

National Trading Standards

Strategic Assessment - October 2024

1. FOREWORD

As we face the ongoing cost of living crisis, the work of Trading Standards is more vital than ever. Criminals are exploiting the most vulnerable among us, but ever-stretched Trading Standards teams continue to disrupt and tackle some of the most challenging risks to consumer safety, despite increasingly tight budgets.

This year, we've seen a rise in illicit tobacco and cigarettes, doorstep crime, and cold calling – driving a 5% increase in recorded intelligence logs. According to Citizens Advice used cars, roofing scams, dodgy MOT and service repairs and botched house renovations by rogue traders remain some of the most prominent issues that consumers experience. Behind these scams are real people left devastated.

Our #NoBlameNoShame campaign tackles the underreported issue of mass marketing scams, which often leave victims isolated and ashamed. We're determined to change that. These scams – such as fake prize drawers and clairvoyant scams – will remain a top priority as we work to disrupt criminal networks and encourage victims to speak out.

Doorstep crime and cold calling are not just annoyances, they're strategic lifelines for criminals who steal millions from the most vulnerable in our society. The rise in fake lettings deposit schemes and energy scams – with consumers being tricked into unnecessary and costly renovations – is equally alarming. These crimes hit people where it hurts most – at home, where they should feel safest.

We're also making strides in the battle against illicit tobacco and vapes, with nearly 1.2 million illegal vapes seized and £11.8 million worth of illicit tobacco removed from sale thanks to local Trading Standards teams. This isn't just about stopping the sale of illicit goods; it's about protecting today's youth from dangerous products. However, our essential work needs continued investment. NTS will continue its work on illicit vapes until March 2025, but further funding is needed to ensure our fight against this growing industry doesn't end next year.

At the heart of everything we do is a commitment to protecting people and honest business – these are real people with real lives and businesses – from the financial and emotional devastation caused by fraud and illicit sales. As we prepare to work alongside the new Government on its plans for national renewal, my colleagues and I are driven by a renewed sense of purpose – to amplify the impact of Trading Standards and to stand as a powerful force against those who threaten the safety and well-being of our communities.

Lord Michael Bichard
Chair of National Trading Standards

DOCUMENT HANDLING INSTRUCTIONS

This document has been produced by the NTS Intelligence Team. It is classified as **OFFICIAL** when completed, as defined by the Government Security Classifications Policy (July 2023).

2. INTRODUCTION

The National Trading Standards (NTS) 2024 Strategic Assessment identifies the key national threats, emerging issues, and priority areas for NTS. It will help the NTS Board produce their national Control Strategy for 2025 – 2026. It is an integral part of the NTS business planning process. NTS only covers England and Wales. There are separate arrangements to cover work in Scotland and Northern Ireland.

It is used to hypothesise and make recommendations on how to develop policies and tackle national problems, it uses data drawn from 1 April 2023 to 31 March 2024. Any comparisons to the previous year's NTS 2023 Strategic Assessment reported figures are from 1 April 2022 to 31 March 2023. (referred to in this document as the 'previous year'). A wide range of information sources have been used by the NTS Intelligence Team to produce this assessment including:

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

The NTS Annual Report and NTS infographic for 2023-24 details the work of the NTS Teams and workstreams. They dealt with £92,155,310 in consumer and business detriment, had 47 people convicted of offences and had prison sentences totalling 103 years and 5 months handed down. In total courts have awarded, £363,900 in compensation, £4.5 million in costs against defendants and £11,752,885 in confiscation court orders from defendants.

NTS 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 and 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.

NTS received £3 million funding for Trading Standards' work and coordination across England from the Department of Health and Social Care. This funding, from July 2023 to March 2025, was provided to Trading Standards Services in England to cover data collection, intelligence development and project work relating to illicit vapes under the name Operation Joseph. Therefore, illicit and underage sales of vapes was a separate priority area in the NTS 2023 Strategic Assessment and 2024-25 NTS Control Strategy. It has been included as priority area in this Strategic Assessment but since the funding is only until March 2025, it will not be a NTS priority area without any additional government funding for NTS to continue to coordinate and do work in this area. Separate funding was provided by the Welsh Government for work in Wales to

March 2024 and any ongoing work in Wales would also be dependent on ongoing funding being provided.

Energy fraud that involves doorstep crime will continue to be supported under the doorstep crime priority area, however it has become clear that for systemic and not capability reasons, Trading Standards is not best placed to lead on tackling large scale energy fraud. Therefore, NTS is still working with the government and others to identify and obtain appropriate funding for a regulatory body to lead on this work.

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

3. KEY FINDINGS

During the period of 1 April 2023 and 31 March 2024 research found that:

- 41,460 intelligence logs were recorded on IDB by Trading Standards Services in England and Wales, Regional Groups and NTS Teams, this is an increase of 2027 (+5.14%) from the previous year.
- Tobacco and cigarettes (13,320), Doorstep Crime and Cold Calling (6,199) and Age Restricted Sales (5,698) have the highest number of intelligence logs recorded on IDB.
- 428,706 Citizens Advice consumer service database reports were recorded this year, which is a decrease of 144,315 (-25.2%) from the previous year. Whilst the figures have dropped they still provide essential complaint data that informs NTS and Trading Standards.
- The top five Citizens Advice consumer service database categories that consumers are complaining about are: (1) used cars, (2) roofing, roof sealing and chimney repairs, (3) car MOT, service and repairs, (4) women's clothing and (5) major renovations (including lofts, conversions and extensions).
- The National Fraud Intelligence Bureau (NFIB) Fraud and Cyber Crime Dashboard reports 5,728 door to door sales and bogus callers (across the UK) with reported losses of £34.5 million. There were 22,301 other consumer non-investment frauds (across England and Wales) with reported losses of £112.6 million (as at 31/03/24).
- Cross cutting issues affecting all areas of Trading Standards' work have been identified as eCrime, serious and organised crime and the cost of living crisis.
- Trading Standards currently have 24 active Organised Crime Groups (OCGs) mapped on the Police National Database (as at 30/09/24).

As anticipated there have been increases in intelligence submissions in the doorstep crime and cold calling category and tobacco and cigarettes categories. The eCrime and mass marketing fraud/scams figures have reduced, but still show the huge scale of internet and digital based scams that are expected to grow as the online marketplace continues to develop. Many scams and eCrime complaints are linked to fraud and instigated via digital platforms or devices. They are often reported elsewhere, such as to Action Fraud, financial institutions, other regulators and ombudsmen.

There have also been increases and decreases in the number of intelligence reports for other areas of work. This may be due to the numbers of complaints received and local resources within Trading Standards Services, but overall, it is positive that the total number of intelligence logs recorded has increased by 5.14%. This intelligence is used to help protect consumers (including vulnerable residents and communities) and safeguard legitimate businesses. It can help inform national, regional and local priorities and support enforcement activities. It helps NTS Teams, Trading Standards Services and Regional Groups to identify and pre-empt emerging threats, such as those identified in this Assessment, so we can get one step ahead of the criminals

NTS Teams and Trading Standards Services will use other data sources, intelligence and information but still do not have direct access to Action Fraud incidents. Citizens Advice consumer service database continues to provide essential information. However, complaints remain under-reported, especially where products are purchased online and where other mechanisms are often used to try and resolve problems, such as social media sites, online review forums etc. Almost a quarter of the Citizens Advice consumer service database reports in this reporting period (103,325) record the purchase method as via trader websites and apps, continuous purchases (e.g., subscriptions), and internet auctions.

The number of cases the Citizens Advice consumer service handles on a year-on-year basis is dependent on a number of interconnected factors. These include, but are not limited to:

- The overall level of demand for the service.
- The pattern of that demand - when it arrives, and whether that is in a relatively flat profile or in significant surges.
- The number of repeat contacts they have on a case. Where a client has a new issue they create a case, however if they return several times, they may take several contacts but all relating to one case.
- The level of adviser resource they have in place to meet demand.
- The need to make some restrictions to the service in light of the current funding circumstances, such as reducing the availability of webforms to clients at specified parts of the day.

Therefore, all of the above factors, to varying degrees, may have contributed to the overall drop in the volume of contacts answered for the last financial year in comparison to the previous years.

NTS uses the Management of Risk in Law Enforcement process (MoRiLE) to assess its threats, risks, and harm. This helps identify what the NTS priority areas should be. The NTS MoRiLE assessment will be different from local Trading Standards or Regional Group's assessments, as each agency completes the process from their own organisation's perspective and cover the:

- IMPACT/HARM – What is the level of harm to victims, the wider community, and the environment?
- LIKELIHOOD – What is the scale of activity, predicted trend and forecast?
- CONFIDENCE – What do we know or not know? Is it a true reflection of the risk?
- ORGANISATIONAL POSITION – How well placed is our agency (NTS) to deal with the risks? Considering external (public interest, reputation & politics) and internal (economic cost, capacity and capability) factors. For NTS, in practice, this will mean whether or not the conditions of the relevant grant agreements permit us to use funds to tackle the issue.

