



Public Health & Protection Service

Interim Needs Assessment
2013/14

Trading Standards: Vulnerable
Individuals

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Community Safety & Protection

Acknowledgements

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Trading Standards: Vulnerable Individuals



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Introduction

PH&P Vision: 'To be recognised as an excellent, integrated and cost effective regulatory service that engages and involves our communities, businesses and partners to continually improve public health, our environment and local economy.'

The Public Health and Protection (PH&P) Service in Cornwall delivers the core functions of Environmental Health, Trading Standards, Licensing, Port Health and Coroners.

The Service describes its role as “a balance between actively providing support, advice and information and targeting enforcement activity against those that put public health, the local economy and the environment at risk”.

The Services' three key outcome areas are:

- Health and Wellbeing
- Economy
- Environment

The **Trading Standards team** is embedded within the **Business Compliance Unit of the Public Health and Protection Service**.

PH&P Objective 4: Maximising the Use of Resources

Through targeted, effective and efficient working we will continue to develop and expand our local intelligence base and work together with partners and local people to meet the needs of our communities.

In order to **understand the needs of local communities and businesses**, and therefore effectively prioritise and deliver targeted, efficient and integrated services, the Public Health and Protection Service within Cornwall Council continues to develop and expand their local intelligence base, which includes Service specific needs assessments.

The Public Health and Protection Service is in the process of developing a series of needs assessment documents, which consider local and wider evidence of need, alongside key regulatory outcomes, to underpin Service planning and delivery; this interim needs assessment forms the third stage of the work towards this aim.

Trading Standards: Vulnerable Individuals

This document focuses on the theme of **trading standards and vulnerable individuals**. It includes commentary and evidence of illegal trading, scams and fraudulent activities that pose a threat to individuals and communities in Cornwall. It also includes details of the work of Cornwall Council's Trading Standards team, and the potential impact any increase in threats is likely to have on the Public Health and Protection Service.

Key Findings

- **Anybody can become vulnerable** to illegal trading activity at any time. Safeguarding individuals and communities is, therefore, a significant challenge, and one which would significantly benefit from a greater level of cross-agency and partner coordination, collaboration and intelligence sharing.
- Illegal trading, scams and fraudulent activities are numerous in nature and constantly evolving. The number of incidents, and victims, of these crimes is likely to be **significantly under-reported**, further highlighting the importance of effective evidence and intelligence gathering by agencies and partners.
- A number of **emerging 'bigger picture' issues may prove to have a negative impact** on the prevalence of illegal trading activity in the UK, including an increase in the number of individual and households experiencing financial difficulties, particularly from changes to the UK welfare system, and the continuing growth of the older population in the UK.
- The **lack of access to affordable credit**, and the existence of alternative sub-prime money providers, including loan sharks and payday loan companies, has been highlighted as a particular issue in the UK.
- Potential changes to local authority Trading Standards Services, through the **introduction of new legislation, or cuts in Government funding**, could reduce powers and resources available to local regulatory services in the UK, including their ability to conduct proactive work to tackle the issues of illegal trading in the local community.
- Cornwall is an area of many contrasts, where affluence sits alongside some of the most disadvantaged areas in England. There are a **number of local factors which could affect an individual's vulnerability to illegal trading activity in the county**, including: a large percentage of elderly people in the population, and their related health issues including dementia; high personal insolvency rates in the county; high costs of living relative to the rest of the UK; individuals experiencing housing problems and rural isolation within the county.
- **Young People, Older People and Low income Households** have been identified as priority groups of 'vulnerable consumers' for PH&P's Trading Standards team.

Cornwall at a Glance: Community Intelligence Team

Cornwall is the second largest local authority area in the South West region and is an area of many contrasts; with remote rural, coastal and environmentally sensitive areas, interspersed with villages and historic market towns; where affluence sits alongside some of the most disadvantaged areas in England. See Appendix 1.

Population

- Dispersed and sparsely populated settlement pattern, combined with Cornwall's coastline, present **issues of accessibility and challenges in delivering services equitably**.
- Concentrations of population in the larger towns, however, exhibit the **same crime and disorder issues as urban areas elsewhere** in the UK.
- **Low representation of minority ethnic groups**; may experience more acute feelings of isolation and vulnerability and lack access to support networks and a strong voice locally.
- Cornwall's MOSAIC profile indicates that the **most common household types are residents of isolated rural communities (23%)** and residents of small and mid-sized towns with strong local roots (21%).

Housing

- **Housing affordability and availability is major issue**, placing increased pressures on families and extended families to co-habit.
- Providing **suitable housing for vulnerable people is a continual problem** likely to be exacerbated by changes to the welfare system.

Health and Wellbeing

- Higher prevalence of limiting long term health problems, including **mental health**.
- Significantly higher proportion of working age people claiming **health-related benefits** due to **alcoholism**.

Labour Market and Economy

- **Low wages, high unemployment** (relative to previous years), an over-dependence on low paid jobs, with a higher proportion of seasonal and part time jobs, and lower earnings across many sectors of the economy means **fewer opportunities for young people**.
- Weak local economy and **economic decline from the recession has been worse than the national average**.
- Areas of **persistent worklessness**, particularly due to disability and **ill-health**.

Deprivation

- **Pockets of high deprivation** where communities experience multiple issues such as lower incomes, higher unemployment rates, **ill health**, child poverty, low qualifications, poorer housing conditions and higher crime rates. **Hidden rural poor**.

Geography

- Problems are not evenly spread and tend to be **concentrated in geographic hotspots**, particularly the centres of our **larger towns**.
- Many thousands of people flock to Cornwall each year for their holidays. This brings many benefits but also places **increased pressure on local services in popular tourist towns** and provides **more opportunities for crime** to be committed and more potential victims and criminals.

1. Trading Standards

Economic recovery, environmental protection, improved health, community safety¹

The Trading Standards service in the UK exists to promote and protect the well being of a modern, vibrant economy and to safeguard the health, safety and environment of its citizens².

The service is a law enforcement agency, responsible for enforcing around 40 Acts of parliament, and over 1,000 associated regulations, including **The Consumer Protection from Unfair Trading Regulations 2008**. The regulations “introduce a general prohibition against unfair commercial practices, specific prohibitions against misleading and aggressive practices and a blacklist of 31 practices that will be deemed unfair in all circumstances”³.

According to the Trading Standards Institute⁴, the Trading Standards profession offers:

- Experts ‘on the beat’, implementing national policy to support fair and competitive markets, honest enterprise and good business
- Protecting standards, an on-the-ground activity that is vital to the livelihoods and safety of our communities
- A friend to the consumer, an advisor to businesses and the scourge of the scammer, rip-off merchant and serious organised crime
- A brand reassuring to consumers and businesses alike and an integral part of consumer, citizen and business confidence

Purpose

Trading legislation impacts nearly all aspects of daily life, from buying a loaf of bread to arranging personal credit facilities.

Figures from the National Trading Standards Board’s enforcement projects (England and Wales, April 2012-March 2013) highlight some of the areas in which the Trading Standards profession works⁵:

¹ Trading Standards Institute website, May 2013. <http://www.tradingstandards.gov.uk/>

² Cornwall Council website, May 2013. <http://www.cornwall.gov.uk/>

³ Consumer Protection from Unfair Trading Regulations. <http://www.out-law.com/page-9050>

⁴ Trading Standards Institute website, May 2013. <http://www.tradingstandards.gov.uk/>

⁵ National Trading Standards Board shows it has teeth as it reaches 1st anniversary. Trading Standards Institute, 30th April 2013. <http://www.tradingstandards.gov.uk/policy/policy-pressitem.cfm/newsid/1134>

- **Almost £140 million:** potential fraud uncovered by Scambusters teams
- **Just over £7 million:** consumer detriment avoided by Scambusters teams
- **Around £1.4 million:** total value of loans, made by loan sharks, tackled by Illegal Money Lending teams, with **865 loan shark victims** given direct or indirect support
- **£6.7 million:** potential fraud relating to investigations uncovered by the National e-Crime Centre
- **70%** of imports sampled by the Safety at Ports Project found to be unsafe or non-compliant

Successful national trading standards prosecution case study examples (April 2012-March 2013) also include⁶:

- **Operation Resolution:** four fraudsters, who cheated millions from investors in a land banking scam, were all sent to prison for more than six years in a case led by the London Borough of Tower Hamlets Trading Standards.
- **Compass Mobility Ltd:** in a case led by the Yorkshire and the Humber Trading Standards Group Scambusters Team, with support from Derbyshire Trading Standards, two company directors were jailed for five years, and a third was jailed for two years, after hundreds of complaints over fraudulent sales of mobility aids.
- **Operation Fleet:** three criminals were sent to prison for up to three years, and a fourth sentenced to community work, for running a fake mobile phone insurance company, netting some £200,000 from 2,500 victims. The case was led by Central England Trading Standards Authorities' Scambusters Team.
- **Illegal Money Lending:** an illegal money lender from the Midlands was sentenced to four and a half years in prison for money laundering, blackmail, running an unlicensed business and perverting the course of justice. He lent money illegally to 88 people at a rate of £50 interest for every £100 borrowed. The case was led by the Illegal Money Lending Team England, based at Birmingham City Council, in partnership with the local trading standards service and Staffordshire Police.

⁶ National Trading Standards Board shows it has teeth as it reaches 1st anniversary. Trading Standards Institute, 30th April 2013. <http://www.tradingstandards.gov.uk/policy/policy-pressitem.cfm/newsid/1134>

2. PH&P Trading Standards

Responsible for enforcing trading legislation that controls the advertising, marketing, distribution and supply of goods and services, throughout the manufacturing, importation and service delivery chain.⁷

PH&P's Trading Standards team **supports local businesses** to comply with UK trading legislation. The team ultimately protects everyone in Cornwall: the 532,300 residents, 10 million day trippers and 4 million staying visitors.

The team is a law enforcement agency, responsible for enforcing a variety of legislation relating to the **safe and fair trading of goods and services in Cornwall**, including investigating and acting upon criminal trading activity when required.

Key responsibilities of PH&P's Trading Standards team include:

- Animal Health and Welfare
 - Enforcing legislation to protect the welfare of livestock on farms, at markets and during transportation, including correct identification, movement records and animal carcass disposal
- Business Advice
 - Providing a wide range of information and guidance to businesses on trading responsibilities and current legislation, including:
 - Fair trading
 - Food labelling and sales
 - Product safety
 - Pricing
 - Trade descriptions
 - Consumer Credit licensing
 - Weights and measures
 - Age restricted products
- Conducting criminal investigations and facilitating prosecutions
- Developing informed and confident consumers through preventative work, consumer education and soliciting information on illegal trading activities.

PH&P's Trading Standards team offers **direct support to consumers** primarily through cases referred directly to them from the Citizens Advice Consumer Service, or as part of a criminal investigation (see the Consumer and Competition Landscape

⁷ Cornwall Council website, May 2013. <http://www.cornwall.gov.uk>

Reform section of this document).

The Trading Standards team is part of the Business Compliance Unit within PH&P and currently consists of 15 full-time equivalents in the Fair Trading Team and 15 full-time equivalents in the Quality Standards and Animal Health Team.

Local initiatives

PH&P's Trading Standards team operates a number of local initiatives and projects to help local communities and businesses, including⁸:

- **Scamnesty Campaign (May 2013):** Campaign to encourage Cornish residents to take any scam mail received to their local library. All mail is assessed by the Trading Standards team and referred to the appropriate authorities, such as Action Fraud, if necessary.
- **Tobacco Outreach⁹:** A variety of planned activities raising awareness of the dangers of tobacco (including illegal tobacco): four outreach events held in town centres across Cornwall (February 2013); Attendance at the Royal Cornwall Show, alongside the Stop Smoking service; Leafleting in targeted locations across Cornwall (December 2012); Article entry in the Penwith Housing Association newsletter (Spring 2013); Attendance at the Stithians Show (July 2013).
- **Loan Sharks:** Warnings regarding unlicensed moneylenders, operating outside the law, usually charging very high interest rates, and sometimes using threatening and violent behaviour.
- **Made in Cornwall Fairs:** Promoting genuine food and crafts produced by businesses in Cornwall.
- **Are you Sun Smart?:** Awareness campaign to highlight that some 'sun protection products', including t-shirts, sunhats and pushchair parasols, may provide very little protection from the sun's harmful rays.
- **Black Henna Temporary Tattoos:** Warnings regarding the safety of some products marketed as 'black henna' which can cause blistering, open sores or scarring.
- **Child Safety:** Including Safety and Your Baby and Toy Safety.
- **Nippers' Nutrition Programme:** Supporting early years settings across Cornwall to ensure their food and drink provision is nutritious, healthy and safe to eat.

Principles, outlined by the Trading Standards Institute, have a direct cross-over with the **Public Health and Protection Service's external facing strategic objectives for 2013/16**, placing the Trading Standards team in a central position to help deliver on overall Service objective results (see Appendix 2).

⁸ Cornwall Council website, June 2013. <http://www.cornwall.gov.uk>

⁹ Elizabeth Kirk, Trading Standards, Public Health and Protection, Cornwall Council

The following case study examples highlight just some of the areas in which PH&P's Trading Standards team works:

Case Study 1: Cornwall Council: Trading Standards

Park Homes

- In August 2010 Cornwall Council received a letter from the chairman of the residents' association at a Cornish mobile home park. The letter complained of **possible breaches of unfair trading legislation by the site operator**.
- The mobile home park the letter referred to was 1 of some 17 operated by the site operator throughout South West England.
- Collation of intelligence, drawn from a number of the mobile home parks owned by the site operator, **led to an application by Cornwall Council's Trading Standards team to the County Court for an order** requiring the site operator to (among other things): not breach residents' contracts under the Mobile Homes Act 1983; comply with laws forbidding unfair trading (the Consumer Protections from Unfair Trading Regulations 2008). The order also covered the Protection from Harassment Act and the law of negligence for failure to maintain common areas of sites in a safe condition. The County Court made the requested order in January 2011.
- The action taken by the County Court against the site operator was **the first significant use, nationally, of trading standards legislation to tackle the widespread problem of unfair trading on mobile home park sites**. It also gave encouragement to a very isolated and vulnerable section of society.
- Joint action by Cornwall Council's Trading Standards and Environment Health (now Licensing) officers was a key component to the success of this case, with officers from both teams providing evidence to a Department of Communities and Local Government select committee on park homes. **This work led to the passing of the Mobile Homes Act 2013**.
- Cornwall Council's Trading Standards team continues to receive some complaints from mobile home park residents living on various sites in Cornwall. Matters vary but include charges for utilities, sales blocking, failure to maintain sites, harassment and threats to residents.

Source: Martin Fisher, Trading Standards, Public Health and Protection, Cornwall Council

Case Study 2: Cornwall Council: Trading Standards

Holiday Homes

- Cornwall Council's Trading Standards team has recently been involved in investigating the substantial county-wide problem of mis-sold holiday homes – homes that under planning rules can only be occupied for a part of the year and never as the owner's sole residence.
- The issue of mis-sold holiday homes has required the formation of a **cross-disciplinary officer team within Cornwall Council**, reporting to local Cornwall Councillors. Officers included are from Housing, Planning, Council Tax, Legal, Licensing and Trading Standards.

Source: Martin Fisher, Trading Standards, Public Health and Protection, Cornwall Council

3. Reform and New Legislation

Recently announced reforms to consumer and competition legislation **are likely to directly impact** the work currently undertaken by PH&P's Trading Standards team.

Consumer and Competition Landscape Reform

In Spring 2012 the UK Government published the Consumer and Competition Landscape Reviews¹⁰. The reviews recommended a number of changes to the provision of advice and help to consumers, changes to UK consumer law enforcement, and to institutions that deal with competition and anti-competitive activities in businesses in the UK.

