

# FOCUS

IN PLAIN SIGHT

## Tackling Crime on the UK's High Streets

# Contents

<b>FOREWORD</b>	3
<b>Executive Summary</b>	4
<b>1. The Rise of Serious and Organised Crime on our High Streets</b>	8
<b>2. Taking Action to Disrupt Serious and Organised Crime</b>	14
<b>3. Mapping the UK's High Street Hot Spots</b>	19
<b>4. Our Ten-Point Plan to Reclaim the UK's High Streets</b>	26



As the UK's only professional membership body for people working in Trading Standards, CTSI's membership represents Trading Standards and consumer protection professionals working in a range of sectors – including local authorities, businesses and not-for-profits.



The Anti-Counterfeiting Group (ACG) is one of the most respected international organisations dedicated to combating counterfeiting. Representing thousands of global brands across a wide range of sectors, ACG serves as the collective voice of industry. It champions strong legal frameworks, robust enforcement, and effective multi-agency collaboration, while promoting public-private partnerships to tackle intellectual property crime. The organisation is committed to raising consumer awareness of the hidden harms of counterfeit goods, including their growing links to serious organised crime. Working closely with Trading Standards and other key partners, ACG plays a vital role in protecting businesses, consumers, and the integrity of the UK marketplace.

# FOREWORD



JOHN HERRIMAN  
Chief Executive of CTSI



CHLOE LONG  
Deputy Director General of the  
Anti-Counterfeiting Group

Serious and organised crime (SOC) has rightly been identified as having a profound impact across all communities throughout the UK.

Shady business practices and criminal activities are not something new, but perhaps the scale and prevalence of the problem is now such that it really does pose a serious national threat to our economy and wider society.

Organised crime groups (OCGs) are increasingly professionalising and their tentacles reach beyond selling goods on UK high streets. Such groups operate in vast and organised international criminal networks, with extensive shadow supply chains, warehousing and logistics.

While Trading Standards is not the lead agency involved in tackling SOC, we do have a critical role to play. Furthermore, in some areas, such as counterfeiting, and illicit tobacco and vapes, Trading Standards is a lead enforcement agency, working closely with the Police, National Crime Agency and HMRC to name but a few.

It is perhaps no surprise that Trading Standards professionals, many of whom are based in local communities across the country, are seeing first hand the impact of SOC upon businesses.

CTSI's members have highlighted the presence of organised crime groups on UK high streets as the number one threat facing the Trading Standards profession<sup>1</sup>. This, coupled with a perceived increase in cash-intensive businesses opening on high streets since 2020<sup>2</sup>, indicates an alarming emergence of national and international OCGs conducting illegal activity out of high street shops up and down the country.

Moreover, OCGs and their activities are striking at the very heart of the work of Trading Standards and the mission of both CTSI and ACG: to protect consumers and achieve a level playing field for businesses.

The illegal retail activity conducted by such groups directly threatens the safety of consumers and local communities – not just from the sale of counterfeit or unsafe products, or under-age sales, but also from the wider illegality such groups are involved in.

There is increasing evidence that highlights the links between illegal activities, such as counterfeiting, with other insidious criminal activities - including child sexual exploitation, modern slavery, human trafficking, and drug and weapons supply.

“Dodgy shops” also threaten the level playing field for businesses as they are often capable of undercutting legitimate law-abiding businesses. This directly deprives the Exchequer of taxes to fund vital public services, which in turn damages local communities.

In our report, *Hidden in Plain Sight*, we highlight the experience of Trading Standards, our own estimates of the scale of the problem, and set out a ten-point plan that we would urge the Government and others to take forward.

It is vital that this threat is comprehensively addressed to boost economic growth, safeguard consumers, and protect the UK's national security.

# Executive Summary

- Serious and organised crime (SOC) is estimated to cost the UK at least £47bn annually<sup>1</sup>. Despite targeted efforts to disrupt it, insufficient investment in enforcement agencies and the increasing use of technology to enable crime, contributed to a rise in SOC threats in 2025<sup>2</sup>.
- In the course of their duties, Local Authority Trading Standards (LATS) uncover and tackle illegal activity – including activities linked with serious and organised crime – in high street shops throughout the UK.
- Such is the potential risk to the public and businesses, that the UK’s Trading Standards profession has identified the presence of serious and organised crime on UK high streets as the number one threat they face<sup>3</sup>.

## • A recent CTSI survey (2025) of Trading Standards professionals found<sup>4</sup>:

- “Dodgy shops” were present in towns and villages across the UK – not just in urbanised centres
- 96% said that they had encountered SOC or organised crime groups (OCGs) within their duties
- 97% were aware of suspected OCGs operating out of retail premises on their local high street(s)



- Recent media attention has highlighted the difficulty enforcement agencies can face in tackling such criminality – with criminals accessing seemingly inexhaustible supplies of illegal goods (such as illegal tobacco or counterfeit goods), and “professional enablers” supporting criminality and frustrating efforts to bring those involved to justice.
- Criminality on our high streets has a serious impact on local communities. It undercuts legitimate brands and businesses, thereby damaging local economies, negatively impacting jobs, poses a risk to public health through unsafe products and underage sales, and deprives the Government of tax receipts that could help fund vital services. The groups involved in this criminality also commit wider offences, including human trafficking, modern slavery, drug supply, and child sexual exploitation.
- The presence of such criminality is impacting on LATS’ ability to undertake its core functions effectively. It diverts resources away from competing priorities, including supporting law-abiding businesses that are fundamental to thriving communities and economic growth.
- To effectively tackle this issue, significant and sustainable investment will be needed to empower enforcement agencies to take targeted, multi-partner action to clamp down on SOC in the UK. While LATS are not best placed to act as the lead agency to spearhead such efforts, the profession’s unique powers and close links with the local community make it well placed to play an invaluable supporting role.

# Our Ten-Point Plan to Reclaim the UK’s High Streets

To empower Trading Standards to contribute effectively to disrupt and help to dismantle SOC that affects our high streets, CTSI and ACG are calling for:

## 1 Invest in Trading Standards and the wider enforcement landscape

To more effectively address SOC on our high streets, Trading Standards and the wider enforcement landscape – most notably the NCA, Police, Border Force, and HMRC – must be sufficiently resourced to deal with the threat posed by SOC.

- Make a phased additional investment in LATS, rising to £100 million after 4 years
- Provide significant investment in partner agencies that play a role in disrupting SOC
- Review the current system in England and Wales whereby criminal prosecutions by LATS are funded by local authorities, to address the cost pressures in bringing criminals to justice
- Provide significant support to the court system to reduce lengthy delays in bringing criminals to justice and providing redress for victims

## 2 Support and encourage partnership working

Tackling SOC on the high street requires a multi-agency approach. Partnership working should therefore be encouraged and supported to enable each agency to deliver its unique role.

- Create a cross-Government department taskforce (involving key agencies) to improve cross-Government communication and ensure it is a shared priority
- Improve the consistency of approach and ensure the inclusion of Trading Standards in SOC Tasking Groups by the relevant lead agencies
- Provide LATS with a direct phonenumber to Immigration Services
- Promote local collaboration through multi-agency integrated frameworks such as SOC Partnership Boards
- Carefully consider how local government reform and reform to police services in England and Wales will impact enforcement agencies and their ability to conduct partnership working
- Enhance multi-agency intelligence and enforcement activity in rural and agricultural settings
- Work with key industry partners to leverage the benefits of public/private partnership working



### 3 Optimise intelligence sharing

For multi-agency partnerships to work as effectively as possible and for SOC threats to be efficiently evaluated, it is vital that intelligence sharing between partner agencies is as efficient and seamless as possible.

- Optimise and ensure consistency of intelligence sharing with Trading Standards from partner agencies
- Allow free, direct access to Report Fraud's data for all LATS services in the UK, to support their ability to investigate fraud and identify trends

### 4 Address eye-watering storage costs

Local Authorities feel they have a lack of legal certainty on whether, in the absence of Forfeiture Orders, whole consignments of seized goods need to be stored for judicial processes and challenges, or whether storing samples are sufficient.

- Provide clear, legal certainty that keeping samples of illegal goods from seizures is sufficient for judicial processes - where Forfeiture Orders cannot be obtained

### 5 Accredited Financial Investigators and the Proceeds of Crime Act

Accredited Financial Investigators (AFIs) can "follow the money" to uncover upstream criminality, seize criminal assets, and identify and help redress victims. Increasing the number of AFIs in England and Wales – and addressing the disparity in Scotland where Local Authority AFIs are not permitted – will help amplify their positive effect.

- Support an increase in the number of Accredited Financial Investigators in LATS
- Give Scottish LATS the ability to employ "Accredited Financial Investigators" and introduce an incentivisation scheme to encourage agencies to recover criminal assets

### 6 Strengthen Closure Order powers

Though not available to Scottish LATS, Closure Orders are used in England and Wales to clamp down on offending shops. Closure Orders should be strengthened to improve their effectiveness and be made available to Scottish LATS services.

- Increase the maximum duration of Closure Orders to twelve months, with an option of permanent closure for persistent offenders
- Give all local authorities in England and Wales – including County Councils in two-tier areas – explicit powers to apply for Closure Orders to tackle persistently offending shops
- Increase the duration of Closure Notices from 48 hours to seven days
- Introduce powers, where a premises' ownership is under question, to indefinitely close a premises via a Closure Order until the lawful owner of the store provides proof of ownership
- Make demonstrating criminality sufficient criteria to justify Closure Notices
- Provide Scottish Local Authorities the power to issue Closure Orders
- Amend the scope of Criminal Behaviour Orders to target those linked to "dodgy shops", and give Scottish LATS the power to issue Criminal Behaviour Orders

### 7 Landlords – a carrot and stick approach

Landlords taking action against criminal tenants can resolve issues quicker and cheaper than taking court action. Law-abiding landlords should be supported in evicting criminal tenants, while indifferent or complicit landlords should be clamped down on.

- Issue civil penalties for landlords who knowingly allow their premises to be used for illegal activity
- Support for law-abiding landlords by:
  - Providing guidance for landlords on handling criminal tenants
  - Supporting landlords to legally evict criminal tenants more efficiently

### 8 Strengthen enforcement powers

Enforcement powers should be strengthened to help to better clamp down on organised crime groups operating out of high street shops.

