

**NATIONAL
TRADING
STANDARDS**

Protecting Consumers
Safeguarding Businesses

ANNUAL REPORT

2023-2024

Background

National Trading Standards was set up in 2012. Since then, NTS has used Government grants and funding to deliver a range of Trading Standards work to protect consumers, support legitimate businesses, and ensure serious offenders are brought to justice. This work is carried out by dedicated NTS Teams, hosted by local authorities, and via local authority Trading Standards Services across England and Wales, alongside other partner agencies.

The Trading Standards system is unique in being able to deliver work at national, regional and local levels and NTS is grateful for the hard work and support of all our colleagues in local authorities, within regions and in specialist teams.

The resource constraints and workforce capacity issues within the Trading Standards system are well documented. We hope that this report illustrates the impact that Trading Standards can have when resourced effectively to carry out such important work.

In 2023-24, National Trading Standards Teams and workstreams:

- Dealt with **£92,155,310** in consumer and business detriment.
- Had 47 people convicted of offences.
- Had prison sentences totalling 103 years and 5 months handed down.
- Had **£363,900** in compensation awarded by the Courts.
- Had over **£4.5 million** in costs awarded against defendants.
- Had Court orders for the confiscation of **£11,752,885** in assets from defendants.
- Took down or suspended **545** websites/social media sites.
- Did **4,307** Feed interventions.
- Seized illicit tobacco with a revenue value of **£11,807,081**.
- Seized almost **1.2 million** illicit vapes in England.
- Issued **21** warning orders, penalty notices or monetary penalties in relation to Estate and Letting Agents.

Between 1/4/14 (when all NTS Teams became fully operational) and 31/3/24, NTS has tackled £1,472,394,373 in detriment with a core spend of £126,922,259 million: **£11.60 impact for every £1 spent.**

Funding 2023/4

NTS receive approximately £18 million from nine Government Departments and Agencies as follows:

Funding	Funding Body	Purpose
£12,027,000	Department for Business and Trade (DBT)	Serious and cross border consumer protection
£2,300,000	Food Standards Agency (FSA)	Safety of Animal Feed
£589,624	Department for Levelling Up, Housing and communities (DLUHC)	Estate Agency work
£730,000	DLUHC	Letting Agency work
£800,000	Her Majesty's Revenue and Customs (HMRC)	Illicit Tobacco local disruption days
£100,000	HMRC	Illicit Alcohol Pilot Oct 23-Mar 24
£100,000	Home Office	Domestic Violence and Scams Work
£10,000	National Crime Agency	Operation Derdap support
£3000	Age UK	Scams related training
£3,000,000	Department for Health and Social Care	Vaping enforcement and compliance work – funding period Jul 23-Mar 25
£88,477	Office for Students	Legal Backstop Nov 22-Mar 24

Table 1- NTS Funding

Intelligence

The NTS National Control Strategy for 2023-24 was published in April 2023.

Serious and Organised Crime System Tasking: NTS processes were updated, and a benefits document produced in June 2023, to show how the system can help NTS Teams and Trading Standards to deal with Serious and Organised Crime. It provides a single view of prioritised demands and threats and is widely used by other law enforcement agencies. There are currently 88 Trading Standards' operations on the system. The NTS Board has agreed that NTS (with input from Trading Standards Scotland) should review the outcomes and use of the system in 2024/25.

Approved trader websites: A national intelligence request was circulated to gather intelligence recorded on the national Trading Standards' intelligence database (IDB) and local information relating to problems relating to the use of these platforms. A

short report was produced with this data in October 2023. This has supported the ongoing project work with the CMA and other partners.

NTS Strategic Assessment October 2023: This was agreed by the Board and sets the priorities for the NTS' control strategy for 2024/25. These are doorstep crime and cold calling (including energy fraud), lettings (England only), mass marketing fraud/scams, illicit and underage sale of vapes (England only), illicit tobacco, used cars, intellectual property, other fair trading issues, estate agency, and animal feed work. Cross cutting themes or enablers are eCrime, on-line and social media, serious and organised crime, and the cost-of-living crisis.

NTS PNC Procedures and Trading Standards' Guidance: These were updated and changed how criminal records may be provided by local authorities to comply with the Criminal Procedure Rules and Directions.

Management of Risk in Law Enforcement (MoRiLE) Training: Tactical and thematic MoRiLE assessments are widely used by law enforcement agencies. They help to assess and prioritise threats, risks, and harm. Approximately 300 officers and managers from Trading Standards Services and NTS Teams received online practical training on their use of MoRiLE from the national MoRiLE team.

Operation Hide short report: A national law enforcement agency's project looked at criminals' use of complex hides (within vehicles and buildings) that are used to store and conceal their illegal products. The Team provided some examples that Trading Standards had discovered in buildings.

Intelligence Data	Apr–Jun 23	Jul–Sep 23	Oct–Dec 23	Jan–Mar 24	Total 23/24
Intel logs recorded on IDB	10,181	11,341	11,027	10,820	43,369
% change from last year	+8%	+19%	+10%	+8%	+11%
Citizens Advice complaints (civil/criminal breaches only)	60,956	64,300	66,946	74,432	266,634
Active Organised Crime Groups	36	27	28	28	-
Total Active National Flags on individuals	202	203	171	164	-
National Flag alerts (trips)	579	510	517	703	2309
Referrals for PND searches (PND searches by NTS Intel Team)	66 (1,803)	49 (1,515)	63 (3,193)	72 (3,729)	250 (10,240)
Total SOC system tasking submissions	104	102	90	88	-

Table 2 – Intelligence Data

The **NTS Intelligence Team** produced:

- Four tactical assessments.
- Four intelligence short reports on Approved Trader Platforms, Operation HIDE and two pieces of work for the NTS Estate and Letting Agency Team.
- Four scoping/research documents on non-compliant letting agents, used cars, modern-day slavery in construction and asbestos removal.
- One briefing document for Operation Joseph.

eCrime

At the end of the year, the Team had **10 active investigations** focusing on secondary ticketing, 'copycat' web sites, technical support helplines and social media advertising fraud.

	Apr-Jun 23	Jul-Sep 23	Oct-Dec 23	Jan-Mar 24	Total 23-24
Operations commenced	0	0	0	0	0
Live Operations	12*	10	10	10	-
Operations concluded	0	0	0	0	0
Operations where the eCrime Team assisted another local authority/agency	4	7	10	0	21
No of website/social media takedowns or suspensions, or other successful interventions outside the courts	94	90	99	262	545
Consumer and business detriment identified through enforcement and disruption activities	£782,160	£4,033,753	£5,113,640	£2,988,093	£12,917,646
No of defendants convicted	0	0	0	0	0
Total £ fines	£0	£0	£0	£0	£0
Total custodial sentences imposed	0	0	0	0	0
Total suspended sentences imposed	0	0	0	0	0
Compensation awards	£0	£0	£0	£0	£0
POCA Confiscation Orders	£0	£0	£0	£0	£0

Table 3 – E Crime Data

The Digital Evidence Unit provided support to 21 new investigations and 94 devices were submitted for forensic examination this year. The Team undertook **545 website and social media takedowns and interventions**. There has been some disruption to service caused by a cyber-incident that took place in February. Where there has been an impact on any case, all relevant authorities have been contacted and plans are in place to resume the service, dealing with matters in priority order.

The value of consumer and business detriment identified is £12,917,646.