The reorganisation of UK 'consumer landscape' organisations and 'competition landscape' organisations has begun, with some organisations being replaced, some taking on more responsibility and others having responsibilities reduced:

- **Citizens Advice Service:** significant changes and increased responsibilities including:
 - Responsible for the national co-ordination of consumer advice, information and education about consumers' rights (transferred from Office of Fair Trading)
 - Responsible for the Consumer Service Helpline (replacing the Office of Fair Trading's Consumer Direct helpline)
 - Responsible for consumer advocacy
 - Integration of Consumer Futures (by the end of 2014)
- **Trading Standards Institute:** increased responsibilities including:
 - Responsible for educating business about consumers' rights
 - Launched a replacement for the Office of Fair Trading's Consumer Code Approval Scheme
- **National Trading Standards Board:** a new board responsible for national and cross-local authority enforcement in England and Wales
- **Consumer Protection Partnership:** a new partnership established to ensure a 'joined-up approach' to consumer issues
- **Competition and Markets Authority:** a new organisation which will take over the responsibilities of the Office of Fair Trading and Competition Commission (by the end of 2014)
- **Office of Fair Trading and Competition Commission:** to close (by the end of 2014)

¹⁰ Providing better information and protection for consumers. Department for Business, Innovation and Skills website, 8th April 2013. <https://www.gov.uk/government/policies/providing-better-information-and-protection-for-consumers/supporting-pages/consumer-and-competition-landscape-reform>

- **Scottish Consumer Protection National Enforcement Team:** a new team established to be in charge of enforcement in Scotland

Changes are due to be completed by the end of 2014.

UK Consumer Bill of Rights

In the Queen's Speech of April 2013, Government plans to bring in a new law to clarify and simplify consumer rights were announced¹¹. The proposed bill aims to make consumers better informed and protected when they're buying goods and services.

The bill is intended to make the law clearer in the areas of:

- **Consumer confidence**
 - Clarifying the standards a consumer can expect when they buy something
 - Setting out what to do when goods, services or digital content don't meet those standards
 - Setting out what a seller must tell a consumer before they buy
- **Enforcement**
 - Simplifying enforcement powers
 - Making it easier to tackle rogue traders
 - Making it easier for small businesses to take legal action against bigger companies breaking competition laws

The Trading Standards Institute welcomed the announcement of the bill, stating that "clarity of rights will not only help consumers but also millions of businesses who are often unsure of their legal obligations towards consumers¹²". The Institute did, however, voice caution if changes were to include a dilution of Trading Standards Officer's powers to enter premises unannounced¹³.

The introduction of the Consumer Bill of Rights is likely to **directly impact PH&P's Trading Standards team**, particularly with regard to UK enforcement law.

¹¹ Providing better information and protection for consumers. Department for Business, Innovation and Skills website, 8th April 2013. <https://www.gov.uk/government/policies/providing-better-information-and-protection-for-consumers/supporting-pages/consumer-bill-of-rights>

¹² Consumer Bill of Rights - potential for 'win-win'. Trading Standards Institute website, May 2013. <http://www.tradingstandards.gov.uk/extra/news-item.cfm/newsid/1142>

¹³ Note: the Government has since announced that Trading Standards officers powers to enter premises unannounced will indeed be restricted with the introduction of the UK Consumer Bill of Rights.

EU Consumer Rights Directive 2011/83/EU

The EU Consumer Rights Directive 2011/83/EU¹⁴ was passed in October 2011, with all EU member states required to implement it by December 2013, and apply the legislation to consumer contracts from 13th June 2014.

The Directive aims to **give consumers improved protection** when they purchase goods and services across borders, simplifying and harmonising rules in a limited number of key areas, including:

- Pre-contract information rights
- Traders obtaining the express consent of consumers for any payments which are additional to the main price for the goods or services provided under the contract
- Cancellation rights for distance and off-premises contracts
- Prohibition of excessive surcharges for consumers' use of payment cards and telephone hotlines to the trader
- Clarification of the cancellation rights and obligations of buyers and sellers of digital products

The introduction of the EU Consumer Rights Directive is likely to **directly impact** the advice that **PH&P's Trading Standards team** currently provides to businesses regarding their trading responsibilities.

See also the Key Findings section of this document.

¹⁴ Providing better information and protection for consumers. Department for Business, Innovation and Skills website, 8th April 2013. <https://www.gov.uk/government/policies/providing-better-information-and-protection-for-consumers/supporting-pages/implementing-the-consumer-rights-directive-2011-83-eu>

4. Vulnerable Individuals

Anybody can become vulnerable at any time.

This document focuses on the theme of trading standards and vulnerable individuals. But **who are the vulnerable individuals** that Trading Standards services are protecting, and what from?

There does not appear to be a single definition of a vulnerable individual.

According to Adult Care and Support¹⁵ a vulnerable person is “a person who is or may be **in need of community care services** by reason of mental or other disability, age or illness, **and** who is or may be **unable to protect him or herself against significant harm or exploitation**”.

However, The City of London Police and Social Care Institute for Excellence¹⁶ explain that, **with regard to financial abuse and crime, “it does not follow automatically** that all those who are in receipt of, or in need of, social care are unable to safeguard themselves from harm or exploitation. Nor does it follow that those not considered eligible for social care services are able to protect themselves from financial abuse and crime.”

Research from Consumer Focus and Citizens Advice Service research¹⁷ also highlights that, when considering consumers, **“people’s circumstances change and anybody can become vulnerable at any time**, for example through job loss or bereavement”.

In the context of trading standards, it seems relevant to focus on what is referred to as the ‘vulnerable consumer’.

¹⁵ See Appendix 3

¹⁶ Assessment: Financial crime against vulnerable adults. City of London Police, Social Care Institute for Excellence, November 2011

¹⁷ Tackling Consumer Vulnerability: An action plan for empowerment. Jonathan Stearn, Consumer Focus, March 2012

Vulnerable consumers

Definitions of Vulnerable Consumers	
Consumer Focus and the Citizen's Advice Service¹⁸	People who cannot choose or access essential products and services which are suitable for their needs or cannot do so without disproportionate effort/cost/time.'
BIS/Cabinet Office¹⁹	'Government has traditionally avoided defining a 'vulnerable' consumer as we can all be vulnerable at different stages of our lives or depending on the type of goods and services we are purchasing.'
BSi's new standard on 'inclusive service'²⁰	'The condition in which a consumer is at greater risk of mis-selling, exploitation or being put at a disadvantage in terms of accessing or using a service, or in seeking redress.'
Eurobarometer report²¹	'The extent of vulnerability of an individual consumer depends on the interaction between the consumer's individual combination of characteristics on the one hand and marketing practices on the other.'
Citizen's Advice Service²²	'Vulnerability should be identified through understanding risk factors, awareness of behavioural triggers, and a recognition of the potential barriers caused by existing systems.'

Source: Tackling Consumer Vulnerability: An action plan for empowerment. Jonathan Stearn, Consumer Focus, March 2012

According to The Consumer Protection from Unfair Trading Regulations 2008²³, consumers are only treated as vulnerable, to a practice or to the underlying product, if they are vulnerable because of **infirmary, age or credulity** (see Appendix 4).

However, alternative sources^{24, 25} have identified a **range of conditions and circumstances** which may also **increase the risk of a person being, or becoming, vulnerable** (to commercial practices), including:

¹⁸ Tackling Consumer Vulnerability: An action plan for empowerment. Jonathan Stearn, Consumer Focus, March 2012

¹⁹ Better Choices: Better Deals. Consumers Powering Growth. Department of Business Innovation & Skills and Cabinet Office, April 2011

²⁰ Inclusive service provision – Requirements for identifying and responding to consumer vulnerability, BS 18477, BSi, 2010

²¹ Special Eurobarometer 342 Consumer Empowerment. European Commission, April 2011

²² Access for all: The importance of inclusive services. Citizens Advice Bureau, March 2011

²³ Guidance on the Consumer Protection from Unfair Trading Regulations 2008. Office of Fair Trading, 2008

²⁴ Tackling Consumer Vulnerability: An action plan for empowerment. Jonathan Stearn, Consumer Focus, March 2012

²⁵ Assessment: Financial crime against vulnerable adults. City of London Police, Social Care Institute for Excellence, November 2011

- Lack of self-confidence
- Low literacy, numeracy and/or financial capability
- Low/insecure income; Low levels of financial capability (ability to deal with financial products and services)
- Being unemployed
- Being responsible for high levels of care for another person; Dependency on others to manage care of finances
- Having a physical impairment
- Having mental health problems; Cognitive impairment having an impact on decision-making
- Living in social rented housing
- Living in a lone parent household
- Lack of capacity to know what's happening, including non-English speaking
- Bereavement/social isolation/loneliness, which may provide an opportunity for exploitation
- Gullibility/over-trusting nature
- For older people in particular, potentially increased assets coupled with low cost lifestyles and a lack of awareness of the modern world may make them more susceptible

Everyone experiences life differently and, therefore, will face different situations, circumstances and risks at different times. As The Financial Services Consumer Panel²⁶ explains, although some groups of individuals (and consumers) are identified as likely to experience a greater level of risk than others “**it is unlikely that everyone who falls into one of these (vulnerable) categories faces the same level of risk.** It is also unrealistic... to assume that everyone in these categories will experience being a consumer in the same way”.

With this in mind, safeguarding individuals and communities from illegal trading activity is a significant challenge: **anybody can become vulnerable at any time.**

²⁶ FSCP Defining consumer vulnerability and disadvantage, December 2012

Safeguarding vulnerable consumers

We should be upstream of abuse, not downstream picking people out of the river.²⁷

Protecting vulnerable consumers is a priority for Trading Standards services.

Although there is evidence²⁸ that UK Trading Standards services work with the Police and other agencies to try and combat illegal trading, fraudulent crime and other activities, it is recognised that a greater level of **collaboration and coordination between agencies** would increase the level of advice, support and safeguarding offered to vulnerable adults (consumers).

Case Study 3: Angus Council

Angus Council Policy on Financial Harm (May 2013)

- Angus Council has seen a **cross departmental partnership** develop between Trading Standards and Social Work, to address the problem of financial harm, especially to Angus' more vulnerable adults. This partnership has seen over 70 awareness raising presentations given to different groups, and Trading Standards now work directly with some Social Work cases of adults at risk of financial harm.
- The Angus Adult Protection Committee oversees the work of the **financial harm sub-committee**, a multi agency partnership of Officers from Tayside Police, Angus Council (Social Work and Trading Standards), a sub post mistress, and the private and voluntary sectors. The main focus of work of the sub-committee is implementing a significant campaign of public education. Amongst other innovative work being developed is the testing of devices designed to block scam phone calls or other nuisance callers.
- Angus Council are considering the adoption of a **formal policy on financial harm**, to generate further publicity to highlight issues and consider responses to them.
- Recommendations include that Officers in both Social Work and Trading Standards continue to work with partners, to reduce the amount of financial abuse in Angus, through a vigorous prolonged campaign of publicity, enforcement and support for victims.

Source: Angus Council Policy on Financial Harm. Report by Chief Executive, 9th May 2013

²⁷ Pete Wild, Senior Manager Professional Practice, Directorate of Adult Care and Support, Cornwall Council. Promoting Independence: Safeguarding the Vulnerable Conference. Cornwall College, 27th March 2013

²⁸ Operation Rogue Trader 2013. Trading Standards press release, 24th April 2013

Case Study 4: Fraud and Financial Investigations, North Yorkshire CC Trading Standards & Planning Services

Doorstep crime: Partnership Working

- Staff in the Fraud and Financial Investigations team of North Yorkshire County Council Trading Standards and Planning Services **work closely with colleagues in Health and Adult Services**, regularly making safeguarding referrals in relation to vulnerable adults (and doorstep crime) that the team have identified. The Trading Standards and Planning Services team regularly attends case conferences, in relation to those adults, until issues are resolved.
- In addition, the **Vulnerable Persons Intervention Partnership** has been set up to enable the Trading Standards and Planning Services team to refer and link up identified vulnerable people to other agencies, for example Adult Services or the Fire and Rescue Service.
- Further planned activities outlined in the Fraud and Financial Investigations Team Plan 2012/13 include to:
 - Undertake partnerships with appropriate agencies (e.g. WRVS, the Alzheimer's Society, Meals on Wheels, District Councils providing community alarms systems) to provide education regarding doorstep crime and encourage reporting of incidents.
 - Actively carry out a media campaign to encourage doorstep crime reporting.
 - Undertake publicity campaigns including through the use of till roll campaigns and similar initiatives, posters and leaflets in locations such as GP surgeries, post offices, pharmacies etc to encourage reporting of doorstep crime.
 - Utilise existing mechanisms for issuing doorstep crime alerts, for example the police Ringmaster system.
 - Carry out safeguarding assessments of all doorstep crime victims with a view to target hardening, re-empowerment, provision of aftercare services and prevention of re-victimisation of victims.
 - Participate in the Vulnerable Adults Pilot operated by Health and Adult Services and North Yorkshire Fire and Rescue and others.

Source: Ruth Andrews, Head of Fraud and Financial Investigations. North Yorkshire County Council Trading Standards and Planning Service, 28th May 2013; North Yorkshire County Council Trading Standards and Planning Service, Fraud and Financial Investigations Team Plan 2012/13

Case Study 5: Doorstep Crime Team, Oxfordshire County Council

Doorstep crime: Partnership Working

- The **Doorstep Crime Team in Oxfordshire County Council's Trading Standards Service** has a local Police Officer seconded within the team.
- The Police Officers' secondment has helped the Doorstep Crime Team work closely with local vulnerable victims of doorstep crime, including enabling victim's statements to be obtained via video technology.
- In addition, and perhaps most notably, the secondment of the Police Officer, and his/her **attendance at each call out made** by the Doorstep Crime Team, has **enabled the immediate arrest of doorstep crime offenders**.
- Oxfordshire County Council's Trading Standards Service comments that the addition of the seconded Police Officer, to the Doorstep Crime Team, has possibly **doubled the overall success the team would have had** in tackling the problems of doorstep crime in the county. See also Appendix 5.
- The partnership between Oxfordshire County Council's Trading Standards Service and Thames Valley Police has also benefited from **effective intelligence sharing**:
 - An increase in the number of doorstep crime investigations being undertaken by Thames Valley Police Scenes of Crime Officers, resulting in offenders being identified by fingerprints and DNA samples
 - Access to Custody Suite (video identification technology) by the Trading Standards Doorstep Crime Team
 - Access to Thames Valley Police intelligence databases, by the Trading Standards Doorstep Crime Team, to support effective cross-checking of sources

Source: Martin Woodley MBE, Team Leader, Doorstep Crime Team, Trading Standards Service, Oxfordshire County Council

5. Threats to Vulnerable Consumers

What are the possible threats?

There are **numerous examples** of illegal trading, scams and fraudulent activities that could pose a threat to individuals and communities. Types of threats are constantly evolving (see the Emerging threats section of this document) and are often not reported (see the Reporting of incidents section of this document) making it difficult to compile a comprehensive and timely list.

See **Appendix 6** for a list of examples of some common threats currently known, and **Appendix 7** for 'A quantitative segmentation of the UK population', detailing the types of fraud certain population segments may experience.

Reporting of incidents

Due to the nature of certain crimes being hidden in the community, it is acknowledged that **an incident does not always result in a crime being recorded**. For example, in 2011/12 nearly 7,450 incidents of domestic abuse were reported in Cornwall. However, it is estimated that the incidence figure is actually nearer 19,100, with 9,200 victims²⁹.