- Give LATS Officers the power to require a person to produce identification to confirm their identity, for the purposes of investigating a suspected offence
- Consider authorisation of Trading Standards Officers under the Customs & Excise Management Act
- Make the sale of illegal goods an explicit trigger for licence reviews

### 9 Empower our Ports and Borders

Huge amounts of products – some illegal and dangerous – enter the UK through ports and borders each year. Resource cuts for enforcement agencies at UK entry points have caused significant capacity challenges. Ports and borders should be empowered and resourced so that they can better prevent illegal goods from entering the UK.

- Provide an additional £20m to bolster Trading Standards resources for Local Authorities with ports and borders
- Improve data access for Trading Standards Officers at ports and border points, including live HMRC export/import data, and manifest data from cargo operators
- Support the unfettered access of Trading Standards Officers to conduct enforcement activity at all entry points and customs clearance zones, including in-land sites
- Provide Trading Standards Officers operating at entry points and customs clearance zones the power to stop and detain a vehicle for the purposes of an enforcement inspection
- Ensure LATS have a voice and presence in border enforcement governance and introduce consistent national expectations for inter-agency cooperation at the border
- Ensure detaining unsafe and counterfeit goods are treated as more of a priority, and UK Border Force resourcing and priorities are reviewed to better tackle illicit and counterfeit goods entering our borders

### 10 Address consumer attitudes to illegal goods

For some consumers, purchasing illegal tobacco or counterfeit goods is seen as a victimless crime or a "good or cheap deal"<sup>3</sup>. Avenues to address such consumer attitudes should be explored to clamp down on the demand for illegal products.

- Tackle "dupe culture" and similar attitudes with consumer awareness campaigns
- Consider alternative options to address consumer purchasing of illegal goods

# 1. The Rise of Serious and Organised Crime on our High Streets

## Growth of the high street

Though the origins of our high streets can be traced back to the 18th century where they were aimed at wealthy clientele<sup>1</sup>, over time, the high street morphed into the life blood of many communities across the UK – with almost half (47%) of Britons visiting them at least once a week<sup>2</sup>.

There are over 6,500 high streets in Great Britain<sup>3</sup> that, in addition to being retail hubs within communities, have seen greater demand and opportunities for social and leisure activities, and public services<sup>4</sup>.

## Adapting high streets

However, in recent years high streets have encountered a number of significant challenges. With the growth of online shopping and services, and the lingering effects of the COVID-19 pandemic, the high street has had to adapt once more to serve its communities. Challenging business conditions have led many units to close, from family-run independent shops to well-known chains such as Wilko, Debenhams, and Woolworths.

The COVID-19 pandemic particularly impacted retail businesses, who saw their footfall plummet during lockdowns, leaving empty units in high streets up and down the UK. Working in the heart of local communities and businesses, Local Authority Trading Standards (LATS) services have seen their local high streets change. LATS play a key role in supporting legitimate businesses by, for example, clamping down on illegitimate businesses through enforcing food and product safety standards, checking for short measures in pubs and bars, tackling counterfeiting, and ensuring children are kept safe from harmful products.

## Growth of organised crime on our high streets

Despite the charm and vibrancy of many UK high streets, there lies a growing blight on communities across the UK: serious and organised crime (SOC).

Opportunistic organised crime groups (OCGs) have occupied empty retail units on our high streets and are operating seemingly legitimate businesses. However, on closer inspection, such businesses may launder money through their shop, sell illegal tobacco and vapes, counterfeit goods, and other illegal products.

These groups may also engage in wider criminality, such as modern slavery, child sexual exploitation, and drug supply. As illegitimate businesses often avoid paying the required taxes and duties, they can undercut local law-abiding businesses which further strains the overheads of legitimate retailers and contributes to further retail vacancies. This in turn provides more opportunities for criminals to occupy the vacant premises, further exacerbating the issue.

The presence of SOC on our high streets makes people feel unable to fully engage with their local community due to safety concerns, thereby negatively impacting local economies. Behind these illegitimate businesses, lies a network of organised criminality that sees illegal products (such as illegal tobacco and vapes; dangerous electronics and children's toys; and counterfeit goods, including clothing and medicine) predominantly smuggled into the country via ports and other border points, before being distributed and sold across the UK. Whilst the sale of illegal tobacco and counterfeit goods may seem a local problem, the groups behind the networks and the profits made from sales funds other offending, such as human trafficking, modern slavery, drug supply, and child sexual exploitation.

Almost two-thirds **(61%)** of Britons think there are too many vape shops on their local high street or shopping area, and more than half **(52%)** think there are too many barber shops.<sup>2</sup>

Almost a third **(32%)** of Britons are limited from visiting their local high street or shopping area because of crime and anti-social behaviour<sup>2</sup>.

## What is serious and organised crime?

The Home Office defines SOC as “individuals planning, co-ordinating and committing serious offences, whether individually, in groups and/or as part of transnational networks.”<sup>7</sup> In a similar manner, the Scottish Government has defined SOC as “crime which involves more than one person; is organised, meaning that it involves control, planning and potentially use of specialist resources; causes, or has the potential to cause, significant harm; and involves financial or other benefit to the individuals concerned.”<sup>8</sup>

The Home Office highlighted that SOC “undermine(s) the UK’s institutions, infrastructure and legitimate businesses by subverting financial systems and operating a hidden trade in illicit goods”<sup>9</sup> and “affects more UK citizens, more often, than any other national security threat.”<sup>9</sup>

Home Office figures conservatively estimate that SOC costs the UK at least £47bn annually<sup>8</sup> – a figure that is likely underestimating the total cost. This means that the annual cost of SOC is 2.5x larger than the Home Office 2024/25 budget<sup>13</sup>, and just over 56x larger than the total budget of the NCA<sup>14</sup> – the lead agency tasked with disrupting SOC.

The National Crime Agency (NCA), which leads the UK’s efforts to cut SOC, reported that SOC threats in the UK grew in 2025<sup>10</sup>. The most recent NCA figures suggest that there is a minimum of 59,000 people in the UK known to be involved with SOC<sup>11</sup>.

“**Serious and organised crime is estimated to cost the UK at least £47 billion annually.**”  
(Home Office, 2023)

## The impact and cost of serious and organised crime

The impact of organised crime groups (OCGs) on our high streets presents in a multitude of ways, including undercutting legitimate businesses, tax and duty avoidance, increased rates of crime and anti-social behaviour in the local area, fuelling the supply of counterfeit goods and putting consumers at risk through unsafe products. Recent consumer polling has found that almost a third (32%) of Britons are limited from visiting their local high street or shopping area because of crime and anti-social behaviour<sup>3</sup>. This drastically reduces the footfall for legitimate businesses on high streets, which in turn impacts local economies.

Equally as concerning (though outside the remit of Trading Standards) is the manner in which high street shops are being used to launder illicit finance, often with the help of so called “professional enablers”. Cash-intensive businesses (for example barber shops, nail bars, and vape stores) have been the target of recent intensifications under the NCA’s Operation Machinize, which has seen cash-intensive businesses targeted across Britain. The NCA suggests that thousands of shops across the UK are involved in low level criminality (i.e. laundering a couple of thousand pounds a month) and that a few hundred shops across the UK launder up to a couple of million pounds every month<sup>14</sup>.

The NCA have highlighted that “SOC offenders use high street businesses, including barber shops, minimarkets, nail bars, and vape shops, to support criminality, distribute illicit goods, engage in illegal working, or launder funds. These practices undermine legitimate businesses, damage consumer confidence, and harm local investment”<sup>14</sup>. Additionally, it notes that “Many individuals are supporting and enabling SOC in communities, usually unwittingly, by supporting these high street businesses.”<sup>15</sup>

## Case study Operation MACHINIZE

Operation Machinize, led by the NCA, saw the Police, Trading Standards, Immigration Enforcement, HM Revenue & Customs (HMRC), and Companies House target the criminal exploitation of high street businesses across two intensification periods.

The NCA noted that Operation Machinize is “the largest operation of its kind focused on rooting out the economic crime and grey economy that makes our high streets less safe and prosperous.”<sup>16</sup>

Across the two intensification periods, the multi-partner activity saw<sup>17,18</sup>:

- **959** individuals arrested
- Seized or froze cash, high value goods, and bank accounts totalling more than **£10.7m**
- More than **£2.7m** of illegal commodities destroyed
- **55** individuals questioned about their immigration status
- **97** individuals safeguarded in relation to modern slavery concerns

**99%** of Trading Standards professionals have seen an increase in the number of cash-intensive businesses opening on their local high street(s) since 2020<sup>5</sup>.