Operation Millie: Four family members were convicted variously of fraudulent trading, aggressive practices, and money laundering, for claiming to offer enhanced checking services for European Health Insurance Cards (as was). A Proceeds of Crime timetable has been set. All defendants have applied for leave to appeal. The Court of Appeal decision is awaited.

Sentencing for **Operation Zebedee**, the final secondary ticketing case, is due this summer. Sentencing for **Operation Gilbert** is due in the autumn because of an outstanding trial for other defendants.

Tackling Economic Crime Awards: The Team was shortlisted as a finalist in the “Outstanding Team” category.

Home Office and indecent material: The Digital Forensics Unit has been granted access to the highly secure Child Abuse Image Database system. The unit is the first in the country to gain access outside of the Police and security services. It contains information about indecent images of children and other known illegal imagery. It does not contain copies of the images themselves. Access allows the Team to detect illegal images almost instantly so that they can be passed to appropriate authorities. It also safeguards staff as the material is automatically identified rather than staff having to view it when carrying out their forensic analysis.

Good practice for seizing digital evidence: Seizure of digital evidence material is being updated. This is particularly important for mobile phones due to ongoing developments in technology because the way in which a phone is seized and transported can affect the success of the subsequent forensic analysis. Also, CCTV examination and analysis now falls under the purview of ISO accreditation and the Forensic Science Regulator, and this could have an impact on how CCTV systems and/or footage is dealt with during warrants.

Subscription Traps: The Team is working alongside the ICO to tackle subscription frauds linked to online loan applications, focussing on companies identified following warrants executed by the ICO. The companies are believed to be sending large numbers of unsolicited text messages to consumers with links directing the consumers to the “loan” web sites that are then used to mislead consumers into signing up for unwanted subscription services.

Approved trader websites: The CMA agreed their consumer division could work alongside NTS to carry out a detailed assessment of the approved trader website landscape. Early findings indicated inconsistent or non-existent vetting/checking processes, poor response to consumer complaints, lack of processes to identify and remove rogue traders and potential breaches of consumer law. The CMA committed to a formal second stage of work that began early in 2024 to develop guidance built on a core set of principles that approved trader websites should meet:

- The overall impression platforms create in vetting/checking/approval of traders.
- Requirements for all platforms to undertake checking/vetting.
- Accessible and transparent consumer complaints processes.
- Ongoing monitoring of trader performance once accepted onto a platform.
- Effective action in response to consumer complaints and/or identification of known rogue traders.
- Transparent and effective moderation of consumer reviews (prevention of fake reviews).

A member of the eCrime Team has been seconded to the CMA on a part-time basis to co-ordinate the work from a Trading Standards perspective and the Team will work with TS Scotland, TS Northern Ireland, CTSI and others to continue developing the data and intelligence picture.

Real Deal Online: The Team has completed short videos highlighting some of the techniques officers can use when investigating Facebook sellers. These will be shared with HMRC to help them produce additional material to support the new track and trace system for tobacco products.

Real Deal Online - Wales pilot programme: Following the Real Deal Online training programme, one consistent theme emerged: some authorities had difficulty in getting engagement with local Facebook “buy and sell” groups. To address this, the Team worked with the IPO Co-ordinator for Wales and five Trading Standards services to assess these challenges. That work is now complete, and the results are being assessed and will be used to produce additional material for the Real Deal Online toolkit that will better support officers having such difficulties.

Investigations and Tasking

The **National Tasking Group** (NTG) agreed 42 funding requests. This included £53,473 start-up funding for four projects that will be delivered in 2024-25: two used car projects, one self-storage project, and one alternative enforcement project. The annual tasking budget of £3.85 million was fully allocated, the bulk of which funded ongoing NTG legacy cases.

NTG held its annual planning meeting in March and approved funding in principle for legacy cases in 2024/25, pending formal confirmation of the NTS grant. Funding requests for other matters will be considered in May 2024.

NTG conducted case reviews and approved their reports. It also approved a number of final project reports.

Work on NTS' alternative enforcement options continued, including a presentation at the Regional Investigation Teams' two-day event in February 2024, assisted by various NTS Managers, as well as Greater Manchester Police. The Programme Office is currently developing a project plan to deliver training across all regions.

The NTS Regional Investigation Teams completed 39 operations this year and have 109 open cases of which 39 are ongoing investigations, 19 are at the reporting stage, 46 are awaiting trial and five are POCA hearings.

	Apr-Jun 23	Jul-Sep 23	Oct-Dec 23	Jan-Mar 24	Total 23-24
Operations commenced	7	12	6	5	30
Live Operations	117	121	118	109	-
Operations concluded	4	9	11	15	39
Consumer and business detriment	£420,479	£399,647	£17,000,632.59	£16,536,830.17	£34,357,118.96
No. of defendants convicted	6	6	23	12	47
Total £ fines	£0	£0	£0	0	£0
Total custodial sentences imposed	4 (160 months)	1 (51 months)	12 (450 months)	4 (320 months)	21 (981m)
Total suspended sentences imposed	1 (24 months)	4 (69 months)	7 (96 months)	8 (72 months)	20 (260 months)
Compensation awards	£0	£58,000	£141,260.35	£164,639.80	£363,900.15
POCA Confiscation Orders	£0	£26,360	£126,525.17	£11,600,000	£11,752,885.17

Table 4 – Regional Investigation Team Data

The value of consumer and business **detriment addressed by the NTS Regional Investigation Teams' interventions was £34,357,119.**

There have been a number of cases completed this year which are reported here and under the doorstep crime, energy and lettings sections.

Operation Blue: The Tri Region Investigation Team assisted Redbridge Trading Standards with an investigation into counterfeit phone and tablet chargers and phone batteries sold through eBay. A shop raid led to seizures of 95 bags of counterfeit goods that safety tests revealed were high-risk electrical safety failures. The value of the rogue trading was £90,000. Two defendants pleaded guilty. Amjad Iqbal received 22 months (suspended), and 200 hours unpaid work, a curfew, and a £20,000 costs order. Dilshad Ullah, who had strong financial connections to Iqbal, was found to be in sole charge of the shop, where boxes of unbranded chargers with branded labels waiting to be attached were also found. He was sentenced to seven months (suspended), 90 hours of unpaid work and ordered to pay costs of £10,800.

Operation Scorpio 2: The South West Regional Investigation Team supported Wiltshire Trading Standards' case against three traders who carried out unnecessary, poor quality and overpriced roofing work at 18 properties, valued at £45,000. They failed to provide cancellation notices or do remedial work and used various business names and false individual names. Victims were aged 44-90. Matty Rossiter, James Rossiter and Dean Smith received a total of 8 years and 7 months' imprisonment.

Operation Cedar: The Tri Region Investigation Team supported West Berkshire Trading Standards' investigation into a property development/home improvement company that targeted consumers seeking building works via mybuilder.com. Michael Corcoran, a director of three companies, dishonestly made misrepresentations on pricing and timetabling to secure the work, then demanded substantial monies upfront and more unforeseen expenses on the first day. If demands were not met, he threatened to leave the job unfinished, a threat that was carried out on numerous occasions, leaving a large amount of work unfinished. Work done was inadequate, vastly over charged and, in some cases, required remedial work to put right. He received a four years and three months' immediate custodial sentence, after earlier pleading guilty to three offences of fraudulent trading and ordered to pay £58,000 compensation. The value of rogue trading was £554,000.

Operation Signature: This case was led by the South West Investigations Team and concerned complaints against an aggressive trader who took up front deposits for home improvement work but either no work was carried out, it was unfinished or of poor quality. James Hookey pleaded guilty to fraudulent trading in November 2023, and was sentenced to 15 months in prison. The value of complaints was £19,413.

