NTSB
NATIONAL TRADING STANDARDS BOARD

TRADING STANDARDS INTEGRATED OPERATING MODEL

STRATEGIC OVERVIEW

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EXECUTIVE SUMMARY

The Trading Standards Integrated Operating Model has been developed by the National Trading Standards Board (NTSB) for the benefit of the trading standards profession. It introduces a national intelligence framework to support not only the NTSB to deal with national and regional enforcement needs but also local authorities in their day to day work. The role of local authorities is essential to its success and this document sets out not only the benefits of the model to all involved, but also how it all fits together.

For many years the trading standards profession has evolved and embraced the use of intelligence as a tool in the detection and prosecution of offenders. Although there are examples of excellent practices, this was fragmented and lacked a consistent national structure. There were also insufficient professional analysts available and support and training for officers was inadequate.

In 2012 the Board identified this need and proceeded to consult on the new framework. The extent of this consultation has been vast and varied. It is one of the most important opportunities that trading standards has to enhance the service and it needs to be done right.

Consultation has been held with hundreds of people at numerous events up and down the country and this Integrated Operating Model (IOM) is the result. The NTSB has not been able to take on board every suggestion made, but the majority of comments have been used to shape it. The IOM consists of several components:

- This Strategic Overview document – this provides the background to the model together with an understanding of its benefits and how it all fits together at local, regional and national level.
- The Operational Procedures document - this provides guidance on intelligence products, processes and analytical tools to be employed.
- The training and development programme - this will ensure that senior managers understand the model, operational officers have the confidence to use the system and professional analysts have the same level of knowledge and understand how they fit into the national structure.
- The monitoring and review programme – this will ensure that the model can evolve in the future.

The Strategic Overview document is structured as follows:

- The introduction and background provides an insight into the model.
- The aims and objectives of the model identifying benefits to all levels of staff.
- The roles and responsibilities of all involved.
- An explanation of 'tasking' for prioritising at national, regional and local level.
- The response and review principles.
- A glossary of terms used.

INTRODUCTION AND BACKGROUND

The IOM is designed to be a comprehensive tool to assist frontline delivery of trading standards regardless of size and resources.

At the heart of the IOM is the effective use of intelligence. It aims to achieve a common understanding of the business processes that will help us to better coordinate our enforcement efforts nationally, regionally and locally in England and Wales, focusing on agreed priorities and the issues causing significant consumer and business detriment. Through a problem solving approach, trading standards will be able to effectively allocate resources to target the greatest problems and this will be a familiar approach to trading standards. It can be used to help shape the development of local authority services.

The IOM is about the identification and assessment of threats, the management of prioritised threats through enforcement and other activity; and the review of the effectiveness of measures taken. It is designed to provide a structured approach to decision making.

The IOM will help to provide processes for the NTSB National Tasking Group (NTG), to enable them to effectively deal with referrals they receive, task work out and provide resources to deliver this work.

The NTSB has agreed that a significant investment in training for existing staff is required and that intelligence training needs to be embedded in the trading standards' professional qualification. To ensure effective implementation of the IOM a range of training will be provided from e-learning material to specific strategy management courses and regional training events.

In 2012 the NTSB conducted a review of the intelligence framework for trading standards and found a genuine willingness and enthusiasm among trading standards services to embrace intelligence led processes. This was encapsulated by the comment of one interviewee who stated all they wanted to achieve was "to develop a culture of intelligence as part of the day job". However, the review found that current knowledge and application of consistent intelligence-led practices throughout local services was limited.

Reasons for this included a misunderstanding of what 'intelligence led' means, a lack of understanding that there are different uses of intelligence and confusion in structures and functions throughout the trading standards services. This is not a criticism of trading standards and there is already some good practice. However a more consistent approach is required to deliver a more effective service. For the sake of clarity, the meanings of terms are defined in the appendix to this document.