The incidence, and victims, of fraud, scams, illegal money lending and illegal trading activities are **likely to be significantly under-reported**. Victims may not know they have been targeted by a scammer, they may not wish to admit to having fallen victim, or personal circumstances may deter them from wanting to involve 'the authorities' in their affairs. Even if reported, these types of crimes may mistakenly be dismissed as 'civil disputes' between householders and tradesmen, and therefore fail to be officially recorded³⁰.

The Trading Standards Institute³¹ reports that the number of complaints about uninvited doorstep selling, for example, is "**likely to be only the tip of the iceberg as many cases will go unreported**. Some victims of doorstep crime have told Trading Standards Officers they feel they may be forced into residential care if they admit to being unable to fend for themselves."

As stated on the Think Jessica website³²: "£3.5 billion is estimated as being lost to (mail) scams each year; however **only one in five cases is reported**".

²⁹ Community Safety Partnership Strategic Assessment 2012/13, Safer Cornwall

³⁰ Nigel Strick, Fair Trading Team Manager, Cornwall Council

³¹ Stay safe and say NO to cold calling doorstep traders. Trading Standards Institute press release, 12th November 2012

³² Think Jessica website. <http://www.thinkjessica.com>

'Suckers lists'

Repeat targeting is a particular and significant problem experienced by victims of illegal trading. Rogue traders, for example, tend to **network closely with each other**, passing on 'willing' customers addresses and details to fellow traders.

In the case of scam mail, scammers buy an **address list from a 'list broker'** (for example Readers Digest³³) and identify target groups, for example those interested in psychic phenomena. Those who respond are added to a 'suckers list' and the scammer sells the names on to other con artists. Respondents will typically then find themselves deluged by scam mail³⁴.

The Think Jessica campaign³⁵ highlights the fact that scams are not only directed at specific targets, but are **advertised in national magazines**, for example 'Chat' and 'Yours'. These adverts typically do not ask for money but anyone responding will likely receive a spin-off letter from a 'world famous psychic' claiming she is going to Lourdes to pray, or similar. Respondents are asked for their personal details, including names of grandchildren and pets. These details are then entered on 'suckers lists'.

Prevalence of threats

As previously discussed, incidence of illegal trading activities are likely to be significantly under-reported due to a number of reasons. Types of crimes and threats are also constantly evolving, making it difficult to track prevalence.

Indeed, several Trading Standards colleagues and professionals, contacted for the purposes of this document, commented on the **problems of obtaining comprehensive intelligence (figures and statistics)** on the prevalence of illegal trading activities in the UK.

Appendix 8 attempts to give a snapshot of the size of some of the illegal trading problems in the UK, produced from figures gathered from a variety of sources.

See also the Intelligence section of this document.

³³ Think Jessica website. <http://www.thinkjessica.com/>

³⁴ 'Clairvoyant' conmen reap millions by preying on weak and vulnerable. The Observer, 25th February 2007. <http://www.guardian.co.uk/money/2007/feb/25/scamsandfraud.observercashsection>

³⁵ Think Jessica website. <http://www.thinkjessica.com/>

Emerging threats

“If you are desperate and the kids have not eaten for three days, if a person comes to the door offering a loan, they’ll seem like the Messiah.”³⁶

The **global economic downturn**, and subsequent **UK recession**³⁷, has had a direct impact on UK households, hitting employment and costs in fuel, transport and food. The state of the UK economy remains subdued³⁸, suggesting that the financial wellbeing of individuals and households is unlikely to significantly improve in the short-term.

In addition, recent changes to the UK benefits system, through the **Welfare Reform Act 2012**, are predicted to have a **significant impact** on the financial capacity of some individuals and households, with 2 million households estimated to have lower entitlements under Universal Credit alone³⁹.

The Citizens Advice Service reported that, in the third quarter of 2012/13, benefit and tax credit advice accounted for a **record 37% of all problems** that the service advised on, with Employment and Support Allowance advice driving the increase⁴⁰. Debt accounted for 29% of all problems advised on.

A recent study by the Institute of Fiscal Studies⁴¹ states that the full impact of falls in real income for low income families are occurring now or are still to come. **Those earning less than £12,000 a year will see their spending power fall by 4.5%** between 2011-12 and 2015-16, partly due to changes to the benefits system.

In times of austerity, **consumers** may be more **willing to take risks**⁴², looking for ‘bargains’ and opportunities to save money. Individuals may be tempted to use cheaper tradesmen, buy second-hand products, borrow money, or even purchase illegal products.

Each of these activities potentially exposes an individual to increased health and safety risks, as well as threatens the health of the local economy.

As financial pressures on individuals increase, so do threats to the safety of those individuals.

³⁶ Britain's poorest city: The struggle to make ends meet. BBC website, 31st May 2013
<http://www.bbc.co.uk/news/business-22623964>

³⁷ See Appendix 1

³⁸ Bank of England upgrades economic growth forecasts. BBC website, 15th May 2013
<http://www.bbc.co.uk/news/business-22539965>

³⁹ Welfare reform research: Understanding and preparing for the impacts on people, places and services. Cornwall Council, December 2012

⁴⁰ Advice Trends Quarter 3 2012/13 (October-December 2012). Citizen’s Advice Service

⁴¹ Families to be £1,800 a year worse off by 2015, IFS says. BBC website, 4th June 2013
<http://www.bbc.co.uk/news/business-22765940>

⁴² Trading Standards: How cuts are putting individuals and communities at risk and damaging local businesses and economies. UNISON, November 2012

Research^{43, 44} also suggests that some **rogue traders** may be **becoming more confident** in their practices. The increased financial difficulties of their potential customer base, and the possible reduction in proactive investigative work undertaken by local Trading Standards services, could significantly increase market opportunities for the illegal trader.

Examples⁴⁵ of illegal trading practices and scams, which have emerged since the recession, include:

- **Training and job ploys:** paying for a phantom training course with the false promise of a job, or working on a commission basis only to find the firm is a fake and they don't make any money
- **Dangerous debt help:** offers of loans or help to clear debts, carrying an upfront fee, but the loan or help never appears

Affordable credit

The lack of access to affordable credit, possibly due to a poor financial credit history, **could push an individual into the arms of a wide range of sub-prime providers**, including local doorstep operations and 'loan sharks'⁴⁶.

Loan Sharks

Loan sharks are illegal money lenders, often charging very high interest rates, and sometimes using threatening and violent behaviour. The Illegal Money Lending Team, England work to identify, investigate and prosecute loan sharks (see also the Campaign examples section of this document). Case studies, received from The Illegal Money Lending Team, England, highlight the dangers that loan sharks can pose to individuals, families and communities.

⁴³ Trading Standards: How cuts are putting individuals and communities at risk and damaging local businesses and economies. UNISON, November 2012

⁴⁴ Rogues enjoying a double-dupe recession. Citizens Advice press release, 1st May 2013

⁴⁵ Rogues enjoying a double-dupe recession. Citizens Advice press release, 1st May 2013

⁴⁶ Tackling Consumer Vulnerability: An action plan for empowerment. Jonathan Stearn, Consumer Focus, March 2012

Case Study 6: The Illegal Money Lending Team, England

Mike's Story

Aged 17, Mike* was keen to buy his first car. When Peter* offered to lend him £250, Mike agreed and began paying back in instalments until the loan was repaid. It was only then that Peter mentioned additional interest, Mike wasn't expecting this and found it difficult to repay, so Peter offered him a further loan to pay off the first.

This became a cycle and continued over the next two decades, which Mike described as "sheer hell". He was trapped in a never ending spiral of debt, and struggled to get by, despite working two jobs. He would make large repayments but his outstanding balance would never drop below £9,000.

Over the years, **Mike paid a staggering £90,000 to the loan shark, all from an initial loan of £250.** This had a hugely detrimental impact on Mike and his family. The loan shark attacked Mike in front of his children. He lost his home as he couldn't pay the mortgage, and three jobs due to depression. Aged 33, he suffered a stress-related heart attack. On more than one occasion Mike attempted suicide.

"You wouldn't wish it on anybody. It affected my relationship with my wife. If I wasn't at work I was home arguing, and it affected the kids. They had nothing. Every Friday and Saturday he was sat outside my work – if I finished late he would text saying 'It's payday where are you'. It was a living nightmare".

The turning point was when Mike spotted an article in his local paper about a loan shark who had been prosecuted by The Illegal Money Lending Team, England. Peter was now threatening to harm Mike's wife and, realising he couldn't take any more, Mike called The Illegal Money Lending Team, England's confidential hotline. From that point forward he was supported and Peter was prosecuted and imprisoned.

"I wish I'd known there was somewhere to go years ago. The Team were fantastic. They offered so much support, and every promise they made they delivered. It was such a relief when I found out Peter was arrested and then put in prison. I nearly broke down when the team rang to say".

"I would tell anyone who is borrowing from a loan shark to be confident to stand up and speak-out. The Team will support you the whole way. Even a year later the Team are always there for me, regularly in touch and always on the end of the phone".

"Life is absolutely fantastic now – we don't have to worry about money any more and I'm happier than I've ever been. We're going on holiday as a family for the first time in 17 years. I can't imagine ever being able to do this before. Contacting the Team is the best thing I could ever have done. I'm living the life I should be living".

Source: Illegal Money Lending, England. * Names have been changed

Case Study 7: The Illegal Money Lending Team, England

Jayne's Story

Single mum of two Jayne*, worked in the local pub, but pulling pints never earned her quite enough to pay the bills.

After confiding in one of the regulars about her troubles, she was given a number for someone who could help her out. Dave* offered her a £500 loan. He would come to her home and collect £25 a week as repayment. Jayne **signed a piece of pink paper to agree to this, convinced that he must be legitimate because he had paperwork.**

However, Jayne then moved home and was not able to work. Her priority was to feed the kids, so she asked Dave if she could have a break in the payments.

He said no, but **offered her another loan for £1,500**, landing her in more financial hot water.

Dave had a proposition for her. He had some work she could do, not bar work but working topless in a massage parlour and offering 'extras'. She was not willing to get involved, but as her situation grew worse, through desperation and fear of what Dave may do to her, she gave him a call.

This is when he came to her home and raped her. After this she still continued to pay what she could. She fell into deep depression and was admitted to hospital.

Jayne said *"I deeply regret ever taking a loan out with this man. The last few months have been a nightmare. I have never felt in such a helpless situation"*.

However, her story does have a positive ending. A leaflet was posted through her door and she contacted the Illegal Money Lending Team, England. From that moment on she was supported 100%. Now the man who lent her money is behind bars, and Jayne is going from strength to strength.

"The Stop Loan Sharks team have supported me through an emotional time. I was enrolled in counselling to help with my confidence and self esteem, and now have savings for the first time in my life through the local Credit Union. I have received budgeting and debt counselling advice from the Citizens Advice Bureau, and am now in full time employment, am doing a Level 2 NVQ and am off benefits. I now no longer just exist but live my life and look forward to the future. I am happier than I've ever been".

Source: Illegal Money Lending, England. * Names have been changed

Payday Lenders

Payday lenders have recently been highlighted as one of those sub-prime providers potentially luring people into taking on debt that can balloon out of control. Payday loan companies **are regulated** and require a consumer credit licence from the Office of Fair Trading.

In their recent review⁴⁷ of the payday industry, the Office of Fair Trading stated they were concerned by the evidence of irresponsible lending within the industry, and particularly that “too many people are given loans they cannot afford, and when they can’t repay (the loan), are encouraged to extend them, exacerbating their financial difficulties”. The review⁴⁸ commented that this irresponsible lending practice was “**causing real misery and hardship for a significant number of payday users**”.

The value and number of payday loans has grown rapidly in recent times:

- **1% to 10%:** percentage of Citizens Advice Bureau debt casework clients with at least one payday loan (growth from **Q1 2009/10 to Q1 2012**)
- **3.7% to 17%:** proportion of StepChange Debt Charity clients with payday loan debts (growth from **2009 to 2012**)

⁴⁷ Payday Lending. Compliance Review, Final Report. Office of Fair Trading, March 2013

⁴⁸ Payday Lending. Compliance Review, Final Report. Office of Fair Trading, March 2013

Q&A: Payday loans

- An Office of Fair Trading review in March 2013 stated that there was widespread irresponsible lending in the UK payday lending industry.
- Payday loans typically offer very high interest rates, with loans being extended or rolled over if payments cannot be made.
- Size of the market
 - Estimated **worth between £2 and £2.2 billion** in 2011/12 (estimated £900 million in 2008/09)
 - Estimated between 7.4 and 8.2 million new loans issued in 2011/12
 - Average **loan is between £265 and £270** and is borrowed over 30 days
 - Average **cost of borrowing £100: £25** (although ranges from £14 to £51)
 - Approximately **240 payday loan firms** operate in the UK, with the top 50 accounting for most of the lending
- Who uses them?
 - Borrowers are not normally unemployed or without a bank account. Payday short-term loans are often seen as alternatives to (often refused) bank loans or overdrafts, and are fast and convenient.

Source: Payday Lending. Compliance Review, Final Report. Office of Fair Trading, March 2013; Q&A Payday loans. BBC website, 31st May 2013
<http://www.bbc.co.uk/news/business-16067283>

Case Study 8: Nottingham City Council Affordable loan scheme (June 2013)

- Nottingham City Council has teamed up with Nottingham Credit Union to provide an **affordable alternative to expensive payday loans** for citizens facing financial hardship.
- The Emergency Hardship Loan Scheme provides households with access to responsible lending of between £50 and £500. It is designed as a temporary measure to help in emergency cases, and has a maximum APR of 26.8% (compared to a payday lenders typical fee and APR ranging from 1500% to 4000%).
- Applications are made through Nottingham City Council and processed by Nottingham Credit Union.

Source: Affordable loan for Nottingham citizens facing hardship. Nottingham City Council press release, 3rd June 2013
<http://m.nottinghamcity.gov.uk/index.aspx?articleid=23653>

Case Study 9: Various Local Authorities Blocking Payday Lender Websites

- A councillor from Cheshire East council has called for **access to payday loan websites, from council computers** (e.g. in libraries, offices, community facilities), **to be blocked**, to help protect vulnerable residents.
- At the end of 2012, Dundee City Council blocked access to payday loan websites from all local authority computers. The Council is promoting the use of the local Discovery Credit Union.

Source: Councils urged to block access to payday lenders. LocalGov.co.uk, 29th May 2013. <http://www.localgov.co.uk/index.cfm?method=news.detail&id=109952>; Dundee cracks down on payday loans websites. LocalGov.co.uk, 20th December 2012. <http://www.localgov.co.uk/index.cfm?method=news.detail&id=108269>

Ageing population

Older people are recognised as a segment of the population vulnerable to illegal trading practices and scams^{49, 50}.

The population of the UK is growing in size and becoming increasingly older. **By 2035 the number of people aged 85 and over** is projected to be almost 2.5 times larger than in 2010, **reaching 3.5 million** and accounting for 5% of the total population (people aged 65 years and over are projected to account for 23% of the total population)⁵¹.

In addition, the Alzheimer's Society reports⁵² that **by 2025 over 1 million people in the UK will have dementia**. Also see Appendix 9.

The average age of a victim of distraction burglary is 81 years⁵³, with a victim 2.4 times more likely to be in residential care, in the 2 years following a distraction burglary offence, compared to their neighbour⁵⁴.

The City of London Police and Social Care Institute for Excellence⁵⁵ reports that a national prevalence study (of financial crime) found that **financial abuse is the second most common type of abuse experienced by the elderly in the UK**.

⁴⁹ Age UK website, June 2013

⁵⁰ A quantitative segmentation of the UK population: Helping to determine how, why and when citizens become victims of fraud. National Fraud Authority, June 2011

⁵¹ Topic guide to: Older people. UK National Statistics website, June 2013.