Operation Cyclone: Rebecca Wilson was at the helm of a home improvement firm, based in Billingham, County Durham that left homeowners with unfinished driveways, paths, patios, and garages, much of which needed re-doing. She had a previous conviction and suspended prison sentence for similar offences from 2017. Following a case by the North East Investigations Team, she was imprisoned for 3

years and one month after admitting 17 counts of fraud and 15 of unfair trading. She was banned from being a company director and received an eight-year Criminal Behaviour Order. Her co-defendant, David Gillies pleaded guilty to eight unfair trading charges and received eight months custodial (suspended), and 240 hours' unpaid work. A POCA confiscation timetable has been set. The value of complaints was £112,520.

Operation Sepia: Several non-limited and limited companies carried out high value domestic building work e.g. extensions, loft conversions orangeries and conservatories. Work was substandard and left unfinished. The frauds often materialised over many months and the victims' accounts and statements were compelling and lengthy and took some time to pull together. Following an investigation by the East Midlands Investigation Team and after a three-month trial, Simon Horsfield was convicted of fraudulent trading, fraud and carrying on a business for a fraudulent purpose. He received 5 years' imprisonment on all counts (25 years in total) which will run concurrently. The value of the fraud was estimated at £730,000. A POCA hearing date is awaited.

Operation Glacier: This case was led by Wiltshire Trading Standards with support from the South West Investigation Team. An 80-year-old man was initially quoted £2,800 for guttering work, then went on to pay £55,000 for an unneeded new roof. He paid £57,000 into the accounts of two defendants. They had agreed to receive the payments into their bank accounts which they then withdrew in cash and gave to the rogue traders, keeping a "commission". A second victim paid £41,790 for roofing work into a third defendant's account. All three pleaded guilty to money laundering offences. The second victim was subsequently targeted by other rogues and persuaded to pay £9,850 into the account of a 40-year-old Chippenham male, since refunded in full. Two further payments were made to a fourth defendant. The victim suspected he had been targeted by rogue traders and refused to make further payments but was then contacted by a man claiming to be from Trading Standards and was convinced to pay £74,650 into an account he believed was controlled by the Crown Court but actually belonged to a fifth defendant. A sixth admitted to attempting to defraud the victim of £37,000 by impersonating an HMRC officer. All were sentenced as follows:

- Patrick Egan - two-years' imprisonment.
- Serena Hodge - 18-months' imprisonment (suspended), 150 hours of unpaid work.
- James Stinchcombe - two-year community order, 30 rehabilitation days and 150 hours of unpaid work.
- Claire Pemberton - 15-month community order, 25 rehabilitation days and 150 hours of unpaid work.
- Arfan Asif - 18-month community order, 20 rehabilitation days and 150 hours of unpaid work.
- Liam Belshaw-Turner - six months' imprisonment suspended for two years.

The total value of complaints was £247,390.

Operation South (POCA): Roofer, Jamie Smith, was sentenced to 3 years and 3 months imprisonment in 2022 for offences relating to a fraudulent roofing business. In October 2023, the court ordered £40,000 to be paid in compensation.

Used cars

Operation Hermes: The Tri Region Investigation Team assisted Hampshire Trading Standards' investigation into "car clocker" Ashley Wilson. He reduced displayed mileages on 33 vehicles by 2.75 million miles and falsified service histories to hide it. He sold to legitimate car dealers through online dealer trading platforms or Cazoo. Wilson received 57 months' imprisonment (45 months for fraudulent trading and money laundering, plus an additional 12 months as he was already serving a suspended sentence). The Court found he had benefitted by £585,600 and was ordered to pay £64,853 in compensation to his victims. No monies have been received yet.

Operation Bobsleigh: The trader pleaded guilty to selling 46 clocked cars worth £350,000. The case was brought by Kensington and Chelsea Council Trading Standards supported by NTS. Iman Behroozi Garaei was sentenced to two years imprisonment suspended, 100 hours of unpaid work and 15 days rehabilitation activity requirement.

Operation Kent concluded successfully in June in a case led by Staffordshire Trading Standards and supported by NTS. Nathan Muronda and Slybeat Muronda pled guilty and were sentenced at Stafford Crown Court for their part in a £350,000 car clocking scam. They received a total 22 months' imprisonment. Judge Edwards thanked those involved for the "monumental amount of work on the case". He went on to say that "clocking cars is a seriously deceitful occupation which undermines consumer confidence in the car trade".

Doorstep Crime

NTG provided £558,728 funding to support nine **doorstep crime investigations and legal proceedings** involving rogue traders supplying roofing, building and maintenance, double glazing and fish selling products to the elderly and vulnerable consumers.

Operation Source: Eight days into a doorstep crime trial in 2020, the case was abandoned because of the pandemic. This was really challenging for the vulnerable victims because a new trial date was postponed for a further two years. Unfortunately, some of the victims passed away before the case ended. It involved

the business practices of Ecoglaze Solutions Limited, Ecohome Solutions Limited, Ecorend Solutions Limited and Ecogreen Improvements Ltd, relating to building work aimed at energy efficiency in the home. The defendants took money from victims aged 70-87 (valued at £45,268). Work started and was not completed, done unsatisfactorily or not carried out at all. Jamie Anderson, who controlled the companies, was convicted of eight offences. He received 22 months' imprisonment suspended for 24 months and disqualification from being a director for 6 years. Michael Hickey was convicted of one offence of doorstep crime. He received a Community Order for 18 months and 150 hours unpaid work. The total value of rogue trading disrupted was £163,493. A POCA hearing took place in July 2023 which determined that Anderson had benefited by £23,330 and Hickey by £3,030. A nominal order was set for both defendants because neither had any assets that could be used to satisfy the order.

Operation Kalimba (POCA): POCA proceedings followed a successful prosecution of a prolific criminal fish seller. Darren Shanks pleaded guilty to fraudulent trading and received a custodial sentence of 2 years and an unlimited Criminal Behaviour Order preventing him from ever trading at the doorstep again. Pre-hearing discussions with the defence led to an agreed amount of confiscation of £42,693 and compensation of £5,428 for 44 witnesses, who paid between £278 and £3,950 for fish at the doorstep.

Operation Surf POCA: POCA proceedings followed a successful prosecution against rogue trader, Mark Buck, in 21/22, who was sentenced to five years in prison for doorstep crime and rogue building related offences. In November 2023, HHJ Ambrose determined the overall criminal benefit at £1,294,535. An Order was made for £45,832 and the Court ordered compensation to be paid out of confiscation.

The NTS Doorstep Crime Working Group had two meetings, sharing good practice and discussing a wide range of doorstep crime prevention work, intelligence development and enforcement activities.

The NTS Doorstep Crime Toolkit continues to be a widely used free resource for Trading Standards' colleagues and is updated twice a year. It contains a wealth of information and practical advice on dealing with doorstep crime and protecting vulnerable consumers. On 31st March 2024, the Toolkit had 1,038 people signed up.

Trading Standards East Midlands printer project, Operation Cuba was completed in March 2023 and a report on the project was published in June 2023. It looked at the use of printed material (leaflets and flyers) by doorstep criminals in the region, to make them appear legitimate. The funding provided the opportunity to engage with the printer businesses, which they may not have done before, to advise on their legal responsibilities. The advice and information provided was positively received and welcomed.

