlands, including counterfeit consumer products.</p>  |
| <b>Details</b>    | <p>The largest portion of this work involves investigating cases originating from consumer complaints and other sources of intelligence. All intelligence will initially be considered on a daily basis by the Duty Officer and further analysed at fortnightly tasking meetings. Cases will be progressed to an appropriate conclusion, including both formal disposals (e.g. prosecution or Enterprise Act Court Order) and informal disposals (e.g. written warning or advice to trader).</p> <p>The sale of counterfeit and other illicit goods has a variety of negative impacts on the Highlands: buyers receive shoddy and often unsafe products; legitimate local businesses unfairly lose out on sales; regional and national organised crime groups receive profits. Officers will follow up intelligence received to prosecute offenders and disrupt supply.</p> <p>In addition to the individual casework described above, there will be a series of planned initiatives to tackle areas of trade identified through complaints and other intelligence to require attention Trading Standards in the Highlands.</p> |

These are:

- **Second Hand Car Sales: SCOTSS Project.** This sector persists as one of the biggest sources of consumer complaints. Some issues – such as faulty vehicles – are obvious to buyers, while others are more “hidden”, such as poor pricing practices, hidden fees, misdescriptions, cancellation rights and unfair terms. These are not as likely to be noticed by the average consumer but cause significant detriment. This project will involve online assessments, forecourt compliance checks and subsequent investigations to address these issues.
- **Home Heating – North Project.** The Scottish Government’s Heat in Buildings Initiative seeks to remove all polluting fuels from Scotland’s homes and is arguably the most ambitious plan since devolution. For it to be successful, consumers must be protected from false claims and unsatisfactory work by businesses. There will be much for Trading Standards to do in the future on this topic, but already complaints are being received in relation to retrofit work in homes. This project will involve working with local businesses to ensure that consumers are treated fairly, with a focus on fair contract terms and realistic claims being made for products and services.
- **Illicit Tobacco: SCOTSS Initiative.** “Operation CeCe” is a project funded by HMRC to tackle the supply of illicit tobacco at retail level. The last year saw a significant increase in intelligence received about counterfeit and non-duty paid cigarettes and tobacco in the Highlands, resulting in several cases and seizures of illicit product. Now, Operation CeCe funding is being increased to develop the initiative in all areas of Scotland. Highland Trading Standards is part of a joint bid with North Lanarkshire and East Renfrewshire to carry out this development work and if successful the funding will enable a new Modern apprenticeship post to be created in Highland.
- **Bulk Heating Fuel: SCOTSS project.** A major factor in the Cost of Living Crisis is the price of fuel, and off-grid oil heating plays an important role in their Highlands. This project looks at issues around pricing and terms and conditions that have been identified as potentially problematical. Local and national businesses will be advised of their obligations and enforcement action taken if necessary. The project began in 2024/25 and is carried over into 2025/26 due to delays caused by the need to get expert legal opinions on some matters of interpretation.

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| <b>Topic</b>      | <b>Domestic Fraud</b>  |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul> <p>CTSI Priorities<br/>P(i) Protecting those at risk of the highest harm from the worst impacts of financial hardship.</p>  |
| <b>Objective</b>  | <p>To protect vulnerable Highland consumers from doorstep crime through close collaboration with partner agencies such as Police Scotland, NHS and other Trading Standards authorities.</p> <p>To protect Highland consumers from scams perpetrated through a range of media - e.g. by letter, telephone, email, online - with particular attention to the effect on vulnerable consumers.</p>   |
| <b>Details</b>    | <p>Domestic Fraud encompasses both Doorstep Crime and Scams. Doorstep Crime refers to the activities of rogue traders offering home improvement services door-to-door. Scams can be perpetrated by a range of techniques, including by letter and by telephone cold-call. Although any householder could be scammed, these activities are often targeted at elderly and vulnerable people and the potential for consumer detriment is very high. The response of Trading Standards on this subject involves close partnership working with Police Scotland and adult protection services and includes:</p> <ul style="list-style-type: none"> <li>• Reacting to complaints and intelligence received and taking appropriate action.</li> <li>• Continue to manage and monitor “call-blocker” installations and the intelligence they produce.</li> <li>• Engaging in multi-agency operations to detect itinerant trading activity.</li> <li>• Promote “Students Against Scams” initiative at UHI.</li> </ul> |

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| <b>Topic</b>      | <b>e-Enforcement</b>  |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient,</li> </ul> |