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

NTS PRIORITY AREAS

Thematic Areas	MoRiLE Risk Score 2022	MoRiLE Risk Score 2023	MoRiLE Risk Score 2024	ORI Score
Doorstep & Cold Calling (including energy related fraud)	81.25	59.37	68.75	4
Lettings (England only)	63	54	60	3
Mass Marketing Fraud/Scams	68.25	49.87	42.5	3
Illicit and Underage Sale of Vapes (England only)	-	37.5	32.5	4
Used Cars	32.5	25	30	2
Illicit Tobacco	44	26.25	26.25	2
Intellectual Property	35.75	24.75	22.75	2
Other Fair Trading Practices	29.25	24.75	22	2
Estate Agents	24.75	18	18	1
Animal Feed	15.75	12.25	8.75	3

OUTSIDE OF NTS SCOPE

Thematic Areas	MoRiLE Risk Score 2022	MoRiLE Risk Score 2023	MoRiLE Risk Score 2024
Animal Disease control	38.25	46.75	35.75
Age Restricted Sales (including vapes)	24	22	30
Product Safety	27	24	18
Food Standards	25.5	18	18
Metrology	6.25	7.5	6.75
Animal Health and Welfare	8.75	5.62	5.62

NOTE – MoRiLE assessment - 1-30 Green (low risk), 30-60 Amber (medium risk), 60+ Red (high risk). The ORI (Organisational Risk Indicator) is used to describe how effectively an organisation is currently placed to effectively manage the risk. Green (low ORI 1 – 2), Amber (medium ORI 3 - 4), Red (high ORI 5).

The NTS priority areas are:

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

NTS cross cutting issues are:

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

These impact on each NTS priority area.

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

4. HORIZON SCANNING AND EMERGING ISSUES

GENERAL ELECTION – The Labour party won the 4 July 2024 General Election with 410 seats and an effective working majority of 181 votes. The party was elected on a manifesto of change including the creation of a new Border Security Command to tackle the criminal gangs exploiting vulnerable people and the creation of Great British Energy to create clean, green energy.

COST OF LIVING CRISIS – A survey in July 2024 stated that 54% of adults reported that their cost of living had increased with rises in the price of food shopping (91%), fuel (58%) or gas and electricity bills (50%) key factors in this increase.¹ While the rate of increases has started to slow, prices continue to rise. Trading Standards will be impacted as consumers/businesses look for discounts or bargains whilst criminals and rogue traders look to exploit consumers who are financially vulnerable. Particularly concerning is the volatility in fossil fuel energy prices with consumers seeking cleaner alternatives that will also be cheaper. NTS has made representations to Government to implement a properly funded robust enforcement regime to tackle bad actors in this market who are exploiting grants and harming consumers.

SUPPLY CHAINS – Military conflicts and political instability (including the war in Ukraine, Israel-Hamas war, Red Sea crisis and potential China-Taiwan crisis) are affecting global supply chains between Europe, Asia, and Africa. There have been disruptions on key sea routes, trade ports and airspace closures. This has led to shortages of goods in certain markets or increased costs due to longer delivery times or rerouting products (including food, oil, construction products, clothing, household staples and white goods).

THE UK ECONOMY – At June 2024, UK interest rates have been held at 5.25% for seven times in a row by the Bank of England with further rate cuts predicted for 24/25. This, along with a reduction in inflation to 2% should help ease some financial burden for consumers however this is being offset by cost of living increases and higher council tax, social care, home and car insurances.

ENERGY COSTS - The energy price cap for a typical household (using electricity and gas and paying by direct debit) is £1,717 per year between October to December 2024. This is an increase of 10% (£149) compared to the cap set between 1 July to 30 September 2024 (£1,568). Ofgem review and update the price cap every three months. The next announcement, for 1 January – 31 March 2025, will be made by 25 November 2024 and is likely to increase again. Financial support from the government has either been wound down or is being cut. The UK has the lowest gas reserves in Europe so relies on gas imports to meet its annual demands. Gas and electricity costs

¹ <https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/bulletins/publicopinionsandsocialtrendsgreatbritain/latest>

remain high although they are lower than at their peak. The new cap is 6% cheaper than the same period in 2023, after the government stepped in to lower energy bill rises.

PESTLE Analysis

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

Political

- Labour government formed following election 4 July 2024.
- A hung parliament in France (after election on 30 June and 7 July 2024), a left coalition won the most seats but without an absolute majority. US elections on 5 November 2024. These may impact on getting support for cross border work.
- Ongoing global geopolitical tensions.
- Ongoing war in Ukraine
- Continued cost of living crisis.

Economic

- UK economy to grow slightly in 2024.
- Inflation at government target in May 2024.²
- Small increase in UK unemployment projected in 2024-2025.
- National Wealth Fund to be created with target of attracting £3 private investment for every £1 public investment.

Social

- Mortgage costs and rents rising.
- Housing shortage.
- Increased demand for food banks and debt advice charities.
- Cost of living crisis creates more demand for cheaper, poorer quality products.

Technological

- Increasing adoption of AI and machine learning across all sectors.
- Cyber threats becoming more extensive and prevalent.
- Social media remains the starting point for the majority of authorised push payment frauds.
- Use of technology to avoid detection of crimes.
- More sophisticated methodology being used to commit fraud.

Legal (legislative changes)

- Online Safety Act 2023.
 - Requires all companies to take robust action against illegal content and activity.
- Financial Services and Markets Act 2023.
 - Mandatory reimbursement of Authorised Push Payments from October 2024.
- Digital Markets, Competition and Consumers Act 2024.
 - Addresses fake reviews, though only civil penalty, and subscription contracts. Creates facility for Trading Standards to seek online interface orders for website takedowns. Strengthens the Competition and Markets Authority's consumer powers.
- Leasehold and Freehold Reform Act 2024.
 - Bans the sale of new leasehold houses, other than in exceptional circumstances.
- Renters' Rights Bill (published and introduced to Parliament on 11/09/24)
- Tobacco and Vapes Bill (to be introduced)

² <https://commonslibrary.parliament.uk/research-briefings/cbp-9428>

- Product Safety and Metrology Bill (to be introduced)
- Animal Welfare (Livestock Exports) Act 2024.
 - Prohibits the export of certain livestock from Great Britain for fattening and slaughter.

Environmental

- Climate change.
- Net zero by 2050
- Changing environmental conditions negatively affect crop production.
- Green energy scams and fraud, requiring proper enforcement model for green energy firms.
- Creation of Great British Energy with £8.3 billion public funds (co-invested with private sector) in next 5 years to deliver clean energy.

5. NTS KEY THREATS AND PRIORITY AREAS

5.1 Doorstep Crime and Cold Calling (including energy related fraud)

Doorstep crime is a high priority area for NTS. This NTS priority areas incorporates, energy fraud, roofing sector, general building work and bogus callers as the most noticeable issues reported by consumers. Doorstep crime also covers, unfair contracts, overpriced and substandard home improvements work, fake surveys, and bogus charity collections as well as other areas.

There are 6,199 Trading Standards' doorstep crime intelligence logs for this year, this is an increase of 263 (+4.43%) from the previous year. Citizens Advice consumer service database figures show there are 33,776 reports where the purchase method is recorded at the doorstep which is a decrease of 4,618 r (-12%) from the previous year. The NFIB Fraud and Cyber Crime Dashboard reports 5,728 door to door sales and bogus callers (across the UK) for this year, with reported losses of £34.5 million. This is an increase of 1,461 reports (29.2%) from the previous year when reported losses were £31.8 million.

Despite these decreases, NTS is aware that many complaints are made via other sources such as online or self-help platforms and the impact of this crime on vulnerable individuals means it should remain an NTS priority area. NTS will continue to support current energy investigations and court proceedings that are mainly related to doorstep crime incidents, rather than looking at energy fraud as a standalone priority area.

The NTS Board has lobbied for a government-led green energy fraud working group and believes that Trading Standards is not best placed to investigate large scale fraud in the energy market. Efforts to establish the working group will continue into 2024-2025.

The NTS Scams Team received further national funding to provide victims of doorstep crime with doorstep recording technology. The funding covered the devices but not installation or any subscription costs. Two products are being 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 2024-25 until they are all allocated to local authority Trading Standards Services and Multi-Agency Approach to Fraud (MAAF) working group partners.

A number of active OCGs involved in doorstep crime across the UK have been identified and mapped on the Police National Database by the NTS Intelligence Team. They are often involved in

other criminality and are highly professional offenders. They are adept at hiding themselves and their assets via third parties and professionals.

KEY SUCCESSES

NTS provided over £1.5 million funding in 2023-24 to support nine doorstep crime and eight energy fraud investigations and legal proceedings. These involved rogue traders supplying roofing, building and maintenance, double glazing, fish selling products, mis-selling of energy contracts and energy saving products and services, to the elderly and vulnerable consumers.

Operation Surf (Proceeds of Crime) - Followed a successful prosecution by the NTS South West Regional Investigation Team in 2021-22, the defendant had been sentenced to 5 years in prison for doorstep crime and rogue building related offences). In November 2023, a confiscation order for £45,832, was made to be paid as compensation to his victims.

Operation Havana - NTS supported an investigation and prosecution by Essex Trading Standards into a renewable energy scam. It focussed on four companies, that mis-sold vastly overpriced products and used scare tactics. Over two years of mis-selling the companies turned over £6.5 million. Following two trials, two people were found not guilty and seven were convicted and sentenced to a range of sentences. 12 years prison time for all defendants, several hundred hours of community service, a 10-year company director ban and a Criminal Behaviour Order.

Operation Mallard - The business was designed to target, re-target and defraud elderly and vulnerable residents to mis-sell 'energy saving' wall coating treatments, promising significant savings and government grants to support the purchase. This activity continued despite repeated contact and advice from trading standards, the investigation revealed the business turned over £10.5m between 2014 and 2017. Charges of fraud and fraudulent trading were brought against six individuals, including the director, resulting in prison sentences totalling 22½ years. Two of the individuals received bans from acting as a company director for 10 and 5 years respectively.