<http://www.statistics.gov.uk/hub/population/ageing/older-people/index.html>

⁵² Dementia 2012: A national challenge. Alzheimer's Society, June 2013.

⁵³ Crimestoppers website. <http://www.crimestoppers-uk.org>

⁵⁴ Operation Liberal comment

⁵⁵ Assessment: Financial crime against vulnerable adults. City of London Police, Social Care Institute for Excellence, November 2011

Approximately 1% (86,500) of people aged 66 and over were subjected to financial abuse over a studied 12 month period.

As the number of older people in the population increases, so do demands on safeguarding them effectively.

6. Tackling the Problem

In addition to the day-to-day operations and initiatives co-ordinated by Trading Standards professionals throughout the UK, there are **numerous national organisations and campaigns dedicated to tackling fraud, scams, illegal money lending and illegal trading activities**. Below are just a few examples.

As has been previously mentioned, joint partnership working is a theme regularly repeated in commentary about how best to tackle the prevalence and affects of illegal trading in the community.

Campaign examples

Case Study 10: Angus Council

Call Blocking Pilot: Unwanted Telephone Calls

- Angus Council are undertaking a pilot project using **call blocking technology to help tackle the problem of unwanted telephone calls**. Current technology on the market is estimated to be able to block around 50-95% of calls made to a single telephone number.
- The pilot is being targeted at vulnerable adults, for example in sheltered housing. Initial results show that (for some participants): 70% of calls received were unwanted; approximately 14% of calls received were from robots.
- Angus Council believe unwanted calls cause stress to vulnerable people and can increase the fear of crime, particularly burglary. The use of call blocking technology could maintain vulnerable people in their own homes, and assist in their overall health and wellbeing.
- The pilot is currently aimed at highlighting the use of call blocking technology as a possible crime prevention and evidence gathering tool.

Source: Brian Smith, Senior Trading Officer, Angus Council Communities Department (Environment and Consumer Protection)

Case Study 11: Cumbria County Council

Nominated Neighbour Scheme

- Cumbria's Trading Standards Team runs the free **Nominated Neighbour Scheme**, an initiative to help householders within the community to feel safer when dealing with unwanted or unexpected callers to their home address.
- The scheme works by the vulnerable person being given a specially developed card, that they hold up to a window or door, which advises any **unidentified or unexpected caller** to go to the address of a 'Nominated Neighbour' who will check the callers identify and, if they are genuine, return with them and supervise the visit to make sure that nothing untoward takes place and will remain there until the caller has left. When the card is shown to the caller, it replaces any need for the occupant to enter into conversation with that person.
- Cumbria's Trading Standards Team believes the scheme will help limit the opportunity for rogue doorstep callers to con their way into homes, or persuade residents to have unnecessary home improvements, by failing to give callers direct access and by making them aware that the local community are alert to their activities.
- In addition, the scheme encourages residents to look after each other and report suspicious activity.

Source: Angela Jones, Trading Standards Service Manager, Cumbria County Council

Case Study 12: Cumbria County Council

No Cold Calling Zones

- Cumbria's Trading Standards Team has introduced '**No Cold Calling Zones**' to reduce the number of cold callers (distraction burglars and rogue traders) operating in certain local community areas.
- The Trading Standards Team has taken a multi-agency 'task force' approach to help **tackle the issue of doorstep crime** in the community, comprising of:
 - Local residents: encouraging residents to report all cold callers and incidents
 - Cumbria County Council: Trading Standards are the lead agency for the scheme
 - Cumbria Police: providing field support to Trading Standards and an intelligence-gathering role
 - Neighbourhood Watch: acting as a local liaison for information sharing
- Each 'No Cold Calling Zone' is highlighted with large rectangular signs fitted to lamp-posts, giving contact details of Cumbria Trading Standards. Any call received by the Trading Standards Team, concerning cold callers in a 'No Cold Callers Zone', is treated as a priority call, with action taken where any crime, illegal trading or misrepresentation has taken place, and details of all cold callers and their vehicles taken and checked with the Police National Computer and other databases. Details are also passed to HM Revenue and Customs and the Department for Work and Pensions for further investigation.

Source: Angela Jones, Trading Standards Service Manager, Cumbria County Council

Action Fraud: The Devil's in Your Details

- Recognising the growing threat of fraud, Government has come together with leading industry players to help people better protect themselves.
- In the first campaign of its kind, involving both the private and public sectors, **The Devil's in Your Details campaign** brings together Action Fraud, The Telecommunications UK Fraud Forum and Financial Fraud Action UK – the name under which the financial services industry coordinates its fraud prevention activity, in a powerful demonstration of what can be achieved when industry and government work together.
- The National Fraud Authority backed campaign is **raising awareness of the importance of protecting personal information** and aims to remind the public to check that who they share their details with is genuine, whether this be on the phone, in person or online.
- The Devil's in Your Details campaign encourages consumers to suspect anyone or anything they are uncertain about, to keep asking questions and to challenge or end an engagement if it feels uncomfortable.
- As an introduction to a wider campaign against fraud, this awareness activity aims to increase reporting of fraud, making it harder for fraudsters to target consumers in the future.

Source: Action Fraud website, June 2013. <http://www.actionfraud.police.uk/>

Not Sure? Don't Open the Door!

- In April 2013, Police from across the UK joined forces with Trading Standards services and other Government agencies in a **campaign to target rogue traders and highlight the dangers of consenting to have work carried out by cold callers.**
- The day of action was part of a week of activities led by **Operation Liberal**, the national intelligence unit for distraction burglary and associated travelling criminality, and Trading Standards.
- The Trading Standards Institute said "We see evidence of links between cold calling rogue traders and distraction burglaries and have found vulnerable consumers being targeted".
- The last Rogue Trader Operation in 2011 saw over 200 people arrested, £450,000 worth of property recovered and nearly 10,000 vehicles inspected. A roof job was discovered that started off as a broken tile; the final bill came to £25,000.

Source: Operation Rogue Trader 2013. Trading Standards Institute, press release, 24th April 2013

Buy with Confidence Scheme

- In **response to concerns about 'rogue traders'**, partnerships of Local Authority Trading Standards services have taken a ground-breaking step by putting together the Buy with Confidence scheme.
- Buy with Confidence provides consumers with a list of local businesses which have given their commitment to trading fairly. It is **aimed to help members of the public find trustworthy and reputable local businesses** when they're looking for goods and services.
- Already operated by Trading Standards services in more than 50 local authorities, Buy with Confidence is currently the largest (membership) Approved Trader scheme in the UK. Members undergo a series of detailed checks by Trading Standards officers before being approved.
- Approved members enjoy several benefits including being able to use the Buy with Confidence logo in advertising and marketing materials, and being listed on the Buy with Confidence and Which? local websites.

Source: Buy with Confidence, Patio Report. John Tutchier, Public Health and Protection, Cornwall Council, 23rd May 2013

Think Jessica: Scam Mail

- The Think Jessica campaign was started in 2007 by Marilyn Baldwin, Jessica's daughter. It is a registered charity, committed to **making people aware of the danger and financial implications caused by postal and telephone scams**, educating professionals and protecting the most vulnerable members of society from illegal practices.
- Jessica's Story
 - During the last 5 years of her life, the Royal Mail delivered **approximately 30,000 scam letters** to Jessica, of which she spent most of her time reading, sorting and responding to.
 - It is estimated that Jessica **could have sent as much as £50,000** to scammers over the period, believing the 'big win' she was promised was just around the corner.
 - Jessica wanted to financially help the ones she loved and donate money to the children's charities she cared about.
 - Scammers would contact Jessica via letters and phone calls.
 - She befriended one particular 'clairvoyant' from Holland, sending personal letters along with payments.
 - Some clairvoyants used fear to extract money from Jessica, claiming that evil was upstairs in her house, as she had been unable to cover the fee to keep the evil away. As a result, Jessica became breathless and fearful every time she tried to go upstairs.
 - Jessica invested so much money into the run up of one particular 'huge pay out', and had promised to gift money to so many people, that she couldn't focus her mind on anything else, often sitting up into the early hours of the morning to meet demands.
 - Convinced of the authenticity of the scams, Jessica refused any help offered and threatened to disown family members if they tried to interfere.
 - She would go without buying food, rather than miss a scam payment. She stopped paying domestic bills, and sent nearly all of her pension each week to pay scam demands.
 - **Jessica died in 2007, aged 83 years.** Her daughter believes the torment the scammers inflicted on Jessica's mental and physical health contributed to her death.

Source: Think Jessica website, June 2013. <http://www.thinkjessica.com>

Illegal Money Lending Team, England

- The Illegal Money Lending Team, England was initially set-up as a criminal enforcement team. However, preventative education around the dangers of becoming involved with Loan Sharks was quickly identified as a priority need so, to this end, the team also run a number of initiatives and projects:
- **Community projects funded through proceeds of crime money from convicted Loan Sharks**, including: young people putting on a Stop Loan Sharks play; graffiti arts project; football tournaments where people have designed a shark mascot and then scored goals past it.
- **Incentive schemes to join the Credit Union:** The aim behind this initiative is to ensure people have savings with the Credit Union so they can borrow safely in the future. The Illegal Money Lending Team, England target areas that have been affected by, or are at risk of, Loan Sharks and offer an incentive (£20) if people join the Credit Union and save regularly for three months. Research has shown that 2 years later, 80% of accounts still have regular savings put into them, showing that the incentive can help change behaviour.
- **Work to target men:** The Illegal Money Lending Team, England have found that men are just as likely as women to use Loan Sharks, but significantly less likely to report incidents. As part of Men's Week June 2013, 70 projects were run by The Illegal Money Lending Team, England, across the country, targeting gyms, boxing clubs, Dads Sessions at Children's Centres and football tournaments.
- **Weeks of Action:** Alongside partner agencies, The Illegal Money Lending Team, England plan to conduct a week long campaign, in targeted estates or towns in England, with the aim of bombarding people with the Stop Loan Sharks message. Events include: community advocate training for residents; questionnaires lead by Housing representatives; Stop Loan Sharks beer mats placed in pubs; door-knocking exercises with PCSO's; banner-making by school children. The Illegal Money Lending Team, England aim to generate intelligence and reinforce the preventative message during the campaign.
- **Schools work:** In October 2013 The Illegal Money Lending Team, England plan to launch School Work - lesson plans for key stages 1-5 around financial awareness and why not to use Loan Sharks. Lessons will include a cartoon featuring a penguin character that borrows from a shark (and gets into all kinds of trouble, until a Trading Standards Polar Bear comes to the rescue, and all the penguins join to form a Credit Union!). The aim of the campaign is to not only educate young people about the dangers of Loan Sharks, but to encourage them to take the message home and spread awareness.

Source: Catherine Wohlers, Illegal Money Lending Team, England

In addition, it has been suggested that a number of national pilot projects and reports, particularly around scams and fraud, may be announced this year, for example regarding the sharing of national intelligence between local authorities, and raising awareness among partners, including the Royal Mail and bank staff.

Sentencing

Existing UK guidelines for sentencing of financial crimes are based on the amount of money involved in the crime or fraud. However, as reported in June 2013⁵⁶, under new guidelines from the UK's Sentencing Council, **sentences for some financial crimes in England and Wales would consider the crimes impact on victims, and whether they were vulnerable**, rather than simply on the amount of money involved.

Research from the Sentencing Council showed that fraud could have a great impact on victims, even if the financial loss was relatively small. The new guidelines would apply to crimes ranging from fraud and insurance scams to money laundering and bribery.

Intelligence

Accurate and timely information is crucial to tackling illegal trading in communities. Trading Standards services, for example, have access to **Memex** and the **National Trading Standards Intelligence Database**, and several national organisations gather 'incident specific' intelligence. However, it has been suggested that a central **cross-agency** hub for illegal trading activity intelligence, including standardised recording protocols and methods, may also further aid effective enforcement work.

There are examples of individual Trading Standards services in the UK that have developed their own 'illegal trading' incident intelligence recording protocols and systems.

⁵⁶ Fraud sentences could focus on harm. BBC website, 27th June 2013. <http://www.bbc.co.uk/news/uk-23073410>

Case Study 13: North Yorkshire County Council

Doorstep Crime Recording (Flare)

- The Fraud and Financial Investigations team within North Yorkshire County Council Trading Standards and Planning Services **record incidents of doorstep crime** on the Flare database. Data is recorded and reported to help prioritise work and monitor crime trends.
- Details added to a new complaint record in Flare include:
 - D99 Doorstep crime code
 - Was the offence committed in a No Cold Call Zone (to monitor the effectiveness of zones in preventing crime)?
 - Was an officer required to go out on a rapid response incident (including out-of-hours response)?
 - Was the victim accompanied to their bank by the offender?
 - Was a safeguarding adults alert form completed in relation to the victim?
 - Is the offender a known repeat offender for doorstep crime/distraction burglary?
 - Is the victim a repeat victim for this type of crime?
 - Doorstep crime type e.g. charities, roofing etc
 - Crime reporting e.g. actual, attempted, non-crimes
 - Age and gender of victim (soon to add dementia, mental health or disabilities options)
 - Number of offences reported to and by Police
 - Agencies worked with or referred to
- By end 2012/13 292 doorstep calls were predicted to be reported, resulting in 40 (predicted) actual crimes (see **Appendix 5**).
- In addition, the North Yorkshire County Council Trading Standards and Planning Services' Fraud and Financial Investigations team conduct a **Citizen's Panel Survey** every three years, to inform service planning and priorities.

Source: Ruth Andrews, Head of Fraud and Financial Investigations. North Yorkshire County Council Trading Standards and Planning Service, 28th May 2013; North Yorkshire County Council Trading Standards and Planning Service, Fraud and Financial Investigations Team Report for GRV Census Results

Case Study 14: Doorstep Crime Team, Oxfordshire County Council

Doorstep Crime Reporting

- The Doorstep Crime Team, within Oxfordshire County Council's Trading Standards Service, produces an **annual report of doorstep crime results, actions and future plans**. Intelligence, analysed within the report, is recorded in an APP database.
- See Appendix 5 for highlight numbers from the Oxfordshire County Council Doorstep Crime Team Annual Report 2012-2013.

