

# NATIONAL STRATEGIC ASSESSMENT

NATIONAL  
TRADING  
STANDARDS

Protecting Consumers  
Safeguarding Businesses

September  
2022



## DOCUMENT HANDLING INSTRUCTIONS

This document has been produced by the NTS Intelligence Team. It is classified as OFFICIAL when completed, as defined by the Government Security Classifications (May 2018).

# 1. Foreword

**Since I became Chair of National Trading Standards (NTS) in June this year, I have been inspired every day by the unwavering determination of the Trading Standards community to protect consumers and honest businesses from harm. Working against a backdrop of ongoing financial constraints and a seemingly relentless onslaught of external challenges – from the pandemic to the cost-of-living crisis – our teams continue to deliver incredible results for the public. I thank each and every one of them for their dedication and commitment.**

In the year from April 2021 to March 2022, NTS teams and workstreams dealt with almost £72m in consumer and business detriment. Prison sentences totalling more than 63 years were handed down. Total fines were £24,400 and 386 websites and social media sites were taken down or suspended. These are just a handful of examples of our impact – and they don't even begin to quantify the emotional distress that's prevented when criminals are stopped in their tracks. Having saved the taxpayer £11 for every £1 spent since 2014, it's clear to me that NTS continues to represent excellent value for money.

This Strategic Assessment identifies the key national threats and emerging issues facing consumers and businesses. It is clear from the analysis that the cost-of-living crisis is having a major impact on all our priority areas, as criminals adapt their tactics – both online and offline – in order to take advantage of people's financial worries.

In particular, energy-related fraud is likely to grow significantly as winter approaches and people look for ways to reduce their bills. During the reporting period, NTS funding supported six energy-related fraud cases, and Citizens Advice consumer service saw an increase of 18% in consumer complaints in this area. This figure is taken from 01/04/21-31/03/22, with a comparison to the previous 12 months data period. For us, this means doubling down on the criminals charging extortionate prices for shoddy, incomplete and often dangerous work as they rip off those looking to make home improvements – such as insulation or double glazing – to make their homes more energy efficient.

We expect consumers' buying habits to change too. Whilst bargain-hunting is no bad thing, we're concerned that many may be tempted, knowingly or otherwise, to buy counterfeit goods. Without realising it, people who buy items such as illicit tobacco, counterfeit alcohol or electrical items may end up putting money in the hands of organised crime groups.

With prices rising across the board, our overriding concern is that more people than ever will be pushed directly into the path of fraudsters in the coming months. I can promise that NTS will continue in its mission to block that path, to identify and bring these criminals to justice, and to help equip consumers with the knowledge they need to steer clear. I look forward to playing my part and supporting our teams, the Trading Standards community and the wider consumer protection landscape as they continue their outstanding work.

A more detailed account of our 2021/22 activity is available in our Annual Report, available at [www.nationaltradingstandards.uk/documents](http://www.nationaltradingstandards.uk/documents).

**Lord Michael Bichard**

Chair of National Trading Standards

## 2. Introduction

The NTS 2022 national Strategic Assessment identifies the key national threats, emerging issues and priority areas for NTS. It will help the NTS Board produce their national Control Strategy for 2023 – 2024. It is an integral part of the NTS business planning process.

It is used to draw inferences and make recommendations on how to develop policies and tackle national problems. The Strategic Assessment is produced by the NTS Intelligence Team. It uses data drawn from 1 April 2021 to 31 March 2022.

A wide range of information sources have been used by the Intelligence Team to produce this assessment including:

- Trading Standards' intelligence recorded on the national Trading Standards' intelligence database (IDB) (see **Appendix 1**).
- Citizens Advice consumer service database (Citizens Advice database) (see **Appendix 1**).
- Regional Trading Standards Group's priority areas (see **Appendix 2**).
- Information from Regional Groups, NTS Teams and partner agencies.
- Open source and other information.

NTS uses the MoRiLE (Management of Risk in Law Enforcement) to identify and assess its key priority areas. It is a risk prioritisation process, widely used by law enforcement agencies. It uses a structured methodology and matrix to consistently assess threats, risks, and harm. The NTS MoRiLE thematic assessment will be different from Trading Standards or Regional Group's assessments. Since each agency has to complete it from their own organisation's perspective, using the following composite sections:

- **Impact/harm** – This is victim focussed. What impact have we seen?
- **Threat/likelihood** – This is threat focussed. What are we seeing?
- **Confidence** – How much do we know or not know?
- **Organisational position** – This assesses your agency. Focusing on your resources, political factors, capacity and capability. How do these factors affect the risk? For NTS, in practice, this will mean whether or not the conditions of the relevant grant agreements permit us to use funds to tackle the issue.

The NTS Annual Report and NTS infographic for 2021-22 detail the work of the NTS Teams and workstreams. They dealt with £71,946,387 in consumer and business detriment. Prison sentences totalling 63 years and 9 months were handed down. 39 people were convicted of offences. Total fines were £24,400. There were 4,483 feed interventions. 386 websites/social media sites were taken down or suspended. 21 warning orders, prohibition orders and penalty notices were issued by the NTS Estate and Letting Agents Team. Tobacco with a revenue value of £7,823,176 was also seized.

This Strategic Assessment is a forward-looking document. Horizon scanning and emerging issues are covered in a separate section. This includes a PESTLE (Political, Economic, Sociological, Technological, Legal and Environmental) analysis that identifies some of the key external factors and emerging issues. These are mentioned in the NTS key threats and priority areas, that also include some key successes.

Dealt with

**£71,946,387**

in consumer and  
business detriment



## 3. Key Findings

### During the period of 1 April 2021 and 31 March 2022 research found that:

- 39,349 intelligence logs were recorded on IDB by Trading Standards Services in England and Wales, Regional Groups and NTS Teams. This is a drop of 1,455 from the previous year
- Age restricted sales, animal health, tobacco and cigarettes have the greatest increases in intelligence recorded on IDB.
- Tobacco and cigarettes (9,586), Fair Trading (7,023) and Doorstep Crime and Cold Calling (6,879) have the highest number of intelligence logs recorded on IDB. Notably, Fair Trading dropped by 3,863 intelligence logs from the previous year.
- Citizens Advice consumer service database complaints increased to 583,298, up 4.7% from the previous year.
- Citizens Advice consumer service database reports there were 229,300 civil breaches and 172,333 criminal breaches recorded.
- The National Fraud Intelligence Bureau (NFIB) Fraud and Cyber Crime Dashboard reports 4,595 door to door sales and bogus callers (across the UK) with reported losses of £25 million. There were 20,262 other consumer non-investment frauds (across England and Wales) with reported losses of £104.8 million (as at 28/07/22).
- Under-reporting and subsequent dissemination of fraud intelligence remains a significant issue in the criminal justice system. The Victims Commissioner reported in October 2021, that only 15% of fraud cases are reported and it was suspected to be even lower for online fraud. This leads to an incomplete intelligence picture when trying to assess the relative threat, risk, and harm across the consumer landscape. It is imperative that Trading Standards Services and NTS Teams should have direct access to the Action Fraud/NFIB data in order to help and protect victims of fraud.
- Cross cutting issues or enablers that affect all sectors across Trading Standards' work have been identified as, eCrime, the growth of serious and organised crime and the cost of living crisis.
- Trading Standards now has direct access to Police National Database (PND) through a central NTS PND team and NTS was the first non-police agency to onboard to PND.
- Trading Standards currently have 36 active Organised Crime Groups (OCGs) mapped on PND (as at 06/07/22).