# Visualising the threat

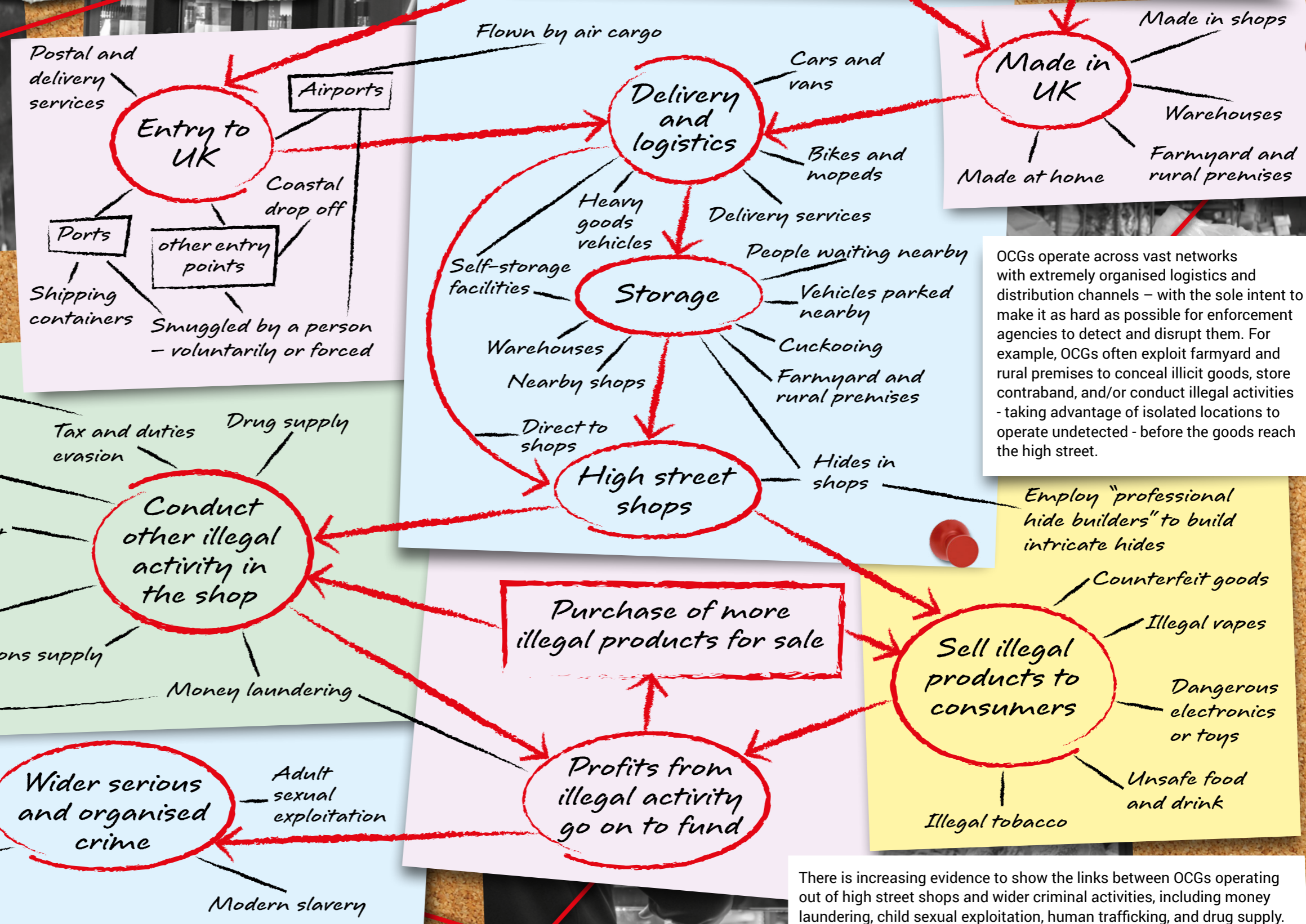
The fingerprints of OCGs are not just found on the high street but across a wide range of locations and activities that intersect with the remit of Trading Standards. For example, rogue traders cause thousands of pounds of construction-related detriment to consumers, and consumers are defrauded in person and online by OCGs.

## ENTRY TO UK

Products or materials made in mass factories abroad, including by victims of modern slavery

## MADE IN UK

Purchase materials that are made in UK, including by victims of modern slavery



OCGs operate across vast networks with extremely organised logistics and distribution channels – with the sole intent to make it as hard as possible for enforcement agencies to detect and disrupt them. For example, OCGs often exploit farmyard and rural premises to conceal illicit goods, store contraband, and/or conduct illegal activities - taking advantage of isolated locations to operate undetected - before the goods reach the high street.

Hiring "professional enablers" (e.g. lawyers, accountants etc) to hide and obscure criminal activities

Fraud (e.g. fake company directors)

Employ "professional hide builders" to build intricate hides

There is increasing evidence to show the links between OCGs operating out of high street shops and wider criminal activities, including money laundering, child sexual exploitation, human trafficking, and drug supply.

## 2. Taking Action to Disrupt Serious and Organised Crime

### Enforcement of serious and organised crime in the UK

There is no single strategy to address SOC across the UK. Rather, the Home Office updates and publishes a SOC strategy for England and Wales, with equivalent strategies published in Scotland, and Northern Ireland. Each strategy embraces a multi-agency approach to address SOC, and the “4Ps” of pursue, prevent, prepare, protect (England and Wales, and Northern Ireland) and the “4Ds” of divert, deter, detect and disrupt (Scotland).



The enforcement landscape is different in Scotland and Northern Ireland compared to England and Wales, partly due to devolution. As a result, there are differing enforcement powers, priorities, and operating models between LATS services across the UK. That said, all nations share a common thread of emphasising multi-agency cooperation and intelligence sharing to effectively disrupt SOC.

In the UK, there are more than 100 government departments, law enforcement bodies, agencies and other organisations involved in addressing SOC<sup>1</sup> and each agency has its own ever-changing set of priorities that impacts partnership working.

### National Crime Agency

Operationally, the NCA coordinates the UK law enforcement response to SOC and has a UK-wide footprint. The NCA works alongside the various police forces in England and Wales, Scotland, and Northern Ireland, to disrupt SOC. Other agencies – including LATS – provide a supporting role in disrupting particular aspects of SOC – for example with Border Force on issues relating to importations, HM Revenue and Customs (HMRC) on illegal tobacco, and the Intellectual Property Office (IPO) on counterfeit goods.

The NCA offers LATS services in England, Wales and Scotland limited access to the Agency and Partner Management Information System (APMIS), which stores records of SOC threat assessments and disruption activity against these threats. Currently, Local Authority Trading Standards are not able to directly view other agencies’ intelligence or cases on APMIS, and vice versa. If optimised to afford more seamless, real-time access to partner enforcement agencies, this system could provide an invaluable central database that all partner agencies could access equally to more efficiently coordinate disruption activity against SOC.

When OCGs are identified and mapped, the Management of Risk In Law Enforcement (MoRiLE) analytical tool/model is applied to support the Tasking process. The output of MoRiLE (including assessment of harm, threat and risks) can be used to inform the prioritisation of resources and capabilities.

### The Police and Regional Organised Crime Units

Across the UK, police services gather intelligence and investigate and disrupt SOC across the breadth of criminal activity.

In England and Wales, Regional Organised Crime Units (ROCU) act as the operational and intelligence link between the NCA and police services. ROCUs and the Government Agencies Intelligence Network (GAIN) in turn provide operational and intelligence support to LATS services – which is often established at regional SOC Tasking meetings. However, not all LATS services are invited to attend SOC Tasking meetings to benefit from such support.

A similar inconsistency of collaboration is seen in the relationships with LATS services and their local police service, with some LATS services receiving more support for enforcement action than other services due to the operational, strategic and resourcing considerations of their local police service.

The Government’s recent decision to abolish all Police and Crime Commissioners raises questions regarding how ROCUs and local police activity will be funded (as a large proportion of police funding derives from local taxes) and whether this will negatively impact local multi-agency partnerships.

Similarly, the Government’s announcement on police reform across England and Wales leave many question marks around the structure and boundaries of police services – as well as how a national police service will function.



### Is the current approach effective?

The current enforcement landscape will see dramatic reform over the coming years as a result of both local government reorganisation and police service reform in England and Wales. It is vital that such reforms take the opportunity to implement a more strategic approach to consumer protection, and that the reforms do not hamper the ability for enforcement agencies to effectively perform their duties or work with partner agencies.

The House of Commons Committee of Public Account’s report (2019) found that the Home Office was “not using all the levers it has at its disposal to ensure that law enforcement bodies at local, regional and national levels prioritise work to tackle serious and organised crime.”

It also highlighted the “complicated and short-term” funding for both ROCUs and individual projects to disrupt SOC<sup>2</sup>. When properly funded, targeted initiatives such as “Clear, Hold, Build” (England and Wales) show promising results in disrupting SOC. Estimates suggest the pilot sites involved with Clear, Hold, Build saw a drop in acquisitive crime of nearly a quarter (23.7%) compared to the control group<sup>3</sup>. See also, the Operation VULCAN case study in which seized goods prevented a loss to the UK economy of £1.5bn.<sup>4</sup>

## Case study Operation VULCAN

Operation Vulcan, led by Greater Manchester Police, saw the police, Trading Standards, Immigration Enforcement, HM Revenue & Customs, Intellectual Property Office, ACG, and others target the “Counterfeit capital of Europe<sup>4</sup>” - Cheetham Hill, Manchester – in persistent enforcement action.

Supported by £1.2m per year of funding through the Proceeds of Crime Act incentivisation scheme, the enforcement action saw:

- All **206** criminal establishments closed
- Cheetham Hill’s MoRiLE score reduce from **858** to **0**
- Seized **1048** tonnes of counterfeit goods with a value of **£1.56bn**
- Direct losses to the organised crime groups (OCGs) of **£104.8m**
- Reduction in other crimes in the Cheetham Hill area following the dispersal of OCGs, including a:
  - **45%** reduction in public order offences
  - **69%** reduction in vehicle crime
  - **69%** reduction in violent crime
  - **58%** reduction in burglary and 50% in theft<sup>4</sup>

*“Operation Vulcan was a major success, dismantling a long-standing hub of high-volume, organised counterfeiting that harmed brands, endangered consumers, and fuelled local criminality. This demonstrates the power of true multi-agency, public-private collaboration.”*

Anti-Counterfeiting Group

## Trading Standards and serious and organised crime

While Trading Standards is not the lead agency involved in tackling SOC, Trading Standards plays a unique supporting role and, on some issues far more than a supporting role, in disrupting SOC.

Trading Standards professionals are agile, multi-disciplinary enforcement officers who often enter a location to investigate a specific issue but are prepared to quickly change focus to handle unexpected problems they uncover.

The presence of SOC diverts precious resources from other competing priorities, and places LATS Officers in real physical danger. Almost three-quarters (72%) of Trading Standards professionals said that they had experienced intimidatory behaviour or had been threatened with violence in the course of their duties<sup>5</sup>.

Due to the breadth of legislation that LATS enforces, their duties intersect with a variety of SOC activity, including the organised importation and retail of illegal goods (e.g. the sale of illegal tobacco and vapes, and counterfeit goods), doorstep criminals and rogue traders, fraud and scams, food safety, drink and other products, and the illegal breeding of companion animals.

These interactions also uncover other criminality, such as money laundering, modern slavery, human trafficking, child sexual exploitation, and drug and weapon supply. LATS services must report such criminality, which is outside of their remit, to partner agencies.

## Organisation of Local Authority Trading Standards

LATS is a service largely operated by County (in two-tier authority areas) or Unitary councils – with the exception of Northern Ireland, where it sits within central government.

Despite the crucial function LATS undertake, the services do not benefit from statutory ringfenced budgets within councils and so compete with the myriad other pressures on local authorities. As such, there are differing levels of resourcing between the numerous LATS services.

LATS services can also benefit from regional and national support in England and Wales, and Scotland. For England and Wales, National Trading Standards (NTS) and, for Scotland, Trading Standards Scotland (TSS), deliver targeted enforcement and support LATS with intelligence gathering, through regional and national teams. In the last year, both TSS (in its Business Plan 2025/26<sup>6</sup>) and NTS (in its 2025 Strategic Assessment<sup>7</sup>) referenced organised crime, with NTS recognising SOC as being a “cross-cutting issue affecting Trading Standards...” Both documents also highlight the poly-criminal nature of OCGs, with those that Trading Standards interact with also committing offences such as human trafficking, modern slavery, illegal money lending services, and sexual offences (including child sexual exploitation).



