

**REPORT TO: ENVIRONMENTAL SERVICES AND SUSTAINABILITY COMMITTEE
15TH NOVEMBER 2004**

**REPORT ON: DEPARTMENT OF TRADE & INDUSTRY (DTI) CONSULTATION RESPONSE
– DOORSTEP SELLING AND COLD CALLING**

REPORT BY: HEAD OF ENVIRONMENTAL HEALTH & TRADING STANDARDS

REPORT NO: 770-2004

1.0 PURPOSE OF REPORT

- 1.1 This report seeks approval for a response to the Department of Trade and Industry on their recent consultation 'Doorstep Selling and Cold Calling', and consideration of other issues in connection with doorstep sales.

2.0 RECOMMENDATIONS

- 2.1 It is recommended that the committee approves the attached document as the response from Dundee City Council
- 2.2 It is further recommended that the committee notes the work currently being done by Trading Standards officers in connection with a local good trader scheme.
- 2.3 It is further recommended that the committee approves an approach to the Scottish Executive, to suggest that doorstep selling be prescribed as an activity which can be licensed under the Civic Government (Scotland) Act 1982.

3.0 FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications arising from this report.

4.0 DUNDEE 21 IMPLICATIONS

- 4.1 People live without fear of crime: These proposals will help prevent doorstep crime, improve community safety, and make citizens more confident in buying goods and services from their own home without fear of fraud or lack of redress.

5.0 EQUAL OPPORTUNITIES IMPLICATIONS

- 5.1 There are no equal opportunity implications in this report

6.0 BACKGROUND

- 6.1 Doorstep selling is the practice of selling goods and services on the doorstep or in the home. It is worth at least £2.4 billion a year and covers a wide range of products from cleaning products costing less than a pound, to property repairs and home improvements costing thousands of pounds. Products can be sold in two ways, either solicited, where the consumer actively initiates the visit by the salesperson, for example by specifically requesting a visit in response to an advert or mail shot; or unsolicited, where the visit does not take place at the express request of the consumer, for example where a salesperson makes a 'cold call'.
- 6.2 There have been a number of surveys and market studies carried out by various organisations to try and assess the main concerns for consumers. A market study report published by the Office of Fair Trading in May 2004 highlighted the following:

- The consumer can become a captive customer in their own home
- Consumers are generally unaware of their rights (94%)
- Consumers can make inappropriate decisions due to high pressure sales techniques
- The majority of complaints are about high value goods and services obtained through solicited visits, where the consumer has no cancellation rights
- Cancellation periods can be undermined by certain sales techniques
- Prices can vary widely with large premiums for buying in the home of up to 144%

6.3 A particular area of concern is that of bogus traders. That is where consumers are cold called, and tricked into paying large sums of money for often very shoddy goods or services. Property maintenance, for example roofing repairs or tarmacking, covers a high proportion of cases, and these are almost always high value cases with consumers parting with sums in excess of £1000. If victims are from vulnerable groups, then the result is often distress as well as financial loss. Of even more concern is the link between bogus workmen and distraction burglary where vulnerable members of the community are specifically targeted by individuals seeking to steal cash and property.

6.4 The Council's Environmental Health and Trading Standards Department is already active in this area, having helped organise a 'bogus caller' theatre group presentation for older people, and continually highlighting the issues over doorstep sales locally. However a more holistic approach would be more effective, bringing together the efforts of all Council departments, the Police, local organisations, and business, to help protect the community.

7.0 PROPOSALS

7.1 There is evidence that despite the existing legislation, consumers are suffering detriment and even distress when purchasing goods and services in their homes. The DTI has produced sensible proposals that, without inhibiting the operation of legitimate businesses, will provide an enhanced level of protection for consumers. The proposals should be supported by Dundee City Council, as set out in the attached consultation response.

7.2 In addition, Dundee City Council does all it can to protect its citizens, and its honest local businesses, who might themselves be subject to unfair competition from unscrupulous trading practices. The Council's Trading Standards service is currently investigating the viability of introducing a 'Better Business' type scheme to the city which will help consumers who are seeking services, and help businesses who are seeking to provide them in an honest and fair fashion.

Such a scheme will initially be aimed at particular business sectors, and will provide an enhanced level of confidence to consumers, as well as helping improve the standard of business practices. Similar schemes are currently operated by Trading Standards officers in Fife, and Perth and Kinross Councils with notable success.