## NTS uses the MoRiLE (Management of Risk in Law Enforcement) to identify and assess its key priority areas

The NTS MoRiLE thematic assessments for the last 3 years show:

Tier	Thematic Areas	MoRiLE Risk Score 2020	MoRiLE Risk Score 2021	MoRiLE Risk Score 2022
<b>NTS priority areas 1</b>	Doorstep and Cold Calling	69.3	68.25	81.25
	Energy Related Fraud	86.62	52.5	73.5
	Mass Marketing Fraud/Scams	83.25	63	68.25
	Lettings	79.2	58.5	63
<b>2</b>	Illicit Tobacco	36	26.125	44
	Intellectual property	33.15	30.25	35.75
	Used cars	33	26.25	32.5
	Other Fair-Trading issues	34.2	29.25	29.25
	Estate agency work	28.35	20.25	24.75
<b>3</b>	Animal Feed	11.7	9.625	15.75

Tier	Thematic Areas	MoRiLE Risk Score 2020	MoRiLE Risk Score 2021	MoRiLE Risk Score 2022
<b>Outside of NTS scope</b>	Animal Disease Control	38.06	29.75	38.25
	Product Safety	54.37	33	27
	Food Standards	38.25	30	25.5
	Age Restricted Sales	27	13.12	24
	Animal Health and Welfare	6.75	6.5	8.75
	Metrology	5.85	4.87	6.25

MoRiLE assessment - 1-30 **Green** (low risk), 30-60 **Amber** (medium risk), 60+ **Red** (high risk)

**Based on the NTS MoRiLE 2022 thematic assessment and this assessment, the NTS Board agree the key priority areas for the NTS national Control Strategy for 1 April 2023 – 31 March 2024 should be:**

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**Tier 1:**

**Doorstep and cold calling, energy related fraud, mass marketing fraud/scams and lettings.**

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**Tier 2:**

**Illicit tobacco, intellectual property, used cars, other fair-trading issues and estate agency work.**

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**NTS will have the following cross cutting themes and enablers, as they impact on each priority area:**

- eCrime and the use of social media/online platforms.
- Serious and organised crime.
- Cost of living crisis.

NTS will also undertake work on specific activities, where direct funding is provided for a programme of work to be delivered, such as the Animal Feed work (Tier 3) that is funded by the Food Standards Agency.



# 4. HORIZON SCANNING AND EMERGING ISSUES

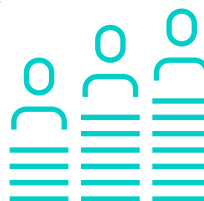
## MILITARY THREATS

While the focus of the international community has been on the Russian invasion of Ukraine, there remain concerns about China's role. If, for example, there was a similar conflict in Taiwan/China then this could be one of the most significant business disruptions the world has seen.<sup>1</sup>



## POLITICAL CHANGES

A new Prime Minister has taken office and a new cabinet and government have been formed. There are likely to be Government policy changes, including income tax and service cuts.



## COST OF LIVING CRISIS



The UK economy is already under pressure and the current Government and PM changes may have further effects on the UK economy. The cost of living crisis remains paramount with inflation figures and interest rates forecast to continue rising. Food costs have gone up dramatically over the past year and will continue to do so, especially when demand outstrips supply. There has been disruption of supply chains and difficulties getting foods, products, and services, particularly following the EU exit, war in the Ukraine, Covid-19 and climate change issues. Trading Standards will be severely affected with consumers continually looking for bargains or products, unfair business practices and criminals seeking to take advantage at every opportunity.

## ENERGY COSTS



Energy costs have escalated making them unaffordable for many consumers and businesses. Criminals have taken advantage of the collapse of the smaller energy firms by claiming people owe outstanding bills. The majority of these scams have been on social media platforms, shopping sites and dating apps where personal information or financial information has been gained. Research from banks state prime targets are now younger victims between 21-30 years old. Criminals will exploit the cost of living crisis, rising energy prices following the war in Ukraine and the drive to net zero and clean energy. Some traders may manipulate the volume of solid fuel, oil or gas supplied especially within rural areas. It is likely that the Government will develop more consumer grant schemes with the potential to drive more fraud into this area. NTS has already discussed these issues with the Government to alert them.

## BUILDING WORK



High inflation, increased cost of materials, global supply chain challenges and transport delays make it more difficult to source products and intense customer demand have led to huge price rises in home improvement work. The Construction Leadership Council, say price rises of between 5-10% were announced by many manufacturers in 2022, with energy-intensive products having increased by as much as 20%. It seems likely this may lead to more rogue traders offering to do work quickly, at a lower price and without having the skills or products to complete the work. There will also be a renewed focus on enforcement around construction products that may have an impact.

## COVID-19

**There are continued waves of Covid 19 and other infectious diseases (both human and animal)** - The rise in cases provides a potential for criminals to scam consumers financially, for example Covid testing kit scams.



## TRAVEL/AIRLINES

There is potential for significant issues within the travel/airline sector in the upcoming months. Short haul flights from the UK are being particularly affected with significant cancellations taking place until the end of October. Staff lay-offs when Covid was prevalent meant the airlines had to recruit new employees leading to a lack of staff and knowledge. This has caused backlogs, delays, and it is anticipated there will be a marked increase in recorded consumer complaints.





# PESTLE ANALYSIS

A PESTLE analysis is an acronym for a tool used to identify the macro (external) forces facing an organisation.

P



## POLITICAL

Change of Monarch, PM, Cabinet and Government policies.  
Russian invasion of Ukraine.  
Cost of living crisis.  
Devolution.  
Relationship with the European Union and world partners.

E



## ECONOMIC

High inflation rates outstripping wages, benefit increases and pensions.  
Global investments have dropped and pension balances are volatile.  
Increased use of property sales and lettings by OCGs to launder criminal gains.  
Disruption of supply chains - difficulties getting food, products, and services.  
Growth in serious and organised crime and fraud.

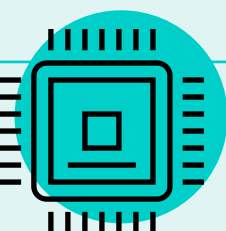
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## SOCIAL

Consumers have less disposable income.  
Households lowering costs - especially energy costs.  
Demand for cheaper products – increasing sales of counterfeit/unsafe goods and illicit tobacco.  
Increase in the underage sale of vapes.  
Difficulties in buying and renting properties.

T



## TECHNOLOGICAL

High volume of digital scams and fraud by OCGs and rogue traders.  
Social media sites and subscription traps – used to mislead/defraud consumers.  
Rogue traders using approved trader schemes, websites and fake reviews to appear legitimate.  
Dealing with criminals who operate globally and are not based in the UK.

L



## LEGAL

Enforcement issues relating to the Consumer Rights Act and legal powers, particularly cross border work. Legislatives changes including:

- Consumer Rights Act 2015
- Online Safety Bill
- Leasehold Reform (Ground Rent) Act 2022
- A Bill to extend Decent Homes Standard to private tenants
- Social Housing Regulation Bill.

E



## ENVIRONMENTAL

Demand for renewable and clean energy.  
Increase in energy related frauds.  
Drive towards a net zero economy by 2050.  
Covid-19 and other infectious diseases.

## 5. NTS Key Threats and Priority Areas for 2022/2023

### 5.1 Doorstep and cold calling

Doorstep crime is a key priority area for NTS. It can take many forms including; pressure selling, unfair contracts, overpriced or substandard home maintenance or improvements work, fake surveys, and bogus charity collections. Doorstep crime is largely targeted at older and/or vulnerable adults, however, the pandemic increased the susceptibility for all consumers. It can include repeat offending over many months and years, using pressure selling and aggressive tactics. It can have a huge detrimental effect on victims, including emotional distress, anxiety, and financial loss. Whilst the vast majority of offences are committed by knocking on consumer doors, phone calls, sending leaflets and using false logos that appear genuine, there has also been an increase in traders using online platforms to advertise their services and make themselves look legitimate. This is often done by using false reviews to appear trustworthy.

Intelligence figures for this year remain almost the same as the previous year, with a slight decrease of 264 reports. There are 48,493 doorstep crime complaints recorded on the Citizens Advice consumer service database, which is an increase of 10,572 (27.8%) from last year. The NFIB Fraud and Cyber Crime Dashboard reports 4,595 door to door sales and bogus callers from 1 April 2021 – 31 March 2022 (across the UK) with reported losses of £25 million.