## Trading Standards – intelligence and investigations

Trading Standards professionals play an invaluable role in helping to build intelligence through close relationships with consumers and businesses in communities across the UK.

All LATS services have access to and use the Intelligence Database (IDB) to log intelligence and disruption activity. Partner agencies – such as HMRC – can also have access to IDB, if they acquire the licenses to do so. LATS services can also access intelligence stored on the Police National Database (PND) and Police National Computer (PNC), if they have a legitimate reason to access the intelligence, via select channels. Likewise, LATS can only access the City of London Police’s Report Fraud database via select channels, and cannot be accessed at all in Scotland.

While investigatory and enforcement powers for LATS vary across the devolved nations, what unites them all is their adherence to investigatory guidelines and unique powers of entry to conduct inspections wherever and however a business is operating, depending on the intelligence received.

Trading Standards adhere to investigatory principles that largely mirror those used by partner agencies. Its unique powers of entry and inspection, combined with detailed, technical product safety knowledge, mean LATS can play an invaluable role in disrupting SOC – particularly when collaborating with partner agencies conducting targeted action.



## Accredited Financial Investigators

Trading Standards services in England, Wales, and Northern Ireland, can include specialist Accredited Financial Investigators (AFIs) to help detect and prosecute criminals through financial investigations, and to operate powers under the Proceeds of Crime Act 2002<sup>8</sup> (POCA). Though not found in every Local Authority, and not at all in Scottish Local Authorities, AFIs can help to detect and evidence criminality, identify and provide redress for victims, and deny or seize assets that have been obtained through criminality. The ability to “follow the money” acts as a powerful deterrent and tool to disrupt SOC and sends a clear message that “crime does not pay”. In a recent CTSI survey, 96% of respondents thought that POCA seizure powers are a useful tool in disrupting SOC and OCGs.<sup>5</sup>

## Closure Orders

Currently, certain Local Authorities in England and Wales (though not all) can apply to the courts for a Closure Order on offending premises, under legislation designed to tackle anti-social behaviour. When granted, the target premises is closed for a maximum of three months. Trading Standards professionals have raised concerns whereby a premises will be shut down through a Closure Order, and the next day the same individuals will be trading in another shop nearby (sometimes even next door to the closed premises). Whilst Closure Orders show promise, particularly when coupled with engagement with landlords, there are significant challenges related to their duration, practical application, and the fact that they are not available to all Local Authorities can hamper their effectiveness. Local Authorities that are not currently empowered to apply for Closure Orders are reliant on partners, who have their own competing priorities and resourcing considerations.

While partner lead agencies – such as the NCA and the Police – must be resourced to spearhead efforts to disrupt SOC, with its unique powers and excellent community intelligence, Trading Standards can play a valuable role – if properly resourced – in supporting partner agencies to disrupt SOC.

# 3. Mapping the UK’s High Street Hot Spots

The remit of LATS encompasses a multitude of different legislation and frequently sees officers taking enforcement action on high streets (and outside our high streets, for example with used car dealerships and garages) across the UK. The breadth of enforcement responsibilities means LATS inspect a variety of businesses, including convenience stores and mini-marts (which, due to their nature, may sell tobacco and vapes, as well as food and drink), American candy stores, and pubs and bars. A recent poll, based on the experiences of Trading Standards professionals, suggested that - in some areas - as many as half of mini-mart/convenience stores and vape shops, up to a third of American candy stores, and one-in-four fast food takeaways are estimated to have links with organised crime<sup>1</sup>.



CTSI is concerned that the organised criminal activities that Trading Standards encounters – including (but not limited to) the sale of illegal vapes and tobacco, counterfeiting and piracy, and food fraud – is being underestimated as to how lucrative it is for OCGs and how dangerous it can be to consumers.

In addition to the multitude of enforcement areas that LATS cover (such as under-age sales testing, fireworks, and product safety), the following are some pertinent areas of enforcement within the context of organised criminality on the high street. This chapter will also highlight areas of the UK that are known to have organised criminality operating out of retail premises.

## Counterfeit goods

Trading Standards services across the UK investigate intellectual property (IP) offences, most frequently in the form of counterfeit goods, and remain at the frontline of protecting consumers and legitimate businesses. Increasingly, they are confronting highly sophisticated operations run by large-scale, transnational organised crime networks, for whom counterfeiting represents a low-risk, high-profit activity. These criminals are producing higher quality fakes designed to evade detection and exploit shifting consumer behaviours, including more price-conscious purchasing and the growth of second-hand markets where counterfeit goods can be more easily concealed.

Counterfeit activity now spans both physical retail premises and an expanding digital landscape, across social media, websites and online marketplaces, making enforcement more complex and enabling criminals to target consumers at unprecedented scale. This evolving threat not only undermines innovation, jobs, and brand integrity, but also increases the risk of harmful products entering local communities, including unsafe medicines, cosmetics, electrical goods, and toys. Trading Standards operate as part of a vital multi-agency network addressing IP crime, working closely with the Intellectual Property Office (IPO), Police, Border Force, and rights holders to deliver coordinated and effective enforcement.

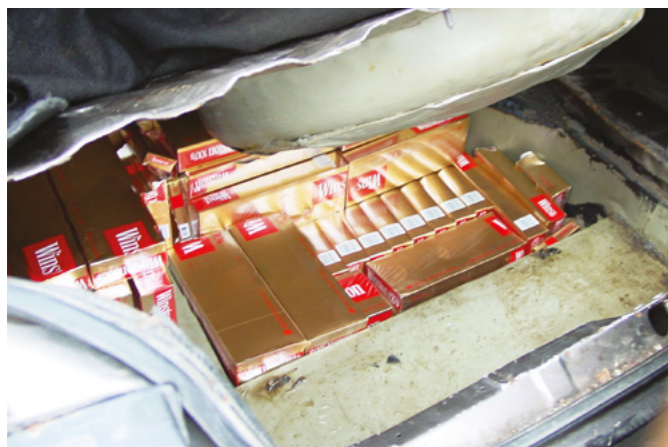


An estimated two-thirds to three-quarters of counterfeit and pirated goods come from China<sup>2</sup>

## International counterfeit trade

The international trade of counterfeit and pirated goods is the single most lucrative illicit trade – ahead of drug supply – with a retail value likely exceeding \$1 trillion annually.<sup>2</sup> International OCGs and other commercial actors, mass produce counterfeit products in specifically-designed factories and import those products around the world – including to the UK.

The OECD<sup>3</sup> notes that China is the primary source of global counterfeit goods but that other major sources include Bangladesh, Lebanon, Syria, and Türkiye. With the counterfeit trade being so global in scope, this puts tremendous pressure on the UK's ports and borders as the first line of defence.



*"Counterfeiting in the UK has become increasingly advanced and innovative, harming consumers, brands, and the wider economy. Criminals now operate through nationwide networks using tactics such as drop-shipping, influencer promotion and affiliate marketing, and live-stream sales. We have consistently championed Trading Standards, advocating for their work and partnering with them to achieve substantial results for our members. To continue protecting UK consumers and the economy, they must be properly resourced to tackle this rapidly evolving threat."*

Anti-Counterfeiting Group

## Counterfeiting in the UK

Despite the challenges regarding resourcing of enforcement agencies, recent statistics (2025<sup>4</sup>) give an insight into the scale of counterfeit imports into the UK, with more than five million articles seized at the border between 2021–2023, at an estimated total retail value of more than half a billion pounds. The report also highlights the exploitative nature of the organised criminal networks behind the importations, as demand for medical articles during Covid-19 saw more than two million suspected counterfeit medical items seized in 2021.

The Anti-Slavery Collective (2025<sup>5</sup>) found that the trade in counterfeits deprives the UK Exchequer of annual taxes worth £2.55bn – which it states is enough to fund 47,300 police officers, 51,400 nurses, and 47,100 teachers.

LATS across the UK will seek to detect and investigate counterfeit items up and down the country. In addition to undercutting the legitimate IP owner(s), counterfeit products - such as toys or electronics - may not meet UK safety regulations and therefore put consumers at real risk of harm and injury. Such products may contain choking hazards that could prove fatal for children, or faulty/unsafe electronics that pose a fire hazard.

### Case study **Operation GRINCH**

Swansea Trading Standards led multi-agency targeted action, including ACG, on counterfeit and unsafe toys, under Operation GRINCH.<sup>3</sup>

Investigations led to an industrial estate near London that was suspected of creating and distributing huge quantities of counterfeit and unsafe toys across the UK.

A series of raids on multiple warehouses saw a huge seizure of counterfeit toys, valued at between £6-10m, stopped from causing any harm to consumers.

## Fast food takeaways, groceries, and American candy stores

The total cost of food crime in the UK is estimated at almost £2bn per year<sup>7</sup>. The Food Standards Agency defines food crime as "serious fraud" that is "organised illegal activity coordinated by criminal networks."<sup>8</sup>

LATS in England and Wales enforce particular aspects of food and drink standards, alongside partner agencies. Such enforcement is usually linked to shops selling food and drink that is misdescribed, mainly in relation to food that has unauthorised food additives or incorrect allergen labelling. Such products can be – and sadly have – resulted in lives being lost, largely as a result of undeclared allergens. LATS also, uniquely, carries out weights and measurements enforcement activity to ensure consumers get exactly the amount of product that they pay for – for example, addressing short measures in pubs and bars.

Fraudulent or counterfeit food and drink is also an area of enforcement for certain LATS. OCGs have identified the profits to be made through the sale of counterfeit food and drink – e.g. selling counterfeit whiskey in pubs and bars, making false claims regarding meat or fish (as was the case in the 2013 UK horse meat scandal), or reintroducing out of date, or waste food and drink into the supply chain.

In addition to the significant public health considerations, such crimes also undermine the trade of the many legitimate businesses on UK high streets. This comes in the form of a loss of custom and from criminals who often do not pay the required taxes associated with being a business (e.g. business rates). This activity puts more pressure on the viability of legitimate high street shops and, should they be forced to close, may lead to more illegitimate businesses taking their place on the high street.