Source: Martin Woodley MBE, Team Leader, Doorstep Crime Team, Trading Standards Service, Oxfordshire County Council

Case Study 15: Trading Standards Team, Cumbria County Council

Doorstep Crime Intelligence

- The Trading Standards Team within Cumbria County Council **gathers intelligence and records incidents of doorstep crime** in the county.
- Intelligence is gathered via a number of routes (for example from the public, through proactive campaigns and initiatives) and recorded in Civica APP. Details recorded include the age of the victim, if the crime was committed by a repeat offender, and which agency partners have been contacted regarding the offence (for example the Police).
- **Analysis of the intelligence** (including using the ACORN socio-economic profiling tool) enables Cumbria's Trading Standards Team to proactively plan and target doorstep crime in priority community areas and population groups.
- Cumbria County Council's Trading Standards doorstep crime awareness initiatives include:
 - The Nominated Neighbour Scheme
 - No Cold Calling Zones
 - The Rapid Response Team
 - Membership of the online Cumbria Community Messaging Solution

Source: Angela Jones, Trading Standards Service Manager, Cumbria County Council

7. Cornwall

Although many thousands of people flock to Cornwall each year for their holidays, enjoying its dramatic coastline, spectacular beaches and hospitality, it is an area of many contrasts, where **affluence sits alongside some of the most disadvantaged areas in England.**

Local factors that could affect an individuals' vulnerability

The following factors **may influence an individuals' risk of becoming vulnerable** to illegal trading activity (in Cornwall) (see also the Vulnerable consumers section of this document). The following references are taken from Cornwall Council's Community Intelligence research and Policy research (also see Appendix 1):

- **Older Population:** As with the rest of the UK, Cornwall's population continues to grow older. It is estimated that by 2033 one in four people in Cornwall will be aged 65 and over. In addition, many retired people come to live in the county. Nearly 34,150 people aged 65 years and over live on their own in Cornwall. See also Appendix 9.
- **Health:** Compared to the English average, Cornwall has a high percentage of people diagnosed with a mental health, and dementia prevalence and the percentage of people with depression is higher than in the South West and England. Over 8,950 people aged over 65 years in Cornwall are predicted to have dementia by 2014. See also Appendix 9.
- **Pockets of Deprivation:** Around 10% of the population of Cornwall live in 'deprived' communities, according to the national measure of deprivation; predominantly found in town centres but also in more rural areas. Cornwall also suffers from the worst fuel poverty in the South West. It is estimated that 19% of children aged under 16 years live in poverty in Cornwall.
- **Debt:** Cornwall has a severe debt problem and it is getting worse relative to the rest of the country. Personal insolvency rates in Cornwall continue to be higher than the South West and national average, and the gap between Cornwall and the rest of the country is increasing.
- **Cost of Living:** The cost of living in Cornwall is high relative to the rest of country and is rising. For the poorest households, rising costs in living may mean these people face extremely difficult choices in terms of what they can afford to spend their limited money on – for example heating, eating or borrowing.
- **Employment:** Earnings in Cornwall are approximately 19% below the national average, attributable to low paid jobs and a high dependency on seasonal and part-time jobs. Unemployment levels have been rising since 2007 (currently around 7.5% of the working age population) and around 3% of households have dependent children and no adult in employment.

- **Welfare Reform:** Around 1 in 5 working age people in Cornwall will be affected by the changes to welfare at various times over the next five years (around 62,000 people). A smaller number, including some vulnerable groups, large families and people who have been out of work due to ill health and disability may face significant reductions in income due to the cumulative impact of the reforms.

As part of the welfare reforms, council tax benefit has been devolved to local authorities, but with 10% less money. Cornwall Council figures show that since April 2013 (when about 20,000 working age people in the region, who would've previously had their council tax paid in full, were asked to contribute at least 25% towards their future bills) 6,000 people are now in payment arrears, of which 1,000 families have already had a court summons⁵⁷.

- **Housing:** 30,160 vulnerable households⁵⁸ live in non-decent housing⁵⁹ in Cornwall. Non-decent housing comprises 42% of Cornwall's total dwelling stock (including owner occupiers, private rented and social rented).⁶⁰

Pressures on the housing market, combined with the current economic climate and changes to welfare reform, place an increasing number of people at risk of homelessness. In Cornwall, there is an increased reliance on the private rented housing sector to accommodate homeless families and others, however nearly 52% of the local private rented dwelling stock does not meet the decent homes standard, with around 37% of dwellings recorded as having a Category 1 hazard ('excess cold' is responsible for 72% of Category 1 hazards). 38% of private rented housing tenants are 65 years old or over⁶¹.

- **Rural Isolation:** People living in rural areas can face barriers that increase their risk of getting into problem debt. A lack of access to a car, poor public transport or long distances can be a barrier for people seeking to access work, training or advice and guidance, increase their incomes, access childcare, cheap fuel or food.
- **Education:** Around 23% of the Cornish population (aged 16-74 years) have no academic or professional qualifications.

Also see the Emerging threats section of this document.

⁵⁷ Households in arrears after council tax benefit cuts. BBC website, 2nd July 2013
<http://www.bbc.co.uk/news/uk-england-cornwall-23141282>

⁵⁸ "Vulnerable households have been defined for the purposes of the Decent Homes standard as a whole as those in receipt of at least one of the principal means tested or disability related benefits". A Decent Home: Definition and guidance for implementation. Department for Communities and Local Government, June 2006 Update.

⁵⁹ "A decent home meets the following four criteria: It meets the current statutory minimum standard for housing; It is in a reasonable state of repair; It has reasonably modern facilities and services; It provides a reasonable degree of thermal comfort". A Decent Home: Definition and guidance for implementation. Department for Communities and Local Government, June 2006 Update.

⁶⁰ Karen Sawyer, Assistant Head of Planning (Private Sector Housing), Cornwall Council

⁶¹ Stuart Kenney, Private Housing Manager, Planning, Housing and Regeneration, Cornwall Council

8. Priority Vulnerable Consumer Groups for PH&P Trading Standards

Supported by local intelligence, and an understanding of Cornwall's demographics, the following groups of vulnerable consumers have been identified as a priority for PH&P's Trading Standards team:

- **Young People**
- **Older People**
- **Low income Households**

Young People

Who	Age Group	Approx Size of Cornish Population ⁶²	Possible Threats	Possible conditions and circumstances increasing the risk of being or becoming vulnerable
Young People	10-17 years	48,000 people	Age-restricted products (see Appendix 11)	Lack of self-confidence Naivety Low income Peer pressure

Why are young people considered a priority vulnerable consumer group?

Protecting children's health and safety is a priority for the UK's Trading Standards service. There are **age restrictions on the sale of numerous products and services** in the UK, with legislation prohibiting the sale, supply, offer to supply, or hire of specified products to persons under the minimum legal age (see Appendix 11).

Intelligence to support why young people in Cornwall are considered vulnerable includes:

- **Alcohol**⁶³
 - 51% of young people (8-18 years) in Cornwall reported that they had **had an alcoholic drink** (ever), compared with 42% nationally; 19% reported having been drunk once or more in the previous 4 weeks, and over a quarter of young people in schools feel that they need better information and advice about drugs, alcohol and smoking (Tellus4 survey, 2009).
 - Alcohol related **hospital admissions for under 18's** in Cornwall are higher than regional and national averages.
 - The demand for **alcohol treatment services** for young people has increased, with 78% of young people in treatment naming alcohol as a problem in 2010/11, compared with 70% in 2008/09.

⁶² 2011 Census Results, Office for National Statistics

⁶³ PH&P Interim Needs Assessment: Alcohol, Obesity, Tobacco and The Economy. November 2012

- **Tobacco**⁶⁴
 - There are around 1,000 **smoking related deaths** per year in Cornwall.
 - 15% of Year 10 pupils in Cornwall admitted to **smoking** 'occasionally or regularly'.
 - A fifth of smokers in the South West smoke **illegal tobacco** (200,000 smokers) and over a third of smokers in the region have been offered illegal tobacco to buy. Cheap tobacco makes it easy for children to smoke and become addicted, and children who buy illegal tobacco can come into contact with criminals, with some being talked into selling cheap cigarettes to school friends.

- **Volatile substances/solvents**
 - In 2012/13, 152 young people in the Cornwall and the Isles of Scilly Youth Offending Service had substance misuse identified as a factor in their (re)offending behaviour: 4 for **volatile substances**; 117 for **alcohol**⁶⁵.
 - Of the 160 young people under-taking drug treatment in Cornwall in 2011/12 (with Yz-Up Young Peoples Substance Misuse Service), 99 were in treatment for **alcohol** as a primary, secondary or tertiary substance; 5 were in treatment for **volatile substances** as a primary, secondary or tertiary substance⁶⁶.

- **'Legal Highs'**⁶⁷
 - 'Legal highs' (or NPS (new psychoactive substances)) are substances which produce similar effects to illegal drugs (such as cocaine, cannabis and ecstasy), but are not controlled under the Misuse of Drugs Act. 'Legal highs' have not been tested and, therefore, **pose unforeseen health risks**.
 - NPS is sold openly, including via the internet, and is often given names (spice, meow-meow, bath salts) which can **mislead young people** into believing they are indulging in low-risk fun⁶⁸.
 - The classification and legal position of 'legal highs' is particularly complex. The chemical structure of NPS is constantly evolving, making it very difficult to set over-arching legislation. For example, mephedrone (meow meow or M-CAT) was legal but is now classified as a Class B substance.
 - According to the World Drug Report 2013, a total of 670,000 Britons aged 15-24 have experimented with NPS at least once⁶⁹.
 - Mephedrone has been implicated in **drug-related deaths in Cornwall**, as well as nationally. Nationally around a third of deaths recorded related to instances where mephedrone was suspected to be a primary cause of death, whether through poisoning/overdose of the drug itself or whether the drug influenced some other mechanism of death.

⁶⁴ PH&P Interim Needs Assessment: Alcohol, Obesity, Tobacco and The Economy. November 2012

⁶⁵ Children aged 10-17 years. Youth Offending Service Cornwall and Isles of Scilly

⁶⁶ 12 month period ending December 2012. Yz-Up Young Peoples Substance Misuse Service.

⁶⁷ Cornwall and Isles of Scilly Adult Drug Treatment Needs Assessment 2012/13

⁶⁸ UK legal high market is EU's largest, UN report says. BBC website, 26th June 2013

⁶⁹ UK legal high market is EU's largest, UN report says. BBC website, 26th June 2013

- Local analysis indicates that Cornwall has seen 75 drug users in treatment specifically state either mephedrone or methylone as a problem substance over the last few years.
- The majority of these NPS users were under 25 years of age at point of triage (initial treatment assessment); **a third under 18 years of age.**
- There are few young people on Cornwall's Youth Offending Service caseload who have mephedrone and other 'legal highs' specifically identified as an issue. Where drug use had been identified as a problem linked to their offending, a dip sample of those young people indicated that **around 8% had a problem with NPS use.**
- The Cornwall and Isles of Scilly Adult Drug Treatment Needs Assessment 2012/13 highlights NPS as an emerging risk, and a priority area for the DAAT.
- **Partnership working and intelligence sharing** between PH&P's Trading Standards team, Devon and Cornwall Police and the Yz-Up Young Peoples Substance Misuse Service is recommended to help in effectively tackling the problems of NPS in Cornwall.

Evidence of the existence of threats to young people in Cornwall

- **Alcohol**
 - **Around 11%** of the 62 (36 on sales and 26 off sales) licensed premises in Cornwall, tested for under-age alcohol sale purchases in 2012/13, failed⁷⁰.
- **Tobacco**
 - **27% of local shops** tested were found to be prepared to sell cigarettes to children⁷¹.
- **Knives/axes/blades**
 - 6 young people in Cornwall and the Isles of Scilly were charged with **possession of a weapon** in 2012/13, 2 with knives⁷².
- **Fireworks**
 - Of the 10 **fires** recorded to have been deliberately started by fireworks, since April 2009, 2 were by youths (10-17 years)⁷³.
- **'Legal Highs'**
 - NPS accounted for 2% of all **drug specific seizures** in Cornwall in 2011/12⁷⁴.

⁷⁰ PH&P Alcohol test purchasing statistics

⁷¹ Business Compliance Unit Service Plan 2013/16, Cornwall Council

⁷² Children aged 10-17 years. Youth Offending Service Cornwall and Isles of Scilly

⁷³ Cornwall Fire and Rescue Service data

⁷⁴ Cornwall and Isles of Scilly Adult Drug Treatment Needs Assessment 2012/13

Case Study 16: Cornwall Council: Trading Standards

Liskeard pub: Alcohol under-age sales

- Following a **test purchase operation** in March 2012, during which a 16 year old volunteer was sold a bottle of 'alcopop', a Liskeard **publican was charged with serving alcohol to a person under the age of 18** and told to pay fines and costs of £1,117.31.
- The test purchasing operation had been prompted by information that suggested underage drinking was regularly taking place in the pub. The pub had failed a similar test purchase operation in 2010, after which support and advice was given to the licensee, by Cornwall Council's Trading Standards service, to prevent a recurrence.

Source: Liskeard publican fined over sales to children. Cornwall Council press release, 30th November 2012.

Case Study 17: Cornwall Council: Trading Standards

Penzance shop: Alcohol under-age sales

- Following three sales of alcohol to underage persons, over a period of five months, a **convenience store's licence to sell alcohol was revoked** by Cornwall Council's Licensing Act Sub Committee.
- Underage sales evidence was gathered from test purchasing, of which two were joint operations between Cornwall Council's Trading Standards service and Devon and Cornwall Police.
- On appeal, the store owner's licence was reinstated and given a 2 week suspension to sell alcohol.

Source: Penzance store has alcohol licence revoked. Cornwall Council press release, 7th August 2012; Lucy Breakspear, Trading Standards Officer, Public Health and Protection, Cornwall Council

Case Study 18: Cornwall Council: Trading Standards

Illegal Tobacco and Tobacco Seizures

- 2012/13 saw **three cases involving illegal tobacco**, in which Cornwall Council's Trading Standards team had investigated, **reaching court**. 2013/14 sees investigative work in this field continue for the team, with several intelligence leads being followed.
- Upon close inspection, tobacco seized by the team in 2012/13 proved to be a variety of counterfeit and smuggled in origin.

Source: Elizabeth Kirk, Trading Standards, Public Health and Protection, Cornwall Council

Case Study 19: Cornwall Council: Community Safety Team

Liskeard: NRGIII ('Legal highs')

- Anecdotal information from Devon and Cornwall Police indicates that there is a **high prevalence of NRGIII use in Liskeard**.
- Local Police Officers noticed that, when issuing drugs warrants, including house searches and body searching drugs dealers, a large number of discarded 'medicine capsules', similar to those used for prescription drugs, were being found.
- When tested, Officers discovered that these capsules contained the 'legal high' NRGIII (empty capsules were being filled with the substance).
- In Liskeard:
 - 1 capsule of NRGIII costs approximately £2, providing a 'high' for around 3 days.
 - 1 dose of heroin costs approximately £10.
- Devon and Cornwall Police highlight that, not only do 'legal highs' have health and wellbeing implications for users, but (like most substance misuse) they are also likely to lead to acquisitive crime in the local community.
- Investigations into the prevalence of 'legal highs' in Cornwall are an ongoing operation for Devon and Cornwall Police. Liskeard also receives attention from Safer Cornwall, in particular the Safer Liskeard Group.

Source: David Parker, Community Safety Officer, Community Safety Team, Cornwall Council

Case Study 20: Cornwall Council: Trading Standards

Retail sales: 'Legal highs'

- In 2011 **five teenagers in Bodmin were hospitalised after consuming substances innocuously labelled as bath salts**. The teenager's hospitalisation prompted Devon and Cornwall Police to contact Cornwall Council's Trading Standards team to work together on a county-wide project to tackle the issue of 'legal highs' (see also the Tackling the Problem in Cornwall section of this document).
- Activity on a joint campaign commenced in April 2012, with Cornwall Council's Trading Standards team and Devon and Cornwall Police making joint county-wide visits to retailers. The visits resulted in the successful removal of all 'legal highs' from sale in 'head shops' in Cornwall, as well as some illegal drugs which were also being sold by one outlet.

Source: Elizabeth Kirk, Trading Standards, Public Health and Protection, Cornwall Council

Older People

Who	Age Group	Approx Size of Cornish Population ⁷⁵	Possible Threats	Possible conditions and circumstances increasing the risk of being or becoming vulnerable
Older People	65+ years	115,200 people	Doorstep fraud/crime Mass marketing scams Rogue taxis Illegal money lending	Lack of self-confidence Low income Physical or mental impairment Accessible savings (cash) Living alone Trusting and respectful Naivety Social isolation/ Loneliness/Bereavement

Why are older people considered a priority vulnerable consumer group?

Cornwall has a large, and growing, elderly population (see the Emerging threats and Local factors sections of this document). See also Appendix 9.

Older people are often identified as vulnerable to the activities of illegal traders, as Age UK describes⁷⁶: "Older people can present an attractive target for scammers, not least because they are more likely than younger people to have easily accessible savings".