NTS continues to support doorstep crime investigations and prosecutions through the work of the NTS Regional Investigation Teams and National Tasking Group funding. It has also provided funding for regional projects where some good work is being done. This includes a Trading Standards South East two year project, that continues previous work done with London Trading Standards in 2020/21. It aims to deter criminals, protecting and increasing the confidence of victims of doorstep crime by providing them with internet connected video doorbells or similar equipment. Trading Standards East Midlands two year project Operation Cuba, is looking at doorstep criminal's use of printers in the East Midlands to make them appear legitimate. This is using information from Operation Mercury, a Yorkshire and the Humber Trading Standards Group project funded by NTS, reported in 2021/22. A toolkit was produced that summarised the legislation, activities, provided template documents and detailed the outcomes achieved.

Several active OCGs involved in doorstep crime across the UK have been identified. These have been mapped by the NTS Intelligence

#### KEY SUCCESSSES

Doorstep crime campaign - During the pandemic, rogue traders adapted their techniques as door-to-door visits became increasingly difficult, with many approaching people online through trader websites or on social media. The Friends Against Scams Team (part of the NTS Scams Team) created materials for a Doorstep Crime campaign launched in April 2022. The materials will help local authorities to spread awareness of these tactics and include a doorstep crime leaflet, three posters and a social media pack with accompanying images.

Team. These groups are often involved in other criminality and are highly professional offenders. They have developed their modus operandi and skills and are very adept at hiding themselves and their assets using professional enablers and third parties to maintain their anonymity.

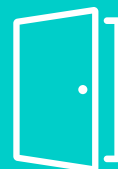
#### Doorstep crime key threats and emerging issues

- Internet/social media being used by rogue traders to promote services.
- Rogue traders using approved trader schemes and professional website enablers to appear genuine often using fake reviews.
- Business practices continue to include property improvements and maintenance (specifically roofing), gardening and green energy products.
- Telephone calls, emails, leaflets and websites are being used to engage with potential victims.
- Use of OCGs with extensive communication and money laundering networks.



**48,493**  
Citizens Advice  
consumer service  
database complaints

**+ 27.8% increase from  
the previous year**



## 5.2 Energy Related Fraud

Energy related fraud is a key priority area for NTS and there continues to be a cross-over between this priority area and doorstep related crime. It generally falls into the following areas:

- Doorstep crime relating to installation and maintenance of renewable energy systems.
- Doorstep crime relating to energy efficiency products.
- Mis-selling of energy supply.
- Large-scale defrauding of government 'green' grants.

There are 12,447 energy related fraud consumer complaints recorded on the Citizens Advice consumer service database, which is an increase of 1920 (18.2%) from the previous year. A further category breakdown of these complaints shows the problems relate to:

- Heating systems/boiler installations.
- Insulation.
- Renewable energy installations.

NTS supported six energy cases in 2021/22. Five are awaiting trial. The NTS Intelligence Team identified the current top ten most complained about renewable energy related traders to enable discussions with partners for any new tasking if additional funding becomes available.

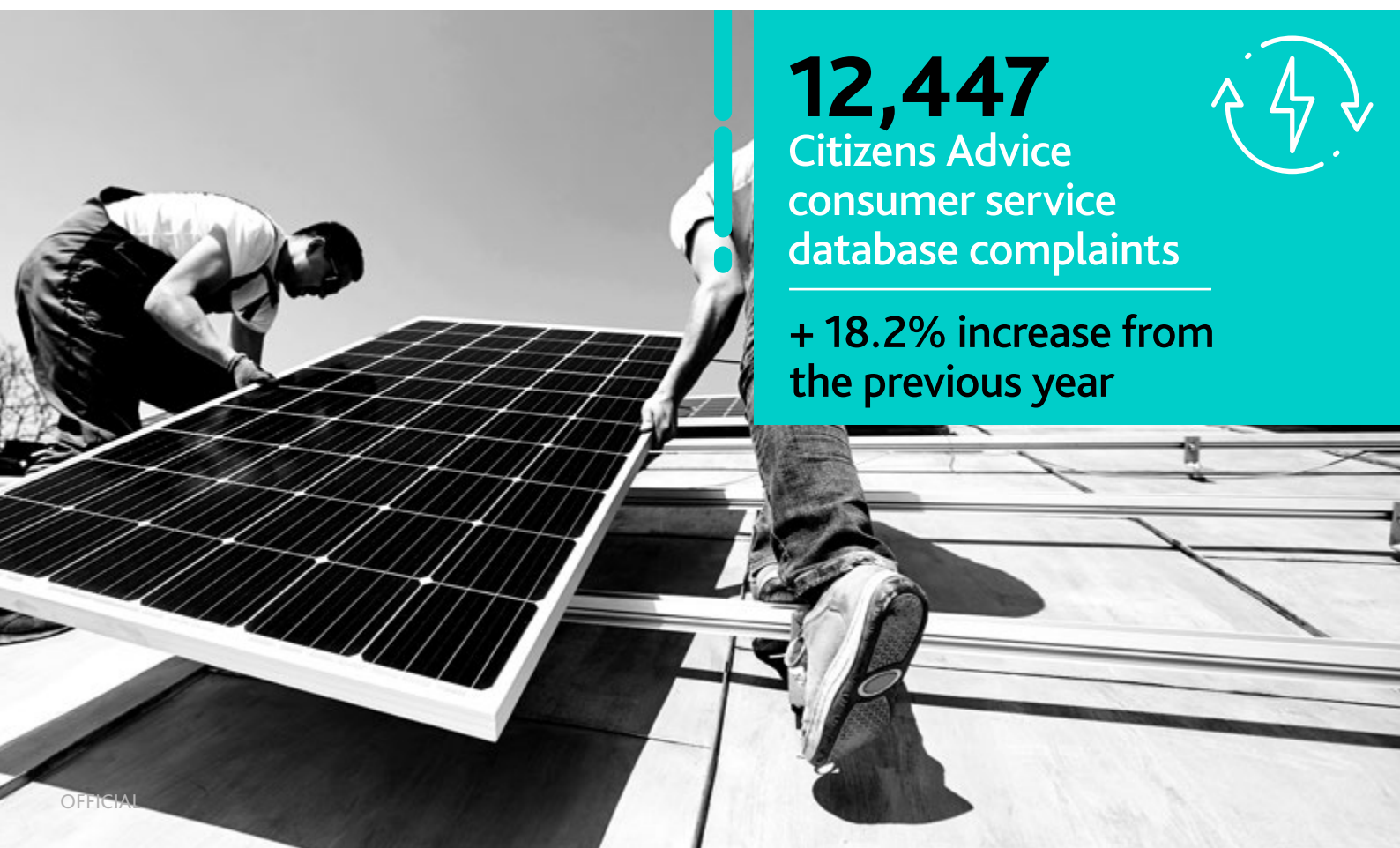
NTS continues to meet OFGEM officials to discuss how the two organisations might work better together, to tackle fraud related noncompliance in the claiming of government grants. Intelligence

analysis has shown that the launch of new government green grants is quickly followed by complaints and fraud in that area. The launch of the boiler upgrade scheme, promoting the installation of air source heat pumps, is likely to lead to work in this area.

This sector will be impacted heavily by the cost of living crisis, rising energy prices following the war in Ukraine and the drive to net zero. All these will increase the demand for clean energy and it is very likely that Government will develop consumer grant schemes with the potential to drive more fraud in this area. Consumers of smaller energy firms that collapsed, are being taken advantage of by criminals indicating that they have outstanding bills or debts.

### Energy related fraud key threats and emerging issues

- Installation of domestic renewable energy sources especially those types linked to central Government green grant schemes – currently air source heat pumps.
- Installation of 'new' insulation technologies such as wall coatings and spray-foam.
- Removal of spray foam.
- Any new Government net zero grant schemes driving fraud in that sector.