The UK horse meat scandal in 2013 is estimated to have cost the UK economy **£850m.**<sup>8</sup>



## Tobacco and vape retailers, mini-marts and convenience stores

When discussing the prevalence of thousands of shops across the UK engaging in criminality, the NCA highlighted the sale of illegal tobacco and vapes as being the most visible symptom of criminality in high street shops<sup>10</sup>.

HMRC's most recent estimates suggest the sale of illegal tobacco amounts to approximately £1.8bn in losses to the Exchequer in excises and VAT in 2023/24<sup>11</sup>. This is further compounded when the unrealised profits of legitimate businesses, that are being undercut, are also taken into consideration. In the near future, vapes will also require that excise duties be paid, which will likely lead to further losses to the Exchequer.

LATS across Britain carry out enforcement action against shops that sell illegal tobacco and vapes. Due to the increasingly sophisticated "hides" that are used to conceal illegal tobacco, Trading Standards are increasingly seeking support from trained detection dogs. Some premises will employ a sophisticated network of hides, off-site storage, and "runners" to store and sell illegal goods. Despite efforts to conceal illegal products, in 2024/25, Trading Standards services seized (at least) 2.2m illegal vapes, more than 24.8m illegal cigarettes, and 7655kg of illegal hand-rolling tobacco<sup>12</sup>. Across the same time frame, HMRC and Border Force have seized 1.19bn cigarettes and 125,088kg of hand-rolling tobacco<sup>15</sup>.

Disrupting the premises and individuals involved in the sale of illegal goods (such as counterfeit products, or illegal tobacco and vapes) is challenging, due to the fluid ability of shops to reopen nearby and difficulties in proving ownership of premises/businesses.

In England and Wales, some (though not all) Local Authorities can apply for Closure Orders through the courts to close a premises for up to three months. However, Trading Standards Officers have described closing a premises down, only to see the same individuals begin trading the next day, in a shop next door. Additionally, Trading Standards Officers can face difficulties identifying the correct landlord or business owner, and Scottish Trading Standards services cannot issue Closure Orders at all. Such loopholes must be addressed to empower Trading Standards services to better disrupt criminality on our high streets.



The sale of illegal tobacco resulted in an estimated **£1.8bn** loss to the Exchequer in 2023/24<sup>11</sup>

## Consumer attitudes and awareness

Recent CTSI consumer polling<sup>13</sup> shows that the majority of consumers are aware of the links between illegal goods and organised crime, they know it's unfair to the legitimate brands, and they know the goods are risky.

However, the polling also found that 18–44-year-olds were still more likely than not to buy illegal goods if they were cheaper than the legitimate alternatives, and 18-34-year-olds are more likely than not to see their actions as victimless or harmless.

The same poll found that almost three-quarters (72%) of consumers would be likely to stop buying illegal products if they knew the groups selling those products used the profit to commit other offences (e.g. child sexual exploitation, human trafficking, modern slavery, supplying drugs, and violent crime). This points to the need for increased consumer awareness of the links between the sale of illegal products and the wider criminality that the profits generated from those sales go on to fund.

One-in-four **(25%)** consumers think buying counterfeit or illegal products is victimless or harmless<sup>13</sup>

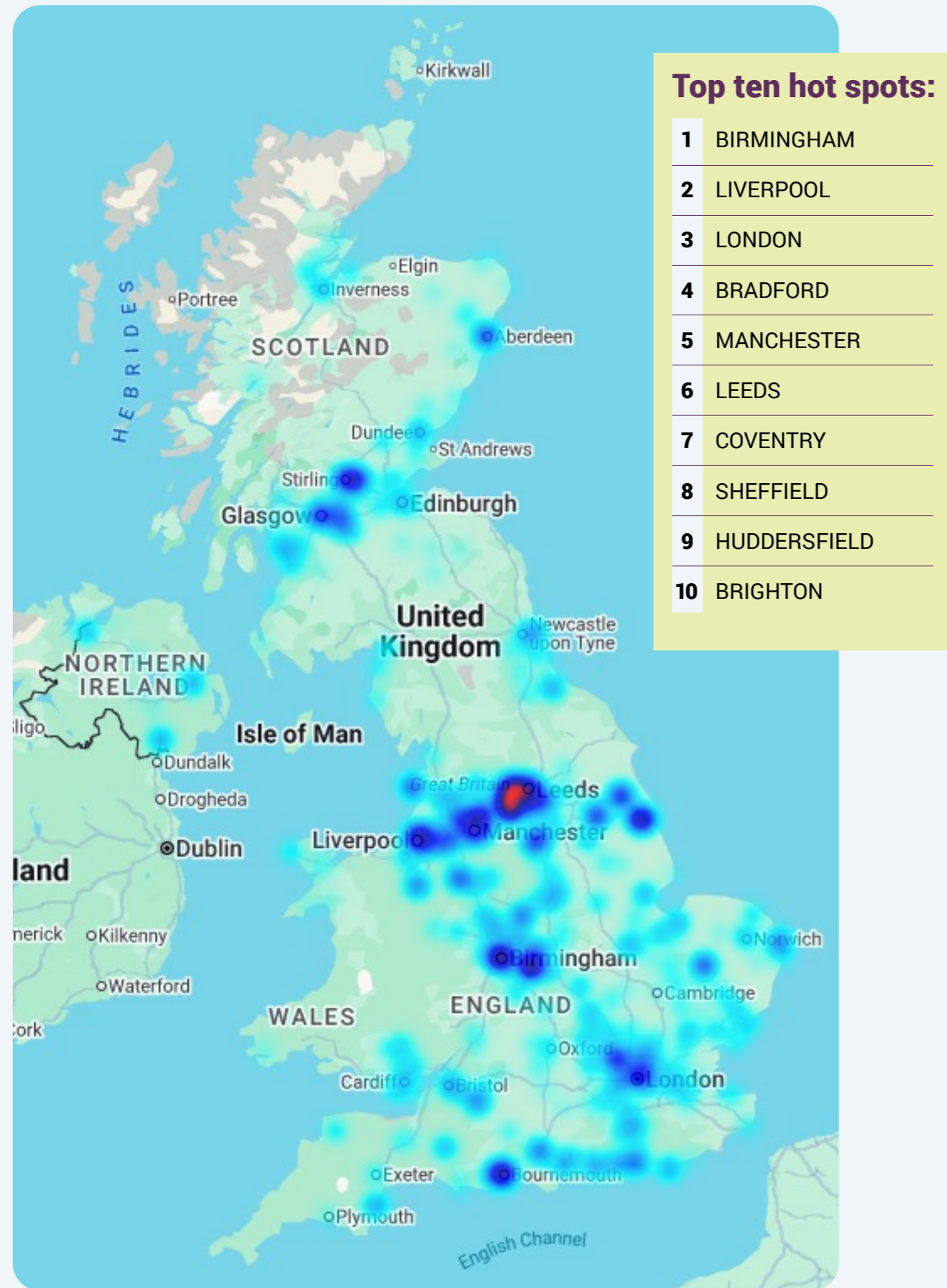
Almost three-quarters **(72%)** of consumers said they would be less likely to buy counterfeit or non-compliant products if they knew the groups selling those products used the profit to commit other offences<sup>13</sup>

### Case study End the Harm campaign<sup>5</sup>

The Northern Ireland Department of Justice launched a consumer awareness campaign called "End the Harm", which sought to highlight the link between fake or illegal goods and funding for organised crime gangs.

The campaign included social media content, press releases, and website content that looked at buying fake and illegal goods, and how those goods help fund organised crime – including discussing "the money chain".

# Mapping the UK's High Street Hot Spots



In a recent CTSI survey (2025<sup>1</sup>), Trading Standards professionals were asked to identify perceived organised crime hot spots in their localities. This data, supplemented by data from the Anti-Counterfeiting Group produced a snapshot hot spot map that highlights the nationwide extent of organised crime on UK high streets.

## Cities in focus

LONDON	MANCHESTER	SHEFFIELD	LEEDS
1 Westminster	1 Cheetham Hill	1 Highfield	1 Armley
2 Hounslow	2 Salford	2 Darnall	2 Hunslet
3 Hackney, and Tower Hamlets	3 Middleton, and Levenshulme	3 Pismire Hill	3 Harehills

## Northern Ireland

- 1 Newry
- 2 Londonderry
- 3 Belfast

## Scotland

- 1 Glasgow
- 2 Edinburgh
- 3 Alloa

## Wales

- 1 Cardiff
- 2 Swansea
- 3 Barry

## Understanding the hot spot map

- The snapshot “hot spot” map illustrates that the issue of OCGs operating out of high street shops is widespread.
- As may be expected, there are a large number of hot spots in the more populated cities and towns.
- However, there are also hot spots in less obvious locations – such as in Great Yarmouth, which may be linked to the tourist trade.
- The data also suggests the presence of two “corridors of crime”:
  - One stretching horizontally from Liverpool on the west coast to Hull and Grimsby on the east coast
  - The second encompassing a collection of coastal settlements across Dorset, Hampshire, and Sussex

**Methodology:** In a recent CTSI survey (2025), Trading Standards professionals were asked to self-identify places in their locality that were perceived hot spots for organised criminality, based on their experiences. The heat map draws on those responses, as well as supplementary data detailing instances where known brand test purchasing and enforcement action took place, and detentions at the border where there was a known high street or commercial onward address. If a location was mentioned, it will have a light blue hot spot. The more a location was referenced, the redder that spot appears on the map.

## Key:

AT LEAST ONE REFERENCE

MOST REFERENCED

This map does not reflect every incidence of high street crime linked to SOC and nor does it reflect the frequency or value of crime in an area. As the data relies partly on survey responses, locations without a hot spot should not be taken to mean that criminality does not occur in those localities but should be seen as no data could be gathered. This map should also not be taken to suggest that areas with a hot spot have more or less effective enforcement than those that do not appear with a hot spot.

## 4. Our Ten-Point Plan to Reclaim the UK's High Streets

To empower Trading Standards to contribute effectively to disrupt and help to dismantle SOC that affects our high streets, CTSI and ACG are calling for:

### 1 Invest in Trading Standards and the wider enforcement landscape

To effectively tackle SOC on UK high streets, significant and sustainable investment will be needed to empower enforcement agencies to take targeted, multi-partner action – such as with the “Clear, Hold, Build” initiative – to clamp down on SOC on UK high streets.