Doorstep crime key threats and emerging issues

- Internet/social media continues to be used by rogue traders to promote their services, along with telephone calls, emails, and leaflets that are used to engage with potential victims.
- Infiltration by rogue traders into online trader schemes and use of professional website developers, often using fake reviews, so they appear genuine, reputable traders.
- Criminal business practices continue to include property improvements and maintenance work especially roofing, and general building work.
- The installation and maintenance of renewable energy systems and energy products.
- Use of OCGs with extensive logistical, communication, and money laundering networks.

5.2 Lettings (England only)

Lettings enforcement is an NTS priority area for England. The NTS Estate and Letting Agency Team protects consumers and businesses by providing the Lead Enforcement Authority for Tenant Fees Act 2019 in England. Its role is to enforce and oversee the operation of the legislation; issue guidance on tenant fees; provide information and advice; and advise the Government on developments in the sector. There are separate enforcement arrangements in Wales.

Bristol City Council is the Lead Enforcement Authority. Some lettings frauds are being investigated by the NTS Regional Investigation Teams. A number of lettings enforcement projects, aimed at increasing levels and capacity of local enforcement, are being undertaken by Trading Standards' Regional Groups.

There are 762 Trading Standards and Housing letting agent's intelligence logs for this year, this is an increase of 263 (+52%) from the previous year. Citizens Advice consumer service database figures show there are 4,359 lettings and property management services' reports recorded which is a decrease of 1063 (-19.6%) from the previous year. Given the significant national press reporting on lettings and landlord related issues NTS believes this continues to be an under-reported area. The NTS Estate and Letting Agency Team has identified that many housing complaints are being made to Shelter, local Citizens Advice Bureaux (but not passed to Trading Standards), as well as to the redress schemes.

It's a very difficult and volatile lettings market at the moment and tenants are often signposted to other specialist housing experts to get help. The government has published and introduced a Renters' Rights Bill, to Parliament on 11 September 2024. The Housing Minister says it should be introduced by summer 2025.

KEY SUCCESSES

The NTS Estate and Lettings Team responded to over 1,300 requests for advice and assistance. It served six penalty charge notices for non-compliance with Redress Schemes and 10 fines under the Tenants Fees Act.

Having launched the final part of the material information guidance in November 2023 the Team are working with property portals and industry groups to ensure estate and letting agents provide basic essential material information in their adverts. Publishing full material information, should increase confidence for tenants and buyers and help them take swift, well informed decisions about property transactions. The Team is supporting local authorities in improving estate agent and lettings enforcement. Where authorities are unable to act on intelligence referrals, the Team is now taking action on high priority cases. In particular, where agents are operating regionally or nationally, where they are taking prohibited payments or where activity is part of a wider pattern across agents.

For the fifth year NTS supported nine projects seeking to improve lettings enforcement in England. The projects engaged with 49 local authorities in six regions in the North East, East Midlands, South West, London, Central England and Yorkshire and the Humber. Two of these regions prevented a total estimated detriment of £8,474,894.

Letting key threats and emerging issues

- Enforcers need to know if 'landlords' are a 'business', to fully understand and enforce their obligations.
- Tenancy holding and security deposits - landlords and letting agents are not returning deposits in a timely manner and finding ways in which they can attempt to justify their reasons for keeping the deposit, often charging prohibited fees.
- Alternative Deposit Schemes - Agents are more frequently offering Zero Deposit or membership schemes aimed at vulnerable tenants who might not have a 5 week deposit.

Tenants usually pay a fee on top of the rent in place of a deposit and are unaware that, unlike a security deposit, it is not protected, and they will not get it back.

- Rent to Rent or Guaranteed Rent schemes - property owners get a guaranteed rent, and the rent to rent business lets the property out and acts as the landlord to the tenant. The property owner (superior landlord) loses control and is often unaware who the tenant is. .
- The use of 'property sourcers' is increasing; how they sell their services to their clients, and the fees charged can impact tenants. .
- New alternative dispute resolution practice of offering the use of services offering ADR membership to agents in specific circumstances, where full membership is required by the legislation.

5.3 Mass Marketing Fraud/Scams

Mass marketing scams are a key priority area for NTS. A general definition of a scam is a 'misleading or deceptive business practice where you receive an unsolicited or uninvited contact (for example by email, letter, phone, or ad) and false promises are made to con you out of money.

³The terms 'scam' and 'fraud' are often used interchangeably

These offers can appear to be very attractive, with payments for goods or services required in advance and requests for personal information. Many frauds perpetrated online, work on the basis that large numbers of victims lose relatively small sums of money so may be less likely to complain. However, some scams can have a devastating impact on those targeted, financially, emotionally, and physically.

NTS provides funding for the NTS Scams Team that is hosted by Buckinghamshire and Surrey Trading Standards. The NTS Scams Team undertake disruptive activities to reduce detriment and work with partners on several mass marketing fraud programmes. The NTS eCrime Team, NTS Regional Intelligence Teams and Trading Standards Services deal with a wide range of online consumer scams and frauds, as detailed in the other priority areas.

There are 1137 Trading Standards' scam's intelligence reports for this year, this is a decrease of 607 records (-34.8%) from the previous year. The NFIB Fraud and Cyber Crime Dashboard reports 22,301 other consumer non-investment frauds (across England and Wales) for this year, with reported losses of £112.6 million. This is an increase of 3,910 reports (19.2%) from the previous year. Due to the way Citizens Advice consumer service database records information, it is not possible to separately identify these complaints, as they form part of the fair trading category, but scams are believed to be vastly under reported. The continued issues preventing Trading Standards' having direct access to Action Fraud/NFIB reports compounds these problems.

The Scams Team work with OFCOM, the Information Commissioner's Office, the Financial Conduct Authority, His Majesty's Revenue and Customs, Trading Standards Services and other law enforcement agencies. They deliver education and prevention work around safeguarding and identifying victims, working with banks, building societies, charities, the National Economic Crime Centre (NECC) and the Multi Agency Fraud Forum (MAFF).

The Team worked with Barclays Business Banking/Fraud Team and Trading Standards Services, who hosted scams awareness events in Bromley and Kettering. Over 800 members of the public

³ <https://www.friendsagainstscams.org.uk/mint-project/uploads/171873904.pdf> (OFT definition of a scam – page 5 report)

received advice on protecting personal information and were invited to share their experiences of financial fraud. The Team produced a package specifically to help Housing Associations make their tenants more scams aware and over 500 UK Housing Associations have been approached and asked to support Friends Against Scams. Supported by Lloyds Bank, in depth training sessions were delivered to 80 Age UK and partner practitioners focussing on scam prevention and consumer vulnerability. The Team also work with Trading Standards colleagues to encourage local collaboration with enforcement partners through MAAFs.

KEY SUCCESSES

The NTS Scams Team saved £44,880,545 in 2023-24 through its investigations, prevention and disruption work, and work alongside Local Authorities. For every £1 spent the Scams Team saved £66.311.

In October 2023, recognising that individuals feel shame and are discouraged from reporting – or even talking about what’s happened to them, NTS launched a **#NoBlameNoShame** anti-scam campaign to try to address these issues. Polling showed that 73% of UK adults have been targeted by scams, with 35% losing money. Fewer than a third reported the crime, with feeling ‘stupid’ and ‘embarrassed’ being among the most common reasons for keeping quiet. This lack of reporting leads to under resourcing, meaning victim support services are patchy across the country. The coverage got the nation talking about the shame felt by scam victims, the need to destigmatise being a victim and the importance of reporting scams.

Mass marketing fraud/scams’ key threats and emerging issues

- Continued activity involving mass marketing frauds around extended warranty cover, home disrepair claims, home repairs, employment and green energy help.
- Increased use of multiple and repeat mailings to previous responding consumers. The content of which is aggressive and threatening as well as requiring victims to send larger amounts of money.
- Increase in lottery and prize draw mailings which are offshore. Countries identified are the Netherlands, Australia, Gibraltar and Cyprus.
- Increase in telephone based frauds. Many are offshore based but potentially with a UK criminal involved. Offering a variety of services in particular energy efficiency goods and services, home and energy cover plans and unregulated claims management businesses.
- Criminals continue to phoenix their activity and using third parties to hide behind and disrupt NTS action against them.
- Use of overseas call and data harvesting centres (based in Southeast Asia) who are subcontracted by UK fraudsters to avoid scrutiny and selling data to these fraudsters.
- Increase in phone enabled scams targeting elderly and vulnerable victims. as well as third parties to operate call centres in the UK and abroad.
- Criminals are using a variety of techniques to bypass or confuse call blockers and targeting individuals via text and mobile phone.
- Criminals using offshore internet-based banking to avoid detection from mainstream financial institutions.
- Legitimate telecom providers and financial intermediaries are enabling fraudsters to conduct telephone and mail scams due to a lack of due diligence when onboarding clients. Criminals using challenger and offshore internet-based banking to avoid detection.

- Non-UK call centres are data harvesting and onward selling victim lists to UK criminal enterprises to target UK consumers. This is particularly prevalent in the claims management arena which is a growing trend.
- Subprime financial parties are being used by fraudsters to obtain funding and avoid detection by the main banks. A subprime borrower is someone considered to be a relatively high credit risk for a lender.
- Cryptocurrency used for money laundering and moving proceeds of crime undetected.
- Fraudsters are recruiting individuals to be money mules, business fronts and company directors, to avoid detection and mask their involvement and benefit from the scams.

