

# ANNUAL BUSINESS PLAN 2025-2026

### **Foreword**

I am very pleased to present the National Trading Standards' (NTS) Business Plan for 2025/26 which builds on a very successful 2024/2025, when between April and December 2024,we:-

- Tackled Consumer and Business Detriment totalling £43.7 million
- Seized £12.8 million of illicit tobacco
- Had 27 defendants convicted
- Obtained compensation worth £588,000 to victims
- Removed over 5400 websites or illegal content from websites.

We have also seen the conclusion of several large cases including:

Two companies cold-called and mis-sold renewable energy products to 50 to 80 year old house owners. They took out fraudulent loans pretending they were government grants, then took the money from customers who picked up the repayments. Three defendants received almost 10 years imprisonment and 16 years of company directorship bans between them.

A former Brookside actor and eight associates set up an extensive network of sham modelling agencies and photography studios falsely promising aspiring models paid work. After offering 'free' test shoots they demanded exorbitant sums for portfolios of poor-quality prints. The main defendant was sentenced to 8½ years imprisonment in his absence. The others received suspended sentences totalling over 15 years.

All of this work protects vulnerable consumers but also prevents legitimate businesses from being undercut by crooks so that more money is being spent in the legitimate economy and does not go into the pockets of criminals. In this way, we support growth in the economy because legitimate businesses have the confidence to invest in products, markets and services without being undercut by those failing to comply with the law or meet appropriate standards.

NTS uses Government these funds to prevent, investigate, or disrupt the more serious attempts by criminals to defraud vulnerable consumers and legitimate business by breaking consumer protection laws. We help to maintain standards in the estate and letting agency markets and tackle the issues associated with illicit tobacco and the import of illegal vapes. We also help to protect food supplies and meat export markets by ensuring that the animal feed chain is safe

The Government allocates funds to NTS for this work and this year NTS we will receive £12.63 million from the Department for Business and Trade, £2.2 million from the Food Standards Agency to deliver our feed programme, £1.34 million from the Ministry of Housing, Communities and Local Government to support work relating to estate and letting agencies, £2.03 million from DHSC to tackle the supply

of illegal vapes at ports and £2.73 million from HMRC to disrupt the supply of illicit tobacco.

The work is overseen, and priorities determined, by the NTS Board, which I chair, and which comprises ten senior Heads of Trading Standards from England and Wales.

We also work with other partners, including the Home Office, the Intellectual Property Office and the Office for Students on relevant trading standards' activities.

The Trading Standards system is unique in having an integrated system that operates locally, regionally, and nationally to make all these various achievements possible. We are grateful for the invaluable support we receive from local authority Trading Standards Services, Regional Coordinators and our other partners without whom our success would not be possible.

Lord Michael Bichard

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Chair National Trading Standards

## **Strategic Objectives**

## **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.

## **Objective 2**

Ensure effective delivery and coordination of enforcement of serious consumer protection crime, including mass marketing scams and the disruption of illicit tobacco and vape markets.

## **Objective 3**

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.

## **Objective 4**

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

A national Strategic Assessment was undertaken and, using this information and the work specifically commissioned by Government, the Board agreed that the key priorities for 2025/26 will be:

- Doorstep crime and cold calling (including energy fraud).
- Lettings (England only).
- Mass marketing fraud/scams.
- Illicit tobacco.
- Illicit vapes.
- Used cars.
- Intellectual property.
- Other fair trading issues.
- Estate agency.
- Animal feed work.

NTS will also 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.
- 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.

The NTS Board may also agree to deliver other Trading Standards related activities where requested to do so by Government, during the year.

# 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.
- Working with the Home Office, National Police Chiefs' Council and relevant host local authorities, to access the Law Enforcement Data Service when it replaces the Police National Computer.
- Providing relevant NTS Teams and regions access to various databases such as the Police National Computer and 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.
- Work closely with HMRC to share and develop intelligence relating to the illicit tobacco market.

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

## We will do this by:

 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.

- Supporting a programme of enforcement activities in relation to used cars, fair trading scams, doorstep crime, mass marketing fraud and the supply of counterfeit goods in key markets.
- Providing a NTS eCrime Team to tackle consumer and business detriment caused by eCrime, taking down unlawful websites and digital content for scams, consumer fraud and illicit tobacco.
- Supporting a Doorstep Crime Working Group: of regional/national Trading Standards' leads across the UK and NTS Teams.
- 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 massmarketing scams by disrupting the mechanisms scammers use and to work with local authorities and other partners to support safeguarding of victims.
- Coordinating a programme of work to disrupt the supply of illicit tobacco in local communities by setting up a network of regional tobacco officers, seizing illicit tobacco, and raising awareness of the work in local areas.
- Coordinating a programme of work to tackle the supply of illicit vapes at ports of entry in England.
- Supporting the system to enable local authorities to make referrals for civil sanctions, for the supply of illicit tobacco, to HMRC.
- Maintaining a relationship with the IPO and supporting regional IPO officer work with trading standards to challenge intellectual property crime.
- Participating in the Government's cross-cutting fraud agenda 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 business case to extend the pilot provision of backstop enforcement role.
- 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 England<sup>1</sup> to ensure the safety of the food chain and protect the UK export market.

## We will do this by:

 Overseeing a programme of food hygiene at primary production (farms) inspections to ensure compliance with standards at the start of the food supply chain.

<sup>&</sup>lt;sup>1</sup> A similar programme of enforcement by Local Authorities in Wales delivers similar work but this is not delivered by NTS.

- Overseeing a programme of inspections and sampling of animal feed 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.
- 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 Agents and Letting Agents<sup>2</sup>.

## We will do this by:

- Providing a NTS Estate Agency Team and an NTS Letting Agency Team to fulfil the statutory functions as lead authorities under the Estate Agents Act 1979, Tenant Fees Act 2019 and relevant lettings legislation.
- Tackling consumer and business detriment caused by unacceptable practices in the sector and taking enforcement action where required.
- Issuing guidance and advice.
- Providing an online portal for consumers and enforcement partners to check the membership status of property businesses against the mandatory member organisations.
- Working with industry to improve standards in the sectors.
- Supporting and encouraging best practice through the provision of training materials, courses and guidance.
- 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:

- Working with HMRC to plan and deliver the significant expansion of Operation CeCe, to tackle illicit tobacco.
- Continuing to work with Trading Standards colleagues 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.
- Working closely with regional Trading Standards groups, who are crucial to the success of NTS' work.

<sup>2</sup> 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.

- Engaging with Government to influence them in relation to Trading Standards matters and to support the Spending Review process.
- Offering the NTS' model for the commissioning of relevant elements of Trading Standards' work.
- Creating a comprehensive national picture of the achievements of NTS.
- Supporting the Consumer Protection Partnership.
- Working with enforcement agencies and partners (including the Government Agencies Intelligence Network and Regional Organised Crime Units).

Published 9<sup>th</sup> May 2025. 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.