At present, services generally have a complaint led approach to activity. The NTSB recognises there are times when it is still vital to react to individual complaints but supports a move to use available strategic and tactical intelligence to make a much bigger impact on the problem and people causing the problem.

In order to ensure the success of the IOM, it is crucial that all those operating within the framework understand the meaning and practicalities of being intelligence led and that the ethos is allowed to integrate with current planning of 'enforcement activities' within local authorities.

AIMS AND OBJECTIVES

The aim of the IOM is to enhance the ability of trading standards services, at all levels, to work together and effectively tackle the issues causing significant detriment to consumers and businesses.

The IOM does this by providing a framework to:

- identify and understand what a local, regional and national problem is,
- increase understanding of how to deal with these problems more effectively,
- provide clearer and more consistent tasking arrangements,
- deliver informed decision making,
- adopt a problem solving approach,
- coordinate enforcement nationally, regionally and locally,
- achieve significant sustained reductions in consumer and business detriment in prioritised work areas, and
- ensure effective allocation of resources.

The benefits of these aims and objectives to trading standards' management, staff, regional intelligence analysts and local intelligence liaison officers include:

- a recognised and credible intelligence framework,
- a structured approach to dealing with information and intelligence,
- clarity of roles and responsibilities,
- clarity of purpose and work prioritisation,
- a consistent, transparent and accountable approach to problem solving and resource allocation,
- a clear understanding of the decision making process,
- a standardisation of processes and terminology that can assist when working with other agencies,
- identification of existing and potential enforcement gaps,
- a structured, consistent, coordinated approach to tackling local, regional and national problems,
- a means to develop strategic and tactical assessments, to identify threats that fit in with local objectives and priorities,
- ability to influence regional and national work, and
- a resource to underpin successful investigations.

ROLES AND RESPONSIBILITIES

Although everyone has different roles to play in intelligence and enforcement, the collection and submission of information is the responsibility of all staff working within local authorities, regional trading standards groups and NTSB enforcement projects. Everyone is essential to the success of the IOM and each piece of information collected is vital in the overall intelligence picture.

All trading standards staff (including frontline enforcement staff, managers and support staff) should record information according to local procedures. Information should be recorded in a universally recognised format which is currently via a 5x5x5 form or directly onto an intelligence database. The Scambusters Teams and other NTSB enforcement projects will record information via a 5x5x5 form or directly onto an intelligence database and share intelligence locally, regionally and nationally where appropriate.

Local Intelligence Liaison Officers

Each local authority is encouraged to have a local intelligence liaison officer, although it is recognised that resources are constrained and this role may be carried out in addition to other duties. These officers are the day to day point of contact between the authority's staff and the regional intelligence analysts. Their exact duties will be a local matter, however, their role should include the communication of the Intelligence Requirement and validation/quality assurance of information.

Local authority trading standards services should carefully consider who they choose as their local intelligence liaison officer. The importance of this role within a local authority must not be underestimated. Ideally this role should report to a member of the senior management team in order to maintain objectivity and ensure they have capacity to fulfill this function. They should work closely with the regional intelligence analyst(s) and will influence the wider regional issues.

Regional Intelligence Analysts

The NTSB has agreed that each regional trading standards group will receive funding to appoint regional intelligence analyst(s). They will be deployed in each region and embedded into regional structures. They will work to support the regional trading standards group and the strategic objectives of the NTSB. The regional intelligence analysts will be responsible for producing the regional strategic and tactical assessments and intelligence packages to support local and regional investigations. They will help implement and effectively support the NTSB Integrated Operating Model.

They will be tasked by the regional tasking group to undertake regional intelligence work. This work will support local authorities in England and Wales and the NTSB enforcement projects. The regional intelligence analysts will also be tasked by the National Intelligence Hub to undertake national intelligence work to support the NTSB's strategic priorities. They will act as the single point of contact for the NTSB National Intelligence Hub and other partner agencies in relation to data sharing and intelligence work.