As is the case for other public sector partners, the single greatest challenge to LATS remains the issue of budgets and resources. In real terms, Local Authority budgets have not kept pace with inflation and LATS have been subject to cuts. In a recent National Audit Office report<sup>1</sup>, Trading Standards was highlighted as having suffered 39% budget cuts from 2010/11 to 2019/20. Such cuts mean that, in some places, LATS may operate at minimum staffing levels, which could place Local Authorities at risk of breaching their legal responsibilities.

Additionally, Local Authorities carry the burden of funding court proceedings against suspected criminals. Due to the nature of OCGs, some undertakings turn into huge cases spanning multiple victims with multiple suspects. In such cases, the OCGs may have more funds to sustain a court case than the Local Authority does. CTSI has concerns that, under the current arrangement, the cost to Local Authorities may be a consideration when considering court action.

#### Recommendations:

- Make a phased additional investment in LATS, rising to £100 million after 4 years
- Provide significant investment in partner agencies that play a leading role in disrupting SOC and provide long-term, sustainable funding for proven multi-agency initiatives to disrupt SOC, such as the “Clear, Hold, Build” initiative
- Review the current system in England and Wales, whereby criminal prosecutions by LATS are funded by local authorities, to address the cost pressures in bringing criminals to justice
- Provide significant support to the court system to reduce lengthy delays in bringing criminals to justice and providing redress for victims

**Every £1 invested in LATS returns £11 of detriment prevented.<sup>2</sup>**

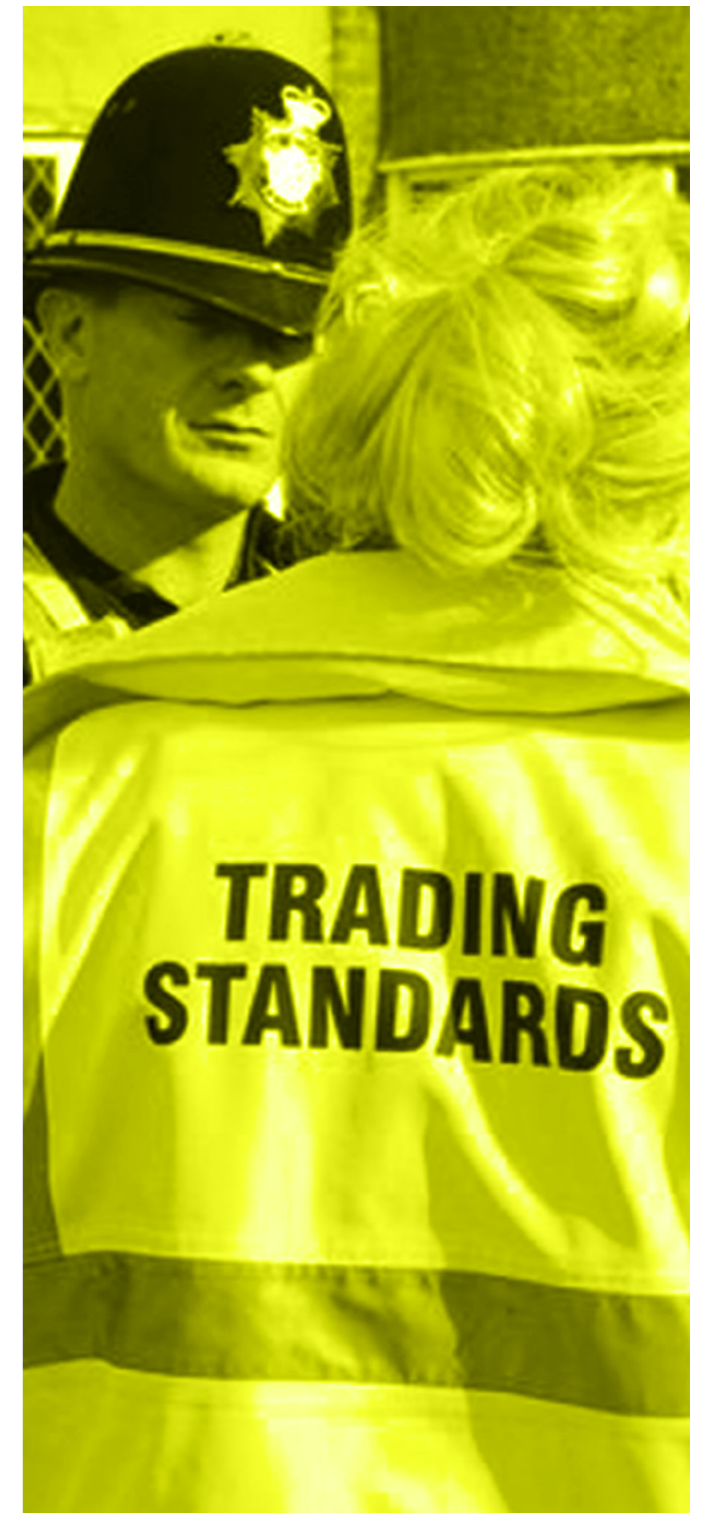
### 2 Support and encourage partnership working

No single agency can tackle SOC in isolation. Protecting our high streets requires collaboration with a diverse range of agencies, each with a unique role but a shared common goal.

Enforcement agencies must be empowered to take bold action through increased, sustainable funding for multi-agency action and capitalise on existing structures (such as Regional Organised Crime Units, local SOC Boards or Joint Action Groups) to improve partner working. For example, when Trading Standards Officers uncover suspected illegal workers or potential victims of modern slavery, currently they must access immigration services through a switchboard line, rather than the direct line that other agencies possess – this hinders the ability to address such occurrences efficiently.

#### Recommendations:

- Create a cross-Government department taskforce (involving key enforcement agencies – including Trading Standards) to ensure it is a shared priority across Government
- Improve the consistency of approach and ensure the inclusion of Trading Standards in SOC Tasking Groups by the relevant lead agencies
- Provide LATS with a direct phonenumber to Immigration Services to more effectively address nationality / right to work queries when at a live incident
- Promote local collaboration through multi-agency integrated frameworks, such as SOC Partnership Boards
- Carefully consider how local government reform and reform to police services in England and Wales will impact enforcement agencies and their ability to conduct partnership working
- Enhance multi-agency intelligence and enforcement activity in rural and agricultural settings
- Provide increased resources for the National Rural Crime Unit and expand the agencies involved, to better support multiagency operations targeting OCG activity in isolated areas and preventing illegal goods from reaching the high street
- Work with key industry partners to leverage the benefits of public/private partnership working



### 3 Optimise intelligence sharing

Agencies increasingly rely on actionable intelligence to plan and conduct operations, including being able to properly conduct threat, risk and harm assessments. Currently, CTSI members have shared examples of the, at times, inefficient and operationally challenging nature of intelligence sharing between partner agencies. This includes a time-consuming multi-step process, being unable to immediately see if other agencies are investigating the same individual, receiving intelligence that is redacted to the point of being unusable, and/or receiving intelligence too late to assist operations.

To optimise partner working, to allow immediate and full threat assessments to be made, and to avoid “blue on blue” incidents regarding investigations, the sharing of intelligence between partner agencies should be reviewed with the goal of optimising partnership working.

#### Recommendations:

- Optimise the sharing of intelligence between enforcement agencies and Trading Standards, to allow actionable intelligence to flow in a timely manner
- Allow free, direct access to the City of London Police’s Report Fraud data for all Trading Standards services in the UK, to support LATS’ ability to investigate fraud and identify trends

### 4 Address eye-watering storage costs

CTSI members have voiced frustration at the significant costs associated with storing whole consignments of seized, illegal goods for the purposes of judicial processes and challenges, where early Forfeiture Orders cannot be obtained. The health and safety considerations of storing large volumes of volatile illicit goods, such as vapes, further imposes additional costs on Local Authorities.

A precedent exists (in the handling of cannabis plants) whereby samples of the suspected illegal goods are kept, and the remaining items are disposed of. Currently, due to a lack of clear, legal certainty on keeping samples of illegal goods from seizures where Forfeiture Orders cannot be obtained, Local Authorities display caution regarding storing such exhibits – and at great cost.

#### Recommendations:

- Provide clear, legal certainty that keeping samples of illegal goods from seizures (rather than whole consignments) is sufficient for judicial processes and challenges - where Forfeiture Orders cannot be obtained

**95% of Trading Standards professionals believe local authorities should only need to keep samples of seized goods for judicial processes, rather than whole consignments<sup>5</sup>**

### 5 Accredited Financial Investigators and the Proceeds of Crime Act

POCA permits Local Authority AFIs in England, Wales and Northern Ireland to use their specialist training (provided by the NCA) to detect crime through financial investigations, strengthen evidence for court, help to identify and gain compensation for victims, and deter criminality by denying or seizing assets gained through crime (including occurrences of criminals having cryptocurrencies instead of cash). Across the 339<sup>3</sup> Local Authorities in England and Wales, AFIs often assist multiple teams within their local authority as a “shared resource”. These AFIs may also assist nearby Local Authorities who do not have their own in-house AFI.

Due to the drafting of the Proceeds of Crime Act 2002, Scottish Trading Standards services cannot benefit from the skills of an AFI. This results in potential avenues to detect criminality, strengthen evidence, and identifying and redressing victims being lost. In a similar manner, the Home Office’s Asset Recovery Incentivisation Scheme<sup>4</sup> (ARIS) - which provides incentives to agencies to pursue the recover of criminal assets - sets out how net receipts from asset recovery are split between the Home Office and operational partners – a scheme that does not exist in Scotland. Amending the Proceeds of Crime Act 2002 to permit Local Authority AFIs and to introduce a Scottish incentivisation scheme would bring Scotland in line with the rest of the UK and provide the benefits of AFIs to Scottish Trading Standards, which would in turn benefit their communities.

#### Recommendations:

- Support an increase in the number of Accredited Financial Investigators in LATS across the UK via a Government-funded training programme, including sourcing funding from ARIS
- Bring Scotland in line with the rest of the UK by amending the Proceeds of Crime Act 2002 (POCA) to include “accredited financial investigators” in the definition of “appropriate officer”, and introduce an incentivisation scheme

**A recent CTSI poll of Trading Standards professionals found 86% thought their service could benefit from having / having more AFIs<sup>5</sup>**

**A recent CTSI poll of Scottish Trading Standards professionals found 97% thought having AFIs in Scottish Trading Standards services would be a positive thing<sup>5</sup>**



## 6 Strengthen Closure Order powers

Under legislation designed to tackle anti-social behaviour, Local Authorities in England and Wales (although not a County Council where that council operates in an area also served by a District Council) can apply to the Courts for a Closure Order, which can close a premises for up to three months.

