Update on Fraud and Unfair Trading

Committee considering report: Joint Public Protection Committee

Date of Committee: 8 December 2025

Chair of Committee: Councillor Tom McCann

Date JMB agreed report: 17 November 2025

Report Author: Sean Murphy

Forward Plan Ref: JPPC

1. Purpose of the Report

1.1 To provide the Committee with an update on the work of the Public Protection Service in tackling fraud, unfair trading and financial abuse.

2. Recommendations

The Committee:

- 2.1 **IS INFORMED** about the contents of this report.
- 2.2 **APPROVES** the approach being taken to tackling fraud, unfair trading and financial abuse.

3. Implications and Impact Assessment

Implication	Commentary
Financial:	The funding for these functions primarily comes from the service revenue allocations from Bracknell Forest, West Berkshire and Wokingham. The specialist investigation team consists of 4 Officers supported by financial investigators and intelligence officers. The total cost of the shared trading standards service is £1.36M This includes the investigations team but also all other trading standards activity from food standards to animal health and weights and measures to product safety, age restricted products and wider fair trading agenda etc.
	In addition, Level 2 and Level 3 investigations are generally supported via grant funding from Department for Business, Energy, and Industrial Strategy (BEIS) and managed by the National Trading Standards Board and Trading Standards South-East. In 2025/26 this grant funding is likely to be around £200K
	Work to tackle scams also receives grant funding from the Police and Crime Commissioner through each Council's community safety partnership grants. This grant is £45K per annum for three years,

Human Resource:	This work has previously and continues to be delivered through specialist resource employed by the service on a permanent basis.
	PPP is also supported by regional and national investigative resource and occasionally additional agency resource is bought through deployed grant funding. The regional support includes investigative support as well as access to regional intelligence capabilities.
Legal:	The Councils have a significant range of statutory responsibilities that are discharged through the shared service. These relate to unfair trading, consumer rights and counterfeiting amongst other matters. These matters are delegated to the Committee and operationally through the Inter-Authority Agreements of 2017 and 2022.
	The Councils can also institute legal proceedings if they are in the interests of residents in their area or in the case of many trading standards matters for offences committed anywhere in England or Wales.
	There is a large volume of legislation and associated statutory codes that govern investigations including the Criminal Procedures and Investigations Act 1996, Data Protection Act 2018, Police and Criminal Evidence Act 1984, the Regulation of Investigatory Powers Act 2002 and Investigatory Powers Act 2016.
	The Councils must have regard to the Human Rights Act 1988 and, in particular Article 1 Protocol 1 (Right to enjoyment of possession); Article 6 (right to a fair trial) and Article 8 (right to a family life i.e. free from unlawful intrusion) of the Charter on Human Rights.
Risk Management:	Failure to comply with the framework set out in the legal section above could lead to defendants being acquitted and the Councils facing judicial challenge together with the risk of reputation, damages and other sanctions.
	These matters are monitored through the service strategic and operational risk register resource.
Property:	None
Policy:	The Joint Public Protection Committee is charged with oversight of the delivery of the Public Protection Service. This report sets out the programme of delivery in a significant area of the Service's work.
	The Committee is invited to consider, comment and advise on strategic direction.

	Positive	Neutral	Negative	Commentary		
Equalities Impact:						
A Are there any aspects of the proposed decision, including how it is delivered or accessed, that could impact on inequality?		x		None – there is no decision to be made		
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?		х		None – there is no decision to be made.		
Environmental Impact:	Х			The activity of the team will have a positive impact on the environment.		
Health Impact:	Х			The activity of the team will have a positive impact on the health of our residents.		
ICT or Digital Services Impact:		х		None		
PPP Priorities :				The report will impact on the following PPP Priorities (delete those that are not appropriate) 1. Building Safer Communities 2. Protecting Consumers from Fraud 3. Protecting and Informing Consumers Business as Usual Activity is supported too.		
Data Impact:	DDD	0,44	ina::-	None		
Consultation and Engagement:	PPP Officers, Joint Management Board and the Case Management Unit have been consulted.					
Other Options Considered:	None					