5.4 Illicit and underage sale of vapes (England only)

The Government announced in May 2023 that £3 million funds would be deployed up to March 2025, via NTS, for enhanced Trading Standards' work and coordination across England, regarding the sales of illicit vapes. This work covers data collection, intelligence development and project work relating to illicit and underage sales of vapes in England under the name Operation Joseph. It will help inform the Department of Health and Social Care and support any policy developments and legislative changes. Other work continues to be done in Wales, Scotland and Northern Ireland outside the Operation Joseph funded work. In Wales funding was provided for Trading Standards Wales by the Welsh Government until March 2024 under Operation Blackspear. Further funding news is awaited.

Although this is included in the NTS priority areas it will not be a priority for NTS without any additional government funding for NTS to continue to coordinate and do work in this area. This may not be confirmed until after this NTS Strategic Assessment is agreed and published and the NTS Control Strategy for 2025-26 will have to take account of any additional funding.

There has been a significant uplift in logs on the national IDB database. There are 5,698 Trading Standards' age restricted sales (including vapes) intelligence logs for this year, this is an increase of 685 (+13.6%) from the previous year. Citizens Advice consumer service database figures show there are 2,543 underage sales reports (including vapes) recorded which is a decrease of 1254 (-36%) from the previous year.

Trading Standards Services in England seized 1,195,579 illicit vapes in 2023-24. This compares with 749,806 seized in 2022-23. The year on year increase is 455,773, which is a 59% rise. Underage test purchasing sales of vapes increased from 1,199 in 2022-23 to 3354 in 2023-24. This is an increase of 2155 test purchases which is 180% increase. The sales rate, or failure rate is 26% for 2023-24, very similar to the 27% failure rate found in the previous year for these targeted checks.

Trading Standards Services in Wales seized 376,406 illicit vapes in 2023-24. This compares with 257,944 seized in 2022-23. The year on year increase is 118,462, which is a 30% rise. Underage test purchasing sales of vapes increased from 187 in 2022-23 to 369 in 2023-24. This is an increase of 182 test purchases which is 98% increase. The sales rate, or failure rate is 14.1% for 2023-24, and it was 24% failure rate in the previous year for these targeted checks. Parents, teachers, youth workers, and even children themselves have reporting concerns about the underage sales of vapes. Although it was common for children to be between 13 and 16, those as young as 7 years old were also being sold vapes. Retailers openly sell vapes to children wearing school uniforms and also covertly sold illicit vapes. They are often hidden on the premises and

stored externally. While limited, instances of grooming and child sexual exploitation have also been associated with some retailers and their premises and the police would be aware of this.

Although Operation Joseph funding ends in March 2025, the Tobacco and Vapes Bill is still a priority for the government and discussions are ongoing as to what funding would be available, linked to the Bill and any new legislation. It is unclear how this would be allocated. NTS will continue to consider its role and priority given to vapes work, depending on any consequential funding, with a commitment to support this work where a NTS role is perceived to be needed.

KEY SUCCESSES

Operation Joseph - £737k funding was allocated for use at ports in England, to help disrupt and prevent the importation of illicit vaping products. The Department of Health and Social Care has been pleased with the work that has been done through Operation Joseph. The NTS Intelligence Team produced a short intelligence report on illicit vapes and a briefing document on the links to serious and organised crime. Other key elements of Operation Joseph have been the establishment of a Vaping Expert Panel; provision of training webinars and guidance for regulators and businesses; and a report of online underage sales of vapes and market surveillance testing of vapes test purchased from premises.

The Welsh Government have been impressed with the amount of work done on illegal vapes for the relatively small amount of funding provided by the Department of Health and in particular with the number of illicit vapes taken off the market. The fact that every local authority in Wales participated in Operation Blacksphear has also been seen as a huge success.

Illicit and underage sales of vapes key threats and emerging issues

- Constantly changing vapes market. Involvement of OCGs, with links to tobacco supply.
- High number of illicit vapes being imported into the country.
- High number of sales to young people under 18.
- Significant increase in the reporting of counterfeit vapes which are at risk of containing carcinogenic chemicals and heavy metals.
- Sale of illicit vape products at a wide range of local and town/city premises, although mainly at newsagents, convenience stores, and vape shops. On a smaller scale selling is taking place from residential addresses, websites, and social media platforms.
- Concealment of illicit vapes in hidden locations.
- Retailers selling illicit and underage products covertly, using the back door or rear of the property, but also requiring the person to hide the product when exiting the shop.

5.5 Used Cars

The second hand or used car market continues to be a priority area for NTS, Regional Groups and local authorities. Used car prices have seen both increases and decreases in the period from April 2023 to March 2024⁴ as supply chain issues continue to impact the availability of new cars and replacement car parts. Demand for second hand electric vehicles also continues to grow, but the market is small. There are issues surrounding battery health concerns, the Green Finance Institute cites this as the number one barrier for used electric vehicle buyers. It is anticipated that assurances on the health of second-hand EV batteries could dramatically increase electric vehicle sales take up.

⁴ <https://www.autotraderinsight-blog.co.uk/auto-trader-insight-blog/used-car-prices-april-2023>

There are 1238 Trading Standards' vehicle intelligence logs for this year, this is an increase of 285 (+29.9%) from the previous year. Citizens Advice consumer service database figures show there are 50,508 used car reports recorded which is a increase of 3,071 (+6.5%) from the previous year. This category is still the most complained about sector, in particular the sale of unroadworthy vehicles and the clocking of used cars. There is a variety of views from local Trading Standards on how this might be defined by Citizens Advice when coding cases. As a result, they have worked with the Chartered Trading Standards Institute (CTSI) Lead Officer to apply a consensus view, when training their staff on these issues.

NTS supported two regional used car projects in 2023-24. These projects help to protect and safeguard used car buyers. The NTS used car group (involving Trading Standards' experts) met and agreed they would benefit from some training from the NTS eCrime Team on the sale of vehicles on the internet. This is planned for 2024-25. The group is still working on:

- Sales by 'traders' via online social media platforms.
- How to tackle 'appointment only/delivery only' operators.
- Used car refunds and returns

The group is also encouraging Trading Standards to record more intelligence, as the number of intelligence reports remain low. This can make it difficult to identify national problems and trends in the sector. This intelligence review may help inform a nationally funded project in this sector.

KEY SUCCESSES

Operation Bobsleigh – A trader pleaded guilty to selling 46 clocked cars worth £350,000. The case was brought by Kensington and Chelsea Council Trading Standards and was supported by the Tri Region Investigation Team. The defendant was sentenced to two years imprisonment suspended, 100 hours of unpaid work and 15 days rehabilitation activity requirement.

Operation Hermes - The Tri Region Investigation Team assisted Hampshire Trading Standards' investigation into a "car clocker". 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. The defendant 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 he was ordered to pay £64,853 in compensation to his victims.

Used car key threats and emerging issues

- High prices and supply issues in the market are resulting in an increased supply of unroadworthy cars, particularly at the lower end of the market.
- High levels of purchases/sales of used cars online.
- Increased complaints about clocking, fraudulent MOTs, and documentation. Intelligence suggests that the demand for used cars, during the cost of living crisis, is being met by high mileage models sourced from auctions across the UK.
- Consumers are purchasing used cars from traders across the country. This can often mean they do not physically see cars before making a purchase. This leaves them vulnerable to buying cars that are in poor condition, are cloned or may not even exist.
- A number of vehicles have been given an MOT prior to sale but are then found to have serious structural damages. This calls into question the validity of some MOTs issued.

- The use of "mileage blockers" on vehicles without disclosing any known mileage discrepancies, especially on leased vehicles.
- Problems with vehicles bought through "private sales".
- The advertising of facilities/extras that are only accessible or available on vehicles through a manufacturer's subscription.

5.6 Illicit Tobacco

Illicit tobacco is a key priority area for NTS with funding provided by HMRC for local authorities and Regional Groups to carry out focused work, in relation to the supply of illicit tobacco products through Operation CeCe. This is part of a wider strategy that HMRC are undertaking to tackle this problem. 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.

There are 13,320 Trading Standards' tobacco and cigarettes intelligence logs for this year, this is an increase of 2,642 (+24.4%) from the previous year. This category has the highest number of Trading Standards' intelligence logs this year. Citizens Advice consumer service database figures show there are 3,488 tobacco reports recorded which is a decrease of 1,724 (-33%) from the previous year.

KEY SUCCESSES

Operation CeCe – This work has completed three full years of activity. The aim is to tackle illicit tobacco at a local level. This local disruption activity, designed to protect consumers and legitimate businesses, is part of a broader strategy that tackles three 'tiers' of criminality, with factories abroad being shut down by HMRC and Border Force intercepting smuggled products and cash at the border. All regions including Wales have remained engaged in Operation CeCe. In 2023-24, 19 million illicit tobacco products and 5,103kg of hand rolling tobacco (with a revenue value £11.8 million) were seized from 1,900 premises.

The decrease in complaints may be due to the cost of living crisis. Many consumers say it is making them buy cheaper (illicit) tobacco.⁵ The intelligence figures show that criminals are continuing to expand their operations. Before the Covid pandemic, most illicit tobacco trades took place face-to-face (e.g. between friends, family and workplace colleagues or from strangers in pubs, bars, cafés or in the street), while during Covid there was a major shift to online sales, with growing quantities of illicit tobacco being traded though social media and on websites offering cheap tobacco which has continued. A new regime for Trading Standards to refer cases to HMRC, (for them to apply civil sanctions) went live in July 2023.

