

# Textile theft: An evaluation of used textiles theft and bogus collections in London



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Project Partners



## Executive Foreword

The UK used clothing and textile collection sector is something that this country can be proud of. We are amongst the best in the world at donating used clothing for re-use and recycling. Around 700,000 tonnes is collected annually. This helps, not only to raise hundreds of millions of pounds for charity, but also enables local authorities to generate income and increase recycling. Thousands of people are employed directly through the industry in the UK and millions of people throughout the world.

The industry enables people, usually in Africa or Eastern Europe, to buy good quality, fashionable clothing at affordable prices. It also fills an important gap in the market that native textile producers in developing countries have not been able to meet.

Diverting textiles away from landfill produces greater carbon benefits than almost every other major household waste stream<sup>1</sup>. Diversion also results in significant water and waste benefits. This means that although textiles only account for an estimated 3% of all household waste, it has become increasingly apparent that it is important to target textiles for recycling. That is why national Governments including our own, and the European Union, are placing increasing importance on diverting textiles away from disposal.

Despite this, and a rise in the value of used clothing between 2005 and 2012, the financial viability of the UK used clothing industry has been eroded through the appearance and proliferation of bogus charity collections and theft of used clothing from door to door collections, textile banks and other collections. In 2014 we now find ourselves at a critical point.

Between 2005 and 2012 we experienced an unprecedented and continued rise in the value of used clothing. The income that charities and local authorities could expect to receive from textile bank operators rose from around £35/tonne to around £300/tonne. Prices remained firm throughout 2013, despite a spate of business closures. The market began to boom just after eight Eastern European Countries joined the EU in 2004. Eastern Europe was already an important market for the international used clothing trade and this EU enlargement opened up the trade for the UK in particular, as unlike most other existing members, the UK did not impose any transitional arrangements with the new member states. At the same time it also meant that collectors from the new member states were able to come here and compete for used clothing collections.

As the market got bigger and competition heated up, prices rose and this inevitably attracted the unwanted illegal collections. Much has been written in the media and on the internet about bogus charity collections and used textile theft, which may have undermined public confidence in collections; and although we have seen estimates that up to 15% of all used clothing/textile donations are being lost through theft in the UK as a whole annually, to date no independent research has been undertaken to validate these estimates.

The research detailed in this report is the first of its kind to independently verify losses through theft and the findings are encouraging. The report estimates that less than 2% of used textiles collected door to door in London are stolen and that bogus charity collections are far less common than they were a few years ago. Theft from textile banks in London is

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<sup>1</sup> Waste Strategy for England 2007 – Chart 4.1 p.54, DEFRA.

higher with an estimated 11% of goods being stolen, but this is still lower than was previously thought. Furthermore, this report has identified and recommended a number of measures that textile bank operators can take to reduce theft levels further.

Improvements in monitoring, bank design, enforcement and prosecutions have all had their role to play in reducing theft, but we also acknowledge that current market conditions for used textiles are likely to have impacted on theft rates.

In 2014, the market price of used clothing has fallen dramatically in the UK and many legitimate collectors that survived the spate of closures in 2013 are struggling to stay in business. Many industry stakeholders have reported a decline in illegal collections and attributed this at least in part to the market decline. The current difficult conditions may have provided a silver lining by contributing to lower theft rates of used clothing and textiles. However, we urge all relevant stakeholders to remain vigilant, take heed of the recommendations made in this report and where necessary instigate new measures to reduce theft levels further.

We are delighted to be given this opportunity to undertake this ground breaking piece of research on behalf of the London Textiles Forum, jointly funded by the London Waste and Recycling Board, to get a more accurate and validated assessment of the scale of the problem of used textile theft in the capital. This report has developed a series of recommendations that will help textile collectors, charities, local authorities and other stakeholders engaged in used textile collectors to mitigate their risks of loss through theft and to make it more difficult for illegal operators to re-establish themselves when the sector becomes more financially viable again.

Alan Wheeler – Director – Textile Recycling Association.

## **Background to LWARB**

The London Waste and Recycling Board (LWARB) was established by the Greater London Authority Act 2007 to promote and encourage the production of less waste; an increase in the proportion of waste that is re-used or recycled; and the use of methods of collection, treatment and disposal of waste which are more beneficial to the environment in London. LWARB has a fund made up of funding from central Government (DEFRA) to achieve these objectives.

## **Textile Re-use and Recycling Fund**

This report has been funded by the LWARB Textile Reuse and Recycling Fund. The aim of the Textile Re-use and Recycling Fund is to improve the management of post-consumer textiles (both clothing and non-clothing). Textiles are a national priority material due to the positive environmental, social and economic impacts of diversion from landfill and re-use.

## **Objectives of the Fund**

- Divert 5% (6,500tpa) of clothing textiles currently going to disposal (landfill/EfW) to re-use and recycling by March 2015.
- Divert 5% (4,000tpa) of non-clothing textiles currently going to disposal up the waste hierarchy to re-use and recycling by March 2015.
- To recognise the economic value of textiles by realising £1.95m of value from the 5% of clothing textiles that currently go to disposal by diverting it to re-use and recycling by March 2015.

Find out more at [www.lwarb.gov.uk](http://www.lwarb.gov.uk)

## **Background to the Textile Recycling Association**

The Textile Recycling Association (TRA) is the UK's trade association for collectors, graders, exporters and processors of used clothing and textiles. It was established in 1913 and was a founding member of the Bureau of International Recycling in 1948. The key objectives of the association are to:

- To represent the interests of its members locally, nationally and internationally;
- To be a major force in creating a favourable climate within which merchants can operate;
- To promote textile recycling and the second hand clothing/shoe re-use and recycling industry.

In order to achieve these objectives it is important that the association ascertain the relevant industry facts and where the information is lacking undertake research to inform relevant stakeholders. It is within this context that the TRA acted as the lead organisation that undertook this research.

For further information visit [www.textile-recycling.org.uk](http://www.textile-recycling.org.uk).

**Written by:** The Textiles Recycling Association and LRS Consultancy Ltd

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## Executive Summary

The theft of used textiles and bogus charity collections has a significant impact on legitimate collections from the kerbside (door to door) and textile banks. This seriously affects the ability of charities, local authorities and commercial textile recycling businesses to operate collections effectively at a profit, to provide social value and deliver any required public benefit. Some estimates put losses to UK charities at £50m annually. Other estimates suggest that about 15% of used textile items that have been donated are stolen in the UK, significantly impacting recycling performance. These figures had never been independently validated, and this report sets out to do so for London.

LWARB funded a joint project through the Textiles Recycling Forum to explore the scale of the textile theft problem in London and identify mitigation measures. The project included a 12 week trial, conducted from April - July 2014, to monitor theft from textile banks and door-to-door collections across four London boroughs: Barking & Dagenham, Lewisham, Redbridge and Sutton. These boroughs were selected because they provide a representation of the economic and social structure of London as a whole, and project partners, Clothes Aid and LMB operate in all four boroughs. Bogus charity collections across London were also assessed during the same period.

The project found that there is potential to implement anti-theft initiatives and monitoring mechanisms to reduce textile theft and the negative impacts on textile recycling industry in London. It is recommended that the theft prevention mechanisms detailed in the report are shared with London Textile Forum members and incorporated into operational collections for textiles. This would assist the process of capturing the maximum amount of material for re-use and recycling in the capital in the future.

The project was conducted at a unique trading period for used textiles due to the situation in destination markets. The majority of clothing for re-use goes to Eastern Europe (Poland, Lithuania, Ukraine etc.) or into Sub Saharan Africa. Both regions suffered a slowdown in trade in used textiles at the time of the project<sup>2</sup>.

As a result, prices per tonne of used textiles in 2014 have dropped, making theft of these materials less appealing. In addition, improved detection and enforcement coupled with an increase in prosecutions, has made it harder for criminality in this sector. Furthermore, the use of the Proceeds of Crime Act, increasing custodial sentencing and money seizures, has played a significant part in combatting textile theft, and is very welcome. Activity by various agencies not just the police but the Insolvency Service, Trading Standards and notably Her Majesty's Revenue and Customs/United Kingdom Border Agency (superseded by the National Crime Agency) has also helped.

All stakeholders interviewed as part of the project commented on how a drop in value of used textiles can be considered to lower instances of theft. Understanding the market and dedicating greater resources and mechanisms during times of high value should therefore help to protect against theft and fraudulent collections.

The key findings of the project are:

### **Textile Bank Collections:**

- Based on the findings of the trial, it appears more likely that several textile banks will be targeted for theft during the same period of time, rather than for any one textile bank to be targeted repeatedly.

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<sup>2</sup> See Appendix I for background information on fall in value of used clothing.

- It appears easier for thieves to access contents of textile banks with “letter box” style openings rather than “chuted” openings. Banks with external locks may also be more susceptible to theft.
- Collecting robust data through monitoring fill levels and comparing these with weighbridge data, as well as maintaining a descriptive inventory of banks, including the bank type and location, can help identify patterns of theft and map hotspots.
- For textile banks that are targets for theft, more frequent collections help to keep the fill level of the textile banks down and therefore make theft less likely as there is less to steal and items are harder to reach.

### **Door-to-door Collections:**

- Providing clear identification, transparent information and relevant contact details to householders is of key importance in enabling potential donors to make a more informed decision about whom they donate to.
- Dedicating more collection vehicles to collection rounds or streets that are susceptible to theft should help to reduce opportunities for theft.
- Establishing relationships with other collectors and charities to create information networks and alliances may provide protection against illegal operations.
- Partnering with local authorities that are well placed to provide guidance to householders, should also be of great benefit.
- Giving advice on how to report suspicious activity may increase awareness (refer to section 7.3.3 for need for a central point of contact such as the National Crime Agency).

Whilst stakeholders in other parts of the country may find the conclusions of interest, it would be difficult to extrapolate the evidence gathered in this study and apply it with confidence to other parts of the UK. In order to get a more accurate picture of textile theft throughout the UK, it would be advantageous to undertake separate investigations in a variety of geographical locations.