4. Background and Update Report

4.1 At the Joint Public Protection Committee (JPPC) meeting held in October 2023 Members received a report on the approach taken by the Public Protection Service to tackle fraud and unfair trading in all its forms. The Committee resolved to receive an

- annual update report on this important area of work. This report updates on recent activity. It also contains some of the background set out in the previous report for the benefit of new Members on the Committee.
- 4.2 At its meeting in <u>June 2024</u> the Committee considered the Strategic Assessment for the service. Between that meeting and the meeting in October 2024 all three partner councils were consulted on the proposed priority areas and it was determined at the <u>October 2024</u> meeting that tackling the harm caused by fraud and unfair trading was to be a high priority for the service.
- 4.3 To put it in context, fraud is one of the most common crimes in England and Wales, accounting for more than 41% of all crimes. According to the National Crime Agency UK Finance 2025 reports unauthorised fraud losses totalled £722 million in 2024 an increase of two per cent from 2023 and authorised fraud losses accounted for £450.7 million of that sum.
- 4.4 Citizens Advice have recently reported that an estimated 10% of people across South-East of England were caught out by a scam in the past year. Nationally, more than seven million people are estimated to have been deceived by a scam in the past 12 months.
- 4.5 Citizens Advice's research shows more than a quarter (26%) of those across the UK were scammed while online shopping. These types of scams often include fake websites and buying and selling counterfeit or non-existent goods.
- 4.6 The top five scams identified by Citizens Advice are:
 - Online shopping scam (26%) Includes fake websites and counterfeit or non-existent goods,
 - Investment scam (18%) Like 'get rich quick' schemes and cryptocurrency scams,
 - Other financial scam (18%) Such as banking, fake loans, card and bank account fraud.
 - A friend or family member 'needs help' scam (16%) Tricked into thinking someone you care about needs money urgently.
 - Mobile phone network scam (14%) Includes being scammed into taking out a new contract or paying for a new handset.
- 4.7 A range of organisations are involved in tackling both the perpetrators and impacts associated with this criminal activity. The Public Protection Partnership plays a significant role in tackling fraud carried out in the course of business (or assumed business) activities and in the area of fraud commonly referred to as 'scams'. There are significant links and often a fine line between fraud and the statutory duty to enforce 'unfair trading legislation' as well as links to other acquisitive crime such as money laundering and dealing in counterfeit goods which is of itself considered a 'lifestyle crime' in law.
- 4.8 As fraudulent activity is often complex and has a high degree of sophistication it is often difficult for victims to identify that they are in fact victims of a fraud let alone how to protect themselves. Data shows that around a third of victims become repeat victims. People in vulnerable circumstances may be put on the derogatively named 'suckers

- lists' that are used and shared by fraudsters and can lead to people being repeatedly targeted. As a service we see many instances where victims are repeatedly targeted, often by 'Organised Crime Groups' (OCG's).
- 4.9 The consequence of fraud is not only financial. The emotional and psychological impact on victims results in feelings of anger, stress and anxiety often leading to depression and low self-esteem and a profound loss of trust in others. Victims can feel personally violated.
- 4.10 The reasons for this are many but include:
 - Victims may be or may feel heavily reliant on the trader/perpetrator and do not want to lose their support/services or indeed their contact.
 - They may have been psychologically groomed into thinking they are making good, reasonable choices and making reasoned, empowered decisions.
 - They may be anxious about being deemed to be incapable of managing their affairs because they have become a victim for fear of being placed in a care home or for a power of attorney to be put in place.
 - They are often not aware they are a 'victim' or indeed will be in denial that they
 have become a 'victim'. Shame can sometimes be a reason for not reporting the
 crime.
 - Victims are sometimes socially isolated without any friends or family members to encourage them to report the crime and may feel it is too trivial.
- 4.11 The following extract from a victim impact statement from a PPP case sets this out clearly:

Realisation hit me hard, my heart sunk and I had the most nauseating feeling in the pit of my stomach - this plastic folder in front of me with the enclosed Building Control Certificate and Electrical Certificate, handed personally to me by XXXX that morning of Thursday 24th August, were obviously fraudulent documents. All my fears of employing "the wrong builder" came true at that moment. I came off that call and broke down in tears, that feeling of total disbelief "Is this really happening to me?" I felt anxious, worried and stressed and then that dreadful feeling of how do I tell my partner XXXX and my two sons of this horrendous news and questioned myself how will this affect them? My emotions were all over the show, a mixture of feeling an idiot for not doing thorough research and homework on XXXXX prior to employing him (hindsight is a great thing) and a feeling of being cheated, used and abused. I had been most patient and kind to XXXXX throughout the build, making him and his two co-workers most welcome in our home, providing them with tea, coffee on their arrival every morning for 20 weeks and providing them with lunches whenever I could. It was a violation of my trust and most hurtful.

For two weeks thereafter I was an emotional wreck, I cried every time I walked into the new build, I hated it! I cried myself to sleep at night and had to be comforted by family members and close friends as well as feeling guilty for introducing XXX to my neighbours who had also employed him."

- 4.12 As stated above tackling fraud and unfair trading has been identified as one of the Key Priorities for the Public Protection Service in the Strategic Assessment 2024 27. The document highlights working with partners. In the case of fraud and unfair trading the Service will continue to work with partners such as Thames Valley Police and the South-East Regional Organised Crime Unit SEROCU and HMRC This work includes victim support and enforcement / intervention. Officers will continue to seek grant funding to support Level 2 / Level 3 fraud and unfair trading investigations and carry out operations to identify and tackle intellectual property crimes. The Service will also continue to undertake active media campaigns to raise awareness of fraud and the work we are undertaking to prevent it.
- 4.13 E-Crime has also been identified as one of the cross-cutting themes in the PPP's Strategic Assessment 2024/27. Online trading has seen significant growth in the last three years, driven by factors like increased digitalization, accessible apps, and the influence of the pandemic. The internet whilst being a vehicle for choice and information is all too often a vehicle for fraud, unfair trading, environmental crime and licensing breaches. The PPP looks for opportunities to tackle consumer and business detriment caused by e-crime across all its themes, priorities and projects.

PPP Resource with respect to Tackle Fraud and Unfair Trading

- 4.14 Fraud can range from a crude to a highly sophisticated activity. To tackle fraud the response must be equally sophisticated, and a range of tools and expertise needs to be deployed.
- 4.15 The Public Protection Service's delivery model is based on the 'National Intelligence Model'. Through this model Officers seek to tackle all areas of its work with a combination of preventative actions, intelligence gathering and analysis and enforcement. To this end, the Service has a strategic assessment and control strategy supported by a tactical tasking process with the service delivered through a number of specialist teams; trading standards, investigations team specialising in acquisitive crime, financial investigators and the case management and intelligence functions.
- 4.16 In addition, the service currently has two Public Protection Community Officers who assist victims of scams and their families with a range of preventative interventions and community engagement activities. This is supported by the PPP communications function and officers from trading standards forming a dedicated fraud awareness function.

Prevention

- 4.17 Preventing residents and businesses becoming the victims of crimes including fraud and unfair trading is a key priority for the service. The PPP recognises that awareness and information is key in protecting residents from scams and fraud and it is important to educate consumers to be fraud aware.
- 4.18 To this end the PPP has a range of interventions in place including:
 - Investigation of scams complaints and the provision of advice.
 - Practical interventions including the installation of free telephone call blockers and video doorbells. These are actively promoted, and a number of blockers are

currently available for supply on a loan basis and installation at no cost to the resident. These help the resident, and their family members feel secure in their own home.