Illicit tobacco key threats and emerging issues

- Capacity issues – Trading Standards are unable to keep up with the increase in retailers selling illicit tobacco products. The number of shops selling the products are increasing with the same amount (or less) of Trading Standards' staff.
- Traders are aware that Trading Standards' staff carry out test purchases. Lots of tobacco products are found in concealments such as vents, ceiling compartments, inside walls etc.
- There has been a 'severe' impact on local communities with anti-social behaviour (particularly parking issues) and grooming of young people involved with tobacco shops.

⁵ [Survey: 73% of smokers nationwide bought illicit tobacco in the last year \(talkingretail.com\)](https://www.talkingretail.com/news/survey-73-of-smokers-nationwide-bought-illicit-tobacco-in-the-last-year)

- Vehicles are being used to store product off premises. They are usually parked on side roads or at the rear of premises.
- Involvement in OCGs with some members having violent pasts. This poses safety threats to officers with some authorities finding it a challenge to get the police assistance they need.
- Local legitimate businesses are harmed by shops selling cheap tobacco.
- Huge taxes on tobacco plus the cost of living crisis has pushed some smokers towards cheaper options, as illicit tobacco is around half the normal price.
- The landscape of tobacco and vapes is changing dramatically with new products entering the market on an almost weekly basis, with the possible legislative changes this will continue to be an issue for law enforcement agencies for some time.
- Enforcement tactics including closure orders, have little impact other than disruption. Businesses will open again at a different premises, due to how lucrative the sale of illicit tobacco and vapes are.
- A home seller market is still evident in rural communities where commercial shops are not prevalent. The illegal market on social media is still evident.

5.7 Intellectual Property

Intellectual property crime remains a priority area for NTS. Trading Standards Services deal with copyright and trade mark offences; intellectual property infringement that occurs when someone uses another person's work without their permission.

Serious and organised crime groups profit from intellectual property crime. They are involved in the promotion, sale, and distribution of counterfeit goods. Using legitimate companies and business structures to facilitate and conceal payment for criminal services. Counterfeit goods can be concealed by intermediary companies who use courier accounts to dispatch goods. Serious and organised crime networks have also migrated into selling counterfeit goods on online trading platforms.

There are 2,111 Trading Standards' intellectual property crime intelligence logs for this year, this is an increase of 202 (+10.5%) from the previous year. Citizens Advice consumer service database figures show there are 2,024 alleged counterfeiting reports recorded which is a decrease of 835 (-30.9%) from the previous year. A breakdown of the civil / criminal breaches within these categories shows tobacco and related products and clothing and footwear as having the most recorded reports.

Citizens Advice consumer service database figures have continued to reduce, but it is suspected that many incidents go unreported by consumers, who are looking for a cheaper alternative especially with the cost of living crisis. Online sellers of counterfeit products continue to take advantage of social media for such purposes, as well as physical markets across the UK. This is corroborated within the eCrime section (cross cutting issues).

The 'Tick Box Keep It Real Keep It Legal' campaign for the Self Storage Industry is a project delivered by a partnership board consisting of representatives of London Trading Standards (LTS), NTS and the Intellectual Property Office (IPO). The project is jointly funded by the IPO and NTS. It was based on a 2014 LTS pilot project that was re-launched in March 2021. Operational work to self-storage facilities has been recorded under Operation Flash. Joint enforcement activity with the Operation CeCe team in Wales, has been very active in this area, resulting in significant seizures of counterfeit and illicit products at locations across Wales. Over 35 self-storage facilities in Wales

have been audited and welcomed onto the Tick Box scheme. These sites have agreed to abide by the code of practice which brings industry standards to this largely unregulated sector. Coverage for these 35 businesses equates to over 70+ sites in Wales and additional sites in England.

KEY SUCCESSES

Operation Rivean - was a joint operation involving the IPO, Border Force and Dyson, which targeted fast parcels on the pre-Christmas period, resulting in the removal of 250 counterfeit Dyson products.

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, They received 22 months and 7 months suspended sentence plus 290 hours of unpaid work.

The IPO recognise resourcing and prioritising issues faced by local authorities when considering intellectual property crime enforcement alongside other consumer protection work. To explore whether additional support would result in greater Trading Standards engagement, three regional co-ordinators were employed by the IPO to work alongside Trading Standards in Wales, Central England and the South East. This pilot is considered a success and the IPO plan to expand this nationally in 2024-25.

Intellectual property crime key threats and emerging issues

- Significant increase in the reporting of counterfeit vapes which are at risk of containing carcinogenic chemicals and heavy metals.
- It is likely that intellectual property infringement of consumable brands on illicit drug-related products such as CBD gummies will increase in the short to medium term. It is highly likely that these products will appeal to an underage audience, and will be targeted as such, leading to significant harm.
- Lack of intelligence from the IPO has been an issue.
- Technological advances enabling more complex financial layering will be swiftly adopted by experienced criminal networks and professionals to protect financial returns.
- The continuing rise in the popularity of cryptocurrencies, indicates that it is likely to become an increasingly established method of payment for consumers over the medium to long term. It is likely that criminals will also use cryptocurrency obfuscation methods like swapping services, mixers and coinjoins to convert their illicit earnings, making traceability and investigations more challenging for enforcement agencies.
- It remains likely that the explosive growth of artificial intelligence (AI) capabilities will present challenges and opportunities for creative industries and exploit inexperienced rights holders.
- Data used for generating images, music and content provide an indication of the training, rights, principles, regulations, and implications which may need to be considered around the development of AI; to ensure transparency, fair competition, and protection for all parties.
- Authors have identified AI generated 'fake' content attributed to them for sale on online platforms. It is unlikely that smaller authors will have the necessary registrations to protect

them from infringement, which leads to difficulties in removing fake content. It is highly likely this will disproportionately affect smaller authors; this could potentially impact the authors reputation, and negatively affect creativity in the field.

5.8 Other Fair Trading Practices

This priority area includes all misdescriptions, such as those arising from advertising, pricing, descriptions of goods and services, terms and conditions, mis-selling of energy products, holidays, and house improvements. NTS Regional and National teams have taken on several successful cases involving the Consumer Protection from Unfair Trading Practices Regulations 2008 and Business Protection from Misleading Marketing Regulations 2008 , fraud and money laundering offences relating to rogue traders.

There are 5,016 Trading Standards' fair trading intelligence reports for this year, this is a decrease of 406 records (-7.6%) from the previous year. This may be due to under reporting by consumers to the Citizens Advice consumer service.

Advertising

Buckinghamshire and Surrey Trading Standards provides the Advertising Standards Authority with backstop enforcement on behalf of NTS. In total, seven full referrals were received, four have been closed and three remain under investigation. Details are on the Advertising Standards Authority's website. Referrals have related to product advertising, potential breaches of the Cancer Act, claims relating to treatment of health conditions and advertising of a telescopic baton. Additional advice has been provided to the Advertising Standards Authority to help them to fulfil their broader functions. In 2023/34 this has included an opinion on offensive weapon adverts, participation in the Advertising Standards Authority Pricing in Advertising Expert Group and draft enforcement notices in relation to vapes.

Buckinghamshire and Surrey Trading Standards provided the Office for Students with backstop enforcement on behalf of NTS, for a pilot in 2023-24. Nine referrals were received this year. Referrals 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 given enables the Office for Students to better use their existing regulatory mechanisms to secure compliance. They have agreed to extend this backstop enforcement work for 2024-25.

Home/Business Improvement Work

NTS has been working closely with the Competition and Markets Authority through the NTS eCrime Team, to seek to improve the landscape for consumers using trader recommendation websites. There is evidence of huge detriment to consumers as a result of issues like poor vetting processes and misleading claims which prompted NTS to approach the Competition and Markets Authority to work together to address this. With other partners now on board, this work has resulted in a Competition and Markets Authority consultation, launched in July 2024, seeking views on the consumer law compliance guidance produced to help relevant businesses to understand and comply with their obligations.

Travel

The issues consumers have been facing in the last year around travel in the UK have been widely publicised in the national media specifically around air and rail travel. The cost of living crisis is

also having an impact with less consumers travelling. Citizens Advice consumer service database figures show there are 8,069 travel reports recorded which is a decrease of 2284 (-26.3%) from the previous year. Although there has been a decrease in reports to Citizens Advice there are significant numbers of incidents that have been dealt with by both the Civil Aviation Authority and the Association of British Travel Agents.

KEY SUCCESSES

Operation Signature - This case was led by the South West Regional 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. The defendant 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 – A home improvement firm, based in Billingham, County Durham left homeowners with unfinished driveways, paths, patios, and garages, much of which needed re-doing. The head of the firm had a previous conviction and suspended prison sentence for similar offences from 2017. Following a case led 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 pleaded guilty to eight unfair trading charges and received eight months custodial (suspended), and 240 hours 'unpaid work. A Proceeds of Crime Act confiscation timetable has been set. The value of complaints was £112,520.