# Contents

	<b>Executive Foreword</b> .....	<b>Error! Bookmark not defined.</b>
	<b>Background to LWARB</b> .....	<b>i</b>
	Textile Re-use and Recycling Fund.....	iii
	Objectives of the Fund .....	iii
	<b>Background to the Textile Recycling Association</b> .....	iii
	<b>Executive Summary</b> .....	
	List of tables .....	iii
	Table of figures .....	iv
	Acknowledgements .....	v
	Glossary.....	vi
<b>1.0</b>	<b>Introduction</b> .....	<b>1</b>
1.1	Project Overview .....	1
1.2	Project Objectives .....	1
1.3	Literature Review.....	2
<b>2.0</b>	<b>Methodology</b> .....	<b>6</b>
2.1	Collection Monitoring.....	6
2.2	Bogus Collections/Bogus Charity Collections .....	12
2.3	Stakeholder Interviews .....	12
<b>3.0</b>	<b>Assumptions and limitations</b> .....	<b>14</b>
3.1	Collection monitoring .....	14
3.2	Bogus Collections.....	15
<b>4.0</b>	<b>Collection Monitoring: Key Findings</b> .....	<b>16</b>
4.1	Textile bank collection monitoring.....	16
4.2	Door-to-door collections .....	17
<b>5.0</b>	<b>Supporting Research: Key Findings</b> .....	<b>20</b>
5.1	Bogus Charity Collections.....	20
5.2	Stakeholder Interviews .....	22
<b>6.0</b>	<b>Clothes Aid Collection Protection</b> .....	<b>25</b>
<b>7.0</b>	<b>Conclusions</b> .....	<b>26</b>
7.1	Potential theft patterns .....	26
7.2	Potential contribution to LWARB targets.....	26
7.3	Scaling up findings for a UK perspective.....	27
7.4	Measures and recommendations for operators.....	27
	Appendix I: Background information on the fall in the value of used clothing in 2014.....	31
	Appendix II: Literature Review Findings .....	31
	Appendix III: Comment by Clothes Aid on Enforcement Action Taken.....	37
	Appendix IV: Stakeholder Interviews .....	37
	Appendix V: Literature Review Bibliography .....	40

## List of tables

Table 1: Methods of theft identification by the literature review.....	2
Table 2: Summary of data from literature review .....	3
Table 3: Type of textile collection operation carried out by the organisations interviewed. ....	13
Table 4: Estimated fill level conversion table.....	14
Table 5: Distributions and filled bags for other charitable organisations (legitimate and illegitimate).....	18
Table 6: Estimated loss from potential theft incidences .....	20
Table 7: Summary of types of literature reviewed .....	31
Table 8: Organisations actively monitoring textile theft. ....	39
Table 9: Organisations recording textile theft.....	39

## Table of figures

Figure 1: Bogus bag example .....	2
Figure 2: Incidents reported to Clothes Aid in the UK 2006-2010.....	5
Figure 3: Summary of the project research approach.....	6
Figure 4: Example of a textile bank with a letter box opening.....	7
Figure 5: Example of a textile bank with a chuted opening.....	7
Figure 6: Approach to textile bank monitoring.....	8
Figure 7: Illustration of theft identification methodology from fill level analysis.....	9
Figure 8: Clothes Aid used textiles door-to-door collection methodology .....	10
Figure 9: Householder survey questionnaire.....	11
Figure 10: Split of monitoring routes.....	17
Figure 11: Response from non-theft respondents .....	19
Figure 12: : Location of volunteers' home residence .....	21
Figure 13: The distribution of clothing collection bags received per household in May 2014 .....	21
Figure 14: Breakdown of classification of collections .....	22
Figure 15: Reports of theft to Clothes Aid collection protection helpline 2009 – 2014.....	25
Figure 16: Stakeholders providing guidance and information on correct practice and conduct for charitable and other textile collectors.....	34
Figure 17: FRSB Campaign 2011/2012 Leaflet .....	35
Figure 18: FRSB Give With Confidence logo.....	35
Figure 19: Development of the market price for used textiles. ....	38

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The report was put together for the London Waste and Recycling Board (LWARB) by the Textile Recycling Association (TRA) and LRS Consultancy Ltd (LRS) in partnership with Lawrence M Barry & Co (LMB) Textile Recycling and Clothes Aid (Services) Ltd (Clothes Aid).

This report would not have been possible without the participation of the representatives of the following organisations, who participated in project activities that created the data sets and insights which have served as the evidence base for this report. Special thanks are owed to the local authorities who enabled the data collection and monitoring to be carried out in their areas:

The London Borough of Barking and Dagenham

The London Borough of Lewisham

The London Borough of Redbridge

The London borough of Sutton

LWARB and the project partners would also like to thank:

Bag It Up

Bag2School

British Heart Foundation

Charity Retail Association (CRA)

Chris Carey's Collections

East London Textiles

European Recycling Company (ERC)

London Textiles Forum

LW Sait and Sons LLP

Oxfam

Salvation Army Trading Company

TRAID

## Glossary

Bogus Collections/ Bogus Charity	Refers to collections made by individual criminals or organised gangs that target clothing collections for their own personal profit, often posting misleading materials through doors appealing for clothing donations. The leaflets can imply a charitable purpose but are fraudulent or misrepresentative.
Civil Society	Refers to organisations that are charitable or philanthropic in nature.
Distributions	Refers to bags or leaflets distributed by or on behalf of door-to-door used textiles collectors that request donations.
Door-to-door	The collection of filled bags of used textiles from the kerbside.
Textile banks	Containers made available to residents to dispose of used textiles.
Used textiles	‘Used textiles’ includes clothing and non-clothing items (e.g. curtains, bed linen etc.) and footwear

## 1.0 Introduction

### 1.1 Project Overview

The theft of used textiles and bogus charity collections has a significant impact on legitimate collections from the kerbside (door to door) and textile banks. This seriously affects the ability of charities, local authorities and commercial textile recycling businesses to operate collections effectively at a profit, to provide social value and deliver any required public benefit.

In addition, used textile collecting, sorting and processing requires substantial manual labour. Thus, the reduction of available textiles through theft has been blamed for recent increases in UK workforce redundancies in the secondary textile industry.

To get a scale of the problem, some estimates put losses to charities at £50m annually<sup>3</sup>. Other estimates suggest that about 15% of used textile items that have been donated are stolen<sup>4</sup>, significantly impacting on official recycling figures. However, to date, no detailed study of the scale of theft has been undertaken and the available figures have not been validated by a third party in the UK.

The lack of research into textile theft means that it has been difficult for law enforcement agencies, such as the police, to get a true understanding of the scale and nature of the problem. In addition, professionals working in the used textile sector believe that the vast majority of incidents of theft go undetected and/or unreported, and that as a result, official crime figures bear no resemblance to the actual scale of the problem.

Reducing theft of used textiles has a key role to play in helping LWARB to meet its targets to increase the official proportion of waste that is re-used or recycled. To this end, LWARB funded this joint project through the Textiles Recycling Forum to explore the scale of the textile theft problem in London and to identify mitigation measures.

This project report seeks to help businesses, charities and local authorities to gain a better understanding of the textile theft arena and suggest possible actions that could be taken to help reduce theft.

Reducing theft can improve revenue streams for legitimate parties; generate growth potential in the collection and sorting sectors; and develop the potential to understand and improve collection rates for re-use and recycling.

### 1.2 Project Objectives

The overarching aim of the project is to provide a more accurate assessment of the scale of used textile theft from door to door, textile banks and other collections in London. The project seeks to achieve the following four key objectives:

- To provide a more accurate assessment of the scale/impact of used textile theft in London, in terms of revenue and tonnage lost;
- To establish potential patterns of theft, for example whether some collections are more susceptible to theft and the reasons behind this;

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<sup>3</sup> This figure is based only on fragmented informal assessments and anecdotal evidence supplied by individual stakeholders

<sup>4</sup> 15% is an estimated figure by the members of the Textile Recycling Association, based on their experience with textiles theft.

- To identify measures and recommendations that will help organisers of both existing and future collections to mitigate risks, improve tonnages collected and improve revenue; and
- To put a spotlight on the nature of this type of crime and help local authorities and other stakeholders to address its impacts on the “street-scape” and make improvements to increase social value and public benefit.

### 1.3 Literature Review

A review of publically available literature was undertaken to establish any available data or information that could provide estimates or indicatory information on the size and scale of the clothing theft problem, either locally, nationally or internationally. Greater detail can be found in Appendix II: Literature Review Findings.

The used textiles trade is complex and influenced by an ever-changing range of economic, geographical and political factors.<sup>5</sup> The average price per tonne for used textiles soared between 2005 and 2012 and held firm until early 2014 due to the high demand from overseas territories for used textiles.<sup>6</sup> The income that a local authority or charity could expect to receive from a textile bank operator, rose from around £35/tonne in January 2005 to about £300/tonne in December 2012<sup>7</sup>. In the first 8 months of 2014 this income dropped by around £75/tonne.

The high value of textiles has attracted illegal practices, which appear to be exploiting an apparent lack of enforcement and effective deterrents to control such practices.

**Figure 1: Bogus bag example**



*Source: BBC News 2010*

The common methods of theft from banks and door-to-door collections, as identified in the literature review, are outlined in Table 1.

**Table 1: Methods of theft identification by the literature review**

Method/Operation	Description
<b>Bank Theft</b>	
Skimming	Chutes are opened and contents are hooked out
Breaking and entering	Bank locks are removed or damaged by drilling them out or filling them with glue
Climbing	Banks are climbed into, often using children as they are smaller. Some people have had to be cut out after they become stuck inside
Cutting	Angle grinders, crowbars and saws are used to cut open our donation banks. Oxy-acetylene torches have also been used, posing a danger to the public
Driver distraction	Drivers can be deliberately distracted and donations stolen once

<sup>5</sup> Brooks and Simon (2012)

<sup>6</sup> Textile Recycling Association (2014)

<sup>7</sup>Based on mid prices quoted in pricing archives – Letsrecycle.com (September 2015).

Method/Operation	Description
	the bank is opened
Tipping	The banks are tipped over to make the stock easier to steal
<b>Door-to-door Theft</b>	
Direct theft	Theft of charity bags from legitimate charities by taking them from the doorstep before the charity has a chance to collect
Fraudulent collections	Distribution of misleading or fraudulent (bogus) bags to householders pretending to be from a charitable organisation.

Despite wide reporting of fraudulent collections and theft, there are no reliable estimates of the scale of the problem in the UK or London. Estimates of revenue lost to charities through the collection of used textiles range from £2.5 to £50 million. The key data reported in existing literature is outlined in Table 2.

