

**London Boroughs of Brent & Harrow  
Trading Standards Joint Advisory Board  
3 November 2026  
Report from the Senior Service Manager**

**FOR INFORMATION**

**Serious and Organised Crime on the High Street: The Role of  
Trading Standards in Protecting Communities and Supporting  
Legitimate Business**

**1.0 Purpose of the Report**

- 1.1 The purpose of this report is to inform Members of the increasing presence of serious and organised criminality operating through retail premises on UK high streets and the implications for Brent and Harrow.
- 1.2 The report summarises key findings from the Hidden in Plain Sight: Tackling Crime on the UK's High Streets<sup>1</sup> report published by the Chartered Trading Standards Institute (CTSI) and the Tackling Illicit Activity in High Street Shops briefing published by the House of Commons Library<sup>2</sup>.
- 1.3 The report outlines the role of Trading Standards in protecting consumers, disrupting criminal activity, supporting legitimate businesses and contributing to wider community safety objectives.

**2.0 Recommendations**

That Joint Advisory Board Members:

- 2.1 Note the findings set out within this report regarding the emerging national trend of organised crime groups operating through seemingly legitimate retail premises.
- 2.2 Recognise the significant contribution made by Brent and Harrow Trading Standards in tackling illicit tobacco, illegal vaping products, counterfeit goods, unsafe consumer products and other criminal activity.
- 2.3 Supports the continuation of intelligence-led enforcement activity and partnership working across Brent and Harrow.

**3.0 Details**

**National Context**

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<sup>1</sup> [hidden-in-plain-sight-tackling-crime-on-the-uks-high-streets.pdf](#)

<sup>2</sup> [Tackling illicit activity in high street shops - House of Commons Library](#)

- 3.1 High streets remain a fundamental part of local communities and economies. However, changing retail patterns, vacant commercial premises and economic pressures have created opportunities for organised criminal groups to establish operations within retail environments.
- 3.2 Evidence presented by the CTSI demonstrates that organised crime groups are increasingly using retail premises to facilitate criminal activity including:
- Money laundering
  - Illicit tobacco sales
  - Illegal vape sales
  - Counterfeit goods distribution
  - Consumer fraud
  - Labour exploitation and modern slavery; and
  - Wider organised criminality.
- 3.3 The National Crime Agency estimates that at least £1 billion criminal cash is laundered annually through high street businesses, particularly cash-intensive business sectors.
- 3.4 The issue has become a national enforcement priority, with government establishing a dedicated High Street Organised Crime Unit and increasing the resources available to enforcement agencies.

### **Key Findings from Recent National Reports**

- 3.5 The CTSI report identifies serious, organised crime operating through retail premises as one of the most significant challenges currently facing the Trading Standards profession.
- 3.6 A survey of Trading Standards professionals found
- 96% had encountered organised crime groups during their duties.
  - 97% were aware of suspected organised crime groups operating from local retail premises; and
  - 99% had observed an increase in cash-intensive businesses opening on local high streets since 2020.
- 3.7 National enforcement activity has identified a range of business types associated with illicit trading, including convenience stores, vape retailers, fast-food outlets and so-called "American candy" stores.

- 3.8 The CTSI report concludes that activity associated with counterfeit goods, illicit tobacco and illegal vaping products is often linked with wider serious criminality including human trafficking, labour exploitation, drug supply and money laundering.

### **Role of Trading Standards**

- 3.9 Trading Standards is the lead enforcement authority in several areas directly linked to illicit high street activity, including:
- Product safety
  - Counterfeit goods investigations
  - Tobacco control;
  - Vape compliance
  - Under-age sales enforcement; and
  - Consumer protection legislation
- 3.10 Although Trading Standards is not the primary agency responsible for investigating serious, organised crime, officers frequently identify offending businesses and gather intelligence that contributes to wider criminal investigations.
- 3.11 Brent and Harrow have diverse local economies and vibrant town centres that rely upon legitimate businesses operating within a fair and regulated marketplace.
- 3.12 The presence of businesses engaged in illicit activity can:
- Expose residents to unsafe products
  - Undermine consumer confidence
  - Create unfair competition for compliant businesses
  - Reduce tax revenues available for public services; and
  - Contribute to wider criminal activity within local communities
- 3.13 Intelligence and enforcement experience locally mirrors trends identified nationally, particularly in relation to illicit tobacco, illegal vaping products and counterfeit consumer goods.
- 3.14 Whilst many businesses within Brent and Harrow operate responsibly and lawfully, a small number of rogue operators continue to present significant risks to consumers and legitimate traders.
- 3.15 Brent and Harrow Trading Standards adopts an intelligence-led approach to

enforcement, focusing resources where risk to consumers and communities is greatest.

3.16 Activity includes:

- Joint inspections with partner agencies
- Targeted intelligence gathering
- Enforcement visits to high-risk premises
- Test purchasing operations
- Seizure of illicit products
- Investigation of counterfeit goods supply chains; and
- Participation in regional and national operations.

3.17 National focus such as Operation Machinize (a nationwide, multi-agency law enforcement crackdown led by the National Crime Agency and the National Police Chiefs) and Operation Zoridon (a police led campaign to disrupt businesses handling stolen goods) ensure that Brent and Harrow remains resilient to the threat posed by criminal enterprises operating through retail premises. To maintain this position, the following priorities are proposed:

- Strengthen intelligence sharing arrangements with Metropolitan Police, Licensing, Planning Enforcement and regional partners to improve identification of high-risk premises.
- Continue targeted interventions within sectors identified as presenting higher risk nationally, including:
  - Vape retailers;
  - Retail convenience stores;
  - Tobacco retailers;
  - Cash-intensive businesses; and
  - Premises subject to repeated complaints.
- Host reporting mechanisms that enable residents, businesses and elected Members to provide intelligence relating to suspected illicit trading activity.

## 4.0 Financial Considerations

4.1 Any significant new initiatives identified through future enforcement activity will be considered within existing budgetary and governance arrangements.

## 5.0 Legal Considerations

5.1 Trading Standards officers hold a range of statutory powers to enter and inspect

business premises, examine goods and records, take samples, and investigate potential breaches of consumer protection and trading legislation. These powers support the Service's role in protecting consumers, promoting fair trading, ensuring legal compliance by businesses and help to identify and eliminate organised crime taking root in our high street business premises.

## **6.0 Equity, Diversity & Inclusion Considerations**

- 6.1 The proposals in this report have been screened to assess their relevance to equality and were found to have no equality implications.

## **7.0 Consultation with Ward Members and Stakeholders**

- 7.1 There is no requirement to specifically consult Ward Members about this report as it affects all wards across both Boroughs.

## **8.0 Human Resources Implications**

- 8.1 There are no human resource or property implications arising from this report although it should be noted that the number of staff vacancies currently within the Service may result in a reduced ability to generate income, as well as the continued restrictions during the pandemic.

### **Contact Officer**

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