Older people may be **welcoming to door-to-door sellers**, as they are unable to shop like more able people, and be **trusting and unquestioning**, due to generational values. They **may also feel isolated** (living alone or in a rural setting) and therefore welcome the interaction a caller brings, including through scam mail.

⁷⁵ 2011 Census at a glance (First Release) July 2012. Community Intelligence, Cornwall Council

⁷⁶ Avoiding scams: Smart ways to protect yourself. Age UK, February 2013

The number of people aged 65-74 years, living alone in Cornwall, is predicted to grow by nearly 8% from 2012 to 2014 (to around 18,000 people), and people aged 75 years and over, by around 4% (to around 28,750 people)⁷⁷.

Older people are also more likely to be at home during the day, making them prime targets for unsolicited door and telephone callers.

According to PH&P Trading Standards⁷⁸, older people are specifically targeted by itinerant gangs of doorstep sellers: they tend to **have pride in their property**, have surplus cash to pay for home improvements, and can often be far more trusting of unknown callers.

Evidence of the existence of threats to older people in Cornwall

- **Scam mail**
 - 20 pensioners in Cornwall collectively **sent £350,000 to criminals** working in organised gangs^{79, 80}.

- **Distraction Burglary**
 - From April 2010 to March 2013, **33 incidents of distraction burglary were recorded as crimes** by Devon and Cornwall Police⁸¹.
 - The average age of a victim of distraction burglary is 81 years.

Distraction Burglaries: Cornwall		
Crimes 2010/11	Crimes 2011/12	Crimes 2012/13
9	11	13

⁷⁷ Appendix 9

⁷⁸ Gary Webster, Trading Standards, Public Health and Protection, Cornwall Council

⁷⁹ Business Compliance Unit Service Plan 2013/16, Cornwall Council

⁸⁰ Think Jessica website <http://www.thinkjessica.com/shocking-facts.htm>

⁸¹ iQuanta. Devon and Cornwall Police statistics

- **Doorstep Crime and Cold Calls**
 - There was an **increase in the number of intelligence reports** recorded in the Memex database for Cornwall, from 2011/12 to 2012/13, with the **primary category of doorstep crime and cold calls** (from 46 to 70). Traders selling driveway work or selling from a van provided the most number of reports in 2012/13⁸².
 - Note: The number of crimes committed as a direct result of a doorstep crime or cold call intelligence report is currently unavailable from the Memex database.
 - Note: Figures from other local authorities (see Appendix 5) suggest Cornwall's recorded intelligence reports for Doorstep Crime and Cold Calls are low.

⁸² Memex database statistics

Intelligence Reports: Cornwall Doorstep Crime and Cold Calling Primary Category				
Secondary Category	Tertiary Category	Number of intelligence reports submitted 2011/12	Number of intelligence reports submitted 2012/13	Number Increase Year-on-Year
Doorstep & Cold Calls	No tertiary category recorded	2	0	-2
Bogus Callers	Bogus officials	2	0	-2
	Bogus charity collections	0	1	1
Construction	Driveways	10	13	3
	Gardening	2	5	3
	General building work	1	2	1
	Guttering	1	2	1
	Roofing	3	3	0
	Windows	2	1	-1
	Damp-proofing	0	1	1
	Security systems/alarms	0	1	1
	Soffits & fascias	0	1	1
	Tree surgery	0	4	4
	No tertiary category recorded	0	12	12
Distraction Burglary	Distraction Burglary	5*	0*	-5
Intelligence	Intelligence	14	5	-9
	No tertiary category recorded	1	1	0
Other Services & Product Sellers	Energy suppliers	1	0	-1
	Selling from a van	1	15	14
	No tertiary category recorded	1	3	2

Source: Memex database. * Differing figures from Devon and Cornwall Police highlight the problems with consistent data recording.

Case Study 21: Cornwall Council: Trading Standards

St Agnes Elderly Victim: Bogus Psychics

- An elderly lady lived in an annexe of her daughter's house in St Agnes, Cornwall. She died suddenly in January 2007 of a brain haemorrhage, aged 76 years.
- After her death, her family made a disturbing discovery:
 - During the 12 months leading up to her death she had been writing and **paying money to 34 bogus psychics** based in Luxembourg, Switzerland, the USA and Ireland.
 - Box after box of correspondence from fake clairvoyants were found in her house.
 - In one month alone she had sent £400 to bogus psychics.
 - Neither the local Trading Standards service nor the lady's daughter knew anything of her plight.
- The correspondence discovered was of a particularly **menacing and bullying nature**:
 - One letter, sent from 'Samantha' in Austria, contained a jack of spades playing card. It began, "This letter reveals worrying events concerning your future. It is the jack of spades card which dominated the deck of your destiny – a symbol of treason and disaster that you must absolutely destroy in order to avert the curse!"
 - Another fake psychic wrote bullying letters claiming the recipient was missing out on untold fortunes from a lottery win: "Dear X, Quite honestly I was expecting a reply from you. Even today I was impatiently waiting for the mailman..".
 - One even claimed to have walked past the lady's house and felt 'a sense of evil'.
- The daughter of the elderly lady in this case is convinced that the scammers' letters contributed to her mother's failing health and may have led to her death.

Source: Julia Groves, Trading Standards, Public Health and Protection, Cornwall Council; 'Clairvoyant' conmen reap millions by preying on weak and vulnerable. The Observer, 25th February 2007.

<http://www.guardian.co.uk/money/2007/feb/25/scamsandfraud.observercashsection>

Case Study 22: Cornwall Council: Trading Standards

Park Home Owners: Rogue Traders

- In January and February 2013, 15 park home residents (all of retired age), across 6 different park home sites, were targeted by a gang of itinerant, cold calling traders.
- In each case the homeowner was approached at the door and **offered the installations of under-floor foil insulation and a free inspection of the underside of their park home**. Prices quoted for the insulation varied between £200 and £500. In other cases traders would offer to renew gutters and fascia boards. Traders failed to give the legally required 7 day cooling-off period notices.
- Upon commencement of the works, one of the workers would immediately approach the homeowner and explain that there were signs of significant rot (either underneath the home, or in the roof). The householders, worried about the integrity of their home, in every case agreed to further works being undertaken, with quotes ranging generally between £2,000 and £7,000 for the additional work.
- The home owner was always asked to pay cash, generally before completion of any work. In nearly every case where insulation was offered, the material used was simply applied to a small strip of the underside of the home. Where guttering, fascias were provided the work was done to a very poor standard, and sometimes not completed at all. In one case a section of guttering actually fell off the roof after the traders had left. In another case, all of the fascias were removed without being replaced, leaving the fabric of the roof in jeopardy during a period of strong winds.
- The total amount of cash **taken from Cornish residents was in the region of £40,000**.
- Through sharing of intelligence with other local authorities, the Police and the regional Scambusters team, the Trading Standards service were able to identify that the same gang had been responsible for similar crimes in a number of other locations around the UK.

Source: Gary Webster, Trading Standards, Public Health and Protection, Cornwall Council

Case Study 23: Cornwall Council: Trading Standards

St Austell Elderly Victim: Rogue Traders

- In June 2012, Cornwall Council's Trading Standards service dealt with a case where an elderly man in the St Austell area was targeted by a group of itinerant traders, offering **exterior house painting and decorating, along with a host of other 'home improvement' services**.
- The 93 year old man suffered from vascular dementia and lived alone. He was supported by his son and daughter-in-law who had power of attorney over his affairs and who lived nearby. Despite having a sign in his window, stating that there should be no cold callers, salesmen or canvassers, the traders cold called at his property and convinced him to agree to have his bungalow painted and roof pressure washed, for a **total price of £750**.
- At no time was the victim given any form of paperwork that identified who they were; nor was he given the legally required cancellation notice, which should have given a 7 day cooling off period.
- The victim's son and daughter-in-law were alerted to the presence of these traders by one of his carers. The family immediately went to their father's home and challenged the traders. It should have been obvious to the men that the consumer did not have the mental capacity to agree to the work.
- Following a brief stand-off, the traders left the property realising that they were not going to get paid on this occasion.
- It soon became apparent that the poor workmanship had left a catalogue of problems. The roof had been constructed of asbestos tiles which the power-washing had damaged, and caused a number of water leaks. Because of the asbestos, all of the tiles would need to be removed by specialist contractors to carry out an effective repair. In addition, the painting was done to a very poor standard, mainly in wet weather, with little or no preparation of the existing surface prior to the paint being applied. Quotes obtained from legitimate traders suggested that repair of the roof would cost several thousand pounds.
- Cornwall's Trading Standards service were able to reassure the victim's family that no money was payable to the traders, as they had failed to provide a cancellation notice prior to commencement of the works, rendering the contract unenforceable. It later emerged that the traders in this case were linked to a similar complaint that had been received earlier that year, and that they were routinely using false addresses on their business documents. Alongside their trading name, the use of the false address created an impression that they were a locally based firm.

Source: Gary Webster, Trading Standards, Public Health and Protection, Cornwall Council

Case Study 24: Cornwall Council: Trading Standards Newquay Retired Couple: Rogue Traders

- In July 2012 a retired couple living near Newquay contacted a tradesman after seeing his advert in a local directory, which stated 'improve your home for less'. They invited the tradesman to quote for the **tarmac**ing of a large area of garden and driveway, in order for the area to be more manageable for them in the future. The work was completed over the course of five days and they were **charged £7,000**. However, within a month of completion, significant weed growth had penetrated the surface; causing damage to the area and making it look unsightly.
- When the consumers complained, the tradesman's reaction was simply to arrange for some weed killer to be sprayed on to the area, which was insufficient to address the underlying problems. Having lost faith in the work, the consumers contacted Cornwall Council's Trading Standards service, who arranged for an independent assessment of the tarmaced area.
- The expert found that the work was of a very poor standard; a weed barrier had not been laid, the surface was poorly compacted and inappropriate grades of materials had been used. Additionally it was noted by the expert that a top layer of fine gravel had been sprinkled on to the surface in order to hide the various 'welts' caused by poor rolling. In order for the work to be put right, the whole area would need to be dug out and new surfaces laid, which would have cost the consumers in excess of £10,000.
- The tradesman pleaded guilty to an offence under Regulation 8 of The Consumer Protection from Unfair Trading Regulations 2008. He was sentenced to **a 3 year conditional discharge and ordered to pay £500** towards the prosecution's costs.

Source: Gary Webster, Trading Standards, Public Health and Protection, Cornwall Council

Low Income Households

Who	Age Group	Approx Size of Cornish Population*	Possible Threats	Possible conditions and circumstances increasing the risk of being or becoming vulnerable
Low Income Households	N/A	60,100 households	Pay day loans Illegal money lending Counterfeit goods Rogue taxis Second-hand product safety	Lack of self-confidence Low income Unemployment Caring for others Physical or mental impairment Living in social rented housing

* 60,100 households in Cornwall claim council tax or housing benefits, or both. These benefits are paid to low income households to help with rent and council tax. Welfare Reform Research. Cornwall Council, December 2012.

Why are low income households considered a priority vulnerable consumer group?

Around 10% of the population of Cornwall live in 'deprived' communities (see also Appendix 1). The effects of deprivation are often **cumulative** and **intergenerational**, suggesting that those who find themselves in poverty often find it hardest to get out of poverty.

As discussed in the Emerging threats and Local factors sections of this document, the impact of the **recession and changes to the UK welfare system are predicted to hit low income households hard**, potentially increasing the size of this priority vulnerable consumer group in Cornwall.

The estimated 19% of children aged under 16 years, living in poverty in Cornwall, are particularly at risk from the impact of welfare reforms. Households with children are expected to be among the worst affected; over 90 families who have 3 or more children will lose money due to the benefit cap; half of these families are likely to lose more than £600 a month⁸³.

⁸³ Welfare reform research: Understanding and preparing for the impacts on people, places and services. Cornwall Council, December 2012

We also know that Cornwall has a severe debt problem, has a high cost of living and below national average earnings.

The Citizens Advice Service reported an increase of around 2,450 (+5%) debt problems advised on, in South West England, from Q3 2012/13 to Q4 2012/13.⁸⁴

Evidence of the existence of threats to low income households in Cornwall

- **Loan Sharks**
 - The Illegal Money Lending Team, England, have received 12 referrals regarding loan sharks in the county over the past 12 months⁸⁵.

⁸⁴ Advice Trends Quarter 4 2012/13 (January-March 2013). Citizen's Advice Service

⁸⁵ Illegal Money Lending Team, England

Case Study 25: Cornwall Council: Housing

Debt: Safeguarding and a holistic approach

- A 52 year old man was referred to the Government Mortgage Rescue Scheme, operated by the local authority, via the Citizens Advice Bureau's debt counselling service. The man had contacted CAB over **concerns about his increasing personal debt and a Repossession Notice** that had been served on his family home. He was the only wage earner for his family, working limited hours for minimum wage.
- The man lived with his family in an apparently picturesque coastal cottage (their original family home). The house had four very small ground floor rooms with narrow access throughout the house. Via a very steep narrow staircase, there were two bedrooms and a bathroom on the second floor. In the bathroom there was dangerous access to the bath and no showering facilities. There was little or no heating throughout the property.
- In addition to himself, the other members of the family, living in the house, were his **83 year old disabled widowed mother and his two adult brothers**. One of his brothers (54 years old) was registered blind, and the other (46 years old) had learning difficulties. The 46 year old brother was also the registered carer for his mother, receiving a Carers Allowance. His **mother had one of the bedrooms**, while the **man and his two adult brothers shared the other bedroom**. Two brothers 'top-ed and tail-ed' in a single bed.
- The Government Mortgage Rescue Scheme discovered that the family were experiencing spiralling debts, exacerbated by **loan sharks**, who regularly called at the house, and the fact that the family regularly cashed the household's weekly benefit income for lottery scratch-cards.
- Perhaps most shocking was **the family's visibility within the local community, and to the local authority**, yet their financial (and housing) situation had apparently not previously been addressed: The family had **lived in the village** since the 1950s; the 83 year old mother had a care package from **Adult Care Services**; the 54 year old blind son also had a care package, and regularly attended a **day care centre** with his mother; the **local post office** were aware that the family's benefit payments were being cashed for lottery tickets.
- Thanks to the intervention of the Government Mortgage Rescue Scheme, and support from the family's local councillor, **professionals from a variety of local services and agencies were co-ordinated to help change the family's situation**: the property was sold and the proceeds used to pay off the family's debts; Adult Care Services assisted in securing permanent residential care for the man's mother, and suitable accommodation for his blind brother; Housing assisted the man and his 46 year old brother to secure a house via Homechoice; the Citizen's Advice Bureau helped the family with debt counselling.

Source: Gila Tatham, (Private Sector Housing) Planning and Regeneration Service, Cornwall Council

Case Study 26: Cornwall Council: Trading Standards

Budget Product Safety: Carbon Monoxide

- In November 2010, two young men from Saltash tragically died from carbon monoxide poisoning. The source of the carbon monoxide was traced to a **budget gas cooker** found in the property.
- Returning from an evening out, the two men had tried to cook an item of food, inadvertently turning on the grill instead of the oven and leaving the grill door closed. Due to an integral design fault, the grill continued to operate with the door was closed, building up a lethal level of carbon monoxide.
- The cooker involved was a relatively low cost model, originally purchased in 2008 at a store in Plymouth. Following investigations by Cornwall Council's Trading Standards team, into potential **product safety offences**, it was quickly established that this particular cooker model had already been identified as having this potentially lethal design fault.
- Following the deaths of at least six other people in the UK and Ireland, the affected model items had been subject to a national safety alert, instigated by the manufacturer. Despite extensive work by the manufacturers, who had managed to trace a large proportion of the cookers, there were still significant numbers in use that had not yet been traced, ultimately leading to the deaths of the men in Saltash.
- The Cornwall Council Trading Standards team's investigation determined that the European Safety Standard, to which each of the affected models would have been tested against prior to being placed on the market, did not include a carbon monoxide test for situations where the grill door was closed. This had been a scenario that simply had not been envisaged by the safety committees when the Safety Standard had originally been drafted.
- Due to the specific facts of the case, and the legal restriction on investigative time limits, Cornwall Council's Trading Standards team were unable to take any formal action against the manufacturer. Local press releases were released warning of the dangers, both at the time of the deaths and following the Coroner's inquest in December 2012.