**Table 2: Summary of data from literature review**

Source	What	Year	Location	Details
<b>Mid Atlantic Clothing Recycling</b>	Bank Theft	2014	USA	<ul style="list-style-type: none"> <li>News report from USA Mid Atlantic Clothing Recycling claim they are losing 35% of donations to theft</li> </ul>
<b>CharityBags.org</b>	Door-to-door	2014	UK	<ul style="list-style-type: none"> <li>Estimates 10% of filled bags in the UK are stolen</li> </ul>
<b>Framimex</b>	Bank Theft	2013	France	<ul style="list-style-type: none"> <li>Productivity of collection containers in France had dropped 15% between 2011 and 2012</li> </ul>
<b>British Heart Foundation (BHF)</b>	Bank Theft	2013	UK	<ul style="list-style-type: none"> <li>BHF 2011/2012 BHF 30 bank thefts, losing ~£30,000</li> </ul>
<b>Palm <i>et al</i></b>	All	2013	Nordic	<ul style="list-style-type: none"> <li>UFF Norge estimates that as much as 10% of the clothes collected from containers are stolen</li> <li>Losses Sweden 4%, Norway 10%</li> </ul>
<b>House of Commons</b>	Bogus Collectors	2013	UK	<ul style="list-style-type: none"> <li>City of London Police estimates this activity costs charities £50 million a year</li> </ul>
<b>Tracey Crouch MP</b>	All	2012	UK	<ul style="list-style-type: none"> <li>Losses to charities through bag theft and bogus bags at around £14m a year, equivalent to a loss of 12% across the sector</li> </ul>
<b>Charity Retail Association</b>	All	2011	UK	<ul style="list-style-type: none"> <li>£2.5 million – £3 million cost to charities</li> </ul>
<b>The Ecologist</b>	All	2011	UK	<ul style="list-style-type: none"> <li>£15 million cost to charities, equivalent of 10% clothing donated lost</li> </ul>

Source	What	Year	Location	Details
				<ul style="list-style-type: none"> <li>■ Oxfam 2,000 tonnes of donations are stolen a year from the charity's 4,800 banks and 14 million household collections</li> </ul>
<b>Fundraising Standards Board</b>	Bogus Collectors	2011	UK	<ul style="list-style-type: none"> <li>■ Charity bag crime estimated to cost charities up to £50 million in lost revenue</li> </ul>

The following list identifies other key findings in the literature that provided supporting information to the project. They also add to the current understanding of used textile theft:

- Theft of used textiles can be opportunistic. However, it is believed that the majority of theft is undertaken by organised gangs and criminal networks.
- Theft from charities via textile bank and door-to-door theft is considered to cause detrimental impact on the work of charities, and also to impact on the public's willingness to donate.<sup>8</sup> This means that not only is the actual physical theft footprint difficult to quantify, but it is also difficult to gain a wider understanding of the future impact on charity used textiles yields from donations.
- In a recent assessment of the textile industry in Norway, Palm et al<sup>9</sup> considered textile bank theft to be a higher risk than doorstep collections. It is difficult to estimate the level of this type of theft, as most textile banks are emptied rather than broken in to. This means that there is no physical evidence of criminality from damage, and unless the fill level of the bank is monitored, there is no way of knowing how much has been stolen.
- The Fundraising Standards Board<sup>10</sup> (FRSB) "give with care" campaign has attempted to minimise the risk of mistakenly giving unwanted clothing to a commercial company rather than to a registered charity. However, charities need to provide better mechanisms to enable potential donors to make a more informed decision about who they are giving to. This is because some legitimate charitable collectors do not disclose who is undertaking the collection, particularly if the charity itself or its commercial arm is undertaking the collection. This makes it difficult for the public to know who is authorised to take items put out for collection.
- The Charity Commission, FRSB, and others have published advice and information about how to ensure that donations go to genuine collection organisations and what to do to report a suspected bogus collection.

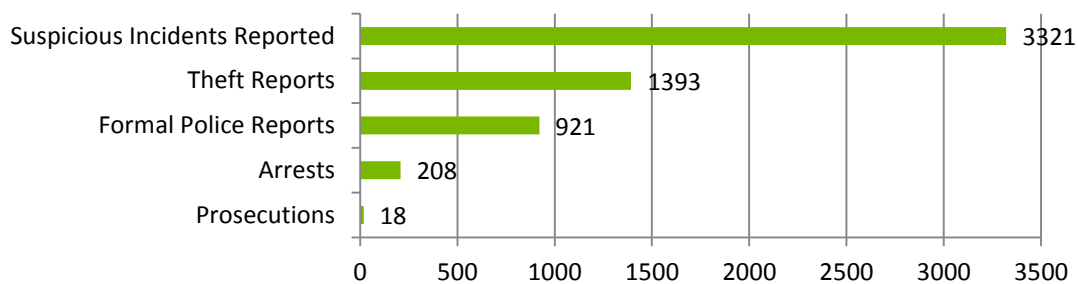
<sup>8</sup> British Heart Foundation (2014)

<sup>9</sup> Palm et al (2013) – Towards a Nordic Textile Strategy

<sup>10</sup> The FRSB is an independent body that has been established to operate the public facing side of the self-regulation of fundraising. The FRSB investigates complaints from the public about the fundraising methods of its member charities and fundraisers if an unsatisfactory response has been received to an initial complaint made directly to the charity by a member of the public.

- Fewer than 1 in 10,000 bogus clothing collections in the UK are subject to enforcement action/prosecution by the local council.<sup>11</sup> All cases that were successfully prosecuted by Clothes Aid resulted in fines only. None led to imprisonment <sup>12</sup>. Figure 2 outlines the reporting, enforcement and prosecutions from used textiles theft incidents in the UK reported to Clothes Aid between 2006 and 2010.<sup>13</sup>

**Figure 2: Incidents reported to Clothes Aid in the UK 2006-2010**



*Source: LRS adapted from Clothes Aid (2011)*

While the literature review revealed a number of figures and comments that are informative to understand the issue of theft in the used textile market, it did not provide sufficient substance to achieve the LWARB objectives. This further highlighted the need for this research project to fill the knowledge gap by exploring the scale of the problem of theft of used clothing and textiles, specifically in London.

<sup>11</sup> Clothes Aid (2011)

<sup>12</sup> For further comment see Appendix III

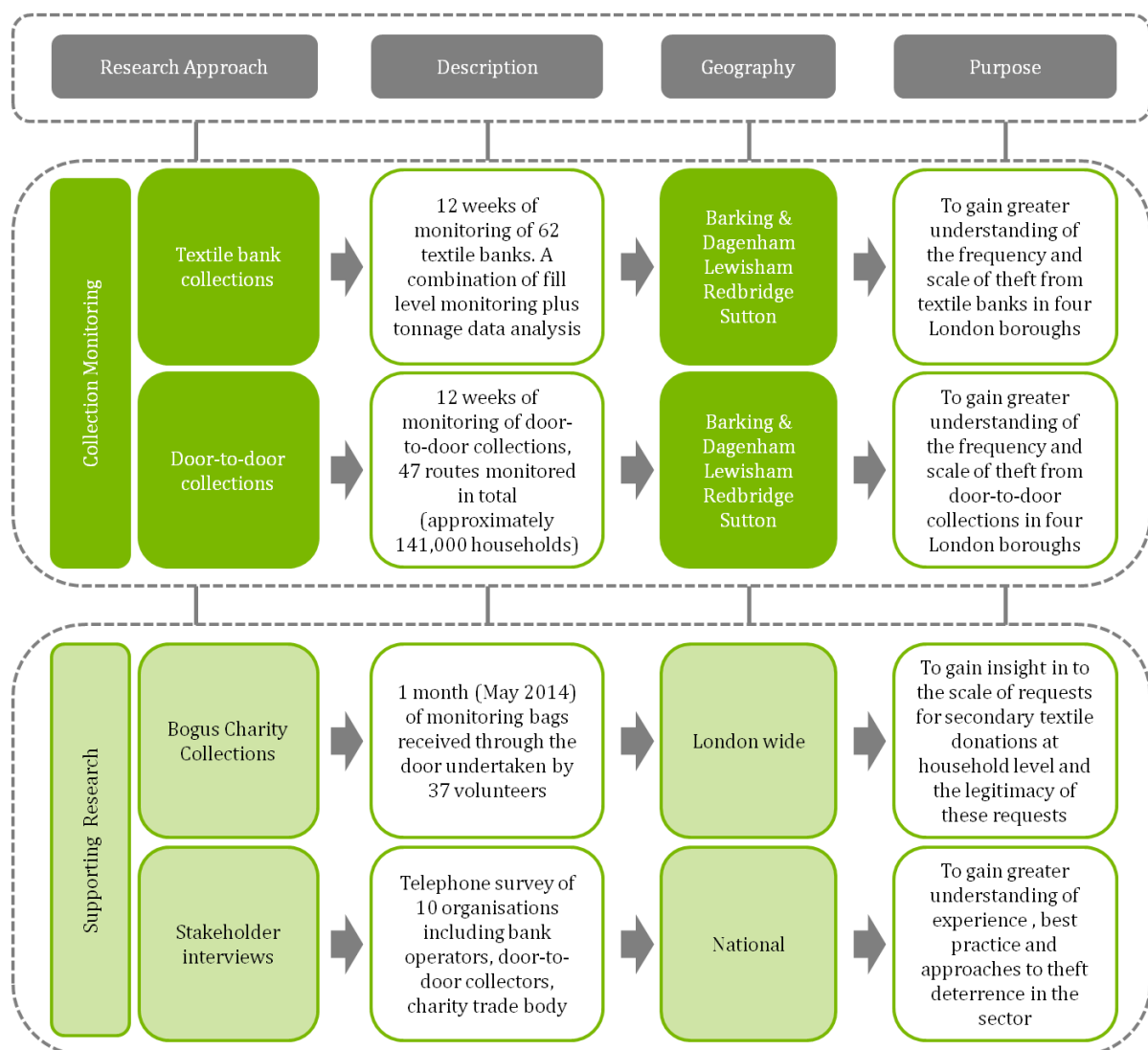
<sup>13</sup> Over a period of five years, 921 Formal Police Reports yielded a Prosecution Rate of 2%. NB: 10 cautions recorded in 2009. Six cautions recorded in 2010. No data on prosecutions for 2006-2008 inclusively but Clothes Aid were made aware of less than 10.

## 2.0 Methodology

A multi-faceted research approach was adopted to explore the scale of the textile theft problem in London and identify mitigations. The approach involved monitoring textile bank and door-to-door collection operations, and undertaking additional supporting desk research. Supplementary research was delivered through a small-scale assessment of levels of bogus charity collections and through semi-structured interviews with stakeholders in the secondary textile industry.

Figure 3 provides an overview of the research approach.

**Figure 3: Summary of the project research approach**



### 2.1 Collection Monitoring

Monitoring of textile bank and door-to-door collections was undertaken across four London boroughs: Barking & Dagenham, Lewisham, Redbridge and Sutton, over a 12 week period (April 2014 – July 2014). These boroughs were selected through analysing ONS socio-demographic data for the London boroughs that the project partners, Clothes Aid and LMB, operate in, as they provided the closest representation of the economic and social structure of London as a whole. To identify potential theft of used textiles, Clothes Aid monitored

door-to-door collections and LMB monitored textile banks in the selected geographic areas. The resultant information was evaluated to estimate total tonnages that were lost. The data was also reviewed to establish whether there were trends or patterns that can be identified in order to increase the understanding of theft in the sector.

### 2.1.1 Textile bank Collections

LMB operate textile bank collections across the UK in partnership with local authorities, charities, community groups and schools. These collections utilise two different styles of banks; those with a letter box opening and those with a chuted opening. Figure 4 and Figure 5 show these two different types of banks. Bank type is considered an important factor in the theft of used textiles as they present different access challenges to potential thieves who wish to extract materials via the textile bank opening.

Out of the 54 textile banks across the 48 sites assessed under the fill level monitoring exercise, 30 textile banks had “chuted” openings and 24 had “letter box” style openings.