Local consumers and businesses are currently being consulted on the introduction of such a scheme, and a report will be brought before committee in due course for approval, before it is introduced.

7.3 In addition, there is an opportunity to lobby the Scottish Executive Ministers to make regulations to prescribe the activity of doorstep selling for the purposes of the Civic Government (Scotland) Act 1982. This would allow the Council, if it so wished, to license any business engaged in cold calling consumers in the city, and provide a large measure of control over their activities, and improve the safety of communities. There is currently a Scottish Executive Task Group reviewing the 1982 Act, and it is proposed to make representation to this Task Group, to include doorstep sellers as a prescribed group for the purposes of the Act.

8.0 CONSULTATIONS

- 8.1 The Chief Executive
Depute Chief Executive (Support Services)
Depute Chief Executive (Finance)

9.0 BACKGROUND PAPERS

Department of Trade and Industry: DOORSTEP SELLING AND COLD CALLING –
Consultation on proposals to improve consumer protection when purchasing goods or
services in their home. July 2004. URN 04/1331

Albert Oswald
Head of Environmental Health & Trading Standards

5th November 2004

CONSULTATION ON DOORSTEP SELLING AND COLD CALLING

RESPONSE FORM

(This will need to be saved as a Word document before being forwarded by Email.)

Please note that there are additional questions contained in the Partial Regulatory Impact Assessment, an electronic version of which can also be found at <http://www.dti.gov.uk/ccp/consultations.htm>.

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Date: 8 th October 2004	

When responding please state whether you are responding as an individual or representing the views of an organisation or representative group.

Representing the views of Dundee City Council.

If responding on behalf of an organisation or representative group, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

Dundee City Council is a Scottish local authority. This response has been compiled in consultation with officers of our trading standards service and has been approved by the Environmental Services and Sustainability committee of the Council. Our aim is to do all we can in support of consumers, encouraging honest business and targeting rogue traders.

SECTION 4

EXTENDING CANCELLATION RIGHTS TO SOLICITED VISITS

Question 1

Would extending to solicited visits the cooling-off period and cancellation rights which currently apply to unsolicited visits be effective in reducing instances of consumer detriment?

Yes, we believe that extending cancellation rights to solicited visits would have a significant impact on reducing consumer detriment in relation to general doorstep selling incidents.

We would suggest however that consideration be given to potential exemptions from this extension, for example to accommodate emergency call-outs etc.

Question 2

Is it possible to quantify the likely impact on traders if solicited and unsolicited visits were treated in the same way?

We are concerned that local small business may suffer through the proposed extension to cancellation rights, however we have no data on which to base a definitive answer to this question.

It is our view that consumers would take advantage of new rights to cancel but the logical reason for this might be that these consumers had either been pressurised or hurried into buying something they didn't want, which consequently would have been detrimental to their interests.

Such an extension would encourage businesses that sell in the home to adopt an open, honest sales system and would generally have a positive effect on the market. It would also establish a level playing field for the trade itself as at present, as some legitimate home selling organisations do provide extended cancellation periods.

It is of note that a number of other countries apply cancellation rights to both solicited and unsolicited visits, including Denmark, Finland, France, the Netherlands, Spain and the USA.

Question 3

Is it possible to quantify the likely impact on enforcement agencies if solicited and unsolicited visits were treated in the same way?

There will likely be an increase in complaints to local authorities through these proposals, however it is our view that the impact will be minimal as it is likely that we would have had to deal with such cases in any event.

We would like to see a proper Regulatory Impact Assessment being made in advance of any new regulations.

Question 4

Could extending the cooling-off period to solicited visits create any negative consequences for consumers (e.g. loopholes to be exploited by rogue traders)?

It is difficult to see how extending cooling off periods to solicited visits could have negative consequences. We cannot foresee any loopholes, but even if they were available then the consumers would only be put back into the same position as they are now.

Question 5

Are there practical alternatives (e.g. increased awareness, code of practice) to legislative change?

There will always be a role for consumer education, increased awareness and other measures, but faced with rogue or high pressure salesmen, these are unlikely to make any real contribution to consumer protection, particularly for older and vulnerable adults. Legislative change is the most effective option.

Codes of practice certainly have a place but as always, they will only regulate or moderate the behaviour of organisations who want to comply and who are generally reputable.