**12,447**  
Citizens Advice  
consumer service  
database complaints

**+ 18.2% increase from  
the previous year**



### 5.3 Mass Marketing Fraud/Scams

NTS provides funding for the NTS Scams Team that is hosted at Surrey County Council. Mass-marketing scams is a key priority area for NTS. It generally refers to any fraudulent scheme that uses one or more mass-communication methods – such as the Internet, telephone, mail, or in-person – to solicit or transact with prospective victims. They include foreign lotteries, romance scams, charity scams and boiler room scams. These offers can appear “too good to be true”, with payments for goods or services required in advance and requests for personal information. Many frauds perpetrated online, work on the basis that large numbers of victims lose relatively small sums of money. Scams can have a devastating impact on those targeted, financially, emotionally and physically.

There has been a decrease in intelligence over the last year of 1,167 intelligence logs (31%). However, the NFIB Fraud and Cyber Crime Dashboard reports 20,262 other consumer non-investment frauds from 1 April 2021 – 31 March 2022 (across England and Wales) with reported losses of £104.8 million. Due to the way recording takes place on the Citizens Advice consumer service database it is not possible to compare figures between the NTS Strategic Assessment date parameters, as these complaints form part of the fair-trading category, but it is believed to be vastly under reported. The continued problems in getting Action Fraud/NFIB data also compounds the problems.

Legitimate data brokers and financial intermediaries enable fraudsters to carry out telephone and mail scams due to a lack of due diligence. Focused mailings repeatedly target victims, with increased amounts of cash being requested. There is also an increased cross over between mail and telephone generated scams.

There has been an increase in “lifestyle data mining” marketing material. This is designed to allow criminals to directly take data that is more likely to make recipients victims of fraud. There has also been an increase in phone enabled scams targeting elderly and vulnerable victims. The fraudsters are using technology and social engineering as well as third parties to operate call centres in the UK and abroad. Non-UK call centres harvest data and sell victim lists to UK criminal enterprises to target UK consumers. Friends Against Scams continues to raise awareness of scams. The initiative hit one million friends in June 2022 with a predicted saving of £59 million to consumers.

The NTS Scams Team has been working on a wide range of scams including the fraudulent activities of entities selling worthless warranties and repair plans. Following joint work with the Scams Team, the Information Commissioner's office has issued £400,000 in fines and served 'stop now' orders on five targets. Due to the changes over the last few years, with the Covid lockdowns, there has been an increase in online sales with consumers changing their buying habits. This has continued to impact on scams across the board, where traders exploit online consumers with mass market material, as consumers look to lower household bills for everyday essentials.

The NTS Scams Team is engaged in disruption work (Operation Dardap) and Buckinghamshire & Surrey Trading Standards is undertaking an investigation (Operation Husky). Working together to tackle criminals selling worthless appliance and home repair cover plans over the telephone to vulnerable consumers. The Public Protection Partnership at Bracknell Forest Council & West Berkshire Council (with the Regional Investigation Team's support) is also looking at call centres selling call blocking devices (Operation Teg).

#### KEY SUCCESSES

In 2021-22, the NTS Scams Team identified 1,145 victims and made savings of £28.7 million through its investigation and disruption work, along with savings made through local authority support. They stopped 1,075,920 mailings from reaching UK consumers and the financial saving from enforcement disruption amounted to £15.76 million.

Following multi-agency pilots in North Yorkshire and Lincolnshire, the NTS Scams Team developed a toolkit to provide guidance on how to establish a Multi-Agency Approach to Fraud and Scams (MAAF). This has been rolled out by the Scams Team with NTS and Home Office funding. 31 police force areas are actively engaged in the MAAF projects working with local authorities and third party organisations, setting a clear strategy and approach to investigations, victim support and prevention. NTS has used grant funding to provide 1,298 call blocker units.

#### Mass marketing fraud/scams' key threats and emerging issues

- Increased use of multiple and repeat mailings to previous responding consumers.
- Increase in non-UK lottery entry, in particular Australia and Cyprus - all in breach of Royal Mail's 'prohibited goods' regulations
- Increase in clairvoyant and religious mailings that are menacing in content, as well as requiring personal details of recipients.
- Telephone based frauds around home repair cover plans and green energy are on the increase.
- Fraudsters based in UK are moving towards telephone-based fraud offering a variety of services including home and alternative energy cover plans, that are not regulated.





## 5.4 Lettings

Lettings is an NTS priority area. The NTS Estate and Letting Agency Team protects consumers and businesses by enforcing the Estate Agents Act 1979 and the Tenant Fees Act 2019. Letting agency regulation (covering England) is led by Bristol City Council. It is the lead enforcement authority for letting agency work in England. Its role, under the Tenant Fees Act, is to oversee the operation of letting agency legislation; issue guidance; provide information and advice; and advise the Government on developments in the sector. Some lettings frauds are being investigated by the NTS Regional Investigation Teams.

There were 1,396 intelligence logs recorded under "Fair Trading" that relate to Housing, of which 286 relate to "Lettings" (a decrease of 58). There are 5,217 lettings and property management services - complaints recorded on the Citizens Advice consumer service database which is an increase of 1,230 (30%) from the previous year. This is an under-reported area for complaints, so the NTS Estate and Letting Agency team is doing work in this area to help improve the information being recorded. A number of projects aimed at improving lettings enforcement are being undertaken by this Team and Regional Groups.

There are several impending legislative changes:

- The Leasehold Reform (Ground Rent) Act 2022 – will restrict ground rents on certain future residential leases, to a token 'peppercorn' per year. Landlords will also be prohibited from charging an administration charge in respect of the peppercorn ground rent (to deter them from attempting to gain lost income from ground rent by virtue of another charge).
- The Decent Homes Standard will put a stop to renters living in "damp, unsafe and cold homes" according to the Levelling Up and Housing Secretary (May 2022). The Bill will extend the Decent Homes Standard to the 4.4 million households privately renting. This aims to tackle the conditions facing 21% the sector who currently live in homes of an unacceptable quality. The Bill will provide security for tenants in the private rented sector by ending Section 21 notices. These allow landlords to evict a tenant without having to give a reason.

- Using a separate Social Housing Regulation Bill there are plans to increase social housing tenants' rights, and improve how they can hold landlords to account, in response to concerns raised by the 2017 Grenfell Tower fire. Under the changes, the regulator will be able to inspect landlords and intervene when they poorly handle issues such as complaints. While new tenant satisfaction measures will be introduced, so tenants can see how their landlord is performing compared to others. Housing association tenants will be able to request information from their landlords in a similar way to how local authority landlords are subject to Freedom of Information requests.

### KEY SUCCESSES

The NTS Estate and Letting Agency Team has been leading a project with industry bodies and the main property online portals. This project is called Operation Neptune. It deals with material information in property listings. This has gained widespread media coverage and started a culture change in material information disclosure.

### Letting key threats and emerging issues

- Tackling hidden referral fees relating to property transactions.
- The use of alternative deposit schemes (such as membership clubs and agents).
- The legality of the Rent-to-Rent market that offers landlords a guaranteed rent.
- The hidden fees that letting agents charge to landlords.
- Conditional offers and sales, that link use of connected businesses such as mortgage advisors.



**5,217**  
Citizens Advice  
consumer service  
database complaints



**+ 30% increase from  
the previous year**

## 5.5 Illicit Tobacco

Illicit tobacco is a key priority area for NTS with funding provided by HMRC for local authorities and Regional Groups to carry out focused work, in relation to the supply of illicit tobacco products through Operation CeCe. This is part of a wider strategy that HMRC are undertaking to tackle this problem. Initially funding ran from January 2020 – March 2022 but three year's funding has now been confirmed from April 2022 (across England and Wales).

### KEY SUCCESSES

Operation CeCe – Local authorities seized illegal tobacco with a revenue value of over £7.8 million. This comprised almost 14.9 million of illicit tobacco sticks and almost 4.8 tonnes of illicit hand rolling tobacco. During 2021-22 a number of regional projects were completed and reports shared with local authorities; North East Trading Standards Authorities on tackling "tab houses", Trading Standards South East on the prevalence of sales via social media, and London Trading Standards on the prevalence of illegal shisha. This local disruption activity aims to protect consumers and legitimate businesses, with HMRC and Border Force shutting down illegal factories abroad by intercepting smuggled products and cash at the borders.