**Figure 4: Example of a textile bank with a letter box opening.**



**Figure 5: Example of a textile bank with a chuted opening.**



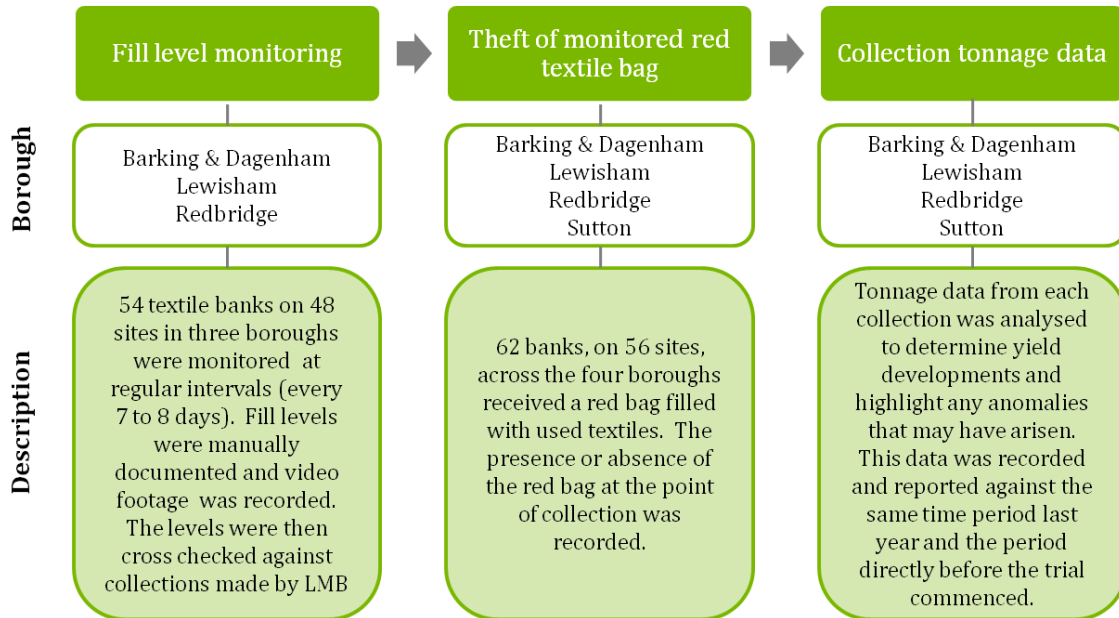
*Source: Lawrence M Barry & Co (LMB) Textile Recycling*

It is worth noting that it in the literature review breaking and entering into banks by either removing locks or damaging them through drilling them out or filling them with glue were identified as a problem. LMB recognised a similar problem, with locks being damaged by thieves in order to gain illegal entry to banks. In order to overcome this problem the business has designed and rolled out a range of new banks without locks. The banks are emptied through an opening at the base of the bank, which is opened, once the bank has been lifted up using a hyab crane and is in position over an appropriate compartment on the back of the collection lorry. Once the bank is opened at the base the clothing simply falls into the designated compartment. As a result of this it has been estimated that LMB has reduced noticeable incidences of theft from its banks by 20 to 30%.

Other textile bank operators have switched to banks that only have internal electronic locks which can be operated remotely using a mobile phone according to research carried out as part of this project.

A three pronged approach was used to monitor textile banks in the four boroughs. Figure 6 provides an overview of this approach.

**Figure 6: Approach to textile bank monitoring**



#### Fill level monitoring:

- In Barking & Dagenham, Lewisham, and Redbridge<sup>14</sup> teams were equipped with a digital camera and a reporting form to record the following data at each site:
  - Date and time of the monitoring of the textile banks;
  - Estimated fill level according to the following definitions:
    - 1 = empty (no bags)
    - 2 = less than half full
    - 3 = half full
    - 4 = more than half full / full
  - Type of the bank (letter box or chuted openings);
  - Textiles left outside the bank;
  - Damage to the textile bank (e.g. vandalism or blockage of a chute).
- The digital camera was inserted into the textile bank via its opening to film the content of the bank. Based on the footage, the monitoring teams estimated the fill levels from 1 to 4 (using the above defined scale). The information was then recorded on the reporting forms. To ensure consistency of monitoring, where possible, the monitoring team members analysing the fill levels were the same throughout the trial period. This was not always possible due to availability and job

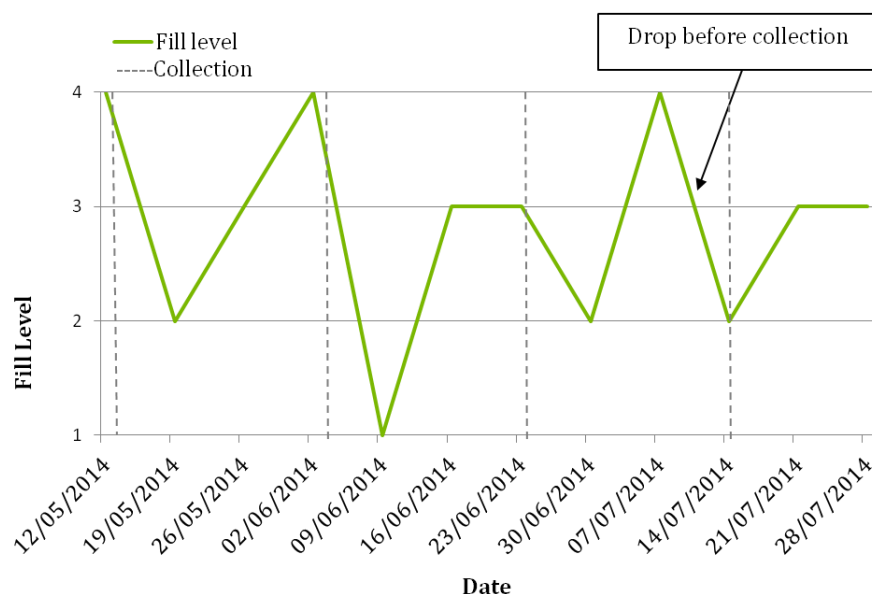
<sup>14</sup> Dedicated resources for undertaking fill level monitoring at textile banks in Sutton was not available and the services could not be performed by any other party involved in the project.

sharing, for example in Lewisham the textile bank sites were monitored by different individuals every other week.

With this information it was possible to assess the development of fill level for each bank over the 12 week monitoring period.

- Information about the dates when the banks were emptied by LMB was compared against the monitoring data. This enabled us to evaluate whether any drop in fill levels was either due to collection by LMB or to theft (see point below for further explanation).
- If a fill level had dropped to 1 or dropped significantly (i.e. from 4 to 2) before an official collection by LMB had taken place, it was assumed theft had occurred. Figure 7 illustrates this process. Smaller drops (i.e. from 4 to 3 and 3 to 2) or plateaus in fill level between collections were not assumed to be theft as the drop could be due to a number of other factors. For example, the natural lowering of the fill level due to compression of materials over time or a difference in judgement on the fill levels between monitoring team members.

**Figure 7: Illustration of theft identification methodology from fill level analysis**



- For incidences where theft was assumed, an independent assessment was undertaken using the video footage to try to establish whether the fill levels could have been incorrectly estimated by the monitoring team member.

#### Theft of monitored red textile bag:

This approach was used to verify any instances of theft identified through fill level monitoring by understanding whether a monitored item placed in the textile bank after it had been emptied was still in the bank at the time of the next collection.

- A red bag filled with used textiles ('red bag') was placed in each of the 62 textile banks in all four boroughs at the beginning of the trial.
- After emptying a textile bank, collection staff deposited a new red bag inside the bank.

- When the contents of the textile bank arrived at the LMB warehouse, the presence or absence of the red bag was recorded. If the red bag was absent it was assumed that an incidence of theft had occurred.

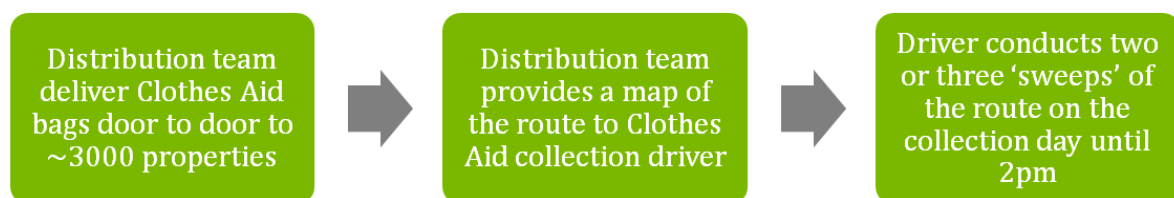
#### Collection tonnage data

- Tonnage data of materials collected at the warehouse were recorded and reported against the same time period last year and against the period directly before the trial commenced.

#### 2.1.2 Door-to-door Collections

Clothes Aid operates a door-to-door clothing collection service as a third party collector on behalf of a range of UK charities.<sup>15</sup> Clothes Aid use branded bags and marked vehicles for their collections; recipients of their service are asked to leave their filled bag in clear view of the road for collection between 7am and 2pm on the designated collection day. Figure 8 outlines Clothes Aid's distribution and collection methodology.

**Figure 8: Clothes Aid used textiles door-to-door collection methodology**



Theft from door-to-door collections in the four boroughs was monitored in two phases:

#### Phase 1:

The Clothes Aid collection driver recorded the following information for each route:

- The streets where used textile donations were made (either to Clothes Aid or other organisations)
- The number of filled bags and distributions (empty bags or leaflets) seen for other organisations
- The streets that received an empty Clothes Aid bag from the distribution team, but where no donations were evident