Other fair trading key threats and emerging issues

- Overcoming tactics used by offender's aimed at hiding their identities, locations, scale of activities and illegal gains.
- The Renewable Energy Sector which is complex and does include some very mixed media messaging for consumers.
- The Energy Saving Sector (e.g. Roof Spray Insulation both installation & removal sector) a lack of clear sector guidance for consumers increases the risk of detriment.
- New Government initiatives & schemes being launched and the potential for offenders to use them as vehicles to engage with victims.
- E-commerce: Requirement for consumer awareness in this sector. Multiple issues exist with significant non-compliance occurring.
- Online dynamic pricing has been identified as a current issue.
- Cost of living crisis is likely to compound issues, with consumers looking to find cheaper alternatives from online sites.
- Continued growth of sellers/unlawful products on social media sites is of particular concern.
- Off premise contracts are becoming increasingly common, where traders who are not the typical 'rogue traders' are involved in providing poor quality work, limited paperwork, or in demanding payment prior to work commencing and then not completing the job.

5.9 Estate Agents

The fair trading intelligence category covers buying a new home, letting agents and house improvements. The NTS Estate and Letting Agency Team protects consumers and businesses by providing the Lead Enforcement Authority for the Estate Agents Act 1979. Powys County Council is the Lead Enforcement Authority for the UK for this Act. Their responsibilities include:

- Issuing prohibition and warning orders against persons ‘unfit to operate’.
- Management and approval of the consumer redress schemes.
- Providing sector specific advice on the Estate Agents Act.
- Maintaining a public register of prohibition and warning orders.
- The Team also works with local authorities who have responsibilities for enforcing some elements of the Estate Agents Act.

Following investigations carried out by local authorities and other enforcement agencies, the Team may consider taking on ‘fitness’ investigations.

There are 81 Trading Standards’ estate agents’ intelligence logs for this year, this is a decrease of 48 (-37.2%) from the previous year. Citizens Advice consumer service database figures show there are 1,274 estate agents and house purchase service reports recorded which is a decrease of 479 (-27.3%) from the previous year.

The Team receives complaints and referrals from a range of sources and undertakes monitoring of news websites, social media etc and a lot of work has been done to encourage local authority housing teams to record intelligence.

KEY SUCCESSES

The NTS Estate and Letting Agency Team served 10 prohibition notices banning individuals from operating as an Estate Agent in 2023-24. These were added to the [Public Register of Orders](#) held by Powys Council. Having launched the final part of the material information guidance in November 2023 the Team are working with property portals to ensure estate agents provide basic essential material information in their property listings.

As well as intelligence via IDB and Citizens Advice information the Team receives complaints and referrals from redress schemes and undertakes proactive monitoring of news websites, social media etc. for offences outside the Act which would trigger a banning order. These include forgery, theft, violence, money laundering and breaches of consumer protection legislation.

Estate agency key threats and emerging issues

- Improving material information in property listings.
- Tackling hidden referral fees relating to property transactions.
- OCGs buying property for their criminal activities, such as money laundering, modern-day slavery and human trafficking.
- Quick buy property purchasing companies often mislead vulnerable clients by claiming that they will receive an agreed amount in cash within days for their property, but often placing the property on the open market and applying for bridging loans in the name of the victim and charging up to 70% in hidden fees.

5.10 Animal Feed

Animal feed is an NTS priority areas as direct funding is provided by the Food Standards Agency to support this work. There is ongoing work at NTS to provide the national animal feed hygiene inspections to protect the food chain and ensure trading with global partners.

KEY SUCCESSES

Local authorities delivered 4,307 official control activities in 2023-24. This was 96% of that committed to at the start of the financial year.

1,747 feed consignments from third countries (outside the European Union) 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 Food Standards Agency. Ports continue to prioritise higher risk 'irregular' consignments for official controls checks.

The NTS Programme Office have undertaken a number of Food Standards Agency agreed projects to better understand and improve the feed enforcement landscape each year. This year projects were:

- A capability and competency survey.
- An earned recognition data project.
- Online sales of feed for food producing animals.

NTS provides secretariat support to the National Agricultural Panel (NAP) and National Animal Feed at Ports Panel (NAFPP), whose work has included:

- Producing 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.
- Updated guidance on insect farming for food and feed with input directly from industry. Training material developed for NAP about the Animal and Plant Health Agency 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.
- Responding to technical queries about feed additives, 'pupucinos', re-packaging, turkey farms, registration of importers, surplus food, pictorial representation, primary authorities etc.
- Responding to consultations on the implementation of the Border Target Operating Model and a draft new regulatory framework for fertilisers.

6. CROSS CUTTING ISSUES

6.1 eCrime

eCrime remains a cross cutting issue for Trading Standards, Regional Groups and NTS. It impacts across all NTS priority areas and continues to grow as UK consumers buy more online through digital platforms. The NTS eCrime Team is hosted by the Yorkshire & Humberside Trading Standards Group (YAHTSG) and is split between a digital forensic unit in Northallerton and a team of investigators in York.

There are 4,264 Trading Standards' eCrime intelligence logs for this year, this is a decrease of 1145 (-21.16%) from the previous year. Citizens Advice consumer service database figures show there are 103,325 reports, where the purchase method is recorded as trader website and apps, continuous purchases (e.g., subscriptions), and internet auctions, which is a decrease of 5975

reports (-5.4%) from the previous year. A breakdown of the criminal and civil breaches recorded shows that the clothing and footwear category has the most reports.

The eCrime team have the following key priority areas listed: -

- Sales of goods on social media.
- Online trader matching/approval schemes.
- Online fake and misleading reviews.
- Subscription traps

KEY SUCCESSES

The NTS eCrime Team provided support to 21 new investigations in 2023-24. They had 10 active investigations focusing on secondary ticketing, 'copycat' web sites, technical support helplines and social media advertising fraud. 94 devices were submitted for forensic examination in 2023-34. They took down or suspended 545 websites or social media accounts. The value of consumer and business detriment avoided was £12,917,646.

Subscription traps continue to be a significant problem. Payday lending and "poor credit" type products continues to a priority issue, and the NTS eCrime Team have been working with the Information Commissioners Office to try and address these issues. This has now been linked to the sending of large volumes of text messages using "SIM farms". There is also an indication that large amounts of consumers' data may be being misused by organisations looking to target consumers with the subscription traps.

An emerging issue, which appears to be linked to the loan-based subscription traps, is online shopping discount offers. Consumers making online purchases can be presented with an offer for a discount on their order when completing check-out. The overall impression is the offer is purely for the consumers' current purchase. However, once the consumer has "accepted" the discount offer, they are automatically enrolled in a recurring subscription that supposedly provides the opportunity for the consumer to obtain discounts on future purchases. In many cases, the subscription service is not made clear to consumers, with many only discovering they have been enrolled once the first payment is taken. In the worst examples, the subscription can be over £200 per month.

The Team worked alongside the used car group to deliver an online workshop aimed at assisting officers in tackling problems with used car sales on social media platforms. They have also completed work with the Welsh Regional Investigation Team and IPO regional coordinator which will result in an update to the Real Deal online toolkit. This work will assist officers investigating breaches across the whole range of trading standards work identify problem sellers across selling platforms and social media and better support officers having difficulty in engaging with 'buy and sell' group administrators

Whilst Artificial Intelligence (AI) is still a relatively new technology, it has already been capable of producing highly plausible video, image and voice content. From a relatively small sample data set, AI can generate spoken word that sounds almost identical to that of a real person. Similarly, it can easily reproduce written word that is near identical to that of a "real" person. All of this means there are very real concerns that AI generated content will be able to significantly increase the reach, impact and success of online fraud. The technology is readily accessible and, in most cases, requires very little technical expertise to produce highly believable content. It will become

increasingly difficult for consumers to distinguish between what might be real and AI generated material.

The Digital Markets, Competition and Consumers Act 2024 includes provisions to try and tackle problems faced by consumers when entering into a subscription-based service, including setting out what information should be provided to consumers when signing up to a subscription and how clearly that information should be communicated. There are also measures to improve the ease with which consumers should be able to cancel an unwanted subscription.

eCrime key threats and emerging issues are covered in the various key priority areas. Legislation regulating the use of digital evidence which has undergone forensic analysis or additional processing will require the digital forensics unit within the NTS eCrime team to demonstrate compliance to prescribed standards by October 2025. The Team have begun preparation for this and expect to achieve accredited status in time for the implementation of these requirements.

6.2 Serious and Organised Crime

Serious and organised crime remains a cross cutting issue for NTS. It continues to impact on every Trading Standards' work area affecting UK consumers and businesses. It is an ongoing threat to national security. It is instigated and committed by OCGs who identify weaknesses in an organisation's security systems and processes, targeting the most vulnerable in our society, either as victims, customers or coerced participants, often using intimidation and violence to fulfil their aims.

NTS Teams and Regional Groups work with law enforcement agencies and partners in the Government Agencies Intelligence Network. They also use the Serious and Organised Crime System Tasking platform to help them adopt a risk based approach and to seek additional capabilities and capacity when necessary. In 2024-25, NTS has agreed to undertake a review on the use and outcomes achieved by participating in the system.

Increasing numbers of OCGs have extended their criminal networks. This impacts on the UK, but also transcends its borders. With the increased emergence of UK based foreign national OCG's, this is becoming far more apparent, and increasingly sophisticated. These networks include points of contact for production, commodity sourcing, transport, and the ability to move, convert and place criminal finances in safe locations abroad.

Since the implementation of OCG mapping in December 2014, the NTS Intelligence Team have input 84 OCGs into the national database, on behalf of NTS Teams, Regional Groups and Trading Standards Services.

The following figures were all taken on 30 September 2024:

- 24 recorded active OCGs associated to 185 nominals and 109 companies.