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|                  | <p>making a positive difference to the lives of people.</p> <p>CTSI Priorities<br/> P(i) Protecting those at risk of the highest harm from the worst impacts of financial hardship.<br/> P(iii) Supporting businesses to diversify and adapt to new circumstances.<br/> P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p>  |
| <b>Objective</b> | <p>To recognise the importance of online sales to the people of the Highlands by focusing on the laws relating to the delivery of goods and services to remote communities.<br/> To help foster the growth potential of e-Commerce for new and existing Highland businesses.</p>   |
| <b>Details</b>   | <p>The term e-Enforcement encompasses a wide range of activities, from combatting serious and deliberate e-Crime to assisting local e-Commerce businesses to thrive through treating customers well. There are three specific initiatives for 2022/23:</p> <ul style="list-style-type: none"> <li>• Review of Delivery Charges website: Highland project. The website <a href="http://www.deliverylaw.uk">www.deliverylaw.uk</a> was set up several years ago by Highland Trading Standards on behalf of the UK Consumer Protection Partnership, which brings together government departments, regulators and consumer advocacy bodies. It provides advice on the application of the law to surcharges and other internet delivery problems. It is due a full review, especially in light of new legislation such as the Digital Markets, Competition and Consumers Act 2024, which comes into effect in April 2025.</li> <li>• Online Investigations Training and Process Review: Highland and SCOTSS initiatives. Highland officers have been heavily involved in the production of a protocol for internet investigations, along with colleagues from SOLACE, SOLAR and SLA-ISG (LA's information security group). Many of the standard approaches are already in operation in Highland but the protocol will now be implemented in full and training will be designed and delivered to all staff in Highland, with a roll out across Scotland also planned.</li> </ul> |

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| <b>Topic</b>      | <b>Petroleum Licensing</b>  |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people</li> </ul> <p>CTSI Priorities<br/>P(iii) Supporting businesses to diversify and adapt to new circumstances.</p>  |
| <b>Objective</b>  | To protect the Highland public by ensuring the safe storage of petroleum and the safe operation of petrol filling stations.   |
| <b>Details</b>    | <p>Including:</p> <ul style="list-style-type: none"> <li>• Liaising with developers, site owners and others to ensure safety requirements are being achieved.</li> <li>• Responding to complaints and intelligence received.</li> <li>• Working with site owners, developers and others to decommission sites where necessary.</li> <li>• Participation in SCOTSS/PELG projects when available</li> <li>• Carry out a programme of visits to rural filling stations.</li> </ul> |

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| <b>Topic</b>      | <b>Business Advice and Protection</b>   |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul> <p>CTSI priorities<br/>P(iii) Supporting businesses to diversify and adapt to new circumstances.<br/>P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p> |

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| <b>Objective</b> | <p>To help Highland businesses comply with consumer laws through advice and guidance and promote a culture of “economic success through best practice”.</p> <p>To provide advice to Highland businesses who are the victims of unfair trading in their purchases.</p>   |
| <b>Details</b>   | <p>There are various strands to this work:</p> <ul style="list-style-type: none"> <li>• Providing “enforcement by advice” through both reactive and proactive action, ensuring compliance in a measured and proportionate way. This mainly involves responding to specific queries from businesses about how they can comply with consumer laws. It also involves providing general guidance, e-newsletters and seminars where appropriate.</li> <li>• Investigating breaches of the Business Protection from Misleading Marketing Regulations 2008 and taking appropriate action.</li> <li>• Providing “1<sup>st</sup> Line” advice to local SMEs who make a complaint about purchases they have made from other traders.</li> <li>• Developing a more “commercial” approach to business engagement when appropriate through increasing opportunities to provide chargeable services.</li> </ul> <p>There are three particular initiatives for 2024-25:</p> <ul style="list-style-type: none"> <li>• <b>Primary Authority Partnerships:</b> these are income-generating contracts between businesses and local authorities for the provision of detailed “assured advice” on Trading Standards legal compliance. There are many of them which work very effectively and to the benefit of both parties in England and Wales. There are very few in Scotland but with most Trading Standards laws being reserved to Westminster, Primary Authority is equally applicable in Scotland. This is the second year of a two-year project which will involve the team approaching a range of local businesses to explain what the scheme can offer, with a view to signing up one or more of them to such a partnership.</li> <li>• <b>Approved Trader Scheme:</b> This new local scheme was set up in 2024/25. It lists local businesses which have been vetted by Trading Standards and have made a commitment to treat their customers fairly. Member businesses undergo a series of detailed background checks, including a review of their complaints history and agree to abide by a code of conduct and to be regularly monitored. 2025/26 will be first full year of the scheme and will see a full public-facing launch with a concerted promotion campaign, and further development of the scheme.</li> </ul> |