#### Phase 2:

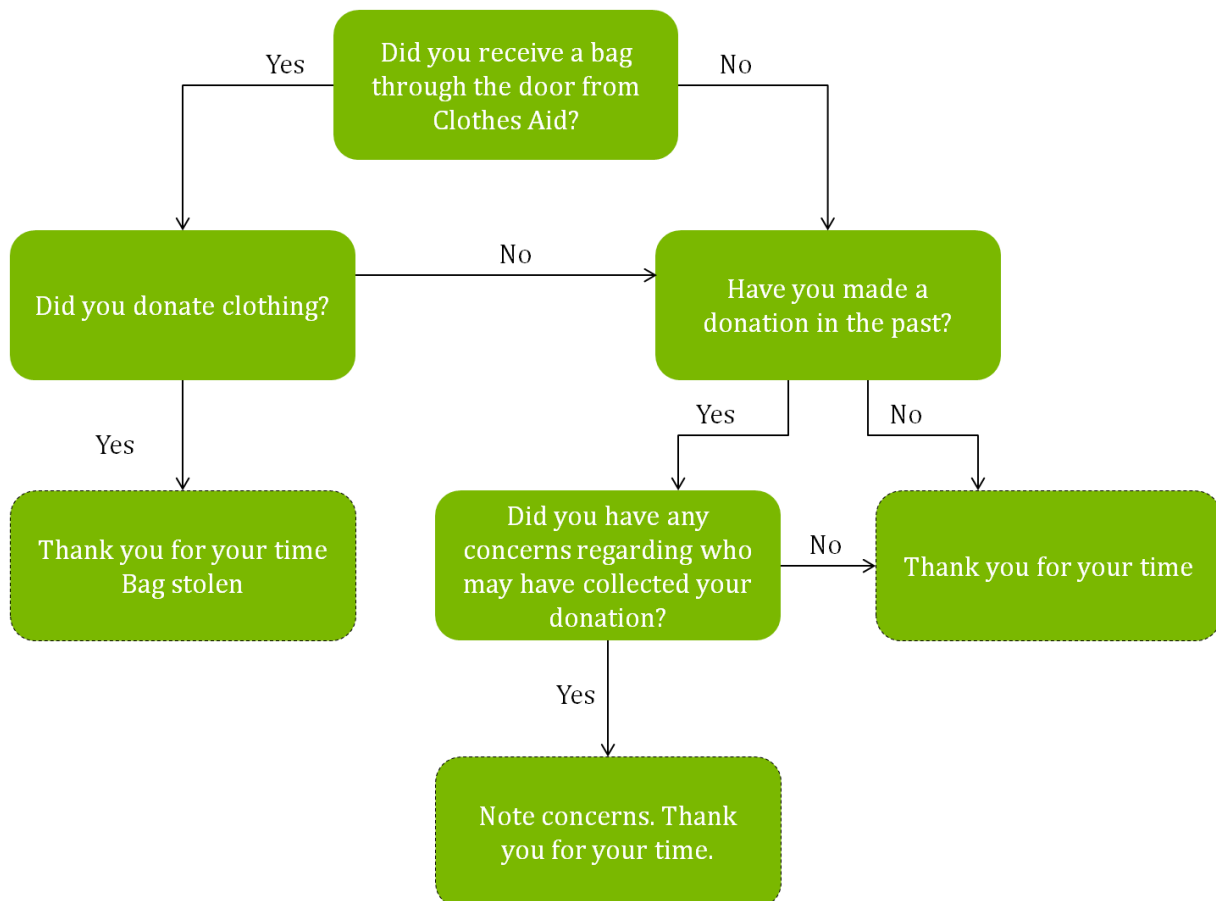
- The streets where no donations were evident were surveyed door-to-door. The survey sought to verify whether the householder did or did not put a filled Clothes Aid bag out for collection.
  - Where a filled Clothes Aid bag had been put out for collection on the designated collection day but not collected by the Clothes Aid driver, it was assumed the bag was stolen.

<sup>15</sup> This method of fundraising raises over £1.4 million every year for Clothes Aid selected UK charities.

Where there were reports of witnessed theft, the survey team also spoke directly to members of the public, drivers and distributors in the collection areas<sup>16</sup>

**Figure 9** is an illustrative flow diagram to show the process used to survey householders.

**Figure 9: Householder survey questionnaire**



Rounds that indicated theft on this basis were examined to calculate the potential tonnages lost due to theft. An average weight of 4kg<sup>17</sup> per filled bag was used to calculate the tonnage lost. For each street where no donations were made, the number of households were counted and multiplied by a 3% response rate<sup>18</sup> to give the estimated number of filled bags that were stolen. The total number of filled bags stolen for the round was then multiplied by 4kg to calculate the total tonnage lost from the round. This is expressed in the below equation:

$$\begin{array}{ccccccc}
 \text{Total no. of households} & & 3\% & & 4\text{kg} & & \text{Total tonnage} \\
 \text{on the streets where no} & \times & \text{response} & \times & \text{average} & = & \text{lost from the} \\
 \text{donations were made} & & \text{rate} & & \text{bag weight} & & \text{round}
 \end{array}$$

<sup>16</sup> Clothes Aid drivers and distributors are trained as part of their role to document any thefts or other activity that could be deemed suspicious.

<sup>17</sup> 4kg is the average weight of used clothing placed in bags by residents for Clothes Aid collections.

<sup>18</sup> 3% is the percentage of households that typically place a filled Clothes Aid bag out for collection

## 2.2 Bogus Collections/Bogus Charity Collections

To gain a better understanding of bogus collections across London, the Textile Recycling Association (TRA) led a small-scale assessment of used textile collection requests (bags and leaflets) posted through the doors of participating volunteers in London from the week beginning 30<sup>th</sup> April 2014 to 30<sup>th</sup> May 2014. This task was delivered in two parts:

**2.2.1 Data gathering:** 37 participating volunteers collected and submitted to the TRA all used textile collection requests (bags and leaflets) posted through their doors from the week beginning 30<sup>th</sup> April 2014 to the 30<sup>th</sup> May 2014.

**2.2.2 Classification of collection requests:** the submitted collection requests were collated and analysed using the following classification categories:

- Charity Collection - National Exemption,
- Charity Collection - Licensed Locally,
- Charity Collection - Not Licensed,
- Commercial Charitable - National Exemption,
- Commercial Charitable - Licensed Locally,
- Commercial Charitable - Not Licensed,
- Bogus Collection/Bogus Charity,
- Fake Charity (i.e. impersonating legitimate charity),
- Local Authority collection,
- Other

Charity Collections are those that are undertaken by the charity itself or its recognised commercial partner. Collections classed as Commercial Charitable are those that are undertaken by a commercial partner, but which donate at least part of the proceeds to a recognised charity. For a door-to-door charitable collection to take place in England, the charity or collector must (under the 1939 House to House Collections Act) either obtain a licence from the relevant local licensing authority or hold a national exemption which is issued by the Cabinet Office. In London (except The City of London) the relevant licensing authority is the Metropolitan Police and The City of London Corporation. The classification and analysis of the collections were sought to ascertain whether the charitable collections were licensed/exempted correctly.

Commercial Collection refers to those undertaken purely on a “for profit” basis.

Bogus collections are those that are undertaken on a “for profit” basis and which use terms/pictures which may give the impression that the collection is for a philanthropic cause (e.g. “Clothing urgently needed for poor people in Africa”), but which actually make no claim to be a charity. Fake Charity collections are those where the collector is claiming to be acting on behalf of a legitimate registered charity without permission or licence.

Local authority collection refers to a collection undertaken either by the local authority or its contractor.

## 2.3 Stakeholder Interviews

10 organisations from the secondary used textile industry were contacted to take part in a survey on textile theft monitoring. These organisations included door-to-door or bespoke collectors (e.g. from schools), textile bank operators and charity shops. The breakdown of operational activities of those interviewed can be seen in

Table 3. The Charity Retail Association (CRA) was also contacted to provide insight into the monitoring activities carried out by its members and the market in general.

**Table 3: Type of textile collection operation carried out by the organisations interviewed.**

Type of textile collection operation	Number of organisations
<b>Textile banks</b>	7
<b>Door-to-door collections</b>	6
<b>Charity shops</b>	4

A telephone survey was undertaken with representatives from these organisations to identify if and how textile theft was monitored. The list of questions and organisations that took part in the survey can be found in Appendix IV: Stakeholder Interviews.

### 3.0 Assumptions and limitations

There are a number of assumptions and limitations related to the data gathered and reporting that must be considered when reading this report.

#### 3.1 Collection monitoring

##### 3.1.1. Textile bank collections:

The following assumptions and limitations apply to the fill level data gathering.

1. **Textile theft:** whether textile theft has actually taken place cannot be said with certainty but is based on estimates and assumptions made when interpreting the data set.
2. **Fill level development and official collections:** a drop in fill level of a particular textile bank is expected after a collection has been made. If fill levels considerably drop from one week to the next without collections from LMB (as the official contractor), textile theft is considered likely to have taken place.
3. **Textiles left outside the bank:** where textiles are found outside the bank and no clear reason as to why this has happened i.e. the bank was not full, nor the opening blocked, it is difficult to draw conclusions as to whether this is due to careless donors or has been influenced by thieves.
4. **Estimation bias:** there are limitations to the estimations of the fill levels made by the monitoring teams. As these are made by different people, in some instances, and depend on a subjective judgement, fill levels can vary. Efforts were made to reduce this by filming the fill level and using independent assessment where potential theft instances were identified.
5. **Damage to textile banks:** new or additional damage to each textile bank was recorded through the monitoring. Such damage may provide additional information that theft has taken place as thieves may have damaged the textile bank in order to access its content.
6. **Quantification of potential loss through theft:** based on the tonnage collected by LMB during the trial, a textile bank can hold approximately 290 kg of textiles. This is based on the average of the highest weight collected from any one bank over this period. The fill level estimations therefore correspond to the following tonnage.

Table 4: Estimated fill level conversion table

Fill level	Share (%)	Tonnage
1 = empty (no bags)	0	0
2 = less than half full	1 - 25%	2.9 - 72.5 kg
3 = half full	26 - 50%	75.4 - 145 kg
4 = more than half full / full	51 - 100%	147.9 - 290 kg

The following assumptions and limitations apply to the monitoring of the red bags:

7. **Presence of red bag:** it was assumed that if a red bag with textiles was returned to the warehouse after the textile bank had been emptied during the collection round, textile theft was unlikely to have taken place.
8. **Presence of red bag does not prove that there was no theft:** a limitation to the above assumption is that a textile bank may still have been stolen from even if the red bag with textiles was returned to the warehouse after collection. The red bag might have been at the bottom of the textile bank and would therefore be less accessible for a thief through the opening of the bank. Instead, only textiles located towards the top of the textile bank may have been removed unlawfully.

### 3.1.2. Door-to-door collections:

The following assumptions and limitations apply to the door-to-door collections.

1. **Textile theft:** whether textile theft has actually taken place cannot be said with certainty but is based on the assumption that the householder correctly recalled placing a filled Clothes Aid bag on the street on the day of collection and it was not collected by a Clothes Aid driver, therefore was stolen by another party.
2. **Quantification of potential loss through theft:** the quantification of potential loss is based on the 3% average set out rates of filled bags that Clothes Aid experience and the average weight of a filled bag of used textiles of 4kg.
3. **Size and scale of trial:** Clothes Aid is just one textile collector operating in the target Boroughs. Whilst the trial can understand the level of potential theft experienced by Clothes Aid from the duration of the trial, it does not take in to account the potential level of theft that other organisations may have experienced.

### 3.2 Bogus Collections

The following assumptions and limitations apply to the bogus charity distributions (bag and leaflet) assessment:

1. **Duration of assessment:** the assessment of bogus collectors from distributions ran for a one month period during May 2014. This is a relatively narrow window to assess the size and scale of bogus collections across London.
2. **Number of participants:** one volunteer put out a request for their colleagues to collect bags on the works extranet service. As a result of this, the volunteer received bags from a total of 12 colleagues. However, it is not known how many of their colleagues were actively looking for bags and received none.
3. **No measure of actual theft:** the scope of this particular exercise was limited to an assessment of what type of organisation was undertaking the collection, if the collection was charitable, whether it was licensed appropriately, or whether it is covered by a national exemption order, and whether the collector is acting legitimately or in an illegal manner. However, this particular exercise did not attempt to assess whether any bags put out were picked up by the authorised collectors or someone else as this work was covered by the assessment undertaken by Clothes Aid and detailed in this report. There is also a small chance that bags purporting to be for collections on behalf of legitimate and licensed/nationally exempt collections could have been distributed and collected by bogus collectors and this may not have been picked up. Particularly if the bags themselves were genuine or very good copies.