Their criminality covers all current NTS priority areas and impacts on all Regional Groups in England and Wales:

- 17 are involved in offences associated to fraud (including fiscal fraud).
- 13 are involved in offences associated with doorstep crime/cold calling.
- 4 are involved in the importation/distribution and supply of illicit tobacco products.

- 3 are involved in offences associated with intellectual property.
- 3 are involved in unlicensed breeding of dogs.
- 1 OCG is concerned in fraud offences associated to used cars.

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

- 7 were previously involved in acts of violence, including murder, torture, and kidnap.
- 7 are involved in modern slavery and human trafficking, including child sexual exploitation, forced labour, and facilitation of illegal immigration).
- 3 are involved in drug supply (including the production, importation, distribution and supply of cocaine hydrochloride, crack cocaine, heroin and cannabis).
- 4 are involved in sexual offences (including grooming and allegations of rape).
- 3 are involved in the importation, supply, and criminal use of firearms.

Criminal finances:

- 9 OCG's are using cash collection and consolidation and the physical movement of their criminal benefit in their money laundering process.
- 6 are exploiting the legitimate banking systems via third party usage and front accounts.
- 2 are using professional services such as solicitors, accountants, company formation agents, shell companies or Individuals with knowledge, to invest, convert, disguise or conceal their criminal financial benefit.

6.3 Cost of Living Crisis

The cost-of-living crisis refers to the fall in 'real' disposable incomes, adjusted for inflation and after taxes and benefits, that the UK has experienced since late 2021.

Driven by the impacts of the COVID-19 pandemic and then the Russian invasion of Ukraine, inflation reached a 41-year high of 11% by October 2022⁶. While real disposable incomes are projected to increase by 1.9% in 2025, pressure remains on UK households; food bank and debt advice charities report an increase in demand. The Consumer Price Index, which is the price of a weighted average market basket of consumer goods and services purchased by households that includes owner occupiers' housing costs, rose by 3% in the 12 months to April 2024. The rate of increase was slowing, with falling gas and electricity prices being the largest downward contributors. However, despite lower wholesale gas and electricity prices in 2024, typical current energy bills will still be almost a third higher than in winter 2021/22, with little immediate prospect of savings⁷.

The energy price cap for a typical household in the UK, that uses gas and electricity and pays by direct debit, decreased by 12% (£238) from 1 April to 31 June 2024 and fell a further 7% (£122) from 1 July to 30 September 2024. However, the UK government announced some changes on 23 August 2024. It removed winter fuel payments for pensioners who do not receive benefits or pension credit and increased the energy price cap by 10% (£149) from 1 October to 31 December 2024, adding about £12 per month to the average bill. However, the new cap will still be 6%

⁶ <https://commonslibrary.parliament.uk/research-briefings/cbp-9428/>

⁷ <https://commonslibrary.parliament.uk/research-briefings/cbp-9714/>

cheaper than the same period in 2023 and is likely to remain around this level for the rest of the winter. This is likely to cause problems for many who cannot afford to meet their energy bills.

Inflation fell to the government target of 2% by May 2024, in line with other comparable economies such as the US and Germany. The Bank of England held the base rate at 5.25%⁸ in June 2024 and expects inflation to rise into 2025 before gradually falling in the first half of 2026. Globally, commodity prices average around 38% higher than they were in the five years before the COVID-19 pandemic.⁹

Despite inflation falling, prices remain high for services such as restaurants, childcare, insurance, and in the rental market¹⁰. The continued imbalance between rental supply and demand is expected to result in further growth of up to 9.5% in rent prices into 2025. For owner occupiers, average fixed mortgage rates have dropped from a peak of almost 7% in mid-2023, but they are still much higher than the start of 2022 when the average was 2.3%. Approximately 1.5 million homeowners will reach the end of their fixed-rate mortgages in 2024¹¹ and transition to higher fixed-rate deals will further impact their disposable incomes.

Following the UK elections on 4 July 2024, the financial markets have remained stable. Ongoing geopolitical tensions, including conflict in the Middle East and Ukraine, are a significant risk to the global economy. If these were to escalate, oil-supply and major shipping route disruptions would likely push up global inflation and energy prices.¹²

7. OTHER TRADING STANDARDS' AREAS (OUT OF SCOPE OR LOW PRIORITIES)

NTS is unable to support national work on the following areas as they are outside the current grant funding provided by the Government. NTS will undertake work on specific activities, where appropriate, if direct funding is provided.

Animal Disease Control

Trading Standards Services help to prevent animal disease. The Association of Chief Trading Standards Officers (ACTSO) provides support to local authorities and acts as a central liaison point in the event of animal disease outbreaks. Between 1/4/23 and 31/3/24, ACTSO supported local authorities with 18 confirmed avian influenza cases and 76 confirmed blue tongue cases. ACTSO has updated the contingency plan annex and run free training sessions on rabies and foot and mouth with over 200 Trading Standards' officers attending each session. There are 123 Trading Standards animal disease control intelligence logs this year; this is a decrease of 140 (-53%) from the previous year.

Age Restricted Sales of Products (excluding vapes)

This is a priority area that continues to impact at a local and regional level but sits outside the scope for NTS. The underage sale of products can also have a huge impact for children as many products link to their health and development such as the effects of tobacco products and alcohol, or the safety aspects of selling them, such as fireworks or bladed articles. Communities can also be badly affected, particularly by underage drinking which can often lead to anti-social behaviour and a fear of crime, as well as the continued upturn in knife crime across the country. Local

⁸ <https://www.bankofengland.co.uk/monetary-policy-report/2024/may-2024>

⁹ <https://www.worldbank.org/en/news/press-release/2024/04/25/commodity-markets-outlook-april-2024-press-release>

¹⁰ <https://www.savills.co.uk/insight-and-opinion/savills-news/354578-0/uk-rents-to-keep-on-rising-but-will-hit-affordability-ceiling-in-2025>

¹¹ <https://hoa.org.uk/advice/guides-for-homeowners/i-am-managing-2/mortgage-rate-forecast/>

¹² <https://obr.uk/box/economic-implications-of-further-instability-in-the-middle-east/>

authority trading standards continue to conduct test purchases to check retailers are complying with the law and not selling age-restricted products to underage persons and continue to educate business when they are not compliant in the selling of age-restricted products such as alcohol, tobacco, solvents, knives, or spray paints to minors.

In the UK, nicotine pouches have become more popular, with increased awareness and use of the products. They look like miniature teabags and are sold in small, round, plastic containers, They are placed under the lip and are generally filled with plant fibres, sugars, and nicotine. They do not contain tobacco. This means that the laws covering tobacco products and cigarettes do not apply to pouches and in the UK, they can be legally sold to people under 18. There are some concerns about these products, the way they are marketed and their attraction to younger people. Other countries have restricted their availability to adults over 18.

There are 5,698 Trading Standards' age restricted sales intelligence logs for this year (including vapes), this is an increase of 685 (+13.6%) from the previous year. Citizens Advice consumer service database figures show there are 2,543 underage sales reports recorded which is a decrease of 1254 (-36%) from the previous year. Intelligence and Citizens Advice consumer service reports have been dominated by underage sales of vapes, as covered in the earlier priority area.

Product Safety

This remains a priority area for many Trading Standards Services. A Product Safety and Metrology Bill is to be introduced. There are 2336 Trading Standards' product safety intelligence logs for this year, this is an increase of 256 (+12.3%) from the previous year. Several Trading Standards Regions have indicated that unsafe cosmetics is a great concern alongside unsafe and non-compliant products being available via online marketplaces. Communicating with traders on online platforms is becoming more of a challenge as officers are finding it difficult to engage with online platforms providers to obtain addresses of traders who import goods directly from abroad and sell on their sites. The continuing cost of living crisis means that people are still looking for lower value products with an underlying assumption that all products on sale must be safe. The Office for Product Safety and Standards is the UK's national product regulator, within the Department for Business and Trade. Their primary purpose is to protect people and places from product-related harm, enabling trade and growth by ensuring consumers and businesses can buy and sell products with confidence.¹³ It is recognised that the online supply and fulfilment house model can make enforcement challenging.

Food

Some regions have highlighted areas of concern around the following issues:

- American confectionery with prohibited ingredients (EDTA) found in multiple brands.
- High level of non-compliance in relation to allergens and mislabelling. Allergic reactions have led to hospitalisation of some consumers.
- Allergen compliance in sectors aimed at children, soft play, and entertainment.
- New food businesses – issues have evolved from initial concerns around unregistered food businesses and the emergence of 'dark kitchens' during the initial pandemic period.
- Food fraud - the cost of living crisis, the geo-political landscape, climate change and crop failures are all contributing factors to this issue.

There are 1110 Trading Standards' food intelligence logs for this year, this is an increase of 216 (+24.16%) from the previous year. Citizens Advice consumer service database figures show there

¹³ <https://www.gov.uk/government/publications/opss-delivery-report-2022-2023/opss-delivery-report-2022-2023>

are 6699 food and drink consumer reports recorded which is a decrease of 3,222 (-32.4%) from the previous year.