National Intelligence Hub

The NTSB has established a National Intelligence Hub that will help it to identify and assess risk. This technical intelligence function is not a decision making function, it is a function that helps inform the tasking and prioritisation carried out by the coordination and assessment functions that the Programme Office undertake. The National Intelligence Hub will conduct a national analysis of threat, risk and harm. It will collate information and intelligence, produce intelligence products and disseminate intelligence requirements throughout LATSS, produce strategic and tactical assessments, research across national sources of data and establish guidance on their use. It will work in partnership with the regional and local intelligence functions.

National information from the e-crime, Safety at Ports, Scambusters, Illegal Money Lending Teams and other projects can be sent directly into the National Intelligence Hub, particularly because of the dynamic nature of much of this work.

Action Manager

Decisions taken by Tasking Groups (see later) need to be overseen by an independent responsible officer who will ensure that any actions the Tasking Group has agreed are being delivered. Actions need to be managed with clear accountability and realistic timescales.

Staff in this role will monitor the progress of any agreed tasks and will report to the Tasking Group on:

- how investigations and any actions are being delivered,

- ongoing intelligence development,

- delivery against agreed timescales,

- how the agreed funding is being spent, and

- progress against projected outcomes.

This officer may be responsible for the administration of the Tasking Group at any level. They play a key role in the review process to ensure that tasking decisions have been completed and evaluated.

At a national level the NTSB Programme Office will act as the NTG Action Manager to co-ordinate actions resulting from the Group and will provide updates on the progress of actions at each NTG meeting.

At a regional level this could be the regional co-ordinator or a member of the regional management group.

At a local level this role could be fulfilled by an officer who has a reporting mechanism to the senior management team.

These roles should be independent of the National Intelligence Hub, regional intelligence analysts and regional enforcement teams such as Scambusters. The Action Manager will help prevent intelligence professionals becoming involved in operational planning and tasking, thereby preserving their objectivity.

TASKING STRUCTURE

The following flowchart shows the tasking processes and requests for support.

At all levels the strategic and tactical tasking is at the heart of the intelligence process. Effective tasking is essential to obtain the maximum value from the collection and analysis of information and intelligence.

The strategic assessment is a long term, high level analysis of problems. The National Intelligence Hub will produce template documents and guidance on the minimum content and format. Each strategic assessment, at whatever level, should link to the strategic assessments at other levels.

It will be produced by the intelligence function at each level from research and analysis of a wide range of information sources. Information should not be restricted to trading standards' information held on intelligence databases and case management systems. It should also include, where available, external information from a range of sources including political priorities, external partnerships, public perception, public satisfaction surveys, etc. Arrangements made to capture the effect of consumer and business detriment can provide a valuable insight to the strategic assessment. It can also assist officers at all levels to understand the impact offences can have and how to effectively deal with the problems.

It is understood that many of these functions are already taking place. An example of existing equivalents are stated in the table below:

Strategic Tasking Group	Business setting meeting
Tactical Tasking Group	Team meetings
Strategic Assessment	Senior management assessment of data sources to determine annual priorities
Control Strategy	Business Plan/Service Delivery Plan - identifying priorities and key pieces of work
Tactical Assessment	Team meeting action plan

The following provides a brief summary of the recommended arrangements for this tasking locally, regionally and nationally; however, more detail is provided in the IOM Operational Procedures document.

STRATEGIC TASKING GROUPS

There should be a Strategic Tasking Group at each level which will consider the strategic assessment in order to set a control strategy and establish intelligence requirements. The control strategy sets the agenda for intelligence, prevention and enforcement priorities. The control strategy will only ever be amended by the Strategic Tasking Group. The Strategic Tasking Group should only meet once a year at all levels of operation ie nationally, regionally and locally.

National Trading Standards Board (NTSB)

The National Strategic Tasking Group is the NTSB. The NTSB will provide leadership, direction, policy and an agreed set of priorities based on a national strategic assessment.