Additional Comments

SECTION 5

AMENDING REG 7(2)(iv) OF THE REGULATIONS

Question 6

Would amending Regulation 7(2)(iv) to apply only in cases where a customer asks for work to commence as soon as possible and confirms that they are aware of the effect on cancellation rights help reduce instances of consumer detriment?

Yes, this would be a welcome amendment but it would not address the problems caused by itinerant or rogue traders. We feel that the proposal outlined in section 6 would be more effective, especially in relation to unsolicited visits.

Whilst this would be a positive development it would be relatively easy for a trader to get round particularly in relation to older and vulnerable clients who would be easily persuaded that there is an urgency (or indeed, to sign anything with in the words hidden in the small print).

We feel there should be additional safeguards such as prescribed documentation signed by the consumer and trader - Any false statement as to urgency could give rise to an offence under the Trade Descriptions Act 1968.

Question 7

Is it possible to quantify the likely impact on legitimate traders of a more limited protection?

The proposals would require some traders to adopt new ways of operating although generally it should be good for the market, and it would be difficult for the trade to argue that to stop people cancelling is a legitimate reason for opposing this amendment.

Question 8

Is it possible to quantify the likely impact on enforcement agencies of amending the legislation in this way?

Similar to Q3 - there will likely be an increase in complaints to local authorities through these proposals, however it is our view that the impact will be minimal as it is likely that we would have had to deal with such cases in any event.

We would like to see a proper RIA being made in advance of any new regulations.

Question 9

Can the amendment be made in such a way as to still provide effective protection for legitimate traders?

We are unsure of what this question is aimed at, but legitimate traders will still enjoy the protection of the courts if they have problems with their customers, for example for non payment.

Question 10

Could amendment of Section 7(2)(iv) create any negative consequences for consumers (e.g. loopholes to be exploited by rogue traders)?

Yes, and care must be taken that amendments are worded very carefully and tightly.

The fear would be that unless the legislation and contract details were worded appropriately, consumers could be pressurised into (or inadvertently agree to) signing exemptions giving explicit permission for the work to go ahead immediately. This may encourage traders to complete works as quickly as possible and use the written agreement to persuade the customer that they can't do anything about it if they later change their mind. In saying that however consumers would not really be any worse off than they are at present.

Question 11

Are there practical alternatives (e.g. increased awareness, code of practice) to legislative change?

We believe that there are no practical alternatives.

See the answer to Q5 above.

Additional Comments

Whilst we would not dismiss this proposal, we feel that the proposals in section 6 are more appropriate for unsolicited visits. We feel this proposal is best suited to solicited visits.

SECTION 6 NO GOODS TO BE DELIVERED OR WORK PERFORMED DURING THE COOLING-OFF PERIOD

Question 12

Should there be a prohibition of goods being delivered or work being carried out under a contract before the seven day cooling-off period has elapsed?

Yes we would welcome this amendment as we feel it goes further and provides better protection than the option described in section 5 above.

We would wish to see some urgency exemptions [see Q15 below].

Question 13

If so, should this prohibition apply to unsolicited and solicited visits or only unsolicited visits?

We would support this proposal in relation to unsolicited visits only and feel that this could be drafted and implemented without too much difficulty.

Unsolicited visits are the most problematic area for consumers, whereas in solicited visits the customer will know who the trader is and will have contact details.

There is much less likelihood of unsolicited visits to be in connection with urgent work, so less likely for the consumer to be disadvantaged by a delay in commencement of that work.

Applying this change to unsolicited visits only will also safeguard the business of honest local traders.

To prevent this creating a loophole in relation to solicited visits however, we feel that the amendment proposed in section 5 above should be applied to these visits.

Question 14

Is this approach preferable to amendment of Regulation 7(2)(iv) of the 1987 Regulations?

Yes – for unsolicited visits.

Question 15

If so, how should any exemptions be framed?

We recognise that this provision could not work unless there is an exemption for 'urgent' work but also believe that if it only applied to unsolicited calls then it would be very rare that such an exemption should need to be invoked.

For emergency occasions (storm damage/floods etc.) when traders may cold call, the local authority should have the power to authorise traders for this purpose.

These occurrences will however be rare and consequently, whilst an exemption may be necessary we believe it should be very limited.

We would like to see prescribed documentation to cover such events as per our response to Q6.

Question 16

What would be the likely impact of this prohibition on the activities of bogus traders?