CTSI members in England and Wales have repeatedly expressed frustrations at the maximum duration of Closure Orders being too short, that County Councils cannot issue Closure Orders in certain circumstances, of being unable to easily confirm the lawful landlord of the shop or owner of the business, and of individuals who persistently reoffend once their Closure Order has expired. CTSI members have also shared examples whereby the individuals believed to be working in a shop under a Closure Order will be seen operating out of another premises on the same street – sometimes as quickly as the next day.

Trading Standards professionals have also raised concerns regarding the short, 48-hour deadline for submitting a Closure Order to the court following the issue of a Closure Notice – with 90% believing the deadlines should be extended<sup>5</sup>.

Additionally, CTSI's Scottish members have voiced frustrations at their lack of equivalent powers to issue Closure Orders, as can be done in England and Wales. A recent CTSI poll of Scottish Trading Standards professionals found that just 11% of respondents felt local authority Scottish Trading Standards services have sufficient powers to close a premises that persistently breaks the law, and 97% felt they should be able to issue Closure Orders to address anti-social behaviour/persistent offenders, as can be done in other areas of the UK<sup>7</sup>.

**More than two-thirds (67%) of consumers think that shops that repeatedly sell illegal goods should be closed<sup>6</sup>**

### A recent CTSI survey of Trading Standards professionals found<sup>5</sup>:

- **98%** felt the maximum duration of Closure Orders should be increased
- **99%** felt that where ownership of a premises/business is in question, the offending premises should be indefinitely closed until proof of ownership is provided
- **97%** believe that persistently offending premises, who have already had previous Closure Orders granted, should be considered for permanent closure

A Criminal Behaviour Order (CBO) is an order, available after a conviction for any criminal offence in the Crown Court, magistrates' court or youth court, that prohibits or requires the offender to do anything described in the order.

CBOs require the courts be satisfied that the offender has engaged in behaviour that caused or was likely to cause harassment, alarm or distress to any person. To complement the use of Closure Orders and mirror their duration, CBOs should be amended to more easily be applied to individuals linked with a premises subject to a Closure Order. This dual approach of closing the premises and addressing the behaviour of the individual will help to address instances where the same individual moves their criminality to a different premises following a Closure Order.

### Recommendations:

- Increase the maximum duration of Closure Orders to twelve months, with an option of permanent closure for persistent offenders
- Give all Local Authorities in England and Wales – including County Councils in two-tier areas – explicit powers to apply for Closure Orders to tackle persistently offending shops
- Increase the duration of Closure Notices from 48 hours to seven days
- Introduce powers, where a premises' ownership is under question, to indefinitely close a premises via a Closure Order until the lawful owner of the store provides proof of ownership
- Make demonstrating criminality sufficient criteria to justify Closure Notices
- Provide Scottish Local Authorities the power to issue Closure Orders
- Amend the scope of Criminal Behaviour Orders to target those linked to "dodgy shops", and give Scottish LATS the power to issue Criminal Behaviour Orders



## 7 Landlords – a carrot and stick approach

To complement Closure Orders, stronger penalties (such as civil fines) should be given to landlords who knowingly allow their property(ies) to be used for illegal activity.

Landlords taking action against criminal tenants can resolve issues quicker and cheaper than taking court action. Trading Standards professionals have shared positive outcomes where supportive landlords took action to address the criminal activity of their tenants. Such law-abiding landlords should be supported when addressing criminal tenants.

However, not all landlords are as supportive, and some are complicit in the organised criminality taking place in the premises. This is due to a perceived lack of deterrence and difficulties in identifying the landlord.

### Recommendations:

- Issue civil penalties (starting at £10,000 per breach and escalating for repeat offences) for landlords who knowingly allow their premises to be used for illegal activity
- Support for law-abiding landlords by:
  - Providing guidance for landlords on how to identify signs of criminal activity taking place in their premises and who they should report issues to
  - Supporting landlords to legally evict criminal tenants more efficiently

**98% of Trading Standards professionals think landlords should be prosecuted or fined for not taking action to remove tenants, where they are aware that the tenants are committing offences on their premises<sup>5</sup>**

## 8 Strengthen enforcement powers

Unlike other enforcement agencies, Local Authority Trading Standards Officers have no powers to require a person to identify themselves for the purposes of investigating a suspected crime. This can be a major impediment to efficiently investigating offences and could result in crimes being unable to be investigated further.

Additionally, “fake” company directors are frequently used by criminals to obscure ownership of “dodgy shops”. Greater powers should be given to Companies House to identify and clamp down on fake company directors.

### Recommendations:

- Give LATS Officers the power to require a person to produce identification to confirm their identity, for the purposes of investigating a suspected offence. This will better enable them to investigate offences and issue court summons
- Consider authorisation of Trading Standards Officers under the Customs & Excise Management Act
- Provide for the sale of illegal goods to be an explicit trigger for licence reviews



**98% of Trading Standards professionals think Trading Standards Officer should have the power to require an individual to identify themselves for the purposes of investigating a suspected offence<sup>5</sup>**

## 9 Empower our Ports and Borders

International OCGs use the UK’s ports and borders – as well as other entry points – to sneak their illegal products into the UK. In 2024, 429.7m tonnes of goods passed through the UK’s ports<sup>7</sup> and, by weight, 87% of all international freight passed through UK ports or airports<sup>8</sup>.

In coordination with the other agencies, LATS provide crucial protection at our ports and borders by preventing illegal and unsafe products entering the UK. However, with minimal resourcing given to LATS and partners at UK entry points, there are capacity challenges with regards checking inbound freight.

Trading Standards Officers at ports and borders have also highlighted the, at times, challenging practicalities in accessing detention sites; having sub-optimal access to import data; and facing significant challenges with roll-on, roll-off entry points.

Where, due to the sheer volume of freight, illegal products manage to gain entry to the UK, they are then distributed across the country. Preventing such goods from ever gaining entry to the UK would allow in-land enforcement resources to protect consumers elsewhere.

### Recommendations:

- Provide an additional £20m to bolster Trading Standards resources for Local Authorities with ports and borders
- Improve data access for Trading Standards Officers at ports and border points, including live HMRC export/import data, and manifest data from cargo operators
- Support the unfettered access of Trading Standards Officers to conduct enforcement activity at all entry points and customs clearance zones, including in-land sites
- Provide Trading Standards Officers operating at entry points and customs clearance zones the power to stop and detain a vehicle for the purposes of an enforcement inspection
- Ensure LATS have a voice and presence in border enforcement governance and introduce consistent national expectations for inter-agency cooperation at the border
- Ensure detaining unsafe and counterfeit goods are treated as more of a priority, and UK Border Force resourcing and priorities are reviewed to better tackle illicit and counterfeit goods entering our borders

## 10 Address consumer attitudes to illegal goods

Recent CTSI consumer polling<sup>6</sup> highlighted that consumers are largely aware that purchasing illegal goods is risky, unfair to genuine brands, and is linked to wider criminality. However, some consumers still choose to purchase the goods, particularly if they are cheaper.

For some consumers, purchasing illegal tobacco or counterfeit goods is seen as a victimless crime or a “good or cheap deal”. This mentality has given rise to, for example, “dupe culture” - whereby items are purchased or bought on the basis that they are “more affordable” versions of luxury brands. However, the reality is that these “alternatives” are often committing intellectual property offences.

The polling also found that, almost three-quarters (72%) of consumers would be likely to stop buying illegal products if they knew the groups selling those products used the profit to commit other offences (e.g. child sexual exploitation, human trafficking, modern slavery, supplying drugs, and violent crime). This points to the need for increased consumer awareness of the links between the sale of illegal products and the wider criminality that the profits generated from those sales go on to fund.

It is also important to consider the most effective method(s) to address the behaviour of consumers (the demand side) who choose to buy counterfeit or illegal goods. For example, several European partners, including Switzerland, France and Italy<sup>9</sup>, have introduced penalties for knowingly purchasing and/or possessing counterfeit goods. However, there are concerns that this may be difficult to enforce and that victims may be unaware that they are purchasing counterfeit goods. Such enforcement options should be analysed to evaluate whether they are effective and practically enforceable.

### Recommendations:

- Tackle “dupe culture” and similar attitudes with consumer awareness campaigns (including community engagement) that evidence the links between the sale of illegal goods (e.g. counterfeit products) and wider criminal activity
- Consider alternative options to address consumer purchasing of counterfeit or illegal goods to coincide with consumer awareness campaigns

# REFERENCES

## Foreword

1. CTSI (2025) Membership Survey
2. CTSI (2025) CTSI Member survey on SOC on UK high streets

## Executive Summary

1. Home Office (2023) *No Place to Hide: Serious and Organised Crime Strategy*. Available at: <https://www.gov.uk/government/publications/serious-and-organised-crime-strategy-2023-to-2028/no-place-to-hide-serious-and-organised-crime-strategy-2023-to-2028-accessible-version>
2. National Crime Agency (2026) National Strategic Assessment 2026 of Serious and Organised Crime. Available at: <https://www.nationalcrimeagency.gov.uk/nsa-overview-of-soc-2026/nsa-summary-2026>
3. CTSI (2025) Membership Survey
4. Censuswide (2025) CTSI Consumer Polling