A Trading Standards South East doorbell project was completed in March 2023 and a report on the project was published in June 2023. It aimed to protect and target harden the victims of doorstep crime in the region by providing them with internet connected video doorbells or similar equipment. Sixty-seven products were installed, and surveys were completed prior to installation. These showed that 32 people had lost an average of £34,082 to doorstep criminals. The highest reported loss was £320,000. After six months, 39 follow-up surveys were received. All but one respondent reported that they had lost no more money and were receiving fewer callers. They felt their well-being had improved. The cost benefit ratio of this project was assessed as being 48:1 i.e. every £1 spent saves £48.

The NTS Scams Team received further national funding to provide victims of doorstep crime with doorstep recording technology. Two products will be used; one that requires user interaction and Wi-Fi; and another that does not require any user interaction or Wi-Fi. Devices will continue to be supplied in 24/25 until they are all allocated to local authority Trading Standards Services and Multi-Agency Approach to Fraud (MAAF) working group partners. The funding covers the devices but not installation or any subscriptions costs.

Energy Fraud

NTG provided £1,091,984 funding to support **eight energy fraud investigations and legal proceedings** involved in the mis-selling of energy contracts and energy saving products and services to vulnerable consumers that were claimed to reduce household bills.

Operation Havana: This renewable energy scam was linked to a previous NTS' supported case from 2017-18. The investigation, led by Essex Trading Standards, with support from NTS, focussed on four companies, Greenpowersolutions Limited, Green Planet Advisory Limited, Offgridplus Limited, and Green Power Energy Solutions Limited. While the period of mis-selling lasted less than two years, the companies turned over £6.5 million. Former customers were revisited, allegedly to carry out checks on previous installations, but scare tactics were used to mis-sell vastly overpriced products, with many being installed the next day. Records showed that the company bought goods for £245 and sold them for £3,500. Salespeople were incentivised to overcharge victims. One victim bought products for over £30,000. Forty victims lost £290,184 between them. Two trials took place, two people were found not guilty, seven were convicted and sentenced as follows:

- Antony Dean - 3 years imprisonment, a 10-year company director ban and a Criminal Behaviour Order.
- Lewis Manley - 2 years imprisonment, 8 months for an earlier suspended sentence, a Criminal Behaviour Order.

- Darrell Smith - 2 years imprisonment (suspended), 150 hours Community Service.
- Carl Smith - 12 months' imprisonment (suspended), 150 hours Community Service, £50,000 costs and compensation.
- David Mayhew - 18 months and 12 months (suspended), 100 hours Community Service, and a Criminal Behaviour Order.
- David Jenkins - 9 months' imprisonment (suspended), 100 hours Community Service, and a Criminal Behaviour Order.
- Emily Dean: 100 hours Community Service.

Operation Mallard: This business was visited and advised by Trading Standards many times yet continued its widespread fraud, predominantly concerning the sale of “energy saving” home installations. The business was designed to target, re-target and defraud elderly and vulnerable residents to mis-sell wall coating treatments, “Secotherm” (and other services), promising significant savings and government grants to support the purchase. Following a case by the East Midlands Investigation Team, charges of fraud, fraudulent trading and proceeds of crime were brought and sentencing took place in September 2023. The court heard that the turnover of the business between 2014-2017 was £10.5 million. Six defendants received custodial sentences of 22½ years:

- Jason Rowan - 7 years and a 10-year company director ban.
- Stephen Tomlinson - 4½ years and a 5-year company director ban.
- David Beeson - 3 years.
- Christopher Simpson - 3 years.
- Bohdan Zacharko - 2½ years
- Phillip Eremenko - 2½ years

Before the investigation began, a BBC Watchdog/Rogue Traders' exposé into the business showed an undercover operative who applied for a job with the company and underwent the induction and training within the business. Their experience was all filmed. The BBC also setup a 'house of horrors' where an elderly actor posed as an interested customer and invited a salesperson to attend.

Operation Best: This has been the largest set of cases ever dealt with by NTS. The investigations were undertaken by the NTS North West Regional Investigation Team. Through sham company structures associated with Business Energy Solutions Ltd, BES Commercial Electricity Ltd and Commercial Power Ltd, Andrew Pilley and his associates were responsible for targeting small business owners and deceiving them into signing long-term energy contracts. It concluded after over ten years, with delays largely caused by a whole range of legal challenges by the main defendants. In total, 13 defendants were prosecuted. On Judge's orders it had to be separated out into 10 trials. The primary defendant received a 13-year prison sentence, which we believe is the longest ever imposed for a Trading Standards' case. One trial remains outstanding due to unrelated drug offences.

The trial was against the four main defendants and following an eight-month trial between October 2022 and May 2023 all four defendants in Operation Best were variously found guilty of fraudulent trading for mis-selling energy supply contracts and concealing this from customers and Ofgem and/or the Energy Ombudsman; being concerned in an arrangement which facilitates the acquisition, retention, use or control of criminal property by another; and false representation.

Judge Knowles KC remarked that Pilley's story is "a sordid tale of squalid lies, greed and fraud" whilst Qualter was told "You agreed to Pilley's sham arrangements. You were, you said, a puppet and a stooge. That means you used your status as a director to conceal his control and did nothing beyond the barest formalities to fulfil your duties as a director."

All four were convicted and sentenced as follows:

- Andrew Pilley - 13 years in prison and a company director ban of 13 years.
- Michelle Davidson - six years in prison and a company director ban of nine years.
Lee Andrew Qualter - seven years in prison and a company director ban of nine years.
- Joel Chapman - eight months in prison.

Various Proceeds of Crime Orders were agreed totalling £11.6 million. Pilley and Donaldson paid £4.3 million towards the costs of prosecution. Over £99,000 was paid in compensation to 72 identified victims who featured in evidence in the trial.

There followed a second set of trials relating to 10 brokers for a series of substantive fraud offences. All worked at an Energy Brokerage controlled by Andrew Pilley. Whilst the charges laid meant that matters could have been heard in the Magistrates Court, all 10 defendants elected Crown Court trial. Ultimately nine pleaded guilty to sample counts of fraud by mis-selling energy contracts using false and misleading statements. Sentences handed down:

- Connor Gladwin (Senior Sales Agent) - 15 months imprisonment (suspended), 150 hours of unpaid work. Value of fraud £26,285.
- Daniel Stoney (Sales Agent) - six months imprisonment (suspended), 60 hours unpaid work, costs £500. Value of fraud £13,655.
- Graham Shaw (Sales Agent) - 13 months imprisonment (suspended), 10 days rehabilitation, 3 months alcohol treatment, costs £200. Value of fraud £11,837.
- Jamie McCracken (Senior Sales Agent) - 11 months imprisonment (suspended), 100 hours unpaid work. Value of fraud £39,324.
- Ryan Keenan (Sales Agent) - 5 months imprisonment (suspended), 60 hours unpaid work. Value of fraud £10,000.
- Stacey Witham (Sales Agent) pleaded guilty - 5 months imprisonment (suspended), 10 days rehabilitation, costs £200. Value of fraud £10,986.

- Victoria Hargreaves (Senior Sales Agent) - six months imprisonment (suspended), a curfew. Value of fraud £11,200.
- Victoria Macauley (Team Leader) - 11 months imprisonment (suspended), 100 hours unpaid work, costs £500. Value of fraud £10,221.
- Jade Lambert (Training Manager and Sales Agent) - 18 months imprisonment (suspended), 180 hours community service, costs £2,000. Value of fraud £30,154.

