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13th February 2013

Rachel Onikosi  
Customer and Competition Policy  
Markets and Social Growth  
3<sup>rd</sup> Floor  
Orchard 2 Department for Business, Innovation and Skills  
1 Victoria Street  
London  
SW1H 0ET

Dear Ms Onikosi

## **Street Trading and Pedlary Consultation**

The purpose of this letter is to provide feedback from Northumbria Police in relation to the consultation paper regarding the Government's proposals to repeal the Pedlars Act.

I have consulted internally and taken account of issues raised by other forces. My view is that we would not be in support of the proposal to repeal the current legislation.

Application of the current legislation is not onerous or frequent. An ancillary benefit is the deterrent effect on criminals who have to apply for a Pedlar's certificate.

I agree with the recommendation in the Government paper to update the definition of a Pedlar. As the fee for a certificate is small, Northumbria Police are not opposed to this being abolished.

My main concerns are that:

- A lack of legislation or a relaxation of that which currently exists may result in an increase in crime and/or incidents such as those recorded as part of Operation Bombay, the regional response to distraction/bogus official burglary offences across the three North East Forces. In turn, this may increase victimisation of the vulnerable coupled with potential damage to public confidence and increase resource demand.
- If no legislation exists, this may afford an increased ability to commit opportunist crimes.
- Whilst accepting that there is a requirement to Act within European law, Northumbria Police would challenge the Government comment that *'we are not aware of any evidence of consumer detriment caused by the activities of*

*Pedlars who trade within the current definition*'. The current certification system screens out those that would potentially act dishonestly. Therefore, the majority of certified Pedlars probably do operate substantially within the current definition of the Act. The application procedure itself may also have a deterrent effect.

Northumbria Police would suggest that ACPO establish the national intelligence picture in relation to inappropriate applicants, and criminal/suspicious activity by persons selling door-to-door and submit a response to the latest consultation. Such an exercise may establish a legitimate evidence basis for maintaining an authorisation scheme founded on a genuine and sufficiently serious threat.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Vant', enclosed within a large, loopy circular flourish.

Greg Vant

A solid black rectangular redaction box covering contact information, followed by a vertical line.