## 4.0 Collection Monitoring: Key Findings

### 4.1 Textile bank collection monitoring

The data gathered through on-site monitoring of the textile bank sites uncovered an inconsistent development of fill levels at each textile bank over time. This highlights the difficulty with estimating textile bank yield. However, taking into account the assumptions outlined in the methodology, data analysis of the boroughs that were monitored for fill level revealed the following key findings:

- Based on the assumptions outlined in the methodology, 33 incidents of potential theft across 32 different textile bank sites were identified. Prior to an official collection, fill levels dropped significantly at these banks indicating that theft may have occurred.
- Theft appears to have occurred at several textile banks across multiple sites in the space of a week. Theft may therefore be more likely to occur at a range of textile bank sites at the same time rather than multiple thefts at particular sites.
- Theft only appears to have occurred twice at one of the 32 textile bank sites that indicated theft. This may indicate that textile bank sites are not necessarily targeted based on their location, for example, if only supermarket bank sites were stolen from then different conclusions would be drawn.
- There were no obvious signs of forced entry to the banks (based on damage reported), it is therefore assumed that all potential theft instances arose through thieves using the letterbox or chuted openings to access the bank
- 21 sites with textile banks with letter box openings appeared to be stolen from compared to 12 sites with chuted openings. This may indicate that letter box style textile banks are more accessible than those with chuted openings.
- Three textile bank sites were reported to have textiles left outside the bank. The banks were neither full at the time of monitoring nor were their openings blocked. It is therefore difficult to draw any conclusions from this recording.
- Red bags across all four boroughs arrived at the LMB warehouse with the collections from the textile banks. Given the above indicators of potential theft, the returning of the red textile bags may suggest that the banks were not emptied fully by the thieves but rather only bags or items that could be reached were skimmed from the top. This is a possibility given that the red bags are dropped into an empty textile bank after it has been emptied and therefore will remain at the bottom of the textile bank. Future monitoring design should take this in to consideration and perhaps drop another red bag in half way between collection dates.

#### 4.1.1 Quantification of textile bank theft

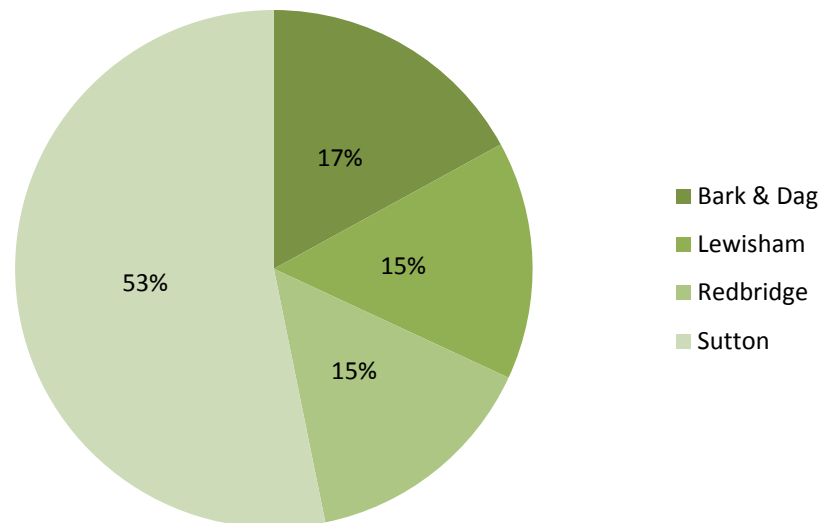
Based on the estimated fill levels and the weighbridge data collected by LMB as part of their operations, an estimated 4,713 kg (4.7 tonnes) of textiles could potentially have been stolen from 32 different banks across three boroughs during the period of the trial.

According to the weighbridge data gathered by LMB, the company collected 42,205 kg from the participating sites during the period of the trial. The loss would therefore represent approximately 11% of the total yield collected during the trial.

#### 4.2 Door-to-door collections

Door-to-door collection monitoring was conducted in the four boroughs from 28<sup>th</sup> April 2014 to the 25<sup>th</sup> July 2014 inclusive. A total of 47 routes were monitored (roughly 141,000 houses). Figure 10 illustrates the split of the 47 routes by Borough.

**Figure 10: Split of monitoring routes**



During the monitoring period, political unrest was experienced in one of Clothes Aid's key second hand clothing destination market. This slowed the trade of second hand clothing and caused stockpiles of used textiles to build up in London locations. As a result, distribution and collection teams were redistributed away from the designated boroughs, causing the uneven split of monitoring routes illustrated in Figure 10.

Analysis of the monitoring undertaken on the 47 routes revealed the following key findings:

- The number of filled bags and distributions (empty bags or leaflets) from other organisations recorded as part of Phase 1 were analysed for their legitimacy. As Table 5 indicates, there were 12 distributions and 30 filled bags seen during the monitoring period from one individual organisation that is believed to be a bogus collector (based on Clothes Aid intelligence). Using the 4kg average weight of a filled bag, this equates to 120kg of used textiles potentially subject to theft or collected by an illegitimate collector.

**Table 5: Distributions and filled bags for other charitable organisations (legitimate and illegitimate)**

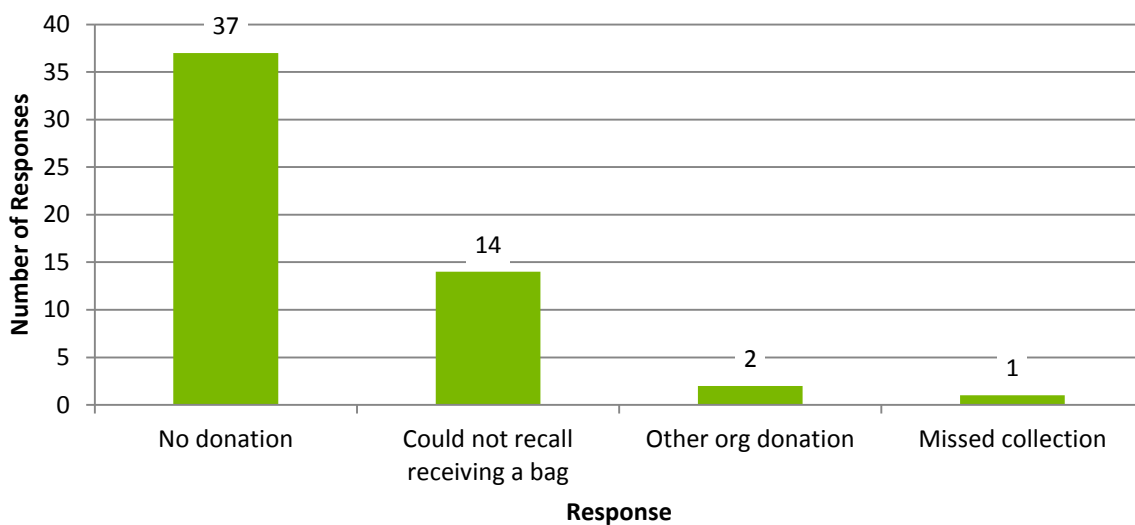
Name of Charity	Distributions	Filled bags	Classification
Against Breast Cancer	0	20	Commercial Charitable - Locally Licensed
Age UK	81	63	Charity Collection - National Exemption
British Heart Foundation	0	16	Charity Collection - National Exemption
Breakthrough Breast Cancer UK	0	23	Commercial Charitable - Licensed Locally
Cancer Research & Genetics	0	4	Commercial Charitable – Licensed Locally until 14 <sup>th</sup> April 2014 <sup>19</sup>
Heart UK	14	1	Commercial Charitable - Licensed Locally
Leukaemia & Lymphoma Research	0	14	Commercial Charitable – National Exemption
Tree of Hope (SOS)	0	38	Commercial Charitable - Licensed Locally
Potential fraudulent collection.	12	30	Bogus Charitable - Not Licensed – all these distributions and filled bags were from a single operator.

- Of the 47 routes monitored:
  - 6 had full collections i.e. no streets were considered non-donating,
  - 20 experienced no thefts i.e. all those interviewed on non-donating streets did not put bags out for collection,
  - 6 had potential theft occurrences i.e. some householders on non-donating streets did set out filled Clothes Aid bags which were not collected by the Clothes Aid driver and therefore are assumed to be stolen,
  - 15 had unsuccessful door stepping results i.e. no answers from householders on non-donating streets. Therefore analysis was undertaken using the 32 routes where results were obtained through survey.
- 67 successful surveys were successfully completed across the 32 routes. 13 of the survey respondents left Clothes Aid bags out for collection that were not collected by the Clothes Aid collection driver. It is therefore assumed that these bags were stolen.

<sup>19</sup> No distributions from this charity observed during trial, therefore it is likely that bags were distributed correctly during licenced period and were put out incorrectly by the public when other collections were taking place.

- Of these 13 potential instances of theft, only one survey respondent witnessed another party collecting their bag, but four respondents said they had concerns over who had taken the donation.
- The 13 survey respondents were part of collections on six separate routes and were split across eight roads.
- Of the remaining 54 respondents: 69% did not make a donation; 26% did not recall receiving a Clothes Aid bag; 4% donated to another organisation; and 2% (1 respondent) had their bag missed so retrieved the bag from the street to take to the charity shop. Figure 11 illustrates these scenarios.

**Figure 11: Response from non-theft respondents**



- In the interviews, three respondents, who had not donated bags, stated that this was as a result of their awareness of instances of theft; two respondents had previously witnessed potential theft from door-to-door collections and therefore have chosen to take their donations directly to charity shops; and another had seen a TV programme related to door-to-door theft that had caused her to be wary of donating using this mechanism.
- One of the textiles collection drivers mentioned in interview that the potential reason one of the roads may have experienced theft is that long and straight roads in their experience are efficient to collect from and therefore, in turn, are efficient to steal from.

#### 4.2.1 Quantification of door-to-door textile theft

From the 32 routes successfully surveyed, 18.75% of collections were subject to potential theft. The estimated total potential theft quantified from the trial was 221.76 kg. If each of the 32 routes were taken on average to have about 3,000 households and 3% of these put out a bag weighing an average of 4kg, then the total collected from the routes would be about 11,520kg (11.5 tonnes). Therefore the estimated loss due to potential theft of 221.76kg represents about 1.8% of all clothing collected.

Table 6 outlines the potential theft incidences from the monitoring period and the estimated associated kg of used textiles lost as a result.