In October, partially in the light of the scale and complexity of the above cases, but also developments in the market, the Board considered a paper setting out issues relating to green energy. The Board agreed that:

- The current focus for NTS tasking should remain energy related fraud that directly links to doorstep crime.
- The Trading Standards system of investigating and prosecuting via local authorities is not best placed for large scale cases relating to the energy market.
- NTS should pursue the establishment of a government led Green Energy Fraud Working Group to look at all the options outlined in the paper.
- A response be submitted to the Heat Networks consultation (and any similar future consultations) to stress the broad point about the need for effective regulation of the energy market and to highlight the current gaps that exist.

Since then, the Programme Office has been consulting with partners with an interest in this sector, with a view to establishing a government led working group. By year end, there had been correspondence between Lord Bichard and Claire Coutinho MP, the Secretary of State for the Department for Energy, Security and Net Zero, as well as meetings at official level from both organisations. Correspondence had also been exchanged with Ofgem who are conducting a review into its use of consumer powers in this sector, to be concluded in the next financial year, to which NTS will contribute. Agreement in principle had been obtained from City of London Police to host a team mirroring the one that currently investigates fraud in the insurance market. Efforts to establish the Working Group will continue into 2024/2025.

Scams

The Team saved **£44,880,545** this year through its investigations, prevention and disruption work, and the savings made through local authority support. For every £1 spent the Team have saved £66.31¹ this year.

¹ £25,853,701/£534,857 DBT grant and £142,000 NTG bid £676,857. £25,853,701 £676,857/4=£169,214= for every £1 spent = £152.78 saved

MJ Awards: The *Friends Against Scams* project was short-listed for a 2023 MJ award in the category of *Transforming Lives*.

	Apr-Jun 23	Jul-Sep 23	Oct-Dec 23	Jan-Mar 24	Total 23-24
No. of pieces of mail returned to sender/disrupted	13,189	30,000	330	0*	43,519
No. of LAs supported with advice & guidance	9	9	8	8	34
Total savings from Scams interventions	£3,191,597	£1,719,824	£14,115,423	£25,853,701	£44,880,545
Value for money (estimated & actual consumer savings/every £1 of budget)	£18.86	10.16	£83.41	£152.79	£66.31
% of consumers recorded feeling safer in their own homes after TS' intervention	60%	48%	37%	47%	48%
No. of Friends Against Scams initiative recruits	14,277	2,525	2,274	2,414	21,490

*No mail received from Heathrow distribution centre this quarter.

Table 5 – Scams Team Data

Scams Prevention Awareness Events: The Team worked with Barclays Business Banking/Fraud Team and local Trading Standards, who hosted events in Bromley and Kettering, to raise scams awareness. Over 800 members of the public were offered advice on protecting personal information and had the opportunity to share their experiences of financial fraud. Age UK received funding from Lloyds Bank Foundation for a Scams Prevention and Support Project and funded the Team to deliver two days' in-depth scams awareness training for Age UK partners.

Friends Against Scams: The Team ran a training session for AbilityNet to help their volunteers give scams prevention advice when supporting people to use and adapt recent technology. The Team also produced a package specifically to help Housing Associations make their tenants more scams aware. Over 500 UK Housing Associations have been approached and asked to support *Friends Against Scams*.

The refreshed ***Friends Against Scams* newsletter** has raised awareness of phishing; bank and investment fraud; fraudulent utility company letters; solar panel fraud; Ofgem imposter, and Housing Association scams; and tactics employed by criminals, and specific fraud terms that are used in cybercrime. It also introduced the *Coercive and Control* study into language, and various other initiatives like the *Stop, Think Fraud* campaign launched by the Government. The monthly newsletter will become quarterly from April 2024.

Coercive control research: Research on the similarities between coercive and control tactics used in both domestic violence and fraud instances was published

with a *No Blame, No Shame* campaign and video. An interactive training session and toolkit explains how to identify, support and respond to victims of fraud and scams, and emphasises changing the language and using different techniques to support victims. The Team has delivered five sessions to 160 online and 20 in person delegates. Feedback has been positive.

Postal Operators: Over 43,500 pieces of mail were returned to the sender or otherwise disrupted this year, each containing an estimated average of £37.

Operation Juojarvi: The Team and its partners have stopped 500 clairvoyant style mailings since March 2023. The mailings target elderly and vulnerable consumers with an average age of 81. The mailings are a mix of threatening, harm or loss to the recipient or predicting windfalls of money and improved relationships. The letters demand between £37 to £80 payable in cash. The Team has recovered over £27,615 this year.

Throughout the year, the Team investigated several UK-based **mail enablers** to disrupt the fraudulent mailings being sent to or returned to the criminal entities. International collaboration identified freight companies, a UK accountant, UK copy writers, a UK-based distributor of the mailings, and numerous Polish and Eastern European bank accounts. The Team, Border Force and Kent Trading Standards recovered 150 mailings and 12,000 mailings en route to previously targeted UK victims, with estimated savings of £1,524,000.

Multi-Agency Approach to Fraud (MAAF): The new call blocker funding initiative was promoted, offering support to areas with difficulties identifying potential victims. The MAAFs were included in the Home Office Fraud Strategy. An updated version of the MAAF toolkit will include advice on Data Impact Assessments to enable better progress in securing data sharing agreements. A separate toolkit for MAAFs in London is being produced; this will also benefit other large 'metropolitan' forces such as West Midlands, Greater Manchester, and Merseyside. The experience & knowledge gained from the work already carried out on the London pilot (covering Bromley, Croydon, and Sutton), will support the remaining 11 Basic Command Unit divisions of the Metropolitan Police, when they launch their MAAFs in the future.

Bank Project: High street banks raised 106 enquiries about companies and traders suspected of defrauding customers. One individual offered vehicle restoration to high value cars then stripped them to sell the rare parts. This was passed to the local police for investigation. Another individual (previously convicted for similar offences) who over charged consumers for plumbing and lock repairs had his ability to process payments stopped, and the bank repaid the consumers. Sadly, the project only ran for six months, ending on 1st October 2023 because the banks declined to provide any further funding.

Operation Derdap: Tactics to disrupt a multimillion-pound fraud operated by interconnected call centres selling misleading white goods warranties, insurance,

home improvement products, cost of living discounts and various consumer loss claims management schemes, continue. The Team's disruption strategy this year led to:

- Removal of serviced and registered office facilities for 28 Derdap companies.
- Removal of accounting and tax filing facilities for 15 Derdap companies. Four of these companies were also reported to the NCA for false accounting and one was referred to Companies House.
- Removal of payment processing and banking facilities from 34 Derdap companies, some of them linked, leading to over 11,800 cancelled direct debits with estimated savings of £2.8m.
- Joint work with the Insolvency Service and HMRC led to total fines of £6,400 for two companies, six County Court Judgments, a business being wound up, directors facing prosecution by the Insolvency Service, and providers withdrawing direct debit facilities.
- Use of a new disruption tool: notifying the Courts that three companies had County Court Judgments against them, with enforcement action to follow.
- Seven companies prevented from voluntarily dissolving, meaning they cannot avoid their tax and creditor liabilities or set up a new company with the same directors.
- Refunds secured for eight consumers amounting to £67,800.
- Joint investigations with the Information Commissioners Office (ICO) (Re: Operations Farin 2, Derdap and Tenago) into 24 companies involved in cold calling and mass marketing of services. The ICO served five Operation Derdap subjects with fines totalling £590,000.
- Joint work with the LGA and ICO disrupted mass marketing of medical alerts to potentially 1.8 million consumers. Four involved companies had links to Derdap nominals. One worthless alert system ended when the telco took down the company's telephone numbers and it ceased trading.
- Work with Telecoms providers disrupted Indian based call centres; removed 94 spoof numbers, which made 1,450,000 calls, from the UK phone network; and barred 740 telephone numbers that collectively made 7.8 million mass marketing fraud calls in one quarter (estimated consumer losses: £7,800,000).
- A call centre number from the UK network was blocked following aggressive calls and TPS breaches for EDF smart meter installation. The company and EDF received advice and then reviewed business practices and training. The ICO was informed.
- 21 media mentions and anticipation of a significant increase when the *No Blame, No Shame* Campaign launches in October.