The NTSB will require the National Intelligence Hub to produce an annual strategic assessment, which is informed by identified and assessed threat/risks from local authorities in England and Wales, as well as other intelligence, complaint data and open source research.

Regional Trading Standards Groups

Regional trading standards groups should have a Regional Strategic Tasking Group made up of chief officers who can determine and commit to regional priorities, for example a regional executive or management board.

The regional intelligence analysts or intelligence capacity will be responsible for producing an annual strategic assessment that outlines the significant threats that should be managed through the Regional Strategic Tasking Group process. This must take account of any locally produced strategic assessments.

Regional strategic assessments are used to inform the Regional Strategic Tasking Group who sanction and action a control strategy and intelligence requirement. The regional intelligence analysts should submit the completed strategic assessments to the National Intelligence Hub, which will use it to inform the trading standards national strategic assessment.

Local Authority Trading Standards Services

Local authority trading standards services are encouraged, where practical, to have a Strategic Tasking Group or equivalent, that will consist of senior officers who can identify and address local priorities and to produce a strategic assessment, that can assist in the production of business plans.

TASKING GROUPS

The Tasking Group can commission the intelligence function to produce research/analytical reports (target and/or problem profiles) to inform and support further operational activity. High risk issues which may fall outside of the control strategy or intelligence requirement will also be considered for action.

Tactical assessments drive the business of Tasking Groups. The assessment identifies the short term issues locally, regionally and nationally. The tactical assessment should be informed from a wide range of sources. It is also a review of recent performance and actions set at previous Tasking Group meetings. It also identifies emerging patterns and trends. The intelligence functions prepare the tactical assessment and offer recommendations for problems that should be targeted, identifying locations, and emerging issues which need greater examination.

The Tasking Groups will consider tactical assessments and determine the allocation of resources based on the assessed risk/harm, other available intelligence and the control strategy. Each group, at whatever level, may determine one of the tiered responses as outlined in the management principles (see below) for each identified threat/risk.   Following this process ensures that decision making is transparent, accountable, risk based and co-ordinated. Further information can be found in the IOM Operational Procedures.

National Tasking Group (NTG)

The NTSB has established a National Tasking Group to determine national consumer enforcement investigations and to task subject to available resources. The NTG will also consider requests for support that come via regional trading standards groups. The NTG will follow the processes set out in a protocol covering 'tasking, referrals and requests for national support for consumer enforcement activities' that replaces the previous protocol between the NTSB and the Office of Fair Trading, and the arrangements within the IOM. Following the setting of the national control strategy, the NTG will align its tasking decision making and its provision of other support in line with the control strategy priorities.

The NTG is made up of three NTSB lead members and three representatives from regional trading standards tasking groups who will rotate after 12 months and ideally should not be from the same regional group as the NTSB members. All of these members will be have full voting rights and will be able to take formal decisions on matters before the NTG. Members must have the knowledge and experience to make tactical decisions. Others members will also be invited to attend but will have no voting rights. It will be chaired by a member of NTSB, who will hold this position for 12 months, although this role may be extended on agreement for a further 12 months. A quorum of 3 is required for all NTG meetings and there must be a minimum of two NTSB members at each meeting.

The NTG may refer intelligence packages concerning identified problems to external agencies where they are the appropriate enforcement body.

The NTG should meet every 8 weeks, or more frequently should the need arise.

The Programme Office will be able to request the National Intelligence Hub to support specific problems or on-going investigations outside the NTG process, where for example the Consumer Protection Partnership has identified a problem of significant national importance.

Regional Tasking Groups

Regional Tasking Groups should be chaired by a chief officer or trading standards manager with operational experience. Members will be taken from the regional trading standards group and should be in a position to commit local authority resources. Regional groups should use the national control strategy to help inform their own decision making

The Regional Tasking Group may refer intelligence packages concerning identified problems to external agencies where they are the appropriate enforcement body.