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| <b>Topic</b>      | <b>Product Safety</b>  |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul> <p>CTSI Priorities<br/> P(ii) Identifying and removing dangerous or harmful products from the market.<br/> P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p>  |
| <b>Objective</b>  | To protect the Highland public from dangerous consumer products and help Highland businesses achieve high levels of consumer safety in their trading activities.   |
| <b>Details</b>    | <p>Including:</p> <ul style="list-style-type: none"> <li>• Considering all consumer complaints and other intelligence relating to product safety and taking any action that is necessary to ensure the safety of Highland consumers.</li> <li>• Providing advice and guidance to Highland businesses on all product safety compliance matters.</li> <li>• Participating in SCOTSS Product Safety Group projects and other joint initiatives, to be considered on a case-by-case basis in terms of their relevance to the Highlands.</li> <li>• Proactive engagement with explosives storage licensees, including inspection visits where necessary.</li> </ul> <p>Two specific initiatives for 2024/25 are:</p> <ul style="list-style-type: none"> <li>• International Food Shops – Recent years have seen a proliferation across the North of shops selling specialist items largely originating from outside Scotland. Although primary focused on food sales, these shops also sell non-food products which require stringent safety standards, such as toys, nursery goods and cosmetics. Some of the supply chains for these items are new to the area. This project will involve close engagement with shop owners to assist them to comply fully and keep Highland residents safe.</li> </ul> |



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|  | <ul style="list-style-type: none"> <li>Office for Product Safety and Standards (OPSS) initiatives. OPSS takes the national UK lead for product safety and each year funds projects for local authority participation. Opportunities that arise from this source will be closely scrutinised for relevance to Highland and participated in if appropriate.</li> </ul> |
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| <b>Topic</b>      | <b>Weights &amp; Measures</b>   |
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| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul> <p>CTSI Priorities<br/> P(iii) Supporting businesses to diversify and adapt to new circumstances.<br/> P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p>   |
| <b>Objective</b>  | <p>To ensure Highland consumers and businesses receive fair measure in their purchases.<br/> To provide an efficient high-quality calibration and weighing &amp; measuring equipment service to business.</p>   |
| <b>Details</b>    | <p>Including:</p> <ul style="list-style-type: none"> <li>Maintaining metrological equipment in accordance with national standards.</li> <li>Responding to complaints and intelligence received.</li> <li>Responding to requests for service from Highland businesses.</li> <li>Membership of the joint "Scottish Approval Body" for new equipment initial verifications.</li> <li>Participating in specialist projects and other joint initiatives relevant to the Highlands.</li> <li>Conduct market surveillance post Brexit to ensure compliance of new/imported equipment being placed on the market.</li> <li>Conduct market surveillance in response to high value goods in pressured markets e.g. domestic and vehicle fuels at times of high prices to ensure equipment used to determine the price is accurate and performing as it should.</li> </ul> |

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|  | <p>Two particular initiatives for 2025-26 that are under consideration are:</p> <ul style="list-style-type: none"> <li>• Participate in SCOTSS project on compliance of non-automatic weighing instruments (NAWI)</li> <li>• A focus on the local licensed trade through a programme of inspections to local bars, pubs and hotels.</li> </ul> |
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| <b>Topic</b>      | <b>Taxis &amp; Private Hire Cars (PHCs)</b>   |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul> <p>CTSI Priorities<br/>P(iii) Supporting businesses to diversify and adapt to new circumstances.</p> |
| <b>Objective</b>  | <p>To ensure that visitors to the Highlands and local residents enjoy high quality taxi and PHC services.<br/>To maintain public safety and fair trading standards of Taxis &amp; PHC via the rigorous application of the Penalty Points System and ensuring the accurate calibration of taximeters.</p>  |
| <b>Details</b>    | <p>Including:</p> <ul style="list-style-type: none"> <li>• Monitoring licensee performance via Penalty Points system.</li> <li>• Responding to complaints and intelligence received.</li> <li>• Responding to requests for Taxi meter testing.</li> <li>• Participate in arrangements for tariff changes when required.</li> </ul>  |