We do not believe this provision would have any real direct impact on the activities of the true criminal bogus trader who has little respect for legislation.

They could call, start work immediately, take cash, use false names and addresses and move on to their next job.

It does however give a useful framework within which enforcement authorities can work and seek to educate and inform. To that extent it can only have a positive impact.

Question 17

Is it possible to quantify the likely impact of this prohibition on enforcement agencies?

There will likely be an increase in complaints to local authorities through these proposals, however it is our view that the impact will be minimal as it is likely that we would have had to deal with such cases in any event.

We would like to see a proper RIA being made in advance of any new regulations.

Question 18

Is it possible to quantify the likely impact on traders if deliveries or work could not take place during the cooling-off period?

We do not think there would be much impact on traders – merely a rescheduling of work initially, particularly if it were only to apply to unsolicited visits.

We feel that there would be a greater impact on some traders if this were to be applied to solicited visits as well, however this would not be significant when weighed up against the potential additional consumer protection which would be afforded by this proposal.

Question 19

Could this prohibition create new loopholes to be exploited by rogue traders (or other negative consequences for consumers)?

It is difficult to see how this provision could have negative consequences for consumers especially if it were limited to unsolicited visits. Even if loopholes were found then the consumer would only be put back into the position they are now.

Question 20

Are there practical alternatives (e.g. increased awareness, code of practice) to legislative change?

**We believe that there are no practical alternatives.
See the answer to Q5 above.**

Additional Comments

SECTION 7

NO PAYMENT TO BE TAKEN DURING THE COOLING-OFF PERIOD

Question 21

Should there be a prohibition of money being paid or taken before the seven day cooling-off period has elapsed?

Yes, we support this proposal especially if it is linked to the proposal in section 6 for no goods to be delivered or work performed during the cooling-off period.

A prohibition on the collection of monies (or deposits) during the cooling-off period is currently in place in a number of other European countries.

Question 22

If so, should there be any exemptions?

We believe that the only exemptions should be as discussed above for sections 5 and 6, and only if this were only applicable to unsolicited visits. However no money should be collected before goods are delivered or services fully completed.

It is important to try to discourage traders from commencing work or delivering goods within any cancellation period.

Question 23

Should this prohibition apply to unsolicited and solicited visits or only unsolicited visits?

See our answer to Q13 above:

We would support this proposal in relation to unsolicited visits only and feel that this could be drafted and implemented without too much difficulty.

Question 24

Should this prohibition be introduced independently or in conjunction with a prohibition of goods being delivered or work being carried out under a contract before the seven day cooling-off period has elapsed?

We believe that this should be introduced in conjunction with a prohibition of no delivery/work being carried out within the cooling-off period.

A holistic approach to this issue would doubtless be the most effective.

Question 25

What would be the likely impact of this prohibition on the activities of bogus traders?

See our answer to Q14 above:

We do not believe this provision would have any real direct impact on the activities of the true criminal bogus trader who has little respect for legislation.

They could call, start work immediately, take cash, use false names and addresses and move on to their next job.

It does however give a useful framework within which enforcement authorities can work and seek to educate and inform. To that extent it can only have a positive impact.

Question 26

Is it possible to quantify the likely impact on legitimate traders if no money could be taken during the cooling-off period?

See our answer to Q18 above

We do not think there would be much impact on traders.

We feel that there would be a greater impact on some traders if this were to be applied to solicited visits as well, however this would not be significant when weighed up against the potential additional consumer protection which would be afforded by this proposal.

Question 27

Is it possible to quantify likely impact on enforcement agencies if no money could be taken during the cooling-off period?

See our answer to Q17 above

There will likely be an increase in complaints to local authorities through these proposals, however it is our view that the impact will be minimal as it is likely that we would have had to deal with such cases in any event.

We would like to see a proper RIA being made in advance of any new regulations.

Question 28

Could this prohibition create new loopholes to be exploited by rogue traders (or other negative consequences for consumers)?

See our answer to Q19 above:

It is difficult to see how this provision could have negative consequences for consumers especially if it were limited to unsolicited visits. Even if loopholes were found then the consumer would only be put back into the position they are now.

Question 29

Are there practical alternatives (e.g. increased awareness, code of practice) to legislative change?

See our answer to Q5 above

We believe that there are no practical alternatives.

SECTION 8

BAN ON COLD CALLING TO OFFER PROPERTY SERVICES

Question 30

Would a ban on cold calling to offer property services be effective in tackling the problem of bogus traders?