- Regular talks and scams presentations are made to local community groups, Adult Social Care Teams/Social workers, care providers and schools.
- Challenging banks under the 'Banking Protocol' to recoup monies for consumers (often successfully) where there may have been some identified failing. Since 2023, a total of £446,730.55 has been recovered for victims within the PPP area.
- The creation of No Cold Calling Zones No Cold Calling Zones PPP
- Provision of scams information and no cold calling door stickers.
- Attending community events including partnering with TVP, banks and other agencies to raise awareness of scams and fraud and attending Lets Talk events.
- Ongoing programme of work with Citizens Advice West Berkshire.
- Attendance and contribution to multi-agency meetings to help combat fraud (regular MAFF meetings with Thames Valley Police)
- Networking with the Adult Social Care teams to raise awareness of what the Service does.
- Promoting the national trading standards initiative known as Friends against Scams: https://www.friendsagainstscams.org.uk/
- Promoting the work of the National Illegal Money lending team. The PPP is an
 official partner of the Team.
- 4.19 Communication also plays a significant role in preventative measures and the Service's social media channels, resident's newsletter contributions and website are actively used to highlight enforcement actions and to issue warnings to create a deterrent. Press releases are issued directly to the local media which are often recognised and published more widely. Some of these get picked up by the national media Victim of Theale roque trader 'cried for a fortnight' after build BBC News Examples of these can be found at Appendix A. In addition, Officers conduct regular radio interviews on the scams and fraud work conducted and the PPP's work, in relation to tackling unfair trading and fraud, was featured in an episode of SAS Catching the Criminals on BBC. This can be found here. BBC iPlayer SAS: Catching the Criminals Series 1: Episode 12
- 4.20 The PPP also participates in National Trading Standards Scams projects which includes the Friends Against Scams work and supporting victims identified through national and international enforcement measures. More on these projects can be found here: National Trading Standards Scams Team National Trading Standards
- 4.21 All staff within the Public Protection Service are required to have safeguarding training including the identification of financial and other forms of abuse and the service has a designated safeguarding lead currently the Senior Officer Community Protection &

Health. Where an officer believes someone is the victim of financial abuse e.g. so-called 'romance scams' they will work with colleagues and partners to ensure the appropriate support and safeguards are put in place. Significantly, Officers also work with friends and families of victims to put in place measures such as those described in 4.15 above. Likewise, the Service receives referrals from Adult Social Care colleagues and attend safeguarding forums to share ideas and best practice. The service's Public Protection Community Officers and Investigators conduct joint visits with partners to support victims.

- 4.22 The Team also raises awareness of these issues and general unfair trading matters through briefings with police colleagues. At various times officers have presented alongside TVP officers. For many years the PPP has also been involved in delivering the training for all PCSO's participating in the TVP training programme at Sulhamstead in recognition that it is often the neighbourhood teams on the ground that can play an important role in identifying possible fraudulent activities and unfair trading practices.
- 4.23 The PPP has recently signed up to the Fraud Victims Charter which can be found at Appendix A to this report. This again demonstrates the teams commitment to supporting victims for fraud.
- 4.24 Finally, officers work with colleagues from community safety teams and partnerships from all three Local Authorities to deliver against common objectives and attend meetings such as the Wokingham PTSG (Priority Setting Tasking Group), and in some cases access funding to support victims.

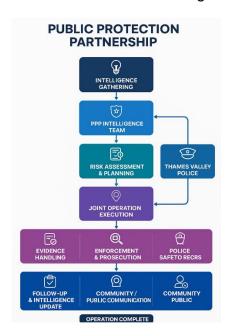
The Deployment of Intelligence

- 4.25 Credible intelligence is critical to tackling fraud and unfair trading. The biggest source of intelligence by far are members of the public who report matters directly to us or by partner agencies such as TVP, Citizens Advice Consumer Line and Action Fraud. The service also receives a significant amount of information through ward members, local MPs and town and parish councils.
- 4.26 It is these reports from residents, businesses, councillors and consumers that are often the trigger for an investigation. Every referral and notification from the national Citizens Advice Consumer Line and those directly entering the service (via email, telephone and web forms) are monitored and reviewed daily. They are then considered in the context of the intelligence picture with a view to identifying any emerging trends related to unfair or fraudulent trading activities.
- 4.27 Once an investigation is commenced the intelligence picture is developed using a range of sophisticated techniques and software packages that can connect nominals and assets. Often this involves the analysis of financial data as well the use of communication data both of which can be obtained within a system of strict regulatory and (in the case of financial information) judicial oversight. The use of communications data and any surveillance considerations are informed by the <u>Regulatory of Investigatory Powers Policy</u>
- 4.28 Finally, the service has a range of data sharing protocols which give us access to vital information. This includes access to material held on the Police National Database (PND) and the Police National Computer (PNC) and data sharing protocols with HMRC, DWP and the National Anti-Fraud Network. The Service also shares an intelligence database with all other trading standards services, regional trading