**Table 6: Estimated loss from potential theft incidences**

Week	Date	Borough	Postcode	Total houses on 'potential theft streets'	Estimated no. of houses putting out bags. (based on 3% response rate).	Est. loss (kg)
6	02/06/14	Lewisham	SE3	130	3.9	<b>15.6</b>
6	02/06/14	Bark & Dag	RM8	259	7.77	<b>31.08</b>
8	16/06/14	Redbridge	IG2	246	7.38	<b>29.52</b>
8	18/06/14	Sutton	SM5	877	26.31	<b>105.24</b>
8	20/06/14	Sutton	SM3	216	6.48	<b>25.92</b>
10	30/06/14	Lewisham	SE13	120	3.6	<b>14.4</b>
<b>Total</b>						<b>221.76</b>

## 5.0 Supporting Research: Key Findings

### 5.1 Bogus Charity Collections

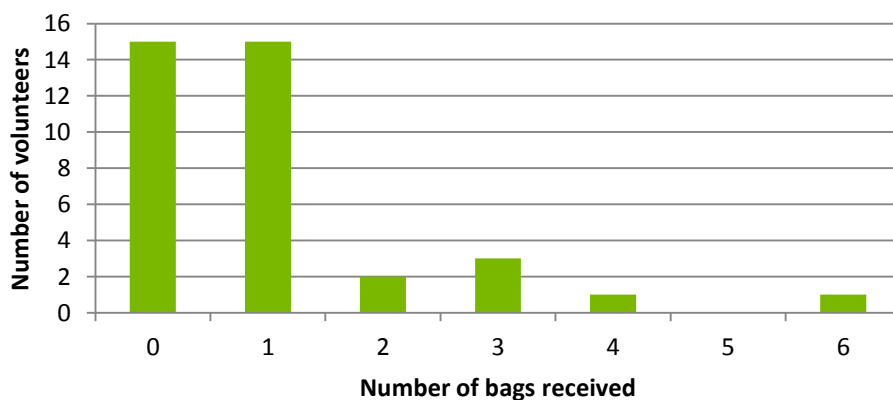
Understanding the frequency with which households in London are typically receiving requests for clothing through door-to-door collections was also assessed through the project to gain a better overall picture of the used textiles collection market in London. In particular, which organisations are making these requests (through bag or leaflet distributions) i.e. how many of these requests are charitable collections, local authority, purely commercial or bogus. The following points outline the key findings of the small-scale assessment undertaken:

- During the collection period, the 37 known volunteers collected and returned a total of 37 bags. 22 out of the 37 volunteers received a bag in this period, meaning that a number of households received multiple bags during the trial period. Figure 12 shows (below) the location of the 37 volunteers' home residence, split by those who did receive a bag (red) and those who received no bags during the period (blue), whilst a full breakdown of the number of bags received per household is summarised in Figure 13 (below).

**Figure 12: : Location of volunteers' home residence**

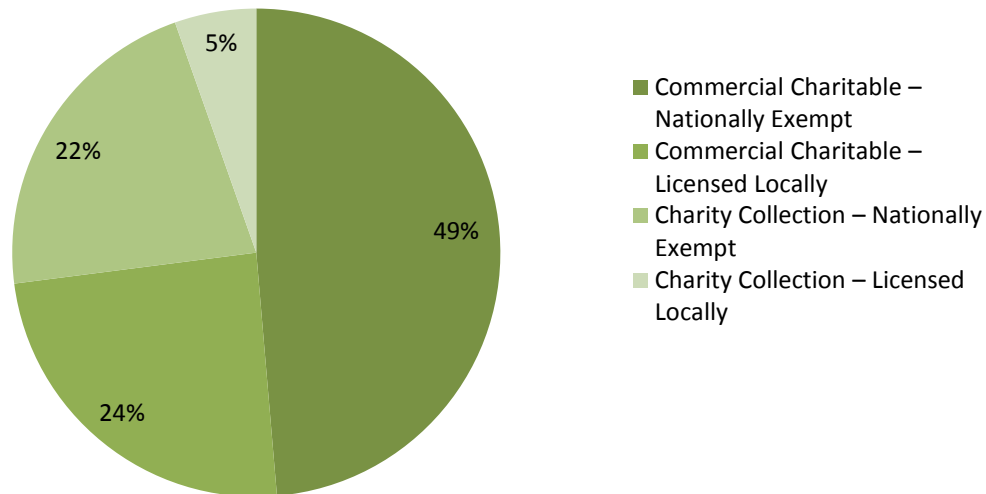


**Figure 13: The distribution of clothing collection bags received per household in May 2014**



- 40.5% (15 in total) of all householders known to be taking part in the survey received no bags at all during May 2014, with a further 40.5% only receiving 1 bag.
- The household that received six bags is in a relatively affluent and densely populated residential area of South East London. This could provide an indication that certain types of households in London are much more likely to receive request for clothing collections. A more detailed study would be required to better understand the factors that may impact frequency and type of clothing requests.
- Analysis of the bags collected revealed that all bags received during the exercise were charitable or commercial charitable collections, the majority with national exemption orders and the remainder with local licensing. The breakdown of the type of collections can be seen in Figure 14.

**Figure 14: Breakdown of classification of collections**



- All requests received by householders for used textiles were charitable, insofar as at least part of the proceeds made are going towards funds for registered UK charities.
- All collections that were undertaken by commercial partners contained solicitation statements which in the opinion of the TRA are compliant with the relevant requirements of the Charities Act 2006.
- It was observed that a number of charities who operate their own collections, make no reference to this fact, nor does their publicity provide any information about how much money is raised for the charity. They are not required to do this. However, this lack of information makes it more difficult for the public to check who should be undertaking the collection and to find out how the charity is benefitting from the collection.
- 71% of the collections recorded in May were for charities which hold National Exemption Orders.<sup>20</sup> The remaining 29% were locally licensed by the Metropolitan Police. As a result, all the collections taking place had the appropriate legal requirements in place to undertake the collections. There were no bogus collections, nor was it evident any of these collections were fake charity collections.

## 5.2 Stakeholder Interviews

50% of the organisations interviewed actively monitor textile theft on a regular basis. 4 out of 10 organisations record incidents and theft as and when they occur. Only one organisation was not monitoring theft at the time of the interview; however the organisation was currently investigating how they can best monitor textile theft in the future.

The interviews uncovered a greater number of mechanisms and tools used to deter textile theft from banks than from door-to-door collections. One interviewee suggested the business case for investing in the additional resources needed to monitor door-to-door

<sup>20</sup> Under the 1939 House to House Collections Act a charitable door to door collection must either be licensed by the relevant local licensing authority (in London the authorities are the Metropolitan Police & The City of London Corporation), or it must hold a National Exemption Order which is issued by the Cabinet Office.

collections is currently lacking. In line with this, it was identified that it is difficult to estimate the yield that may be generated in a specific area from this type of collection as donations are inconsistent.

All organisations interviewed had recently observed a decline in theft. This was largely attributed to the declining market prices (see Figure 19 in Appendix IV: Stakeholder Interviews) for used textile materials. This is a key point from the study as when the value of used textiles is high it is economically more attractive to potential thieves and therefore theft is more likely. Correspondingly when values are low, theft is less likely. Therefore, greater resources to monitoring and deterring theft are required when prices are higher.

### 5.2.1 Monitoring theft: reporting tools and mechanisms

The methods to monitor used textile theft range from regular data collection to anecdotal evidence gathering on a case-by-case basis. Stakeholders identified the following mechanisms and tools as practices they undertake to monitor and report theft:

- **Collection of weighbridge data to determine yield developments:** weighbridge data can be used to compare the yield data from textile bank collections of different locations or time periods. Using this data, operators may be able to identify when theft might have occurred by estimating what volumes of used textiles they can expect on a specific route and during a specific period of time.
- **Collection of data from driver reports;** drivers can play a key role in theft monitoring and reporting. Drivers can record damage to textile banks and estimate the fill level of the bank at collection.
- **Placing of a specific item in the textile bank to monitor its arrival at the warehouse:** much like the red bag method used in the textile bank monitoring, operators can place marked items in their banks and monitor their arrival at the warehouse after the emptying of the textile banks. If the items do not arrive at the warehouse with the rest of the collection, the operator can assume that the bank has been stolen from. As uncovered by the research, placing an item in the bank half way between two collection dates would be beneficial.
- **Use of tracking devices and movement sensors in textile banks:** GPS tracking devices can be attached to an item of used textiles in the bank. If the item with the tracking device is stolen from the textile bank, the operator can use the device to potentially locate the item as well as the thief. This allows the organisation to identify where the stolen textiles are brought to and how far they travel. Another mechanism is to attach a movement device to the textile bank. The device enables the operator to monitor whether banks have been moved. One organisation interviewed had experienced theft of entire textile banks in the past.
- **Anecdotal evidence on a case-by-case basis:** in addition to the tools mentioned above, operators can collect information provided by drivers and other members of staff, civil society (charities) and clients (e.g. schools, churches or sports centres) that have scheduled collections in place.
- **Hot spot mapping:** textile banks and door to door collection locations where theft recurs may be considered as hot spots. 70% of the organisations interviewed identify these hot spots based on yield data analysis, theft reports, and the general experience within the organisation. Two organisations in particular, formally map hot spots. One uses an online system where potential hot spots are logged. The second operator concentrates on areas of good return to identify hot spots of used textile theft. Three out of the 10 organisations interviewed do not identify hot spots at all

### 5.2.2 Theft deterrence: tools and mechanisms

8 out of 10 survey participants use various mechanisms and tools to actively deter textile theft. These stakeholders identified the following mechanisms and tools as practices they undertake to deter theft:

- **Bank design:** textile bank operators strive to make the banks as theft-proof as possible by designing bank openings that make it difficult to access the bank from the outside, improving the locking mechanisms of the banks and/or by increasing the thickness of the outer walls of the bank.
- **Collection schedule management:** various organisations manage their collection schedule in a way to deter possible theft. Textile bank operators may amend their collection schedule in order to empty banks before theft occurs. Door-to-door collectors may agree set collection dates with their clients, such as schools, churches or sports centres. The latter would also inform their clients of the uniform worn by their staff and provide the collection staff with ID to make their service teams recognisable to the client.
- **Communications:** communication tools to interact with the public and local authorities are also used to deter theft. Used textile collection organisations are trying to raise awareness of used textile theft. Methods used include encouraging civil society to post signs of possible theft on twitter or report incidents by e-mail. Another organisation is working with the local police force to establish ways of deterring textile theft.

### 5.2.3 Barriers to monitoring textile theft

During the interviews three main barriers to monitoring used textile theft were mentioned.

- **Size and geographical scope of operation:** organisations with smaller operations and a thin geographical spread of collection points or changing locations may find it difficult to collect robust data on the yield generated from collections. As a result, estimations cannot be made to identify if used textile theft may have occurred.
- **Resourcing:** some organisations do not have the physical resources to offset the cost of remote monitoring and the use of technology.
- **Lack of business case:** the CRA suggested that used textile theft is not monitored because there is no business case to justify the cost of monitoring. Some organisations receive far more used textiles through their charity shops, for example, than from their textile banks or door-to-door collections. As a result, the loss of revenue from used textile theft may be too small to invest in resources to tackle theft.

### 5.2.4 Value and tonnage lost through textile theft

Only two organisations (of the nine that responded to this question) were able to estimate how much material they are losing to textile theft. One organisation estimated losing 1-3% of its total yield from textiles. To derive this figure, estimations from collection staff are compared to weighbridge data. The estimated associated financial loss is based on the market price for a tonne of textiles. A second organisation estimates losing 1-3 tonnes a week. To derive this estimate the organisation works on the average capacity of a textile bank of 300kg.