## The Rise of Serious and Organised Crime on our High Streets

1. English Heritage. [n.d.] *From stalls to malls: A brief history of the high street*. Available at: <https://www.english-heritage.org.uk/visit/inspire-me/a-brief-history-of-the-high-street/>
2. Ipsos (2025) *Majority of Britons think their high street has too many vape shops and hairdressers, Ipsos poll reveals*. Available at: <https://www.ipsos.com/en-uk/majority-britons-think-their-high-street-has-too-many-vape-shops-and-hairdressers-ipsos-poll>
3. Ordnance Survey (2019) *OS and ONS release report on the geography of Britain's high streets*. Available at: <https://www.ordnancesurvey.co.uk/insights/the-geography-of-britains-high-streets>
4. House of Lords Library (2025) *'High streets: Life beyond retail?': House of Lords Built Environment Committee*. Available at: <https://lordslibrary.parliament.uk/high-streets-life-beyond-retail-house-of-lords-built-environment-committee/>
5. CTSI (2025) CTSI Member survey on SOC on UK high streets
6. Institute of Chartered Accountants in England and Wales (2020) *Anti-money laundering: the basics*. Available at: <https://www.icaew.com/-/media/corporate/files/technical/ethics/money-laundering/icaew-ifac-aml-the-basics/installment-6.ashx>
7. Home Office (2023) *No Place to Hide: Serious and Organised Crime Strategy*. Available at: <https://www.gov.uk/government/publications/serious-and-organised-crime-strategy-2023-to-2028>
8. Scottish Government (2022) *Serious and Organised Crime Strategy*. Page 3. Available at: <https://www.gov.scot/publications/serious-organised-crime-strategy/pages/3/>
9. Home Office (2018) *Serious and Organised Crime Strategy*. Available at: <https://assets.publishing.service.gov.uk/media/5bd99ee8e5274a6e39bf2c2e/SOC-2018-web.pdf>
10. National Crime Agency (2025) *National Strategic Assessment 2025 of Serious and Organised Crime*. Available at: <https://www.nationalcrimeagency.gov.uk/nsa-2025>
11. National Crime Agency (2023) *National Strategic Assessment 2023 of Serious and Organised Crime*. Available at: <https://www.nationalcrimeagency.gov.uk/nsa>
12. HM Treasury (2025) *Budget 2025*. Available at: <https://www.gov.uk/government/publications/budget-2025-document/budget-2025-html#government-spending>
13. National Crime Agency (2025) *Annual Report and Accounts 2024-2025*. Available at: [https://assets.publishing.service.gov.uk/media/6887534dbe2291b14d11af91/NCA\\_Annual\\_Report\\_Accounts\\_2024-25.pdf](https://assets.publishing.service.gov.uk/media/6887534dbe2291b14d11af91/NCA_Annual_Report_Accounts_2024-25.pdf)
14. House of Commons Business and Trade Committee (2025) *Small Business Strategy Evidence Session, 25 November*. Available at: <https://www.parliamentlive.tv/Event/Index/6439f349-c8a2-43ea-8b0b-7f592d4729c8>
15. National Crime Agency (2025) *National Strategic Assessment 2026 of Serious and Organised Crime - Summary*. Available at: <https://www.nationalcrimeagency.gov.uk/nsa-overview-of-soc-2026/nsa-summary-2026>
16. National Crime Agency (2025) *National Strategic Assessment 2026 of Serious and Organised Crime - Harms to Society*. Available at: <https://www.nationalcrimeagency.gov.uk/nsa-domains-2026/nsa-harm-to-society-2026>
17. National Crime Agency (2025) *Operation Machinize 2: Thousands of businesses targeted in coordinated crackdown on high street crime*. Available at: <https://www.nationalcrimeagency.gov.uk/news/operation-machinize-2-thousands-of-businesses-targeted-in-coordinated-crackdown-on-high-street-crime>
18. National Crime Agency (2025) *Operation Machinize: Hundreds of barbershops targeted in NCA-coordinated crackdown*. Available at: <https://www.nationalcrimeagency.gov.uk/news/operation-machinize-hundreds-of-barbershops-targeted-in-nca-coordinated-crackdown>

## Taking Action to Disrupt Serious and Organised Crime

1. National Audit Office (2019) *Tackling serious and organised crime*. Available at: <https://www.nao.org.uk/wp-content/uploads/2019/03/Tackling-serious-and-organised-crime.pdf>
2. House of Commons Committee of Public Accounts (2019) *Serious and Organised Crime*. Available at: <https://publications.parliament.uk/pa/cm201719/cmselect/cmpubacc/2049/2049.pdf>
3. Home Office (2025) *Evaluation of Clear, Hold, Build: A local response to serious and organised crime*. Available at: <https://www.gov.uk/government/publications/evaluation-of-clear-hold-build/evaluation-of-clear-hold-build-a-local-response-to-serious-and-organised-crime#executive-summary>
4. Arizona State University Center for Problem-Oriented Policing (2024) *Greater Manchester Police - Operation Vulcan; Swooping in on the Counterfeit Capital of the UK*. Available at: [https://popcenter.asu.edu/sites/g/files/litvpz3631/files/manchester\\_police\\_operation\\_vulcan\\_2024\\_0.pdf](https://popcenter.asu.edu/sites/g/files/litvpz3631/files/manchester_police_operation_vulcan_2024_0.pdf)

5. CTSI (2025) *CTSI Member survey on SOC on UK high streets*
6. Trading Standards Scotland (2025) *Business Plan 2025/26*. Available at: [https://www.tsscot.co.uk/wp-content/uploads/2025/06/TSS\\_Business\\_Plan\\_2025-26.pdf](https://www.tsscot.co.uk/wp-content/uploads/2025/06/TSS_Business_Plan_2025-26.pdf)
7. National Trading Standards (2025) *NTS 2025 Strategic Assessment*. Available at: <https://www.nationaltradingstandards.uk/uploads/NTS%202025%20Strategic%20assessment.pdf>
8. Tony Blair Institute for Global Change (2024) *A New Approach to Serious and Organised Crime in the UK*. Available at: [https://institute.global/insights/public-services/a-new-approach-to-serious-and-organised-crime-in-the-uk#footnote\\_list\\_item\\_89](https://institute.global/insights/public-services/a-new-approach-to-serious-and-organised-crime-in-the-uk#footnote_list_item_89)
9. Legislation.gov.uk (n.d) *Proceeds of Crime Act 2002*. Available at: <https://www.legislation.gov.uk/ukpga/2002/29/contents>

## Mapping the UK's High Street Hot Spots

1. CTSI (2025) *CTSI Member survey on SOC on UK high streets*
2. Global Financial Integrity (2017) *Transnational Crime and the Developing World*. Available at: <https://gointegrity.org/wp-content/uploads/2017/03/Transnational-Crime-final.pdf>
3. OECD (2025) **Mapping Global Trade in Fakes 2025: Global Trends and Enforcement Challenges**. Available at: [https://www.oecd.org/en/publications/mapping-global-trade-in-fakes-2025\\_94d3b29f-en/full-report/component-3.html#execsumm-d1e87-02e5458d7c](https://www.oecd.org/en/publications/mapping-global-trade-in-fakes-2025_94d3b29f-en/full-report/component-3.html#execsumm-d1e87-02e5458d7c)
4. Border Force (2025) *The UK Customs Intellectual Property Enforcement Report 2021-2023*. Available at: <https://www.gov.uk/government/publications/the-uk-customs-intellectual-property-enforcement-report-2021-2023/the-uk-customs-intellectual-property-enforcement-report-2021-2023#overall-results-uk-ipr-enforcement>
5. The Anti-Slavery Collective (2025) *Fake Fashion: A Human Rights Scandal - How counterfeit fashion intersects with organised crime & labour exploitation*. Available at: <https://theantislaverycollective.org/wp-content/uploads/2026/01/FAKE-FASHION-POSITION-PAPER.pdf>
6. Swansea Council (2025) *Huge counterfeit toy seizure by Swansea trading standards*. Available at: <https://swansea.gov.uk/article/37878/Huge-counterfeit-toy-seizure-by-Swansea-trading-standards>
7. Food Standards Agency (2020) *The Cost of Food Crime*. Available at: <https://www.food.gov.uk/research/food-crime/the-cost-of-food-crime>
8. Food Standards Agency (2024) *Food crime - guidance for businesses*. Available at: <https://www.food.gov.uk/business-guidance/food-crime-guidance-for-businesses>
9. Food Standards Agency (2023) *Written evidence from the Food Standards Agency (UKR0085)*. Available at: <https://committees.parliament.uk/writtenevidence/126950/pdf/>
10. House of Commons Business and Trade Committee (2025) *Small Business Strategy Evidence Session, 25 November*. Available at: <https://www.parliamentlive.tv/Event/Index/6439f349-c8a2-43ea-8b0b-7f592d4729c8>
11. HMRC (2025) *Tax gaps: Excise (including alcohol, tobacco and oils)*. Available at: <https://www.gov.uk/government/statistics/measuring-tax-gaps/3-tax-gaps-excise-including-alcohol-tobacco-and-oils#tobacco>
12. National Trading Standards (2025) *Annual Report: 2024-2025*. Available at: <https://www.nationaltradingstandards.uk/uploads/annual%20report%2024-25.pdf>
13. Censuswide (2025) *CTSI Consumer Polling*
14. NI Direct (n.d) *End the Harm campaign*. Available at: <https://www.nidirect.gov.uk/campaigns/end-the-harm>
15. HMRC (2025) *Annual outputs for tackling tobacco smuggling, 2024/25*. Available at: <https://www.gov.uk/government/publications/annual-outputs-for-tackling-tobacco-smuggling/outputs-for-april-2024-to-march-2025>

## Our Ten-Point Plan to Reclaim the UK's High Streets

1. National Audit Office (2021) *Protecting Consumers from Unsafe Products*. Available at: <https://www.nao.org.uk/wp-content/uploads/2021/02/Protecting-consumers-from-unsafe-products.pdf>
2. CTSI (2024) *CTSI Manifesto: Helping Local Communities and Businesses to Prosper*. Available at: <https://www.tradingstandards.uk/media/3180045/manifesto-final-version.pdf>
3. House of Commons Library (2025) *Local government in England: Structures*. Available at: <https://researchbriefings.files.parliament.uk/documents/SN07104/SN07104.pdf>
4. Home Office (2015) *Asset Recovery Incentivisation Scheme Review - February 2015*. Available at: [https://data.parliament.uk/DepositedPapers/Files/DEP2015-0223/ARIS\\_Review\\_Report\\_unmarked.pdf](https://data.parliament.uk/DepositedPapers/Files/DEP2015-0223/ARIS_Review_Report_unmarked.pdf)
5. CTSI (2025) *CTSI Member survey on SOC on UK high streets*.
6. Censuswide (2025) *CTSI Consumer Polling*
7. <https://www.gov.uk/government/statistics/port-freight-annual-statistics-2024/port-freight-annual-statistics-2024-overview-of-port-freight-statistics-and-useful-information>
8. Department for Transport (2025) *Transport Statistics Great Britain: 2024 Freight*. Available at: <https://www.gov.uk/government/statistics/transport-statistics-great-britain-2025/transport-statistics-great-britain-2024-freight#international-freight>
9. Tempo (2024) *5 European Countries that Will Fine Travelers Carrying Fake Designer Items*. Available at: <https://en.tempo.co/read/1875691/5-european-countries-that-will-fine-travelers-carrying-fake-designer-items>



Chartered Trading  
Standards Institute