The following food key threats and emerging issues have been identified with help from the National Food Crime Unit:

- Misrepresentation of meats as halal.
- Fraudulent claims of “free range” or “locally produced” products.
- Fraudulent claims of Protected Designation of Origin (PDO) or Protected Geographic Indication (PGI) goods (such as Welsh lamb, Feta cheese, Parma ham).
- Food businesses fraudulently claiming to meet the standards of assurance schemes.
- Counterfeit wines and spirits.
- Misrepresentation of origin – food from abroad imported and re-packaged as UK produce.
- Relabelling and repackaging out of date produce with false expiry dates.
- Fraud relating to the misrepresentation of food as “Organic” has been identified on a significant scale outside of the UK and it is a realistic possibility that the UK could receive and further process falsely marketed, imported products.
- Heavily reported olive oil shortages in Europe indicate that misrepresentation of quality will almost certainly be seen with some products falsely marketed as “Extra Virgin”. Large scale adulteration and substitution of olive oils has already been identified abroad.
- Trade restrictions on Russian fish imports present a realistic possibility that there could be misrepresentation of country of origin, adulteration or substitution of fish. Composite or coated products (such as fishcakes) are considered to be at a significant risk
- Unauthorised diversion of food, drink or feed intended for disposal back into relevant supply chains. Financial incentives are stronger with price increases across proteins, energy and disposal costs.
- Local authority sampling around takeaway/fast food products has regularly identified adulteration or substitution relating to items such as kebabs, pizza toppings and curries where strong flavours or colourings can disguise the true nature of the meat.
- Herbs and spices – although usually produced outside of the UK, sampling has identified levels of adulteration – for example, the addition of olive leaves in oregano.
- Levels of lead detected in spices including chilli, turmeric and cinnamon within the UK, but it is not confirmed that this was as a consequence of deliberate adulteration.
- Alcohol - local authority reporting has identified watering down or replacement of high value spirits as well as counterfeit wines and spirits.
- Honey – reports of non-UK honey adulterated with sugar syrup are being identified regularly although unlikely that it is broadly present on the UK market.
- Livestock theft, regularly identified, presents food safety risk if able to enter food chain (due to unknown medical histories, health status of animals and clandestine movements and slaughter).
- Employees of food business have been identified as trading meat or animal by-products “off the books” for personal gain. The cost of living crisis and the price of red meat is considered to be driving thefts.

Metrology

Trading Standards’ officers can carry out checks on a wide range of instruments used to weigh and measure goods in the public domain to test for their accuracy and can test pre-packed goods to ensure compliance with weight or measure claims. A Product Safety and Metrology Bill is to be

introduced. New research published on 24 May 2024¹⁴ by CTSI has found that over two thirds (70%) of beer and wine, checked by Trading Standards' professionals, is short measured. The national fieldwork was undertaken by local authorities across the UK. The findings come at a time when the price of alcoholic drinks is at an all-time high: according to the Office of National Statistics, the average price of a bottle of red wine has increased 8% in the last year, while the average cost of a pint of lager is up 5.6%. CTSI's findings show that there is more work to be done in ensuring that customers get what they pay for when they order a pint, or a glass of wine, at British pubs, bars, and other establishments. There are 208 Trading Standards' metrology intelligence logs for this year, this is a decrease of 74 (-26.24%) from the previous year.

Animal Health and Welfare

Trading Standards provide essential support to the farming industry through the enforcement of legislation aimed at protecting animals from disease, preventing animals from suffering, and maintaining the integrity of the food chain. There are 2,079 Trading Standards' animal health intelligence logs for this year, this is a decrease of 1074 (-34.06%) from the previous year. Wales are reporting an array of illegal practices are taking place. These include animal mutilation, illegal importation, poor living conditions, illegal veterinary medicines, and poor breeding practices, posing considerable threats to animal health and welfare in Wales and disease control. There are also a number of factors which may have a negative effect upon the mental health of farmers, which could result in an increase in animal welfare referrals being made to Trading Standards.

¹⁴ <https://www.tradingstandards.uk/news-policy-campaigns/news-room/2024/over-two-thirds-of-uk-beer-and-wine-is-short-measured/>

Appendix 1 – IDB and Citizens Advice Consumer Service Database Statistical Information

Intelligence figures show an increase of 2027 (+5.14%) intelligence logs against the previous 12-month Strategic Assessment period with a full breakdown shown in the table below: -

Intelligence figures	1/4/22–31/3/23	1/4/23-31/3/24	Difference	% increase / decrease
Age Restricted Sales	5013	5698	+685	+13.66%
Alcohol	193	0	-193	N/A
Animal Feed	78	50	-28	-35.89%
Animal Health	3153	2079	-1074	-34.06%
Consumer Credit	43	6	-37	-86.04%
Doorstep & Cold Calling	5936	6199	+263	+4.43%
Fair Trading	5422	5016	-406	-7.48%
Food	894	1110	+216	+24.16%
Intellectual Property	1909	2111	+202	+10.58%
Lifestyle	2008	2190	+182	+9.06%
Metrology	282	208	-74	-26.24%
Product Safety	2080	2336	+256	+12.30%
Scams	1744	1137	-607	-34.80%
Tobacco and Cigarettes	10678	13320	+2642	+24.74%
TOTAL	39433	41460	+2027	+5.14%
eCrime element	5409	4264	-1145	-21.16

NTS utilise the Citizens Advice consumer service database to identify levels and types of issues being raised by consumers.

- From 01/04/22 – 31/03/23 (the 2023 NTS Strategic Assessment period) - 573,021 case reports were recorded.
- From 01/04/23 – 31/03/24 (the 2024 NTS Strategic Assessment period) - 428,076 case reports were recorded.
- The Citizens Advice consumer service database shows that consumer reports recorded decreased by 144,315 (-25.2%) from the previous year.

A breakdown of the top five case classifications and comparisons against all cases shows the following:

CASE TYPE BREAKDOWN		CASE TYPE BREAKDOWN	
2023 NTS Strategic Assessment period		NTS Strategic Assessment period 2024	
Trader Complaint - Civil breach	204236	Trader Complaint - Civil breach.	154379
Trader Complaint - Criminal breach.	150094	Trader Complaint - Criminal breach.	140637
Out Of Scope - Refer/signpost to another agency.	117605	Out Of Scope - Refer/signpost to another agency.	74687
Out Of Scope - Wrong number.	20905	Enquiry - Consumer law/rights.	14439
Feedback - Not Consumer Direct related.	19544	Out Of Scope - Wrong number.	10888

The method of purchase as recorded is shown below (this year the analysis of this category is only looking at complaints and enquiries):

PURCHASE METHOD BREAKDOWN		PURCHASE METHOD BREAKDOWN	
2023 NTS Strategic Assessment period		2024 NTS Strategic Assessment period	
Not Recorded	177565	(021) Trader Premises	96128
(034) Trader websites and apps	109208	(034) Trader websites and apps	89214
(021) Trader Premises	108840	(005) Telephone	37928
(005) Telephone	42066	(027) Doorstep	33776
(027) Doorstep	38394	(031) Online marketplace (non-auction)	10594

The top five Citizens Advice consumer service database categories that consumers are complaining about are : -

- Used cars.
- Roofing, roof sealing and chimney repairs.
- Car MOT, service and repairs.
- Women’s clothing.
- Major renovations (including lofts, conversions and extensions).

Appendix 2 – Regional Trading Standards Groups’ Priority Areas

<p>CEnTSA</p>	<ul style="list-style-type: none"> ● Underage Sales & Safety of E-cigarettes ● Tobacco & Cigarettes ● Doorstep Crime and Rogue Trading ● Scams ● Animal Health ● Used Cars <p>Additionally, the following areas have been assessed as cross cutting issues:</p> <ul style="list-style-type: none"> ● Serious and Organised Crime ● Online Trading/eCrime 	<p>TSNW</p>	<ul style="list-style-type: none"> ● Doorstep crime ● Scams ● Used cars ● Illicit tobacco and cigarettes ● Intellectual property crime ● Vapes ● Animal health and welfare
<p>EETSA</p>	<ul style="list-style-type: none"> ● Doorstep Crime and Rogue Trading ● Fair Trading ● Product Safety ● Tobacco ● Vapes ● Animal Health ● Food ● Scams ● Underage Sales 	<p>TSSE</p>	<ul style="list-style-type: none"> ● Protection of vulnerable consumers/scams ● Tobacco Control ● Fair Trading ● Doorstep Crime ● Product safety ● Animal Health ● Food
<p>LTS</p>	<ul style="list-style-type: none"> ● Safeguarding ● Doorstep crime ● Intellectual Property Crime ● Fair Trading – Scams ● Lettings ● Age related products ● Tobacco and alcohol ● Product safety 	<p>TSSW</p>	<ul style="list-style-type: none"> ● Workforce/raising investment in Trading Standards ● Doorstep Crime and Rogue Trading ● Tobacco ● Vapes ● Animal Health – Disease Control ● eCrime
<p>NETSA</p>	<ul style="list-style-type: none"> ● Fair trading (including used cars) ● Illicit tobacco (including vapes) ● Doorstep and cold calling ● Product Safety ● Scams (including energy and mass marketing) 	<p>TS Wales</p>	<ul style="list-style-type: none"> ● Illicit tobacco ● Illegal dog breeding ● Doorstep crime ● Scams ● Product safety ● Intellectual property ●
<p>TSEM</p>	<ul style="list-style-type: none"> ● Scams (Distance Fraud) ● E-Cigarettes and Vapes ● Food (including Allergens) ● Product Safety ● Illegal Tobacco ● Fraud in the Home (including Doorstep Crime) ● Used Car Crime 	<p>YAHTSG</p>	<ul style="list-style-type: none"> ● Crime in the home ● Used car crime ● Product safety ● Tobacco control ● Animal health ● Serious and organised crime (cross-cutting) ● eCrime (cross-cutting) ● Cost of living crisis (cross-cutting)