Yes - we feel that a ban on the cold calling to offer property services would be the most effective single measure in tackling the problem of bogus traders.

Taking effective enforcement action against bogus traders is currently very difficult, by the Police or Trading Standards - either because it is difficult to prove any actual criminal offence or the witness (often because of their age or lack of corroboration) would not stand up in court.

Effective enforcement actions are rare and in particular, are very resource intensive.

A ban would tackle both prevention and detection. It would send a clear message to the criminals and importantly, it would be a very clear message to the public, who would know that there was some law which stopped people calling to offer property services.

Few if any legitimate businesses cold call property services and for those that do, they will still be able to do business in people's homes – but only by appointment.

There is currently a prohibition on the cold calling of finance and loans which has been in place for 30 years. A ban on cold calling of property services could be equally effective.

Dundee City Council is currently considering options for controlling doorstep sales locally, including measures such as bylaws, or through the Civic Government (Scotland) Act 1982. We would therefore welcome a national ban.

Question 31

If so, how should "cold calling" and "property services" be defined and would some exemptions be needed to avoid the ban applying to legitimate businesses?

Cold calling should include any unsolicited visit to a consumer, and subsequent visits should the initial contact have been unsolicited.

Property services should be a wide definition including a service consisting of the doing of something to buildings or land, or fittings, machinery or equipment in or connected with buildings or land, and including the fixing of things to buildings or land or, as the case may be, to things so fixed.

There would be a need for exemptions to avoid the ban applying to legitimate activities for example by a local authority, government department or landlord exercising rights under a lease.

Question 32

Would making the ban subject to certain exemptions undermine its effectiveness and the message to be sent to consumers?

We believe that the exemptions as detailed above would not undermine the

effectiveness of this legislation, nor its message to consumers.

Question 33

Should cold calling (the means of contact with a consumer) by itself be treated as a criminal act?

Yes, it would be vital that the cold call itself would trigger the offence as opposed to the actual sale/contract.

It is only by making the act of cold calling a strict liability offence that this legislation would be enforceable. Otherwise officers would be in a situation of only being able to react to consumer complaints after the event (with all the resultant problems of evidence, witnesses etc).

Question 34

If so, what penalty (e.g. criminal or civil offence, custodial sentence or level of fine) should breach of a ban attract?

We suggest that this should be a summary offence only with imprisonment for a term not exceeding 3 months or a fine not exceeding level 5.

We believe that it is important that this offence should be summary only (as opposed to either way) so as to ensure that prosecutions are dealt with both at the appropriate level and quickly.

Question 35

Is it possible to quantify the impact of a ban on enforcement authorities?

Enforcement operations into doorstep crime are difficult and time consuming, and more often than not they have an unsatisfactory outcome due to lack of evidence or an inability to locate the offender.

This would suggest that the resources being channelled into this enforcement effort could be saved by this simple ban. However an increased awareness and improved regulation could increase demands.

It is difficult to quantify the resource impacts on enforcement authorities except to say that the resource savings will almost certainly outweigh any resource implications in enforcing legislation.

We also consider that there are other local authority services which are impacted by this type of rogue activity such as Police, community or social work activities. If this ban were to stop a large proportion of the doorstep crime/property services incidents then there would also be a significant 'knock-on' saving in relation to health and community safety.

Question 36

Would a power of arrest be important to the effective enforcement of a ban?

A power of arrest would be vital to the effectiveness enforcement of this ban. Indeed, we would go so far as to say that without the power of arrest, the proposed legislation would be largely unenforceable.

The type of people who cold call property services with criminal intent will not

respond to an enforcement officer trying to interview them in the street or politely request that they attend their office voluntarily to discuss the matter further. These types of criminals will have no hesitation in either dismissing/ignoring enforcement officers or giving false information.

The arrest element will also act as a powerful deterrent, making it less worth while for these criminals to travel large distances to commit crimes.

Question 37

Could a ban with exemptions create any negative consequences for consumers (e.g. loopholes to be exploited by rogue traders)?

We can not see any way in which this ban would create any negative consequences for consumers.

Question 38

Are there practical alternatives (e.g. increased awareness, code of practice) to a statutory ban enforced by criminal sanctions?

We believe that there are no practical alternatives.

Additional Comments

Dundee City Council is currently considering options for controlling doorstep sales including bylaws, or through the Civic Government (Scotland) Act 1982. We would therefore welcome a national ban.