The Regional Tasking Groups should meet every 8 weeks, or more frequently should the need arise.

Local Tasking Group

It is recommended that all trading standards services in England and Wales should have their own local arrangements, which prioritise work and feed into the regional intelligence and tasking processes. Local authorities should use the regional and national control strategies to help inform their own decision making. As local authorities have regular management meetings, these could form the basis for local Tasking Group meetings.

Local tasking groups may sanction a request for support to the regional group and regional groups may sanction a request for support to the national group. Submissions to the NTG should be reviewed by the Programme Office following the initial intelligence assessment by the National Intelligence Hub and prior to consideration by the full national group. It is recommended that the Management Teams of all local authority trading standards services in England and Wales should operate in the manner of a tactical tasking and co-ordination group, which prioritises work demands, approves significant enforcement interventions and, where appropriate, makes referrals to the Regional Tasking Group. However, it is recognised that at this level local political priorities will take precedence.

NTSB enforcement projects

The NTSB enforcement projects can be tasked by regional trading standards groups and the NTG to undertake investigations as appropriate to their enforcement remit.

ASSESSMENT PROCESS

Identification Principles

It is essential that officers continue to use all available intelligence sources to capture this information. Identification of problems can be based on numerous sources of information/intelligence including:

- Open source

- Casework

- Citizens Advice database

- Other agencies

- Professional judgement

- Public reporting

- Tasking group reviews

It is vital that local authority officers submit information and intelligence. Without information coming in, any intelligence framework will fail.

All trading standards staff (including frontline enforcement staff, managers and support staff) should record information according to local procedures. This could be via a 5x5x5 intelligence report or directly onto an intelligence database (which should follow a 5x5x5 form).

Assessment Principles

The main purpose of the assessment process is to analyse all intelligence, in order to identify problems. Identified problems should be assessed and prioritised in terms of impact. This will be completed by the intelligence functions at all levels looking at available sources of information/intelligence.

It is recognised that many cases will be managed locally or regionally but there will still be a need for intelligence relating to such investigations to be collected and submitted on whatever intelligence database is being used.

It is vital that officers do not feel that the information and intelligence they have submitted has been ignored or lost. All pieces of intelligence will be useful. However, it may be some time before specific pieces of intelligence can provide the vital piece required during analysis or investigation. Therefore it is important to ensure that officers get feedback on the work they are doing and the information and intelligence they have submitted to promote good communication between local, regional and national levels.

TASKING FOR ACTION

The tasking for action stage is where work is handed over to a named individual, appropriate resources are allocated, governance arrangements are established. It is where appropriate resources and governance are allocated by the Tasking Group to manage assessed problems.

Ownership/management should be led at the correct level of governance. This may involve the referral of an identified problem to a more approriate level of governance.

The IOM acknowledges that not all problems can have a full operational response. If the Tasking Group accepts that they can provide the correct level of governance and provide resources to deal with the problem, then one of five responses is required in terms of priority and expectations:

– **Tier 1: Full operational response** led by the level of governance making the decision (including coordination of multi agency activities and/or support from other areas of local authority trading standards services)

– **Tier 2: Limited response** led by the level of governance making the decision (local authority trading standards services resources only)

– **Tier 3: Develop further knowledge** led by the level of governance making the decision (this may include coordination of multi agency activities and/or support from other areas of local authority trading standards services)

– **Tier 4: Monitoring** the relevant intelligence function (regional intelligence analyst(s) or National Intelligence Hub) is responsible for maintaining a watching brief, and escalating the issue if the assessement of threat/risk changes (or if a new opportunity to intervene is identified)

– **Tier 5: No Further Action** for matters that will never be developed, for example where they are not a priority or are outside the remit of work.

REVIEW PRINCIPLES

The review stage commences as soon as work is allocated by the Tasking Group.

The review stage is linked to the assessment and tasking of action stages of the IOM, and is the one that will determine the operational effectiveness in line with the IOM.

