

**NATIONAL
TRADING
STANDARDS**

Protecting Consumers
Safeguarding Businesses

ANNUAL BUSINESS PLAN 2023-2024

Foreword

I am very pleased to present the National Trading Standards (NTS) Business Plan for 2023/24. NTS has been in operation since 2012 and I was delighted to take over as Chair of the Board in June 2022.

The Board comprises the senior Heads of Trading Standards from England and Wales and we use Government grants and funding to prevent or investigate the more serious attempts by criminals to target consumers and legitimate business by way of, for example, scams, counterfeit goods and selling products which are not fit for purpose. We also protect food supplies by ensuring that the animal feed chain is safe. Our work has become all the more important as people seeking to offset the increased cost of living and energy become vulnerable to seemingly attractive offers made online or 'on the doorstep'. The victims are often the most disadvantaged in our society.

This year NTS will receive £12.03 million from the Department for Business and Trade, £2.3 million from the Food Standards Agency to deliver our feed programme: £1.3 million from the Department for Levelling Up, Housing and Communities (DLUHC) to support work relating to estate and letting agencies: and £800,000 from HMRC to disrupt the supply of illicit tobacco. All of these, except the FSA grant, represent a cash standstill which creates its own challenge for the Board in the face of ever increasing costs. NTS will also work with other partners including DHSC, the Home Office, the Intellectual Property Office, DEFRA, the Office for Students and the Advertising Standards Authority on relevant trading standards activities.

We believe that our work is increasingly effective and has never been more important than it is now and we are grateful for the support we receive from local authority Trading Standards Services and our other partners.



Strategic Objectives

Objective 1	Objective 2	Objective 3	Objective 4
Provide a framework for the effective sharing of intelligence to identify and tackle emerging threats, and support Trading Standards across England and Wales.	Ensure effective delivery and co-ordination of enforcement of serious consumer protection crime, including mass marketing scams and illicit tobacco.	Deliver a programme of animal feed and food hygiene enforcement in England to ensure the safety of the food chain and protect the UK export market.	Deliver a programme of national enforcement, advice and support for local authorities in the property market, in particular the activities of Estate and Letting Agents.

Figure 1 – Strategic Objectives 2023/24

A national Strategic Assessment was undertaken in October 2022 and using this information and the work specifically commissioned by Government, the Board agreed that the key priorities for 2023/24 will be:

Tier 1: Doorstep Crime, energy related fraud, mass marketing fraud/scams, and lettings.

Tier 2: Illicit tobacco, intellectual property crime, used cars, other fair trading, and estate agency work.

Tier 3: Safety of animal feed.

The Board also agreed that NTS should have the following cross-cutting themes:

- eCrime and the use of social media/online platforms,
- serious and organised crime,
- the cost of living crisis.

We have developed a series of activities that underpin our strategic objectives. Detailed actions to address the priorities are contained in our National Control Strategy which determines how NTS' funds will be allocated to deliver specific outcomes and activities.

Objective 1 - Provide a framework for the effective sharing of intelligence to identify and tackle emerging threats, and support Trading Standards across England and Wales.

We will do this by:

- Making informed decisions by using all available information and intelligence, and promoting the use of the Intelligence Operating Model, nationally, regionally and locally.
- Actively sharing intelligence with enforcement partners.
- Developing intelligence products to inform tasking and intelligence led prevention and enforcement.
- Identifying emerging threats and gaps in consumer protection enforcement and working with partners to address them.
- Providing a NTS intelligence network that includes our National Intelligence Team and a network of Regional Intelligence Teams/Units.
- Ensuring each local authority can have direct access to a national Trading Standards intelligence database and the Sanctions Information Database.
- Providing relevant NTS Teams and regions access to various databases such as the Police National Computer.
- Undertaking appropriate Police National Database searches via the NTS Intelligence Team.
- Using Organised Crime Group mapping and national flagging to target and tackle criminals engaged in consumer protection crime.
- Using Serious and Organised Crime System Tasking to assess regional and national threats consistently and to prioritise tasking.
- Undertaking a scoping exercise to determine the prevalence and enforcement issues associated with the supply of illicit alcohol.¹

Objective 2 - Ensure effective delivery and co-ordination of enforcement in relation to serious consumer protection crime, including mass marketing scams and illicit tobacco.

We will do this by:

¹ Predicated on additional funding from HMRC.