Source: Gary Webster, Trading Standards, Public Health and Protection, Cornwall Council

9. Tackling the Problem in Cornwall

In addition to day-to-day operations and initiatives (see the Local initiatives section of this document), PH&P's Trading Standards team has **established partnerships and lead awareness raising events** to specifically address illegal trading activity threatening Cornwall's priority vulnerable groups.

Case Study 27: Cornwall Council: Trading Standards

Partnership working: Devon & Cornwall Doorstep Crime Reduction Partnership

- The **Devon & Cornwall Doorstep Crime Reduction Partnership** was launched in April 2013. The partnership includes Cornwall, Devon, Plymouth and Torbay Trading Standards services and Devon and Cornwall Police.
- The aim of the partnership is to **help prevent residents becoming victims of doorstep crime**, by raising awareness, particularly among the more vulnerable, and to encourage people to report incidents.

Source: New doorstep crime initiative launched across Devon and Cornwall. ThisisCornwall, 16th April 2013

Case Study 28: Cornwall Council: Trading Standards

Raising Awareness: Promoting Independence – Safeguarding the Vulnerable Conference

- In March 2013, Cornwall Council's Trading Standards team lead on a conference entitled 'Promoting Independence – Safeguarding the Vulnerable', in partnership with Cornwall College's Social Work degree course.
- The conference **highlighted the issues facing vulnerable people in local communities**, including loan sharks, scam mail and doorstep fraud, and **in particular the importance of cross-agency partnership working**.
- Speakers and attendees included Trading Standards professionals, Social Workers, Police Officers, representatives from Cornwall Council Adult Care & Support and Housing, and Cornwall College social work lecturers and students.

Case Study 29: Cornwall Council: Trading Standards Partnership working: 'Legal highs'

- Following an approach from Devon and Cornwall Police to Cornwall Council's Trading Standards team, regarding partnership working and the ACPO Guidance on Policing New Psychoactive Substances including Temporary Class Drugs, the **Trading Standards team began working closely with local Drugs Liaison Officers.**
- Cornwall Council's Trading Standards team, in partnership with the Police, identified approximately 8 retail premises in the county that were selling 'legal highs'.
- Through a series of joint visits, and some sampling and testing, the Trading Standards team and Devon and Cornwall Police managed to persuade each of the 8 retail premises to remove the substances from sale.

Source: Elizabeth Kirk, Trading Standards, Public Health and Protection, Cornwall Council

Case Study 30: Cornwall Council: Trading Standards Raising Awareness: Age-restricted products

- In January 2012, Cornwall Council's Trading Standards team **attended an event run by 'Safer Cornwall'**, held on an Under 18's night (average age of clientele around 13-14 years) at a Cornish nightclub.
- An age-restricted sales themed stand was manned by members of the Trading Standards team, which included a competition relating to age-restricted sales knowledge. Illegal tobacco information was also available on the stand.

Source: Elizabeth Kirk, Trading Standards, Public Health and Protection, Cornwall Council

Case Study 31: Cornwall Council: Trading Standards

Partnership working: Illegal tobacco

- In order to help tackle the issue of illegal tobacco in the county, Cornwall Council's Trading Standards team **regularly works in partnership with the local Stop Smoking Service**. The team is also a member of the Smokefree Cornwall Alliance, alongside Devon and Cornwall Police, Cornwall Fire and Rescue Service and various representatives from the NHS.
- Current Smokefree Cornwall Alliance initiatives include a questionnaire to all those attending Quit sessions in Cornwall, regarding their tobacco supply. Intelligence gathered from questionnaire results will help inform future enforcement and education activities undertaken by the Alliance and Cornwall Council's Trading Standards team.
- Cornwall Council's Trading Standards team also works closely with Smokefree Southwest, contributing to regional campaigns and activities.

Source: Elizabeth Kirk, Trading Standards, Public Health and Protection, Cornwall Council

Case Study 32: Cornwall Council: Trading Standards

Debt and Illegal Money Lending

- Cornwall Council's Trading Standards team have been working on a number of local events to raise awareness about debt and the dangers of illegal money lending. Events include:
- **Local Community Fun Day:** A multi-agency Community Fun Day, involving Cornwall Fire and Rescue Service, The Illegal Money Lending Team, England and Cornwall Council Trading Standards staff, was held in a targeted community where illegal money lending was likely to be active. Advice and support for anyone who had been targeted by illegal money lenders, or anyone who was able to give details of any suspicious activity in the area, was offered by The Illegal Money Lending Team and Trading Standards staff.
- **Training Days:** Cornwall Council's Trading Standards team and The Illegal Money Lending Team, England have been working together to deliver 'loan shark awareness' training days for local Councillors and front line staff working in the local community. Training includes 'intelligence gathering', for example what warning signs to look out for (that someone may be a victim of a loan shark) and the types of questions to ask members of the public to try and establish whether there is any loan shark activity in the area.
- **Poverty:** Cornwall Council's Trading Standards team hosted an event during a local 'Feast Day' aimed at 'Poverty in Today's Communities'. The team manned a stall in a local church, providing advice on matters likely to affect many of the local residents, ranging from Scams awareness to tackling debt and loan shark activities. Also present were representatives from the local Credit Union and Food Bank.

Source: Martine Barnes, Trading Standards, Public Health and Protection, Cornwall Council

Methodology

A number of methods were used to gather and present the information and data within this document:

- Interpretation of conversations from meetings and telephone calls with PH&P colleagues
- Interpretation of conversations from meetings and telephone calls with internal and external contacts
- Presentation of case study examples from internal colleagues and external contacts
- A literature review of internal and external data, research, articles, reports and documents (including websites) to establish the critical points of current topic knowledge

Data Issues & Knowledge Gaps

Whilst every attempt has been made to gather timely, accurate and relevant information to develop this interim needs assessment, it is acknowledged that there may be gaps in our understanding due to time limitations and lack of available data.

Appendix 1

Cornwall Profile – Facts & Figures: Community Intelligence Team

Population

- 2011 Census estimates suggest that Cornwall's population stands at around **532,300** and is estimated to reach 633,200 by 2030⁸⁶, an increase of 100,900 (18.9%).
- **Cornwall's population has been growing steadily since the 1960's**. The highest numbers of **inward migrants are persons of working age**, contrary to the common perception that most people who move to Cornwall are retired or elderly.
- In line with national trends, **Cornwall's population is getting older** as average life expectancy continues to rise; it is estimated that by 2033, one in four people, in Cornwall, will be aged 65 and over.
- Cornwall has **fewer younger people than the UK average**, but this is changing.
- Black and minority ethnic groups are estimated to make up around 4% of the population; this is in contrast to 1% in the 2001 Census. This does not include migrant workers (estimated at around 3,000) and Gypsy, Roma and Traveller communities (estimated at around 1,000).
- Cornwall's local resident population is **significantly swelled by tourists each year**. In 2010 there were 10.2 million day trips and 3.9 million staying trips, bringing in a total visitor spend of £1.6 billion and supporting 22% of employment.

Households and housing

- Cornwall has just over **230,400 households**⁸⁷. Around 53% are couples living together and 34% are households with only one person. The rest are single-parent families (7%) or people living in shared accommodation (4%).
- **Housing affordability is a major issue in Cornwall** – particularly for new households. Despite the recent economic downturn house prices have remained strong as demand for housing has remained high.
- Cornwall suffers from the **worst fuel poverty in the South West** and furthermore the rate of **excess winter deaths is significantly higher** than in England and Wales.
- As at 31st March 2012, there were just under 25,000 households in need of housing.
- Pressures on the housing market, combined with the current economic climate, place an **increasing number of people at risk of homelessness**, including those who would not have previously been considered vulnerable.⁸⁸

⁸⁶ 2008-based sub-national population projections and mid year population estimates, Population Estimates Unit, ONS: Crown Copyright 2010

⁸⁷ 2011 Census, ONS: Crown Copyright 2012

⁸⁸ Homelessness Strategy 2010, Cornwall Council

Education and skills

- Enhanced participation in education and educational attainment, at all levels, are vital to the future competitiveness and flexibility of Cornwall's businesses and labour market. **Skills levels** of local residents of working age **are slightly lower than the regional average**.
- GCSE attainment, and the percentage of residents qualified to degree level and above, however, are **improving**.
- Six universities and colleges make up the Combined University for Cornwall – Cornwall is one of the UK's fastest growing study destinations. The **number of students in Cornwall has more than doubled in the last eight years** and this presents both risks and opportunities.

Labour market and economy

- Earnings in Cornwall are approximately **19% below the national average**.⁸⁹ This can be attributed to an over-dependence on low paid jobs, a higher proportion of seasonal and part time jobs and lower earnings across many sectors of the economy.
- **Levels of unemployment have risen**, both nationally and locally, in the wake of the recession. Unemployment levels in Cornwall have been getting worse since 2007 (4.1%), and are now in-line with national rates at 7.5% of the working age population.
- The rate of unemployed 16 to 24 year olds in Cornwall has risen by 40% over the last two years, **one of the highest rises in the South West**.
- Levels of unemployment differ across Cornwall and there are areas with **high concentrations of people who are not in work**. This is a severe and persistent problem.
- Growth rates for the local economy have been high over the last decade. Cornwall remains the **second weakest economy in the country**, however, and the latest data for 2009 shows local **economic decline from the recession has been worse than the national average**.⁹⁰

Deprivation

- Cornwall as a whole is not particularly deprived, ranking 110 out of 326 local authorities. There are, however, wide geographic variations between areas; Pengegon in Camborne is within the 2% most deprived areas in England and Latchbrook South is at the other end of the spectrum at 94%.
- Around **52,000 people (10% of the population of Cornwall) live in 'deprived' communities** according to the national measure of deprivation.⁹¹ These are predominantly found in town centres; there are, however, **pockets of deprivation in more rural areas** that are not identified by national measures, due to the dispersed nature of Cornwall's rural population.
- Many people living in deprived areas will experience issues associated with **lower incomes, higher unemployment rates, ill health, child poverty, low qualifications, poorer housing conditions and higher crime rates**.

⁸⁹ ONS annual survey of hours and earnings - resident analysis, 2011, NOMIS

⁹⁰ Cornwall's Economy at a Glance, Community Intelligence, March 2012

⁹¹ Defined as the 20% most deprived areas in England, English Indices of Multiple Deprivation

- The effects of deprivation are often **cumulative** and **intergenerational**. Those who are in persistent poverty i.e. poor for a long time, are most at risk of social exclusion.
- The Department for Work and Pensions estimate that 19% or **17,040 children aged under 16 live in poverty** in Cornwall. This is a rise of 420 children since 2008 and is **likely to rise further** given the welfare reforms and reductions to benefits.

Health and Wellbeing

- 66% of Cornwall residents described themselves as being in good health.⁹² Cornwall has a **higher than average rate of chronic disease or limiting long term illness**, however, even when the numbers of elderly people are considered.
- Compared to the English average, Cornwall has a **high percentage of people with a mental health diagnosis**.⁹³ Dementia prevalence and the percentage of people with depression in Cornwall are higher than in the South West and England.
- A significantly higher proportion of the working age population in Cornwall is claiming **health related benefits due to alcoholism** and the majority of **alcohol-related health indicators for women are worse than the regional average**.⁹⁴
- Road deaths due to alcohol are also significantly higher than average.

⁹² 2001 Census, NOMIS

⁹³ Community Mental Health Profile 2012, North East Public Health Observatory

⁹⁴ [Local Alcohol Profiles for England](#), North West Public Health Observatory

Household Types in Cornwall

Experian's Mosaic UK™ is a classification system provides an understanding of the demographics, lifestyles and behaviour of all individuals and households in the UK. The data can be used to better understand our communities and make sure that services are designed around their needs.⁹⁵



Households in Cornwall are most commonly residents of isolated rural communities (23%) and small and mid-sized towns with strong local roots (21%).

- Small villages and isolated farmhouses
 - Traditional way of life and long established local families
 - Strong community spirit and sense of responsibility towards neighbours
 - Farming, small businesses, low and middle income jobs in local market towns; high self employment
 - Modest disposable income but quite high levels of capital; high motor costs
 - Low crime but residents often complain that they get little support from police
 - A legacy of poor quality housing among privately rented stock
 - Physical access to public and commercial services is a serious issue
 - Residents prefer face-to-face contact but increasingly rely on the internet and the telephone
- Group A**
Residents of isolated rural communities
55,700 households,
- Medium sized and smaller towns
 - Mixed communities in terms of ages and types of household
 - Traditional attitudes and strong local roots; support of extended family networks and friends
 - Wide range of jobs in service occupations and public sector; mixed income levels but few at either extreme of the income distribution
 - Mixed housing; often older properties, poor condition private rents above shops
 - Lack of variety of entertainment for young people
 - Moderate crime levels; relatively good relationship with local police
 - Good access to public and commercial services, often within walking distance
 - Prefer face-to-face contact and establishing a personal relationship; internet and telephone less favoured channels of communication
- Group B**
Residents of small and mid-sized towns with strong local roots
52,300 households,

⁹⁵ If you would like further information on Mosaic please contact the Cornwall Council Community Intelligence Team; telephone: 01872 324126, email: intelligence@cornwall.gov.uk

Breakdown by all types

<p>Group A</p> <p>Residents of isolated rural communities</p> <p><i>55,700 households, 23%</i></p>	<p>Group B</p> <p>Residents of small and mid-sized towns with strong local roots</p> <p><i>52,300 households, 21%</i></p>	<p>Group C</p> <p>Wealthy people living in the most sought after neighbourhoods</p> <p><i>1,200 households, 0.5%</i></p>
<p>Group D</p> <p>Successful professionals living in suburban or semi-rural homes</p> <p><i>11,300 households, 5%</i></p>	<p>Group E</p> <p>Middle income families living in moderate suburban semis</p> <p><i>9,100 households, 4%</i></p>	<p>Group F</p> <p>Couples with young children in comfortable modern housing</p> <p><i>5,600 households, 2%</i></p>
<p>Group G</p> <p>Students and transient singles</p> <p><i>3,600 households, 1%</i></p>	<p>Group H</p> <p>Couples and young singles in small modern starter homes</p> <p><i>9,500 households, 4%</i></p>	<p>Group I</p> <p>Lower income workers in urban terrace</p> <p><i>6,200 households, 3%</i></p>
<p>Group J</p> <p>Owner occupiers in older-style housing in ex-industrial areas</p> <p><i>19,200 households, 8%</i></p>	<p>Group K</p> <p>Residents with sufficient incomes in right-to-buy social housing</p> <p><i>21,900 households, 9%</i></p>	<p>Group L</p> <p>Active elderly people living in pleasant retirement locations</p> <p><i>30,000 households, 12%</i></p>
<p>Group M</p> <p>Elderly people reliant on state support</p> <p><i>14,500 households, 6%</i></p>	<p>Group N</p> <p>Young people renting flats in high density social housing</p> <p><i>2,200 households, 1%</i></p>	<p>Group O</p> <p>Families in low-rise social housing with high levels of benefit need</p> <p><i>4,900 households, 2%</i></p>

Appendix 2

PH&P Service: External Facing Objectives 2013/16		Trading Standards Institute: Principles	
Health & Wellbeing	We will protect and improve health, wellbeing and safety by targeted advice, community engagement and enforcement action	Improving the health of society	Tackling smoking, alcohol and obesity through under-age test purchasing, advice to retailers and prevention education
		Strengthening community safety	Taking action to prevent people being victims of commercial crime in their own homes; Disrupting traders from operating in the informal economy; Preventing harm to children and nuisance caused by young people accessing age-restricted goods
Environment	We will protect and improve Cornwall's environment from harm by targeted advice, community engagement and enforcement action	Protecting the environment	Meeting carbon reduction and other eco-targets through enhanced monitoring of all trading activity, for example packaging energy labelling and environmental credential checks
Economy	We will support economic growth and consumer confidence through targeted advice, community engagement and enforcement action	Facilitating economic recovery	Supporting efficient, competitive and judiciously policed markets; Targeting rogue traders who inhibit legitimate businesses, harm vulnerable people and damage communities

Source: Public Health and Protection Service Plan 2013/16; Trading Standards Institute website, May 2013

Appendix 3

Cornwall and Isles of Scilly – Safeguarding Adults

Who is a vulnerable adult?	A vulnerable adult is a person who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to protect him or herself against significant harm or exploitation.
What is abuse?	Abuse is a violation of an individual’s human and civil rights by any other person or persons. Abuse can occur in any relationship, both formal and informal, and may result in significant harm or exploitation of the person subjected to it. Abuse can consist of single or repeated acts.
Things that may make adults vulnerable to abuse	<ul style="list-style-type: none"> • Physical disability • Learning disability • Sight or hearing loss • Severe illness • Mental health problems • Old age and frailty • Dementia or confusion
Abuse can happen in many different places	<ul style="list-style-type: none"> • Someone’s own home • A care home • A hospital • A day centre • A public place
Anyone could be an abuser	<ul style="list-style-type: none"> • A family member or partner • A neighbour • A health or social care worker • Another professional worker, for example a financial advisor or solicitor • A volunteer worker • A friend • A service user

Source: Cornwall Council website, May 2013

Appendix 4

Guidance on the Consumer Protection from Unfair Trading Regulations 2008 (Office of Fair Trading 2008).