Operation Kalvi: This is an ongoing enquiry into cold callers offering remedial works to consumers who had previously had spray foam insulation installed. In one case the directors wound up the original installation company and formed a claims company targeting their original customers. Several unregulated claims management companies are involved who aggressively targeted consumers. The Team engaged with a respected claims management company and the original

finance provider to disrupt the fraudulent company. Potential losses to 200 consumers of £2,500-£5,000 each have been identified. In the last six months, a further 57 criminal companies targeting consumers have been identified and work continues with Dorset Police.

Operation Henhouse: This national initiative unites UK law enforcement to tackle fraud. A third-party telecoms provider and several linked offshore call centres used 104 telephone numbers to target Operations Dardap and Kalvi consumers with mass marketing frauds. Another 4,034 numbers were also discovered. Seven million calls were made from these 4,138 numbers. All are now barred from accessing the UK telecom networks. Estimated savings £22,638,000.

Operation Enonvesi: When disrupting scam mail in 2016, the Team discovered that the criminals had a common financial link with “PACNET”, a financial services company headquartered in Canada with UK and Ireland offices. An estimated 45,000 UK consumers were targeted. Work has been ongoing since then to support overseas enforcement agencies. In December 2023, PACNET agreed to pay a \$10 million forfeiture, the largest single forfeiture for the British Columbia Civil Forfeiture Office.

Operation Malaran: This investigation involves cold calling private and social housing tenants offering house disrepair claim schemes. The overseas call centres and UK-based enablers harvest personal data and charge fees for non-existent services. Enquires resulted in the take down of two numbers being used to call consumers from call centres based in South African and the Philippines- (approximately 300,000 calls made). The average loss to consumers for the introductory fee is £120 per consumer. Estimated savings: £1,108,800.

Estate and Letting Agency

The NTS Estate and Lettings Team are the statutory lead authorities for the Estate Agents Act and the Tenants Fees Act. As part of these core functions, they provide regular advice to the Government, engage with a wide range of industry stakeholders, provide training and share best practice with local authorities. The Team responded to over 1,300 requests for advice and assistance, issued five warning orders under the Estate Agents Act, six penalty charge notices for non-compliance with Redress Schemes and 10 fines under the Tenants Fees Act. In addition to this the Team also undertook a range of other work as outlined below.

Operation Saturn – Material Information Guidance: The Team launched its material information guidance for industry in November 2023, and since then has been engaging with the industry to embed a new approach to compliance. One officer was keynote speaker at the Land Data annual conference; took part in two panel sessions at the annual Conveyancing Association conference; and was a panel member during National Conveyancing Week.

Steering group members and industry stakeholders have also been working to update their own best practice guides, educational materials and property questionnaires (e.g., the Law Society TA6 and TA7 forms have been updated) to encourage their members to make the required adaptations as smoothly as possible. By way of example of the Team's success, Zoopla reported that property adverts are now showing tenure on 84% and price on 100% of listings and for leasehold (around 20% of listings) 65% show the years remaining on the lease, 46% show service charges, and 41% show the ground rent. These are significant improvements from 18 months ago.

Property Agent Checker (redress and CMP membership): The Team has continued to work on the single search facility to check on redress membership, and the client money protection (CMP) membership information has been tested this year. Difficulties arise particularly with CMP schemes submitting membership information at irregular intervals, and with occasional data problems such as incomplete company names and wrong postcodes. Five of the CMP schemes have updated their processes to improve the veracity of the information provided.

“Property Crime Tackling It Together” and “Introduction to Intelligence” e-learning, launched at the end of 22-23: 845 people completed this course in 23/24.

The Team worked with the Greater London Authority and secured changes to the **London Rogue Landlord and Agent Checker**, meaning enforcement authorities can now submit entries to the public register for notices served under the Tenant Fees Act 2019 and the Leasehold Reform (Ground Rent) Act 2022 in London.

Operation Arion: The Tri Region Investigation Team supported this case last year. In Summer 2022, letting agent, Frank Smart, was imprisoned for failing to secure deposits, pay rent payments to landlords, and his companies failed to carry out services, like PAT testing. An application to have him disqualified as a director was postponed until a hearing for victim compensation. Compensation was not possible as there was no realistic prospect of recovering any assets, however, Smart was disqualified as a company director, for a period of 8 years.

Regional Lettings enforcement projects 23/24

For the fifth year NTS supported nine projects seeking to improve lettings enforcement in England. Via this work, there was engagement with 49 authorities (including Trading Standards and housing authorities) across six regions (NETSA, TSEM, TSSW, LTS, CEnTSA & Y&H). Related intelligence logs on IDB more than doubled in authorities participating in funded projects. The total estimated detriment prevented across the two projects where it was a relevant measure in 23/24- £8,474,894.

A summary of each project is below:

Derby City Council: The aim of this small project was to identify letting and property management agents within Derby and assess level of compliance. Compliance of 48 websites was assessed and 60% were non-compliant. Letters were sent to all non-compliant agents and monitoring has shown increased compliance. Estimated detriment prevented was **£23,000**. This project has continued into 24/25, entering an enforcement stage.

Central England Trading Standards: The aim was to raise regional compliance levels by Letting Agents for Client Money Protection, by training authorities, encouraging liaison and identifying the top 10 non-compliant premises in each authority and giving advice and/or taking enforcement where needed. Final notices were served on 58 agents with £4,965,175 fines imposed, 13% which have been paid to date. There is an issue with inadequate powers for officers in enforcing The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019. Detriment prevented: £8,541,894.

Cornwall: The aim was to improve co-operation and intelligence sharing between Private rented sector housing teams and Trading Standards and together tackle compliance in the lettings sector. Funding was used to appoint a SPOC in Trading Standards as a dedicated link to the housing team. Training was provided and a referral system agreed. A joint compliance assessment approach was agreed with supporting audit checklists and used successfully. Overall compliance was found to be satisfactory. Enforcement policies needed to be reviewed and aligned to ensure they were consistent in approach. ‘Selling’ the use of IDB to those who are not used to a formal intelligence model is challenging but the use of a local champion for day to day support and use of ‘real examples’ has been a game changer in terms of its use. Fines of £6,500 were issued and all have been paid.

London Trading Standards “Operation Redditus”: The aim was to increase ease of reporting for tenant fees issues via the [London mayors rogue landlord report line](#), and improve housing enforcement across London. The Mayor’s office updated the reporting line to include all 33 boroughs and now sends referrals through to all London Boroughs. Citizens Advice have launched their [new London tenants webpage](#) which includes a link to the mayor’s reporting line. LTS continues to support boroughs where they do not have the capability or capacity to take appropriate enforcement action, via the provision of suitable contractors. This also enables those boroughs to build their skills to ensure a legacy of enforcement on this issue. By the end of the year, 22 authorities are taking action on referrals.