The illicit tobacco trade involves criminal gangs smuggling illicit tobacco across borders. Engaging in large-scale tax evasion and producing counterfeit cigarettes and tobacco. The perpetrators exploit poor border controls, low arrest rates and tobacco tax disparity between neighbouring countries to expand their enterprise. Illicit trade stifles the operation of the legitimate industry. The economic fallout from Covid-19 may have added to this issue, as consumers become increasingly stretched due to the cost of living crisis and the Government seeks to raise revenues through increases in tobacco excise duties.

While the lower price of illicit tobacco and cigarettes makes it less likely that smokers will quit, it is predicted that the financial difficulties facing consumers in the months/years to come will increase demand for illicit tobacco products. This may increase the number of OCGs, as they benefit from millions of pounds each year through their criminal networks. It will continue to fund other criminal activities including modern slavery, people trafficking, drugs etc. Illicit tobacco is a constant issue for most Regional

Groups. Current intelligence shows that there was a large increase in recorded intelligence for the current strategic period with 9,586 logs, which is an increase of 2,699. This is mirrored by Citizen Advice figures where an increase of 1,591 (80%) consumer complaints on last year. With further restraints on consumer finances and everyone looking to lower their household costs it is expected that there will be an increase for demand on illicit tobacco products.

### Illicit tobacco key threats and emerging issues

- Foreign and domestic OCGs involved in importation, distribution, and supply of illicit tobacco.
- A reduction in Trading Standards' resources available for surveillance and enforcement and the availability of third-party services e.g., detection dog services, test purchasing operatives.
- Rising cost of living expenses, increases in the cost of all household products in the UK and increase in taxes, make illicit tobacco products more attractive to consumers.
- Intelligence identifying comprehensive supply networks around the UK. Difficulties in adequately targeting this level of criminality with partner agencies, mainly due to differing priority levels.
- Reducing expertise/knowledge of profession.
- Promotion of Operation CeCe and HMRC work may lead to a reduction in other areas (such as underage sales largely due to a reduction in funding from Department of Health and Social Care (DHSC) that ended in March 2022).

**9,586**  
Trading Standards'  
intelligence logs



**+ 39% increase from  
the previous year**



## 5.6 Intellectual Property

Intellectual property crime is a priority area for NTS. It poses a security threat to the UK, and is increasingly carried out by sophisticated, networked OCGs capable of operating across multiple countries. Intelligence shows there are 1,873 recorded intellectual property crime intelligence logs, a small decrease of 234 logs from the previous year. A breakdown shows that clothing continues to be the highest category of recorded logs. Other identified categories include; accessories, electrical items, toiletries, streaming services and nicotine inhaling devices. There are 2,828 intellectual property crime complaints recorded on the Citizens Advice consumer service database (which is a decrease of 483 from the previous year).

### KEY SUCCESSES

**Operation Beorma** - The NTS Central England Regional Investigation Team leads this complex multi-agency operation. Targeting serious and organised criminals responsible for huge imports of counterfeit goods into the UK and sales at both on-line and physical market places. It has led to over 70 direct enforcement actions, the identification of previously unknown OCGs and the recovery of several million pounds worth of counterfeit goods.

**Self-Storage project** – These units are being used to store and sell counterfeit products. The Intellectual Property Office and NTS have allocated funding for a project that will continue until March 2023, supported by the Self Storage Association. London Trading Standards led this project across England and Wales, to identify and improve standards in self-storage premises. Over 50 self-storage businesses at over 400 physical premises, signed up to a code of practice. Intelligence resulted in several raids and over 35,000 items were seized with a street value of £3.25 million.

**Operation Monty** – This operation targeted Instagram traders selling counterfeit goods. In November 2021 over 20 brands and law enforcement agencies, as well as Instagram and Facebook joined forces to identify and remove over 10,000 images of counterfeit goods being offered by 450 traders.

Recorded incidents appear to be reducing; however, it is anticipated that these figures will increase due to the cost of living crisis as consumers look for cheaper products. Online sellers are increasingly using private accounts to conceal their activity, aware that law enforcement have strict rules about using social media for such purposes. The sale of counterfeit products from online marketplaces has become normalised in the last year and appears to be increasing, in particular clothing and tobacco. There are also supply chain issues for many products, such as football shirts and other official

merchandise, where consumers are likely to buy counterfeit goods as an alternative. More sellers with a settled lifestyle are using the sale of these products to counter the cost of living crisis and are open about sourcing counterfeit stock from Manchester (Cheetham Hill). Operation Magpie is a multi-agency approach to tackling serious and organised intellectual property crime in the Manchester area, supported by Manchester Trading Standards, Trading Standards North West and NTS.

The National Market Group's Real Deal Campaign has been very successful in reducing intellectual property infringement at markets and car boot fairs. It is now being adapted to apply to the digital world. The Real Deal Online tackles the sale of counterfeit goods on social media platforms and is being supported by the NTS eCrime Team.

A key issue in all areas of this section is the consumer's appetite for 'a bargain'. Consumer messaging is fragmented across the UK and many within local communities still see the sale of counterfeit goods as providing an opportunity for them to obtain 'designer branded goods' at far cheaper prices than the genuine article. There still is no deterrent to stop a consumer buying a counterfeit product.

### Intellectual property crime key threats and emerging issues

- The continued availability of counterfeit goods being sold via online platforms.
- Use of semi 'legitimate' Fulfilment Houses in the UK to facilitate the importation and distribution of often unsafe counterfeit goods.
- Ongoing use of self-store facilities to import, manufacture, distribute and store counterfeit goods.
- The physical marketplace allows counterfeit goods, including dangerous consumer products, to be openly sold at markets, car boot sales and from retail/commercial premises.

**2,828**  
Citizens Advice  
consumer service  
database complaints



**- 14% decrease from  
the previous year**

## 5.7 Used Cars

The second hand or used car market continues to be priority area for NTS, Regional Groups and local authorities. In 2021 used car transactions grew 11.5% with 7,530,956 cars changing hands in the UK. The used car market is predicted to continue to rise and supply pressure could see a rise in unsafe and unroadworthy cars.

Used cars, in particular the sale of unroadworthy vehicles and the clocking of used cars, remain the most complained about sector. There has been a 13% increase in complaints on the Citizens Advice consumer service database (5744) from the previous year. There was a slight decrease in recorded intelligence, down 150 logs to 887 for this strategic reporting year.

The Covid pandemic has seen a shift in buying habits, with an increase in online and distance purchasing of used cars and a variety of new online only companies selling used cars with door-to-door delivery. This could leave consumers without the same rights, as they would have with a purchase in a showroom or forecourt. Longer factory warranties and service plans has also added to the appeal of used cars.

In 2021, there was also an increased demand for used electric vehicles (up by 119.2%). The popularity of used electric vehicles will heighten, due to the cost of petrol/diesel and the difficulties in obtaining new EV cars. Although this may be limited in the short term, due to a shortage of component chips.

### Used car key threats and emerging issues

- Sale of unroadworthy vehicles that have false vehicle history/ documentation (including odometer adjustment) via enablers providing MOTs, repairs, and servicing.
- Increased online sales of cars, with some diminished consumer rights.
- Reduced importation of new cars, leading to a growing used car market. An increased supply of unroadworthy cars, especially at the lower end of the market as supply tightens.
- Increased market for used electric vehicles and a lack of consumer knowledge in these products.



# 49,921

Citizens Advice  
consumer service  
database complaints



+ 13% increase from  
the previous year

## 5.8 Other Fair Trading Issues

Other fair trading issues is a priority area for NTS. It covers many aspects of Trading Standards' work that ensures businesses trade fairly. It includes pricing, advertising, misdescriptions of goods and services, terms and conditions, holidays and house improvements. The NTS Regional Investigation Teams and the NTS eCrime Team have taken several successful prosecutions involving the Consumer Protection from Unfair Trading Practices Regulations 2008 and Business Protection from Unfair Trading Practices Regulations 2008, fraud and money laundering offences relating to other fair trading offences.