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| <b>Topic</b>      | <b>Tobacco, Nicotine Vapour Products (NVPs) and Age Restricted Sales</b>  |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient,</li> </ul> |

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|                  | <p>making a positive difference to the lives of people.</p> <p>CTSI Priorities<br/> P(ii) Identifying and removing dangerous or harmful products from the market.<br/> P(iii) Supporting businesses to diversify and adapt to new circumstances.</p>  |
| <b>Objective</b> | <p>To protect young people in the Highlands by preventing the supply to them of harmful age restricted products.<br/> To promote public health through ensuring compliance with Tobacco and NVP legislation.</p>  |
| <b>Details</b>   | <p>Including:</p> <ul style="list-style-type: none"> <li>• Carrying out necessary “proactive” work on age restricted sales, tobacco and NVPs as per specific Scottish Government funding.</li> <li>• Responding to intelligence received about underage sales and tobacco and NVP infringements by carrying out investigations and taking enforcement action where necessary.</li> <li>• Providing advice and guidance to Highland businesses on age restricted sales, tobacco and NVP compliance matters.</li> </ul> <p>Specific initiatives for 2024/25 include:</p> <ul style="list-style-type: none"> <li>• Continue to meet the high demand in the community to investigate allegations of legal breaches, particularly in relation to sales of vapes to children, taking all necessary actions including business advice, fixed penalty fines, banning orders and other court actions.</li> <li>• Continued proactive enforcement of tobacco and NVP legislation through inspection visits, publicity campaigns and test purchasing programmes.</li> <li>• Provide clear guidance to all sellers of vapes on the upcoming ban on single use vapes and offer and provide advice on related queries. This will be followed up by visits and other enforcement work on the ban when it comes into force in June 2025.</li> <li>• Continue to develop a systematic approach to recruiting underage sales volunteers that provides sustainability for future work. Traditionally, volunteers have been recruited on an ad hoc basis and this initiative seeks to set up ongoing arrangements with bodies that have strong links to young people and ensure that existing volunteers are effectively replaced when they reach the age of 18.</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>• Provide expert services in relation to Age Restricted Sales to neighbouring authorities on a contracted basis. The fees generated will contribute to the Team's income generation strategy.</li> </ul> |
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| <b>Topic</b>      | <b>Animal Feedstuffs &amp; Fertilisers</b>  |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul> <p>CTSI Priorities<br/> P(ii) Identifying and removing dangerous or harmful products from the market.<br/> P(iii) Supporting businesses to diversify and adapt to new circumstances.</p> |
| <b>Objective</b>  | <p>To ensure compliance with quality standards for animal feed and fertilisers by the targeted surveillance of producers and feed businesses.<br/> To meet the requirements specified in the contract with Food Standards Scotland (FSS) for the delivery of Official Feed Controls.<br/> Providing specialist Service to neighbouring Local Authorities under contract.</p>  |
| <b>Details</b>    | <p>Including:</p> <ul style="list-style-type: none"> <li>• Completing Food Standards Scotland (FSS) Official Feed returns.</li> <li>• Conducting an agreed programme of premises inspection and product sampling within Highland.</li> <li>• Conducting an agreed programme of premises inspection in CNES.</li> <li>• Responding to FSS feed incidents.</li> <li>• Taking action as necessary regarding Fertilisers</li> </ul>   |

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| <b>Topic</b>      | <b>Border Control Posts – Animal Feed</b>   |
| <b>Priorities</b> | <p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul> <p>CTSI Priorities<br/> P(ii) Identifying and removing dangerous or harmful products from the market.<br/> P(iii) Supporting businesses to diversify and adapt to new circumstances.</p> |
| <b>Objective</b>  | <p>To conduct new duties in respect of being a Port Health Authority for Animal Feed and related products.<br/> To conduct phytosanitary checks to ensure imported product is compliant with quality standards.<br/> To liaise with other agencies as necessary on BCP matters, e.g. DEFRA, APHA, FSS.</p>  |
| <b>Details</b>    | <p>Including:</p> <ul style="list-style-type: none"> <li>• Completing agreed documentary, physical inspection and sampling checks on imported product.</li> <li>• Responding to feed importation incidents.</li> <li>• Preventing non-compliant feed from entering the inland arena.</li> </ul>   |