North East England Trading Standards “Operation Timpani”: The aim was to establish a baseline in respect of the lettings sector in the region. 11 of 12 authorities in the region participated. The project officer assessed compliance significant levels of non-compliance on websites. For all non-compliances, the relevant local authority was provided with a pack of intelligence. The enforcement phase will be carried out in 24/25.

Trading Standards South West: Two short films were produced for students looking to become first time tenants and highlighted what they need to do to avoid becoming a victim of an unscrupulous landlord. The first film was launched via social media in August (timed to coincide with clearing) and a longer film forms the introduction on the [TSSW Student scams Toolkit microsite](#). These films both finish off with a call to action to view the 2022 '[Student guide for renting](#)' that was produced by Bournemouth, Christchurch and Poole council, funded by NTS. The film is part of the [TSSW student scams toolkit](#) and will be made available nationally via Citizens Advice.

West Yorkshire Joint Services “Op Titan”: A dedicated lettings enforcement officer was employed to continue to develop relationships with the five West Yorkshire housing teams, to generate intelligence to identify and take action on non-compliant landlords. Having identified all lettings agents in the region, compliance advice was provided to businesses in tranches. This took more time than originally anticipated and West Yorkshire will continue to work on non-compliant agents next year. They have referred cases to the national team for enforcement action where necessary.

Regional Lettings Projects 24/25: In March, funding was agreed for the continuation of five previous projects (Derby, CEnTSA, LTS, NETSA, TSSW, and WYJS).

Funding was also agreed for one new project by Gloucestershire County Council operating across six district county boundaries to determine compliance with Client Money Protection Scheme membership requirement by Property Management Agents. Priority will be given to engagement with those agents not belonging to a recognised scheme.

	Apr-Jun 23	Jul-Sep 23	Oct-Dec 23	Jan-Mar 24	Total 23/24
Incidents Received	283	359	303	431	1376
Request for Advice	89	97	110	98	394
Other enquiries/requests for assistance	192	255	191	333	971
Prohibition & Warning Notices issued (Estate Agents)	4	0	3	3	10
Prohibition & Warning Orders Issued (Estate Agents)	3	1	0	1	5
Penalty Charge Notice for Non-membership of a redress scheme (Estate Agency)	3	1	1	1	6
Monetary penalties issued under Tenant Fees Act 2019 (Lettings)	3	3	2	2	10

Table 6 – NTS Estate and Lettings Team Data

NTS Animal Feed Delivery Programme

Local authorities delivered 4,307 official control activities in the year. This is 96% of that committed to at the outset of the financial year.

The level of delivery on sampling (at 75%) have lowered the overall programme delivery figures in 23/24. This reflected the narrow scope of sampling this year as local authorities struggled to find sufficient businesses at which products could be analysed.

NTS had originally planned against a standstill budget. In late March 2023, the FSA allocated an additional £400,000 to the budget. Some of this funding was used to fund a small uplift to unit costs (to reflect unanticipated inflationary costs) but regions have also delivered additional activity, including work to focus on non-compliant businesses. However, £150,000 was rescinded to the FSA as not all the additional budget could be spent.

A total of 1,747 feed consignments from third countries were checked on import. NTS have delivered: 15% documentary checks on imported feed in scope; 5% ID checks; and 5% physical checks. All of these were within targets set by the FSA. Ports continue to prioritise higher risk 'irregular' consignments for official controls checks.

All England	Allocated activity 23/24	Delivery				
		Apr-Jun 23	Jul-Sep 23	Oct-Dec 23	Jan-Mar 24	Total 23/24
Inland feed inspections	2831	267	612	653	1129	2661
Primary Production premises inspections	937	156	223	255	344	978
High Risk Food	182	20	46	27	57	150
Inland samples taken	106	7	38	4	31	80
Total ports activity (3rd country imports)*	422	86	124	86	142	438
Ports sampling and analysis*		12	26	12	31	81
<i>Overall delivery (exc. ports samp)</i>	<i>4478</i>	<i>536</i>	<i>1043</i>	<i>1025</i>	<i>1703</i>	<i>4307</i>

Table 7 - NTS Feed Data

NTS Feed projects: NTS programme office have undertaken a number of FSA agreed projects to better understand and improve the feed enforcement landscape each year. This year projects were:

- [Capability and competency Heads of service survey](#). This project was completed and results shared in July, in time to input into wider work undertaken by FSA to develop LA resilience.
- **Earned recognition data project** – This report was finalised and shared with FSA in March 24. It will be published in June.
- [Online sales of feed for food producing animals](#). This report was published and shared with FSA in March 24.

National policy support: NTS provides secretariat support to the National Agricultural Panel (NAP) and National Animal Feed at Ports Panel. (NAFPP).

NAP and NAFPP have produced detailed [guidance on identifying feed for surveillance sampling](#), which aims to help officers understand the range of analyses that can be carried out on samples of feed.

NAP has significantly [updated guidance on insect farming for food and feed](#) with input directly from industry. This guidance uniquely brings together feed, food, ABP and TSE legal requirements in relation to insect farms. Training material developed for NAP about the [APHA National Feed Audit](#) and [insect farming](#) has been shared with all local authorities.

[Guidance on responding to illegal imports of feed containing animal by-products](#) has been updated and additional case studies shared.

NAFPP and NAP have also responded to technical queries on the [National Agriculture KHUB](#) about feed additives, 'puppuccinos', re-packaging, turkey farms, registration of importers, surplus food, pictorial representation and Primary Authority.

The Panels have responded to consultations on the [implementation of the Border Target Operating Model \(BTOM\)](#) and a draft new regulatory framework for fertilisers.

[NAFPP have updated their Terms of Reference](#) in line with the updated NAP version. NAP and NAFPP [agendas and minutes](#) are available on the KHub.

Operation Georgi – Illicit Alcohol

NTS agreed to run a scoping project for HMRC, to assess the level of availability of illicit alcohol at retail premises.

All visits were completed by the end of March 2024 and data returned to HMRC. In total, 30 local authorities participated in this work across five regions – NW, LTS, TSEM, CENTSA and YAHTSG.

A key issue identified by TS has been the quality and quantity of intelligence of illegal alcohol supply at local level.

A total of 265 premises were visited with seizures made at 16 premises. Approximately 2,400 litres of alcohol was removed. In the main this was spirits including Famous Grouse, Smirnoff and to a lesser extent smaller quantities of beer. The brand and price data provided has proved valuable to HMRC.

Feedback has been sought from participating authorities and this will be considered alongside the data review before any decision is made by HMRC about whether any future activities will be required.

Operation Joseph - Vaping

After April's announcement of £3 million funding, up to 31/3/25, for specific work to target the underage sale and supply of illegal vapes, DHSC confirmed the budget in mid-July. This was to cover specific data collection, intelligence development and project work relating to illegal vapes in England. Grants were issued to all regions to support intelligence gathering, data collection, and to assist with storage and disposal costs for local authorities. These were used through the year to support their vapes enforcement work. Data collection and collation has continued quarterly, along with 2022-23 data on seized illegal vapes and underage sales test purchasing by local authorities. This data has helped inform DHSC policy.

Data collected via the England regions showed that local Trading Standards services **seized 1.2 million illegal vapes** in over 3,000 seizures. They also made **3,385 underage test purchases of vapes with a sales rate of 26%**. This represents significant increase in LA TS activity: 174% increase in underage vapes test purchasing and a 59% increase in the seizure of illegal, non-compliant vapes.