### Advertising

NTS provides the Advertising Standards Authority (ASA) with a legal backstop enforcement regime, for non-broadcast advertising, to ensure the continued success of their self-regulation model. Buckinghamshire and Surrey Trading Standards deliver this legal backstop on behalf of NTS. They dealt with three formal ASA referrals and in addition, supported the ASA with a range of advice on issues such as pricing, alternative therapies, social media influencers, property raffles and eScooters. The NTS Estate and Lettings Team and NTS eCrime Team also provided support in appropriate cases.

### Home improvement work

The media has reported the difficulties in getting supplies and work done because of increased complaints about home improvement work. In 2022, the NTS Intelligence Team carried out some analysis on approved trader schemes and website enablers. These were being used by rogue traders to make them appear genuine often using misleading information and fake reviews. The NTS eCrime Team plans to work with Trading Standards and other partners to see what steps can be taken to disrupt and stop these activities.

The Residential Property Surveyors Association (RPSA) and Property Care Association (PCA) issued surveyor guidance on 20 December 2021 that recommended the removal of spray foam insulation. They failed to identify any likely circumstances where a roof structure with the foam could be given a clean bill of health. They also stated 'The use of spray foam insulation could make around 250,000 homes

un-mortgageable or ineligible for equity release and surveyors should recommend its removal'. Although the installation of spray foam into the roof of a building is not illegal, it could have implications for anyone wanting to sell their house or release funds from it. There could also be complications around the removal of such products and criminals could target those householders who may have been sold spray foam insulation without being advised of the potential implications or fitted incorrectly by rogue traders.

### Illegal puppy sales

Puppy farms continue to be a significant issue for Trading Standards due the public demand for pets and many consumers still working from home. Puppy farming/breeding intelligence logs remain high with 1,473 recorded on IDB, this is an increase of 253 on 2020/21, which saw intelligence figures triple. It is a nationwide problem that is on the increase. Illegal puppy sales are a fair trading issue due to the mis-description and mis-selling of the puppies. Puppy farming has become a profitable business with proven links to serious and organised crime, as evidenced in the current disruption project, Operation Cabal in Trading Standards Wales was supported by NTS in 2020/21.

### Other fair trading key threats and emerging issues

- Continued illegal puppy sales with links to serious and organised crime.
- Use of approved trader schemes and professional website enablers to make offenders appear genuine (often using misleading and fake reviews).
- Increase in travel complaints associated to airline/flight problems (summer 2022).
- Consumers can be misled by the use of cryptocurrencies, due to their lack of knowledge associated to the risk in purchasing such currencies.
- Scam adverts online can lead unsuspecting consumers to sites that can defraud them.<sup>3</sup>
- Ongoing selling and removal of roof spray insulation.



## 5.9 Estate Agents

The fair trading intelligence category covers buying a new home, letting agents and house improvements. The NTS Estate and Letting Agency Team protects consumers and businesses by enforcing the Estate Agents Act 1979 and the Tenant Fees Act 2019. Estate agency regulation is led by Powys County Council. It is the lead enforcement authority for estate agency work in the UK.

The Team works closely with local authorities who have local responsibilities for enforcing the Estate Agents Act. It is the lead enforcement authority for the Estate Agents Act. Its responsibilities include, the issuing of prohibition and warning orders, the management and approval of the consumer redress schemes, providing sector-specific advice on the Estate Agents Act and maintaining a public register of prohibition and warning orders. Following investigations done by local authorities and other enforcement agencies, the Team may consider taking on a fitness investigation. Fitness investigations are also triggered by the commission of offences outside the Act, including forgery, theft, violence, money laundering and breaches of consumer protection legislation.

The Team receives complaints and referrals from a range of sources and undertakes monitoring of news websites, social media etc. There were 1,396 intelligence logs recorded under "Fair Trading" that relate to Housing, of which 133 which relate to Estate Agents (a decrease of 110). There are 1,923 Estate Agents & House Purchase Service complaints recorded on the Citizens Advice consumer service database, which is an increase of 139 (7.7%) from the previous year.

### Estate agency key threats and emerging issues

- Tackling hidden referral fees relating to property transactions.
- Improving material information in property listings.
- Mis-selling of deposit alternative schemes.
- Compliance with the Leasehold Reform (Ground Rent) Act 2022 (came into force 30 June 2022).
- OCGs buying property for money laundering, modern slavery and human trafficking, connected to their criminal activities.

**1,923**  
Citizens Advice  
consumer service  
database complaints



**+ 7.7% increase from  
the previous year**

## 5.10 Animal feed

**(this is an area where  
NTS receives funding)**

NTS receives funding from the Food Standards Agency to support a programme of work to ensure the integrity of the animal feed chain and protect food safety and UK meat exports. NTS is commissioned directly by the Food Standards Agency to deliver a programme of official controls and specific projects to address their identified priorities.

**4,483**  
feed interventions



## 6. Cross Cutting Themes and Enablers

### 6.1 eCrime

eCrime remains a cross cutting theme for Trading Standards, Regional Groups and NTS. It impacts across all NTS priority areas and continues to grow as UK consumers buy more online through digital platforms. The digital world continues to develop at an increasing rate and criminals are adapting to this change in consumer's buying behaviour. The NTS eCrime Team is hosted by the Yorkshire & Humberside Trading Standards Group (YAHTSG) and is split between a state-of-the-art digital evidence unit in Northallerton and a team of investigators in York.

Online sales in the UK accounted for an average of 29% of all purchases according to the Office for National Statistics. The latest recorded ecommerce revenue in the UK reached £693 billion and is expected to grow by 5% a year until 2025.<sup>4</sup> With the acceleration in growth of online shopping since the pandemic in 2020, many think this will be a permanent trend that will continue to grow. Online selling platforms continue to be linked to a range of offending including fraud, subscription traps, counterfeiting, unsafe products, and the continued use of an increasing range of social media platforms to advertise goods for sale and offer streaming services.

Identifying the 'consumer journey' continues to remain a challenge. Establishing the source of how consumers are initially misled is a significant barrier. Whether it is a search engine advert, a social media advert, an online review, or a trading matching/approval web site. This is a key cross-cutting issue for prevention, intelligence, and enforcement. It can hinder putting in place preventive measures (for example removal of social media advertising or consumer awareness campaigns) as the consumer is either not always aware of how they were initially targeted, or the information is not recorded on consumer complaints or intelligence systems. This appears to have been exacerbated during the Covid pandemic, as consumers were increasingly reliant on the internet for all manner of purchasing decisions, leading to significant cross overs in online and offline activity. For example, we know consumers have become ever more reliant on online reviews (and associated web sites, such as trader matching/approval schemes). A consumer survey, carried out by the NTS Communications Team on behalf of the NTS eCrime Team, revealed over half of all consumers rely on such sites when making a purchasing decision.

Intelligence on IDB shows 5,722 recorded intelligence logs have an eCrime element, a decrease of 1,606 logs from the previous corresponding year. There are 123,350 complaints marked with an eCrime element recorded on the Citizens Advice consumer service

database, a 12% decrease from the previous year. Although the figures have reduced, they still show the huge scale of internet and digital based scams, that NTS and Trading Standards are dealing with. These are expected to grow as the consumer landscape evolves.

#### eCrime key threats and emerging issues

- Scale and volume of digital scams/criminality and increased resources needed to deal with it.
- Subscription traps are often deployed across a range of platforms, from social media feeds through to banner advertising on legitimate web sites.
- Establishing the source of how consumers are initially misled. This is highlighted in relation to trader matching/approval sites where consumer complaints very rarely record the origin of the issue (i.e., that the trader was identified by way of a trading matching/approval site). This can hinder the development of strategies to disrupt harm as the root cause cannot always be evidenced.
- Continued use of a wide range of social media platforms to advertise goods for sale or offer illegal streaming services etc.
- Social media sites that directly sell counterfeit or unsafe goods, or indirectly display deceptive adverts/posts that lure consumers onto web sites where they are subsequently misled/defrauded.
- Offenders based overseas continues to be a challenge. The NTS eCrime Team continues to make significant progress in engaging with overseas hosting companies and domain registrars.