Average Consumers: Average Member of a Vulnerable Group of Consumers (Type 3)

14.37 **Consumers** are only (within the meaning of the CPRs) treated as vulnerable, to a practice or to the underlying **product**, if they are vulnerable because of infirmity, age or credulity:

- *infirmity (mental or physical)*: this covers a range of infirmities including sensory impairment, limited mobility and other disabilities. For example, **consumers** who need to use wheelchairs might be a vulnerable group in relation to advertising claims about ease of access to a holiday destination or entertainment venue, or those with a hearing impairment may be a particularly vulnerable group in relation to advertising claims about 'hearing aid compatibility' in a telephone advertisement.
- *age*: it may be appropriate to consider a practice from the perspective of an older or younger **consumer**. For example, the elderly might be particularly vulnerable to certain practices connected with burglar alarm sales, or children might be particularly vulnerable to advertisements relating to toys shown on daytime television.
- *credulity*: this covers groups of **consumers** who may more readily believe specific claims. The term is neutral, so the effect is to protect members of a group who are for any reason open to be influenced by certain claims. An instance might be members of a group who, because of a particular misfortune, might believe certain claims more readily than others.

Appendix 5

Trading Standards Services: Doorstep Crime Reporting Examples

North Yorkshire County Council Trading Standards and Planning Service Fraud and Financial Investigations					
Number of Doorstep Calls* Reported 2011/12	Number of Doorstep Calls* Reported Q1 2012/13	Number of Doorstep Crimes* Q1 2012/13	Predicted Number of Doorstep Calls Reported by Year End 2012/13	Predicted Doorstep Crimes by Year End 2012/13	Predicted Doorstep Crimes as % of Doorstep Calls Reported by Year End 2012/13
256	76	10	292	40	14%

Source: North Yorkshire County Council, Trading Standards and Planning Service, Fraud and Financial Investigations. Report for GRV Census Results.

* All doorstep calls reported are recorded for intelligence purposes. In addition, the actual number of crimes (from those doorstep calls) is also monitored.

Oxfordshire County Council Doorstep Crime Team Annual Report 2012/13 Highlights			
	2011/12	2012/13	Change
Number of incidents reported	470	393	-77
Percentage of total reported incidents received from Thames Valley Police	~40%	~30%	-10%
Interventions made whilst suspect still present at victims premises	56	68	+12
Suspects arrested	49	37	-12
Monies paid by victims to doorstep criminals	£313,453	£448,407	+£134,954
Average monies lost by victim per incident	£666.92	£1,493.03	+£826.11
Money saved from being paid directly to suspects	£133,383	£164,466	+£31,083
Intelligence reports referred by team to other agencies	267	299	+32

Source: Oxfordshire County Council Doorstep Crime Team Annual Report 2012-2013. Martin Woodley MBE, Trading Standards Doorstep Crime Team Leader, Oxfordshire County Council.

Cumbria County Council Trading Standards Team Doorstep Crime Incidents: Cumbria			
Number of Doorstep Crime Incidents 2011/12	Number of Doorstep Crime Incidents 2012/13	Rate Doorstep Crime Incidents per 1,000 population 2011/12	Rate Doorstep Crime Incidents per 1,000 population 2012/13
205	174	0.41	0.35

Source: Angela Jones, Trading Standards Service Manager, Cumbria County Council

Appendix 6

List of Common Threats

Threat	Example
Rogue Traders	Dishonest trades people carrying out unnecessary work to a poor standard at inflated prices. Typically doorstep sales people.
Bogus Callers/Distracted Burglary	Callers who con their way into homes to steal or persuade the resident to part with money. Possibly posing as a utility employee, charity worker or someone doing a survey.
Direct Mail Scams	Receiving unsolicited offers of products and services, requesting some kind of payment, through the post e.g. lotteries/prize draws, psychics or clairvoyants, pyramid schemes, miracle health cures and weight loss products, hard luck stories, bogus job offers, pension scams.
Email/Internet Scams	Spam email, typically asking for bank account details e.g. phishing, 'Advance fee fraud', 'Work from home scams'.
Telephone Selling	Pressure selling by unsolicited telephone calls e.g. financial investments, or calls requesting bank account details.
Bad Investments	Unauthorised financial investment firms selling products.
Relationship Scams	Fake online dating or social networking sites asking for personal and bank details or using manipulative techniques.
Identity Theft	Emails or telephone calls claiming to be from your bank, or another financial institution, asking for confirmation of bank account details.
Illegal Money Lending	Someone who lends money without the appropriate license issued by the Office of Fair Trading, for example a loan shark.
Counterfeiting	The production and selling of fake goods.
Under-age Trading	Illegal sales of age restricted products (see Appendix 11).

Sources: Avoiding Scams. Age UK, February 2013; Crimestoppers website, June 2013 <http://www.crimestoppers-uk.org/>; Illegal Money Lending Team, England website, June 2013

Appendix 7

Fraud: A quantitative segmentation of the UK population

Segment (% of UK population)	Age (years)	Household Composition	Personal Wealth	Residency Type	Information Sources/ Contact Channels	Personality	Total Likely Fraud Loss* £bn	Likely Victim of Fraud Type...*
Avoiding risk but lacking awareness (16%)	36-55	Families	Average or above average wealth	Detached/ Semi-detached	New to the internet/ e-converts	Worried	4.12	Identity fraud Holiday club scams Property Investor Scams Work at home scams
Risk takers and sure of themselves (10%)	26-35	Singles and co-habiting	Modest wealth	Flats/ Terraces	Internet savvy and smart phones	Time poor	3.36	Identity fraud Rental fraud Property investor scams Loan scams
Risk takers seeking financial gains (21%)	36-55	Singles and families	Affluent/ Comfortably off	Detached	Online banking and money management	Financially aware	3.35	Identity fraud High risk investment scams Property investor scams
Risk takers, demonstrating naivety (10%)	26-35	Singles and co-habiting	Low incomes	Flats/ Terraces	Online shoppers	Financially naive	0.84	Pyramid schemes Loan scams Premium rate telephone scams Work at home scams

Segment (% of UK population)	Age (years)	Household Composition	Wealth	Residency Type	Information Sources/ Contact Channels	Personality	Total Likely Fraud Loss* £bn	Likely Victim of Fraud Type...*
Risk takers and poor behaviours (14%)	18-25	Singles, co-habiting and sharers	Very low incomes	Flats/ Terraces	Social networks connected	Carefree	0.54	Rental fraud Online ticket fraud Career opportunity scams
Avoiding risk, exemplary behaviours (19%)	56+	Singles; Married Couples 'empty nesters'	Low income/ financially vulnerable	Semi-detached /Terraces/ Bungalows	Digitally excluded	Cautious	0.36	Foreign lottery scams Prize draw scams Clairvoyant fraud
Avoiding risk but vulnerable to others (4%)	66+	Singles	Very low incomes	Semi-detached /Terraces/ Bungalows	Isolated and alone	Vulnerable/ Requiring support	0.32	Foreign lottery scams Prize draw scams
Avoiding risk but still a victim (10%)	56+	Singles; Married Couples 'empty nesters'	Modest wealth	Semi-detached /Terraces/ Bungalows	Traditional media	Fraud hits hard	0.22	Premium rate telephone scams Prize draw scams Romance fraud

* Derived from the NFA's Annual Fraud Indicator – figure represents the entire loss to the UK population and are indicative of the losses the segment may have suffered.

Source: A quantitative segmentation of the UK population: Helping to determine how, why and when citizens become victims of fraud. National Fraud Authority, June 2011

Appendix 8

Prevalence of Threats

Threat	Numbers	Source/Organisation
Scams/Fraud	Over 22,000: reports of scams to Citizens Advice Service in England and Wales (April 2012 to March 2013)	Citizens Advice Service
	48%: estimated percentage of population targeted by scams every year	Office of Fair Trading
	3 million: estimated number of scam victims per year	Office of Fair Trading
	£3.5 billion: estimated value of money sent by adults in the UK to postal scammers every year	Think Jessica
	100: estimated number of scam letters some victims can receive every day	Think Jessica
	5: the number of scam mail victims known to have committed suicide	Think Jessica
	£9.1bn: estimated annual total fraud loss to UK adult population	National Fraud Authority: Annual Fraud Indicator June 2013
	£3.5 billion: estimated annual loss to individuals from mass-marketing fraud	National Fraud Authority: Annual Fraud Indicator June 2013
	£3.3 billion: estimated annual loss to individuals from identity fraud	National Fraud Authority: Annual Fraud Indicator June 2013
	£1.5 billion: estimated annual loss to individuals from online ticket fraud	National Fraud Authority: Annual Fraud Indicator June 2013

Threat	Numbers	Source/Organisation
Scams/Fraud	£755 million: estimated annual loss to individuals from private rental property fraud	National Fraud Authority: Annual Fraud Indicator June 2013
	£2.7 million: estimated annual loss to individuals from pre-payment meter scams	National Fraud Authority: Annual Fraud Indicator June 2013
Counterfeiting	£11 billion: the annual estimated loss, to all industry sectors in the UK, from counterfeiting	The Anti-Counterfeiting Group
Loan sharks	310,000: estimated number of households in the UK borrowing from loan sharks	Illegal Money Lending Unit
	£82 million: the total amount up to 100,000 households were expected to end up paying loan sharks on an estimated total of £29 million loans taken out over Christmas 2009	Financial Inclusion Centre

Appendix 9

Cornwall: Certain at risk populations aged 65+ years

Cornish population aged 65+ years predicted to live alone	2012	2014	% Change
Males aged 65-74 years	6,480	6,980	7.7
Males aged 75+ years	7,752	8,269	6.7
Females aged 65-74 years	10,290	11,070	7.6
Females aged 75+ years	19,764	20,435	3.4
Total population aged 65-74 years	16,770	18,050	7.6
Total population aged 75+ years	27,516	28,731	4.4
Cornish population aged 65+ years predicted to have severe depression	2012	2014	% Change
People aged 65-69 years	993	1,045	5.2
People aged 70-74 years	432	480	11.1
People aged 75-79 years	767	809	5.5
People aged 80-84 years	504	510	1.2
People aged 85+ years	644	690	7.1
Total population aged 65+	3,339	3,534	5.8
Cornish population aged 65+ years predicted to have dementia	2012	2014	% Change
People aged 65-69 years	494	520	5.3
People aged 70-74 years	739	822	11.2
People aged 75-79 years	1,281	1,350	5.4
People aged 80-84 years	2,011	2,042	1.5
People aged 85-89 years	2,100	2,172	3.4
People aged 90+ years	1,852	2,062	11.3
Total population aged 65+	8,450	8,968	6.1
Cornish population aged 65+ years predicted to have a moderate or severe visual impairment	2012	2014	% Change
People aged 65-74 years	3,735	4,021	7.7
People aged 75+ years	6,845	7,167	4.7
Cornish population aged 75+ years predicted to have registrable eye conditions	2012	2014	% Change
People aged 75+ years	3,533	3,699	4.7
Cornish population aged 65+ years predicted to have a moderate or severe hearing impairment	2012	2014	% Change
People aged 65-74 years	12,768	13,745	7.7
People aged 75-84 years	24,060	24,986	3.8
People aged 85+ years	14,006	15,025	7.3
Total population aged 65+ years	50,833	53,757	5.8
Cornish population aged 65+ years predicted to have a profound hearing impairment	2012	2014	% Change
People aged 65-74 years	407	438	7.6
People aged 75-84 years	242	250	3.3
People aged 85+ years	710	759	6.9
Total population aged 65+ years	1,359	1,447	6.5

Source: Dr Philip Bringham, Associate Specialist, Public Health, Cornwall Council. Note: The numbers in the table are not mutually exclusive i.e. individuals could be in several tables.

Appendix 10

Age-restricted products

Product	Age restriction	Maximum penalty
Tobacco products	18 and over	£2,500
Knives/axes/blades	18 and over	£5,000 and up to six months' imprisonment
Crossbows	18 and over	£5,000 and up to six months' imprisonment
Party poppers and similar low hazard low noise fireworks (category 1) (except Christmas crackers)	16 and over	£5,000 and up to six months' imprisonment
Christmas crackers	12 and over	£5,000 and up to six months' imprisonment
Adult fireworks and sparklers (category 2 [outdoor use - confined areas] and category 3 [outdoor use - large open areas] fireworks)	18 and over	£5,000 and up to six months' imprisonment
Video recordings: classification 12	12 and over	£5,000 and up to six months' imprisonment
Video recordings: classification 15	15 and over	£5,000 and up to six months' imprisonment
Video recordings: classification 18	18 and over	£5,000 and up to six months' imprisonment
Video games: PEGI rating 12	12 and over	£5,000 and up to six months' imprisonment
Video games: PEGI rating 16	16 and over	£5,000 and up to six months' imprisonment
Video games: PEGI rating 18	18 and over	£5,000 and up to six months' imprisonment
Volatile substances/solvents (offence to supply/offer to supply to under 18s occurs ONLY if the person knows or believes it is to be used for intoxication)	18 and over	£5,000 and up to six months' imprisonment
Lighter refills containing butane	18 and over	£5,000 and up to six months' imprisonment
Lottery tickets/'instant win' cards	16 and over	£5,000 and up to two years' imprisonment
Aerosol paint	16 and over	£2,500
Alcohol	18 and over	£5,000 and forfeit of licence
Liqueur confectionery	16 and over	£500
Petrol	16 and over	£20,000 and up to 12 months' imprisonment, or both

Source: Cornwall Council website, May 2013

Also:

- Tattooing: Age restriction - 18 and over
- Tanning salons: Age restriction - 18 and over

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