The Property Repairs (Prohibition of Cold Calling) Bill presented by Andrew Robathan MP as a private members bill in January 2004 should also be noted.

SECTION 9

HIGHLIGHTING THE CONSUMERS CANCELLATION RIGHTS

Question 39

Would consumers be more likely to invoke their cancellation rights if cancellation notices are more prominently and clearly displayed in the contract and provide a clear indication of the circumstances in which cancellation rights may be lost?

Yes, probably, there are situations where cancellation rights are not sufficiently prominent. Specifying provisions for clarity, size etc. would be a sensible step as part of a wider review.

We are also conscious of the special needs of some client groups (particularly older people) who would benefit greatly from clarity and larger print.

Question 40

If so, how can this best be encouraged in practice? (For example, legislative or non-legislative options.)

We see no reason why this simple requirement should not be introduced by way of legislation. We cannot see any reason why the legitimate trade would have grounds for objection.

Question 41

Is it possible to quantify the likely impact on traders of providing more prominent cancellation notices?

There should be no impact on traders, other than costs for redesign or printing of forms. If there was to be a derogation for a period, or if authorities were to provide advice or assistance to mitigate this cost, then we can see little grounds for objection.

Question 42

Is it possible to quantify the likely impact on enforcement authorities of a requirement for traders to provide more prominence cancellation notices?

The impact on enforcement agencies would be little if anything. The requirement is already in place, and while there may be an increase in consumer complaints through a greater awareness, this should be minimal.

Question 43

Could a requirement to provide more prominent cancellation notices create any negative consequences for consumers (e.g. loopholes to be exploited by rogue traders)?

No.

Additional Comments

SECTION 10 INCREASED PRICE TRANSPARENCY

Question 44

Should firms trading via doorstep selling be required to provide consumers with greater transparency on prices for their products?

Yes, this is a sensible proposal that will go some way to addressing the imbalance between the salesman and consumer in relation to doorstep/home selling.

Current legislation requires 'high street' retailers to display their prices. We see no reason why doorstep/home sales should be excluded indeed, to do so clearly puts at a disadvantage the group of consumers who for whatever reason are more reliant on this way of shopping.

Question 45

If so, how can this transparency best be encouraged in practice? (For example, legislative or non-legislative options.)

We feel that to be effective, new provisions must be embodied within legislation, along with the proposals from section 9.

Question 46

Is it possible to quantify the likely impact on traders of providing greater transparency on prices (e.g. written price lists, detailed quotes, breakdowns of cost)?

We would anticipate that the trade will argue that greater transparency (e.g. price list) would be difficult to deliver and would result in lost contracts. We do not accept this position as legitimate or moral. We believe that if through greater transparency consumers are able to make a considered choice, then this is appropriate and that any other position is untenable.

We also believe that the issue of providing price lists for bespoke items is not peculiar to the home/doorstep selling industry and can think of many examples where high street retailers are in a similar position yet still have to produce price lists and display prices in accordance with current legislation.

Question 47

Is it possible to quantify the likely impact on enforcement authorities of a requirement for traders to provide greater transparency on prices?

The impact on enforcement agencies would be little if anything. Greater price transparency may reduce complaints if anything, and any subsequent prosecutions might be more easily taken if better pricing information is available.

Question 48

Could a requirement to provide greater price transparency create new loopholes to be exploited by rogue traders (or other negative consequences for consumers)?

No

Question 49

Do you have any other comments at all on any of the issues raised in this Consultation Document?

In conclusion we would support the proposals in their entirety, with the caveats mentioned in particular circumstances. The proposals must be implemented as a complete strategy as they will be ineffective individually [with the exception perhaps of the ban on cold calling].

In looking at this and similar proposals, it must always be borne in mind that the majority of 'victims' of rogue traders and doorstep criminals are the more vulnerable of the older adult community who will never understand their rights and the legal consequences of contract documentation. But we must also recognise that this group is not alone in falling victim – younger people, students, and other groups can and are still taken advantage of by doorstep criminals. We must do all we can to protect them all within our communities

Dundee City Council plays a full part in its local community through the Dundee Community Planning Partnership, and we are committed to working with our partners to make Dundee a better and safer place to live. We fully support these proposals to clamp down on rogue traders and help enhance the life of our citizens.

DTI
URN 04/1359