**123,350**  
Citizens Advice  
consumer service  
database complaints



**- 12% decrease from  
the previous year**



## 6.2 Serious and Organised Crime

Serious and organised crime remains a cross cutting issue for NTS. It impacts on every area of Trading Standards' work affecting UK consumers and businesses. It is a national security threat. This criminality is instigated and committed by OCGs who identify weaknesses in security systems and processes. They often target the most vulnerable in our society. According to the National Crime Agency, the UK has approximately 70,000 individuals engaged in serious and organised crime. It undermines everyone's safety and security and is reported to cost the UK economy billions of pounds a year.

Serious and organised crime is complex and often involves multiple crime areas such as; fraud, economic crime (including money laundering), use of technology, cybercrime, organised immigration crime (including people trafficking), drugs, firearms, and other illicit smuggling activity. Criminals identify and exploit new technologies and recruit professional enablers into their groups, including corruption of professionals in law enforcement. This makes the challenge for UK law enforcement and partners even greater. NTS Teams and Regional Groups use the Serious and Organised Crime System Tasking platform to help them adopt a risk based approach and seek additional resources and support when necessary.

Many UK OCGs have a criminal network that impacts on the UK and transcend its borders. With the increased emergence of UK based foreign national OCG's, this is becoming far more apparent and increasingly sophisticated. These networks include points of contact for production, commodity sourcing, transport, and the ability to move, convert and place criminal finances in safe locations abroad.

NTS direct access to PND has enhanced the organisational capability to manage OCG's and associated nominals in "live time". It will add value to ongoing investigations linked to those OCG's and enhance the reputation and credibility of NTS, Regional Groups and Trading Standards Services.

Since the implementation of OCG mapping in December 2014, the NTS Intelligence Team have input 74 OCGs into the national database, on behalf of NTS Teams, Regional Groups and Trading Standards Services. There are currently 36 recorded active OCGs associated to 213 nominals and 161 companies. Their criminality covers all current NTS priority areas and impact on all Regional Groups in England and Wales:

- 31 are involved in offences of fraud (including fiscal fraud).
- 12 are concerned in offences associated to doorstep crime/cold calling.
- 9 are concerned in the importation/distribution and supply of illicit tobacco products.
- 7 are involved in offences associated to intellectual property.

In addition to offences more commonly dealt with by Trading Standards Services, the current Trading Standards' active OCGs on the PND are also involved in the following criminality:

- 11 were previously concerned in acts of violence, including murder, torture, and kidnap.
- 11 are concerned in organised immigration crime and human trafficking including sexual exploitation, forced labour, and facilitation of illegal immigration.
- 7 are concerned in drug supply, including importation, distribution and supply of cocaine hydrochloride, crack cocaine, heroin and cannabis. One OCG is concerned in county lines activity.
- 2 are concerned in sexual offences, including allegations of rape.
- 7 are concerned in the importation, supply, and criminal use of firearms.<sup>5</sup>



**36**  
Trading Standards'  
OCGs associated  
to 213 nominals  
and 161 companies  
(as at 06/07/22)





### 6.3 Cost of Living Crisis

The cost of living has been increasing across the UK since early 2021. In April 2022, it reached its highest recorded level and is believed to be at the highest levels since 1982. This affects the affordability of goods and services for consumers. Rising prices, particularly food, energy and fuel prices, and the current conflict in Ukraine has pushed inflation to an all-time high. Consumer prices, as measured by the Consumer Prices Index (CPI), were 9.0% higher in April 2022 than a year before.<sup>6</sup>

Another important driver of inflation is energy prices, with household energy tariffs increasing and petrol costs going up. From April 2021 to April 2022, domestic gas prices increased by 95% and domestic electricity prices by 54%, due in part to a return of global gas demand as pandemic restrictions are lifted and lower than normal production of natural gas. On 1 April 2022 the new price cap came into force, increasing its current equivalent annual level of £1,277 per year to £1,971; a 54% increase. From 1 October 2022, the price cap for customers on a standard variable tariff was due to rise by 80% to £3,549. However, on 8 September 2022, the Prime Minister, announced plans to freeze the energy price cap and replace it with an "Energy Price Guarantee" that will last for two years. A typical household can now expect to pay about £2,500 a year although there is no limit on what they may pay, as this will depend on how much energy they actually use. A one-off £400 fuel bill discount will be paid to all homes (paid as £66 a month over the winter). Businesses, charities, schools and other organisations will also get help. The Government says they will get an "equivalent guarantee" on energy prices for six months from October 2022 and after this, "vulnerable" businesses (including pubs) will receive further support. A review will be carried out as these measures are implemented to see where any extra support should be targeted.

Russia and Ukraine are large producers and exporters of agricultural products. Ukraine was the fifth largest wheat producer and largest sunflower oil producer in the world prior to the invasion. These products have become more expensive on financial markets, potentially leading to price increases in food and materials that will affect all consumers. These global issues will impact on the UK and individual consumers. It is expected there will be an increase in both intelligence and consumer complaints, across all Trading Standards' key priority areas as many households look to cut costs or find cheaper alternatives.

Following the pandemic many consumers have changed their buying habits. This continues to impact on mass marketing scams/fraud, where traders exploit online consumers, especially where they are looking to lower household bills for everyday essentials. Energy related fraud, is likely to increase as consumers look at the green energy sector to reduce the ever increasing costs of gas and electricity. Whenever the Government launches new initiatives or grant schemes for green energy there are spikes in the recording of rogue traders exploiting consumers.

Intellectual property crime is expected to increase as consumers looking for cheaper alternatives to products that are often too expensive to purchase. This often leads to product safety issues of imported electrical and other goods that do not meet UK safety standards. Intellectual property crime is often under reported due to consumers being aware of their purchases being counterfeit but they are sometimes unaware of the safety issues that are associated with a counterfeit purchase. This is especially prevalent with counterfeit tobacco products and alcohol that often have harmful ingredients mixed into the product.



## 7. Other Trading Standards' areas (out of scope or low priorities)

NTS is unable to support national work on the following areas as they are outside the grant funding provided by the Government but will undertake work on specific activities, where direct funding is provided for a programme of work to be delivered.

### Animal disease control

Trading Standards are part of the Government's activities to prevent animal disease, from the reduction of bovine tuberculosis to the implementation of controls that prevent the spread of major animal disease outbreaks. There were 189 intelligence logs recorded on IDB a decrease of 26 on the previous reporting year, despite the national outbreak of Avian Influenza that local authorities have been dealing with over the last year. Via a contract with the Association of Chief Trading Standards Officers (ACTSO), some national projects were undertaken in 2021/22. These included; producing guidance on recording animal health intelligence, an updated national framework agreement, and producing guidance on how to spot, control and deal with illegally imported animals especially dogs. In 2022/23, the contingency plan for dealing with outbreaks of exotic disease (especially Avian Influenza) will be updated and guidance will be developed on illegal collection centres.

### Product Safety

This is a priority area for many Trading Standards Service and Regional Groups and it often crosses over into other areas of work, the Office of Product Safety and Standards (OPSS) has responsibility for this area of work. There were 1,843 intelligence logs recorded on IDB for this strategic year, a decrease of 558 from the same dates the previous year. Some regions have identified product safety as a priority area within the following categories; E-cigarettes, intellectual property and tobacco categories, with consumers looking for cheaper products due to the current cost of living crisis.

### Food

This priority area is overseen by the Food Standards Agency who have overall responsibility. Some regions have this as an area of concern due to the changes in EU and UK legislation following the EU exit. Other issues are counterfeit food and alcohol, allergens and labelling, fish sales (doorstep) etc. There were 732 intelligence logs recorded on IDB, a decrease of 166 on the previous reporting year, this is the second year in a row that the recorded intelligence has decreased.