standards enforcement teams and the National Intelligence, Scams and eCrime units of National Trading Standards.

Enforcement - Level 1/2/3 Fraud and Unfair Trading

- 4.29 At any one time the service is investigating a significant volume of unfair trading and acquisitive crime matters including counterfeiting, fraud, money laundering and the sale of illicit goods. These are investigated by trading standards and the specialist investigation team comprised of Trading Standards Officers and Investigators who are solely dedicated to the most complex matters.
- 4.30 Where there is evidence of offences inside and outside of the PPP area grant funding is sought from the National Trading Standards Board to progress these investigations. Funding and other practical support mechanisms (including allocated staff) are also available from Tri Region Investigation Team which covers the South-East, London and the East of England. Financial support includes support for investigation work, expert witnesses, forensics and legal costs.
- 4.31 Day-to-day the service operates a Rapid Response Protocol with respect to Doorstep Crime incidents and officers will attend blue light events as soon as notification is received that a crime is in progress.
- 4.32 The Service will also work closely with other partners including TVP, other trading standards services and regional crime units. Investigations often require warrants to be executed at home addresses and arrests to be made, and officers work with a number of police forces and regional crime teams such as South-East Regional Organised Crime Unit (SEROCU) to arrest suspects where arrest criteria are met and it is necessary to further the investigation. The illustration below shows how the operations are managed within the service and working with partners:



4.33 The Service has four staff accredited by the National Crime Agency to conduct and supervise investigations under the Proceeds of Crime Act 2002 into money laundering and where appropriate to conduct confiscation proceedings to recover the proceeds of crime. This includes the ability to restrain assets whilst proceedings are on-going or in the event of a conviction. Judicial oversight of this work is undertaken by the Judiciary

- at Reading Crown Court. The Service also have the support of a Financial Intelligence Analyst.
- 4.34 Many of the victims Officers encounter have vulnerabilities that make them eligible for so called 'special measures'. This includes video recorded evidence in the main. The service has several officers specially trained and highly skilled officers to take video recorded evidence from both adults and children. Officers engage these measures following review and assessment by the relevant senior manager.
- 4.35 The service engages a wide variety of expertise whilst investigating matters. These can include expert witnesses e.g. chartered surveyors, vehicle examiners etc, along with computer and phone forensics experts, forensic accountants, handwriting and other forensic experts. Digital data can be critical and in the modern era the Service has seen several complex investigations built around digital and financial evidence. The PPP also has staff trained in online investigations with access restricted to two officers with digital data expertise who follow the Association of Chief Police Officer's (ACPO) guidance on digital evidence.
- 4.36 Over the period of the PPP's existence, staff have investigated a large range of complex fraud and unfair trading matters relating to a range of trading activities including second hand car sales, doorstep crime, advanced fee fraud, serviced accommodation, solar energy, locksmiths, plumbing, timeshare re-sale and the sale of puppies. The scale of these investigations has included levels of detriment ranging from hundreds or thousands of pounds to multi-million-pound frauds and money laundering cases. An example of this is Operation Cara which was a property related fraud that resulted in a conviction for fraudulent trading and forgery and counterfeiting offences following an eight week trial at Reading Crown Court.
- 4.37 The Joint Case Management Unit supports the enforcement functions. Every investigation with a degree of complexity is allocated a lawyer from the unit from the outset. It may also be allocated to an Accredited Financial Investigator if appropriate. The unit provides a variety of roles which includes advising on the application of the law throughout the lifetime of the investigation, checking procedural applications such as warrants, considering intelligence data applications and ultimately considering case files and disclosure related matters. The team work closely with West Berkshire Legal Services on West Berkshire cases.
- 4.38 Relevant officers have undertaken Disclosure Training, RIPA Training and case file preparation throughout the 2025/26 financial year.
- 4.39 The Strategic Manager Case Management role (which is currently vacant) oversees the conduct of financial investigations and along with the Service Lead is able to authorise the making of judicial applications under the Proceeds of Crime Act 2002. Finally, the Service also has a specialist disclosure function to ensure its obligations under the Criminal Procedures and Investigations Act 1996 are fulfilled. The Strategic Manager role is currently being covered in part by the Service Lead Public Protection along with other staff.