Often within an organisation, activity is completed and resources are then moved. Debriefing of previous (or ongoing) activity, and assessing it's impact can be overlooked but it is important to ensure that this does not happen.

Without the review phase, the IOM does not effectively operate and local authorities will not be able to make evidence-based decisions or enhance their ability to identify, assess and manage regulatory threats/risks and protect consumers and businesses from harm.

All findings from the review process should be used to inform future Strategic and Tactical Assessments, with a view to helping managers to make informed decisions. Further detail on the review stage is contained in the IOM Opertating Procedures.

GLOSSARY OF TERMS / DEFINITIONS

Term	Meaning
Control Strategy	The control strategy sets the agenda for intelligence, prevention and enforcement priorities. The control strategy is set by the Strategic Tasking Group and will only ever be amended by this Group.
Enforcement Priorities	This is a statement by a Strategic Tasking Group to identify which specific threats are high priorities for tackling in the forthcoming period. Resources are allocated to these high priority threats, away from lower priority threats to consumer and business welfare.
Harm	Physical, financial or psychological injury, damage or loss – consumer/business detriment, negative impact on fair and equitable trading environments
Information	Information refers to all forms of data obtained, recorded or processed by an organisation, including personal data.
Integrated Operating Model (IOM)	The method by which Trading Standards operates to prioritise and tackle identified problems.
Intelligence	Intelligence is information that has been subject to a defined evaluation process in order to assist with decision, currently the 5x5x5 format. Intelligence is not what is collected; it is what is produced after collected information is evaluated and analysed. The 5x5x5 form is a universally recognised format that is used by the majority of law enforcement entities in the UK.
Intelligence function	Intelligence professionals who are responsible for assessing identified problems (ie threats and/or risk), developing and assessing knowledge, supporting enforcement activity. Dependent on size of the unit this may include people conducting distinct functions such as intelligence officers, intelligence analysts, intelligence researchers and intelligence managers. Whilst they are separate roles that require specialist skills in smaller Units, the researcher and analyst can be operated as a hybrid role.
Intelligence led	Intelligence led is a business process for systematically collecting, organizing, analysing, and utilising intelligence and information to guide operational and tactical decisions. Intelligence-led aids in identifying, assessing and managing targets, threats, and problems at the local, regional and national level.
Intelligence product	There are four intelligence products; Strategic Assessments, Tactical Assessments, Problem Profiles, and Target Profiles. They provide the information upon which strategic and tactical decisions are made.

Term	Meaning
Intelligence report	Intelligence report is defined as information that has been subject to a defined evaluation and risk assessment process (currently the 5x5x5) in order to assist with decision-making.
Intelligence Requirement	The request to provide intelligence to fill any identified gap between what is known and what is not known forms the intelligence requirement.
NTSB enforcement projects	NTSB has a number of enforcement projects including the Illegal Money Lending Teams in England and Wales, the Scambuster Teams, the Safety at Ports Projects and the National Trading Standards eCrime Centre and any other projects that may be added in the future.
Strategic Assessment	This document is a long term, high level analysis of problems. It is produced by the intelligence functions and utilised by the Strategic Tasking Group to set the control strategy.
Strategic Tasking Groups	The Strategic Tasking Group meet once a year to consider the strategic assessment and to set the control strategy.
Tactical Assessment	Tactical assessments drive the business of Tasking Groups. The assessment identifies the short term issues locally, regionally and nationally in accordance with the control strategy.
Tasking group attendance	This will vary dependent upon the level of operation. Attendees should include a senior manager (Chair) who has responsibility for enforcement in their area, the intelligence manager and/or intelligence analyst.
Tasking groups	Tasking groups will consider tactical assessments and determine the allocation of resources based on the assessed risk/harm, other available intelligence and the control strategy. Each group, at whatever level, may determine one of the tiered responses as outlined in the management principles (see below) for each identified threat/risk.
Threat	Misconduct which is causing harm to consumers and businesses.