- Providing a network of NTS Regional Investigation Teams and resourcing other enforcement activities to tackle regional and national consumer and business detriment and ensuring those engaged in criminal activities are punished and/or their activities disrupted.
- Providing a tool to enable tasking groups to consider different approaches to dealing with non-compliances and guidance on appropriate scoping of cases to maximise the impact of NTS' tasking budgets.
- Supporting a programme of enforcement activities in relation to used cars, doorstep crime, energy related fraud, mass marketing fraud, the supply of illicit goods in key markets and the local disruption of the supply of illicit tobacco.
- Supporting regional IPO officers and working with the IPO to review and expand the provision in other regions.
- Providing a NTS eCrime Team to tackle consumer and business detriment caused by eCrime, in particular taking down unlawful websites and digital content.
- Providing national expertise in the investigation and prevention of eCrime and a national digital forensic capability to support Trading Standards' related cybercrime enforcement.
- Providing a NTS Scams Team to tackle consumer detriment caused by mass-marketing scams by disrupting the mechanisms scammers use to target victims, and to work with local authorities and other partners to support safeguarding of victims.
- Participating in the Government's cross-cutting fraud agenda with the National Economic Crime Centre and other partner agencies to better protect those most vulnerable from becoming victims of fraud.
- Providing the Advertising Standards Authority with a backstop enforcement regime to ensure the continued success of their self-regulation model.
- Providing the Office for Students with a backstop enforcement role to better regulate unfair terms and claims in the education sector.
- Supporting the regional Trading Standards' infrastructure to enable them to co-ordinate Trading Standards' activities at a regional level.

Objective 3 - Deliver a programme of animal feed and food hygiene enforcement in England² to ensure the safety of the food chain and protect the UK export market.

We will do this by:

- Overseeing a programme of animal feed inspections and sampling to ensure compliance with standards across the animal feed supply chain.
- Protecting the integrity of the food chain by undertaking surveillance and official controls on imported animal feed at points of entry in England.
- Overseeing the collection and analysis of compliance data from feed and food official controls to support the FSA assessment of the effectiveness of the control system.
- Overseeing a programme of food hygiene at primary production (farms) inspections to ensure compliance with standards at the start of the food supply chain.
- Supporting local authority expert panels on feed to develop guidance and help ensure consistency and best practice in feed enforcement.

Objective 4 - Deliver a programme of national enforcement, advice and support for local authorities in the property market, in particular the activities of Estate and Letting Agents³.

We will do this by:

- Providing a NTS Estate and Letting Agency Team to fulfil the statutory functions under the Estate Agents Act 1979 and relevant lettings legislation, and to tackle consumer and business detriment caused by unacceptable practices in the sector.
- Working with the estate and letting agents' industries to improve standards in the sectors.
- Taking enforcement action where required to tackle serious consumer and business detriment in this sector.

² A similar programme of enforcement by Local Authorities in Wales delivers similar work but this is not delivered by NTS.

³ Work in relation to estate agents is UK wide. Work in relation to letting agents is delivered for England only. Similar work is undertaken in Wales but not delivered via NTS.

- Issuing guidance and advice for the public, businesses and enforcement authorities.
- Providing an online portal for consumers and enforcement partners to check the membership status of property businesses against the mandatory member organisations.
- Supporting and encouraging best practice in the enforcement of estate & letting agencies through the provision of training materials, courses and guidance.
- Support better intelligence sharing between Trading Standards and Housing officers in local authorities.
- Allocating grant funding to appropriate projects or investigations that will enhance lettings enforcement in England.
- Working with industry partners to increase the level of basic and material information available to consumers via property portals, enabling them to make better informed decisions about buying or renting property.
- Support the Government and Local Authorities on the implementation of relevant parts of the Renters Reform legislation

Partnership working

NTS will continue to demonstrate its importance and effectiveness to our partners and to Government. This will include:

- Engaging with Government to influence them in relation to Trading Standards matters and to offer the NTS' model for the commissioning of relevant elements of Trading Standards' work.
- Continued work with Trading Standards in Northern Ireland and Scotland and with other enforcement partners across the UK to ensure that the consumer protection regime is as successful as it can be.
- Ensuring close working relationships with partners and in particular with regional Trading Standards groups who are crucial to the success of NTS' work.
- Maximising the support for and benefits of membership of the Consumer Protection Partnership.
- Creating a comprehensive national picture of the achievements of NTS and communicating these effectively.

Published xxx. For any enquiries about the content of this plan, please email nationaltradingstandards@actso.org.uk or call 0345 608 9515. Alternatively, you can write to National Trading Standards, 1 Sylvan Court, Sylvan Way, Southfields Business Park, Basildon, Essex SS15 6TH.