### Age restricted sales

This is a local and regional priority area for many Trading Standards Services and Regional Groups. It therefore sits outside the scope of NTS unless specific funding is provided for project work. Underage sales of tobacco products, alcohol, fireworks and bladed articles can have huge consequences on the health and safety of young people. There are 2,830 intelligence logs recorded for underage sales, which is an increase of 1,908 from the previous corresponding year. Tobacco products account for 49% of all recorded intelligence with nicotine delivery devices featuring highly. Several Regional Groups

report disposable vape devices are becoming more prevalent as the marketing is aimed at young people. The Khan Review "making smoking obsolete" promotes vapes as an effective "swap to stop" tool, to help people quit smoking, but ensuring that vaping does not appeal to young people. NTS will continue to work with the Home Office to try to secure future funding on the underage sales of knives and other corrosive substances. Between 2018 and 2021 Croydon Trading Standards carried out 100 attempted test purchases of knives being sold to children online. This led to 41 sales, 17 prosecutions and 17 convictions.

### Animal Health and Welfare

Trading Standards provide essential support to the farming industry through the enforcement of legislation aimed at protecting animals from disease, preventing animals from suffering, and maintaining the integrity of the food chain. There were 2,411 intelligence logs recorded on IDB, an increase of 463 compared to the previous reporting year. There was an increase of 253 intelligence logs relating to illegal puppy farms. Trading Standards have multiple OCGs mapped regarding the illegal importation/sale of puppies the Covid pandemic. With the displacement of some of the Ukrainian population, due to the invasion of their country, it is expected there will be an increase of potential rescue dogs from Ukraine.

### Metrology

This is the science of weights and measures, determination of conformance to specification or technical requirements, and development of standards. Trading Standards officers can carry out checks on a wide range of instruments used to weigh and measure goods in the public domain to test for their accuracy and can test pre-packed goods to ensure compliance with weight or measure claims. There were 199 intelligence logs recorded which is an increase of 87 from the previous reporting year. OPSS has responsibility for this policy area. No funds are provided to NTS to commission work in this area. No work will be commissioned unless specifically agreed by OPSS and it links to a widespread serious fraud.

## Appendix 1 – IDB and Citizens Advice Statistical Information

Intelligence figures on IDB show a decrease of 1,455 against the previous 12-month NTS Strategic Assessment period with a full breakdown shown in the table below:

Intelligence figures (IDB)	01/4/20 – 31/3/21	01/4/21 – 31/3/22	Difference
Age Restricted Sales	922	2,830	+1,908
Alcohol	724	440	-284
Animal Feed	58	79	+21
Animal Health	2,945	3,876	+931
Consumer Credit	35	27	-8
Doorstep & Cold Calling	7,143	6,879	-264
Fair Trading	10,886	7,023	-3,863
Food	898	732	-166
Intellectual Property	2,107	1,873	-234
Lifestyle	1,960	1,403	-557
Metrology	112	199	+87
Product Safety	2,401	1,843	-558
Scams	3,726	2,559	-1,167
Tobacco and Cigarettes	6,887	9,586	2,699
<b>TOTAL</b>	<b>40,804</b>	<b>39,349</b>	<b>-1,455</b>
eCrime element	7,328	5,722	-1,606

The Citizens Advice consumer service database shows that consumer complaints increased by 4.7% from the previous year.

From 01/04/20 - 31/03/21 (the 2021 NTS Strategic Assessment period) 556,929 cases were recorded. From 01/04/21 – 04/04/22 (the 2022 NTS Strategic Assessment period) 583,298 cases were recorded.

A breakdown of the top 5 complaint areas and comparison against all cases shows the following:

CASE TYPE BREAKDOWN			
01/04/20- 31/03/21		01/04/21 – 04/04/22	
Trader complaint - civil breach.	234,058	Trader complaint - civil breach.	229,300
Trader complaint - criminal breach.	182,560	Trader complaint - criminal breach.	172,333
Out of scope - refer/signpost to another agency.	60,093	Out of scope - refer/signpost to another agency.	89,799
Enquiry - consumer law/rights.	25,977	Enquiry - consumer law/rights.	20,984
Out of scope - wrong number.	16,772	Out of scope - wrong number.	17,917

The method of purchase as recorded is shown below:

PURCHASE METHOD BREAKDOWN			
01/04/20- 31/03/21		01/04/21 – 04/04/22	
Trader websites and apps	141,228	Not recorded	145,691
Not recorded	115,510	Trader websites and apps	123,342
Trader premises	112,193	Trader premises	116,307
Telephone	46,143	Doorstep	48,485
Doorstep	37,921	Telephone	47,571

The trading practice breakdown is shown as below:

TRADING PRACTICE BREAKDOWN			
01/04/20- 31/03/21		01/04/21 – 04/04/22	
Defective goods	185,473	Defective goods	180,605
Not recorded	129,329	Not recorded	167,831
Substandard services	99,049	Substandard services	116,377
Business practices	26,470	Selling practices	21,128
Selling practices	25,972	Misleading claims/omissions	20,194

## Appendix 2 - Regional Trading Standards Group's Priority Areas

<b>CEntSA</b>	<ul style="list-style-type: none"> <li>• Rogue trader doorstep crime &amp; scams</li> <li>• Product safety</li> <li>• Protecting the food chain (food, feed and animal health)</li> <li>• Tobacco</li> <li>• Lettings project</li> </ul>	<b>TSNW</b>	<ul style="list-style-type: none"> <li>• Illegal puppies</li> <li>• Disposable e-cigarettes</li> <li>• Illicit tobacco and cigarettes</li> <li>• Doorstep crime</li> <li>• Intellectual property crime</li> <li>• Scams</li> <li>• Used cars</li> </ul>
<b>EETSA</b>	<ul style="list-style-type: none"> <li>• Major renovations (Operation Amber)</li> <li>• Doorstep crime – roofing</li> <li>• Illicit tobacco – supply chains</li> <li>• Green energy fraud</li> <li>• Used cars</li> <li>• Product safety</li> <li>• Puppy importation</li> <li>• Food allergens</li> <li>• Mass marketing scams</li> </ul>	<b>TSSE</b>	<ul style="list-style-type: none"> <li>• Protection of vulnerable consumers</li> <li>• Product safety</li> <li>• Rogue trading &amp; doorstep crime</li> <li>• Food</li> <li>• Animal health</li> <li>• Fair trade</li> <li>• Tobacco control</li> </ul>
<b>LTS</b>	<ul style="list-style-type: none"> <li>• Doorstep crime and the impact of the newly launched regional booklet</li> <li>• Product safety</li> <li>• Fair trading</li> <li>• Lettings</li> <li>• Tobacco and alcohol</li> <li>• IP crime</li> <li>• Age related products</li> <li>• Vapes (age restricted sales and non-compliant products)</li> <li>• Online markets surveillance (eBay and Amazon addressing OWA/corrosives – vapes &amp; non-compliant goods being sold)</li> <li>• Illegal tobacco and shisha (Operation CeCe)</li> <li>• Client Money Protection</li> <li>• Virtual offices</li> <li>• Self-storage</li> </ul>	<b>TSSW</b>	<ul style="list-style-type: none"> <li>• Doorstep crime and rogue trading</li> <li>• Illicit tobacco and cigarettes</li> <li>• Animal health - illegal pet trade</li> <li>• Scams</li> </ul>
<b>NETSA</b>	<ul style="list-style-type: none"> <li>• Product safety</li> <li>• Scams</li> <li>• Doorstep crime</li> <li>• Tobacco and cigarettes including e-cigarettes</li> <li>• Used cars</li> <li>• Animal feed</li> </ul>	<b>TS Wales</b>	<ul style="list-style-type: none"> <li>• Illegal dog supply</li> <li>• Doorstep crime</li> <li>• Fair trading</li> <li>• Cost of living</li> <li>• Product safety</li> <li>• Illicit tobacco</li> <li>• Energy related consumer issues</li> </ul>
<b>TSEM</b>	<ul style="list-style-type: none"> <li>• Doorstep crime</li> <li>• Scams</li> <li>• Product safety</li> <li>• Food allergens</li> <li>• Illegal tobacco</li> <li>• Used cars</li> </ul>	<b>YAHTSG</b>	<ul style="list-style-type: none"> <li>• User car crime</li> <li>• Crime in the home</li> <li>• Energy related fraud</li> <li>• Scams</li> </ul>