	2022-23	Apr-Jun 23	Jul-Sep 23	Oct-Dec 23	Jan-Mar 24	Total 23/24
Illegal vapes seized (inland only)	749,806	286,002	*264,557	*345,796	297,604	1,193,958
Underage sales test purchases	1,199	*790	*1,165	*624	705	3,284
Underage sales failure rate (sales)	27%	25%	25%	29%	26%	26%

*Includes some retrospective minor additional data provided in Q4

Table 8 – Local Authority Vape Activity

Operation Joseph has needed to have some flexibility, taking account of the changing legislative landscape emerging around vaping products, notably the announcement of the Tobacco and Vapes Bill, published in March 2024, and the development of regulations to ban single-use vapes, which make up a significant proportion of the market.

A **Vaping Expert Panel** was established and first met formally in September 2023, with representation from TS experts from the England regions, with later added input from key stakeholders and TS representatives from other home nations. Nine technical matters have been reviewed and technical guidance added to the Regulators Companion website. The group is supported by CTSI.

CTSI have led on the **professional upskilling and business guidance** elements of Operation Joseph, delivering 670 training seminar bookings to officers and business representatives. Feedback across all delivered webinars found that: 96% believed the objectives of the webinar attended were met; 98.5% felt that their knowledge had improved from attendance at the webinar.

Additional **web guidance for businesses**, using the CTSI Business Companion website, has been slower to develop, with many changes on the horizon that now need to be taken account of, if new guidance is not to become quickly outdated.

Intelligence reports have been drafted by the NTS Intel Team: an overview 'short report' and a specific report on OCGs. These will be shared early in 2024-25.

A report on the first phase of **online underage sales** funded work was circulated, noting a 10% sales rate from 312 test purchases. This work was carried out by Thurrock, Cheshire East and North Yorkshire Trading Standards.

The first phase of market surveillance testing of 120 MHRA notified products was completed with a final report awaited. This work was carried out by Salford, Heart of the South West and the West Berkshire Public Protection Partnership.

From January, after some delays in securing DHSC agreement to proceed, funding was allocated to selected LAs with ports, to start intervention and intelligence gathering work on **imported illegal vapes**. To date, funding has been allocated to 10 ports. These allocations have used over 99% of the £737,000 allocated to ports work. Each port is required to submit a return summarising action taken and signposting IDB intelligence entries each quarter, the first due by the end of April 2024.

The Medicines and Healthcare Regulatory Agency made a referral to the NTS eCrime Team for a **website takedown**. However, there was no UK base thus no "home" Trading Standards service. To ensure appropriate oversight, the current takedown procedure does not allow the Team to act as both the initial referrer and the processor of the takedown request to the hosting company. As a result of this

situation, the Team is assessing how widespread this issue may be, so appropriate amendments could be made to its takedown procedure to ensure sites selling non-compliant vapes do not “fall through the gaps.”

To evaluate Operation Joseph, an initial face-to-face workshop was held in January with DHSC, NTS and CTSI representatives, together with the **external evaluation** team from IPIP (Improving Performance in Practice). A plan and timeline for the evaluation process has been produced, focussing on the elements where value can be added most, and where longer-term funding could be of greatest value.

Illicit Tobacco – Operation CeCe

Seizures were made from a total of 1,900 premises during 2023-24.

A total of 19 million sticks and 5,103kg of HRT with a revenue value £11.8 million have been seized during this year.

In recognition of the considerable amount of work undertaken locally, NTS Chair Lord Bichard, wrote to the Chief Executives of the 15 local authorities who had carried out the most interventions, expressing his thanks for the commitment and support given by the Trading Standards services to Operation CeCe. Several press releases and local promotion work was then done by those local authorities on the basis of the letter.

	Apr-Jun 23	Jul-Sep 23	Oct-Dec 23	Jan-Mar 24	Total 23/24
Total Sticks Seized	4,047,420	3,343,850	7,338,425	4,322,031	19,051,726
Revenue Value of Sticks Seized (£)	2,007,520	1,658,550	3,639,858.	2,143,727.38	9,449,656
Total Hand Rolling Tobacco seized (kg)	920.75	1372.26	1548.38	1,262.165	5,103.55
Revenue Value of HRT (£)	418,020	623,006	702,964	573,022.91	2,317,017
Total Shisha Seized (kg)	183.4	4.6	6.8	14.4	209.2
Revenue Value of Shisha Seized (£)	35,379	890	1319	2793.60	40,381.6
Other items seized					
Revenue Value of Other Items (£)					
Total Revenue Value Seized (£)	2,460,920	2,282,446	4,344,142.	2,719,543.89	11,807,051

Table 9 - Operation CeCe Illicit Tobacco seizures.

The new regime for Trading Standards to refer cases to HMRC for them to apply civil sanctions went live in July 2023. A working group was established to assist local authorities in progressing the signing of the necessary MoU and the process of making such referrals. To date, there are 88 correctly completed and signed MoUs and over 500 officers authorised to use the Dentsu tobacco track and trace database.

To date, 28 referrals have been made to HMRC for the imposition of a civil sanction, of these, five cases have resulted in sanctions totalling £22,500 being issued. Other cases are being progressed.

The future funding for Operation CeCe is the subject of on-going discussion with HMRC. It is possible that this work may be expanded in future years using part of the funds provided to HMRC under the “Smokefree Generation” proposals made by the Government.

Heads of Service have recently indicated their support for this possible extension and provided feedback on a range of issues affecting the delivery of this work.

Advertising Standards Authority – Backstop Enforcement

Buckinghamshire and Surrey Trading Standards provide the above role on behalf of NTS.

In total, seven referrals were received, four closed and three remain under investigation. Details of all referred cases appear on the ASA website.

Referrals have related to:

- product advertising.
- potential breaches of the Cancer Act.
- claims relating to treatment of health conditions.
- Advertising of a telescopic baton.

In addition to formal referrals, the Team supports the ASA with advice to assist them to fulfil their broader functions. This year this has included:

- an opinion on offensive weapon adverts.
- draft enforcement notices in relation to vapes.
- participation in the ASA Pricing in Advertising Expert Group.
- an opinion on Cancer Act 1939 - Alternative Health Practitioner claims.
- long covid claims.
- opinion on alleged CPRs breaches by a ticketing site.
- Twitter alleged offensive weapon (CAP) - CJA 1988, opinion.
- Nitrous Oxide Google Ads.
- Meaning of “free” linked to banned practices.

The Team met with ASA Head of Regulatory Projects and Casework. This is a new post in their organisation working across ASA and CAP, responsible for ensuring regulatory projects are aligned with strategy and casework is of high quality, proportionate and consistent and delivered online training sessions for ASA new starters in the compliance team.

Office for Students Backstop

Buckinghamshire and Surrey Trading Standards provide the above role on behalf of NTS. This was a pilot that ended in March 2024.

There were a total of nine referrals received, six were closed and three remain open. Referrals have related to potentially unfair terms and conditions; an unregulated provider using the terms “University” and “degrees”; and the enforcement provisions for the Skills and Post-16 Education Act 2022. The advice provided enables OfS to better use their existing regulatory mechanisms to secure compliance.

The Team also attended the OfS annual Insight event.

OfS officials advised that they were happy with progress and hoped to extend the work after April 2024.

Published 28th May 2024. For any enquiries about the content of this report or if you require any further detailed information, 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.