Activity Since Last Report

4.40 In the last twelve months the Service has investigated or is investigating over twenty cases relating to property related fraud and unfair trading. A number of these are now in the court system and a number are still under investigation. In addition, there are

XXXXX cases being investigated with respect to money laundering and confiscation. Confiscation with respect to these types of cases is focussed on recovering money for the victims. The total amount of detriment under investigation by the service runs to several million.

4.41 At the time of writing (end October 2025) the total amount paid out by PPP residents on doorstep crime / householder incidents is £957,577. The losses to all victims including those out of area is significantly higher. The following table gives more detail:

Identified Loss	Total Number of Incidents Total Year to date across PPP area 2025 to 2026	Average Loss	Money Recovered	Live Level 2/3 Operations
£957,577	105	£9,119	tba	tba

- 4.42 Examples of unfair trading and fraud cases from 2025 can be found in the links at **Appendix B** to this report.
- 4.43 Looking ahead the PPP is seeking to strengthen its ability to tackle and prevent this type of crime and are exploring working with the Crown Prosecution Service to apply for Serious Crime Prevention Orders in appropriate cases.

5. Concluding observations

- 5.1 A so-called scam is a fraud and it is one of the biggest crime issues of our time. Although fraud and unfair trading is as old as time it has become more sophisticated and many consumers are subject to frequent attempts to defraud them through all mediums, phishing emails, scam telephone calls, unsolicited doorstep traders and increasingly trader platforms.
- There has been a huge growth in e-crime. This is probably the largest emerging threat. The perpetrator does not need to be physically present, the risk of being caught is reduced. Multiple people can be targeted at the same time, and the scam can be changed at the push of a button to exploit changing circumstances. Something that has been seen time and again, recently with the winter fuel payments, parcel deliveries and the digital switchover.
- 5.3 Fraudsters will exploit peoples lack of knowledge as has been seen in green energy scams, some will exploit people's trust pretending to be family members in need of money or catfishing on social media. These can be professional and convincing and most of these frauds or attempted frauds remain unreported.
- 5.4 We are all capable of falling victim to fraud and unfair trading everyone has moments of vulnerability where they are caught off-guard. Sadly, many actual victims of fraud and unfair trading are often amongst the most vulnerable in our communities. For those most vulnerable, the effects of becoming a victim can be life-changing losing large

- sums of money can impact on their financial security, there may be a loss of confidence and an on-going fear of further targeting.
- 5.5 The effects can quite literally lead to the loss of independence, health issues and more reliance on support from family members and the state. The impacts on mental health can be devastating as can be seen from the impact statement above. Alternatively early intervention and focus on preventative measures can be change the course of peoples lives and the need for costly interventions such as care costs further down the line.
- 5.6 This report sets out some of the steps the Public Protection Service is taking to protect residents and legitimate businesses. This work is delivered across Bracknell, West Berkshire and Wokingham under the various shared service arrangements. The ability to deliver these levels of protection in the way the Service does is enhanced by those very arrangements and deliver on the original business case which includes pooling resources and developing expertise. That expertise is recognised both regionally and nationally.

6. Appendices

Appendix A – Victims Charter

Appendix B – Selection of Press Releases

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