A further three organisations, do not formally calculate the value lost through textile theft but make estimations based on general observations. These observations are based on

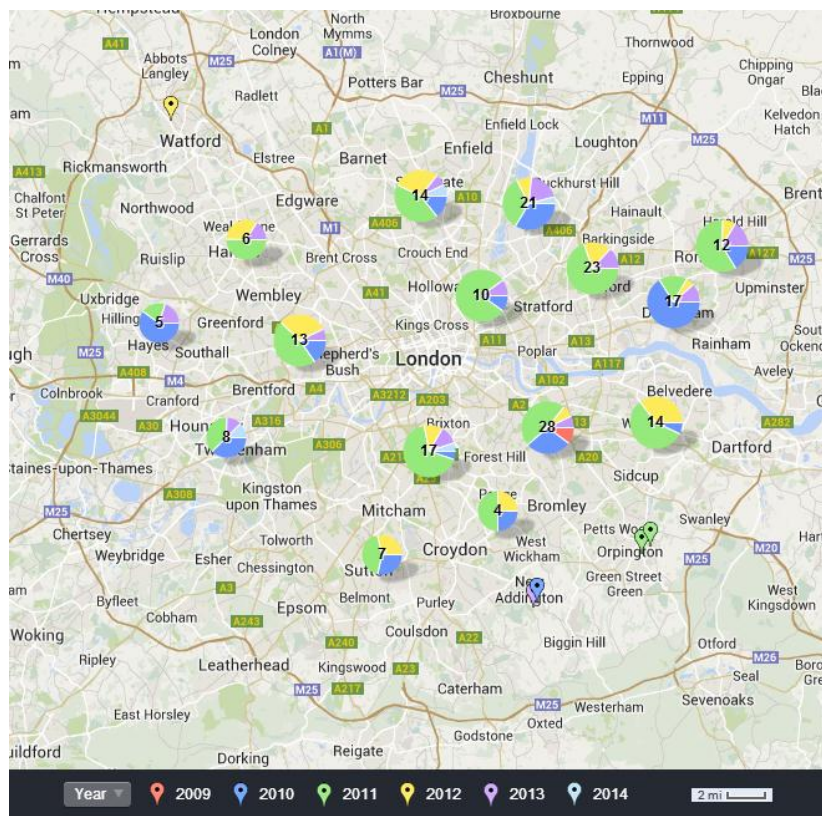
changes in yield from collections and damages to textile banks that may have occurred. Two organisations also mentioned that theft has generally decreased and link it to decreasing textile market prices.

The remaining four organisations interviewed do not have a view on the value or tonnage lost to textile theft. Challenges in generating robust collection data and identifying yield patterns make it difficult for these organisations to estimate their loss.

## 6.0 Clothes Aid Collection Protection

Clothes Aid operates a department called Collection Protection dedicated to protecting clothing donations from theft by so-called bogus collectors. Clothes Aid collated customer reports from the target Boroughs for the period of the trial and for the whole of London for the past 5 years. This provided an overview of suspicious activity with regards to clothing collection reported to Clothes Aid by the general public. For the period of the trial, there were two allegations of theft reported to Clothes Aid staff from members of the public in the target Boroughs. Figure 15 illustrates the reports from the public to Clothes Aid over the period 2009 – 2014 (until July 2014 only).

**Figure 15: Reports of theft to Clothes Aid collection protection helpline 2009 – 2014**



One of the key trends the map indicates is that there was a significant uplift in reporting of theft during 2011. Furthermore, the map indicates that more thefts were reported in the North East and East of London compared to the South and West. Plus the groupings of the theft reports illustrate the close proximity of these incidences. However, it is important to recognise that there may be greater awareness in these areas of the reporting mechanisms Clothes Aid have in place to document this activity.

## 7.0 Conclusions

The following conclusions relate to findings from the monitoring and supporting research undertaken as part of this project.

### 7.1 Potential theft patterns

#### 7.1.1 Textile banks

- According to current literature, theft from textile banks is considered a higher risk than doorstep collections and one that is difficult to estimate. Most containers are emptied rather than broken into as the literature review and monitoring trial suggest.
- The literature review suggests that the placement of containers is key to avoiding theft, namely in recycling centres which can offer the greatest protection. Conclusions with regards to the impact of the location of a bank on textile theft cannot be made based on the data gathered during the monitoring period.
- Two patterns of theft have been identified, based on this data gathered and the assumptions made as mentioned in the trial methodology:
  1. It appears more likely for several textile banks to be stolen from during the same period of time than for any one textile bank to be targeted repeatedly.
  2. Letter box style openings at textile banks suggest an easier access for thieves to the contents of the bank than chuted openings.
- The literature review also highlighted that banks which have external locks are susceptible to theft with bank locks being removed, damaged by drilling them out or filling them with glue. Banks without such locks, which are either emptied at the base using a hiab crane or which contain locks situated internally within the bank which can be operated remotely, can help to reduce theft.

#### 7.1.2 Door-to-door

- Patterns of theft are not evident from the results of the monitoring due to low instances of theft.

### 7.2 Potential contribution to LWARB targets

The aim of the Textile Re-use and Recycling Fund is to improve the management of post-consumer textiles (both clothing and non-clothing). This project has demonstrated that there is potential to implement anti-theft initiatives and monitoring that can contribute to stimulating and safeguarding the operational activities in London dedicated to diverting used textiles from disposal (landfill/EfW) to re-use and recycling.

However, up scaling of the findings from any aspects of the project to quantify the London-wide contribution that theft prevention could have on tonnage and economic value is very challenging. This project presents only a snap shot and therefore only an indication of what might be made available to contribute to the LWARB targets.

It is recommended that theft prevention mechanisms (as detailed in section 5.2) are shared with London Textile Forum members and incorporated into other operational collections for textiles in order to realise the full potential to capture the maximum amount of material for re-use and recycling in the capital.

This report may also be used to help law enforcement agencies such as the police to get a better understanding of the scale and nature of the textile theft problem and to be able to address it within London.

### 7.3 Scaling up findings for a UK perspective

Whilst stakeholders in other parts of the country may find the conclusions of interest, it would be difficult to extrapolate the evidence gathered in this study and apply it with confidence to other parts of the UK.

In order to get a more accurate picture of the scale of theft of used clothing and textiles across the UK, a more detailed study of the issue at different locations across the country would be required. Stakeholder interviews identified that many organisations nationally are implementing monitoring, and reporting theft deterrence mechanisms. The sharing of this experience from across the UK would aid the industry as a whole to build intelligence and implement best practice, creating a national approach to theft deterrence.

### 7.4 Measures and recommendations for operators

#### 7.4.1 Textile banks

- **Record fill levels:** record fill levels of textile banks over a consistent period of time, e.g. a year, in order to allow for comparisons to be made. This will help to track the development of yield from the textile banks, to identify potentially high and low performing banks as well as to spot anomalies in fill level developments.

Fill levels could be recorded by engaging the collection staff in estimating them when emptying the banks and to enter the data into a central system.

Another option to monitor fill levels may be to install sensors in textile banks which automatically feed data back to a central system.
- **Compare fill levels with weighbridge data:** match the weighbridge data with fill level records from on-site monitoring to try to identify fluctuations in tonnage collected on specific collection routes, geographic areas or within a certain period of time.
- **Identify textile bank type:** record the types of textile banks used. Incidents of theft can then be linked to the type of bank to identify whether particular textile banks are targeted more frequently and potentially less theft proof than other models.
- **Identify location type:** identify what type of location thefts occur, e.g. supermarkets, car parks, residential areas, and map hot spots where textile theft occurs.
- **Collect robust data:** develop and maintain data sets, such as fill levels, weighbridge data, textile bank and location types to make it easier to identify patterns if theft.

- **Quantify loss through textile theft:** the quantification of the loss through potential textile theft by use of robust data (e.g. from fill levels or weighbridge tonnage data) can help to build a business case around mitigation actions which may incur additional cost.
- **Empty textile banks more regularly if theft identified:** if textile banks are being targeted, more frequent collections may help to keep the fill level of the textile banks down and therefore make theft less attractive.

#### 7.4.2 Door-to-door

- **Clear identification:** most legitimate collectors carry identification, wear uniform and will collect in marked/branded vehicles. This is recommended practice for all door to door operators.
- **Clear information:** bags/leaflets should be clearly identifiable with relevant information for householders, including the name of the charity the collection is supporting and the registered charity number (if it is a charitable collection). This can then assist donors who may wish to check the charity number written with the Charity Commission website.
- **Provide information of membership of relevant organisation:** if the collector is a member of a relevant organisation such as the Textile Recycling Association, Charity Retail Association, Fundraising Standards Board (FRSB) or Institute of Fundraising, this should be displayed on collection material. This indicates that the collection is probably genuine.

The research also concluded that the Fundraising Standard's Board Give with Care campaign has attempted to minimise the risk of mistakenly giving unwanted clothing to a commercial company rather than to a registered charity, and that all charitable collectors should consider applying to use the FRSB (Give with confidence tick)<sup>21</sup>.

- **Provide traceable contact details:** collection bags/leaflets should provide appropriate contact information that enables immediate verification of the collection, including a landline telephone number which is staffed, as well as an appropriate website which contains the postal address of the collector.
- **Transparency:** the publicity of all charitable collections should state who is undertaking the collection and how the charity is benefitting.

Commercial collectors operating on behalf of a charity must provide a solicitation statement under the Charities Act 2006, which states who is undertaking the collection and how the charity is benefitting. Whilst charities (or their registered commercial arm) that undertake the collection themselves are not required to provide this information it is recommended that they do so. The lack of such statements makes it difficult for the public to check the veracity of such collections.

- **Ensure licence or National Exemption is in place:** before collecting, charities or their commercial partners need to get a licence from the local licensing authority.

<sup>21</sup> Members of the TRA should apply for the Give with Confidence Tick through their association.

In London, the licensing authorities are the Metropolitan Police and the City of London Corporation (for collections in The City of London only).

Alternatively larger charities can apply to the Cabinet Office to obtain a National Exemption from licensing in England.

Details of licences issued by the Metropolitan Police can be found at:

<http://content.met.police.uk/Article/House-to-house-licences-issued/1400012685915/1400012685915>

Details of the National Exemptions Order Scheme can be found at:

<https://www.gov.uk/government/publications/national-exemption-order-scheme>

Collectors must ensure that they hold an appropriate licence or exemption. The public can help by checking that charitable collections are licensed/exempt and reporting any that are not to the licensing authority.

- **Resource dedication:** collectors should dedicate sufficient resources to collection to create shorter times between a householder placing a filled bag on the street and the physical collection by a collection crew, thus reducing the opportunity for theft to occur.
- **Hot spot identification:** collectors should identify streets that may be susceptible to theft (e.g. long and straight roads which are anecdotally reported to be subjected to higher levels of theft should be identified by collectors) as priority areas for resources to be deployed in during collections to reduce the opportunity for theft, as these types of streets are targeted for their ease of theft in relation to ease of access, quick pick up times and resultant larger volumes collected.
- **Relationship building:** where possible collectors should establish relationships with other collectors and charities to create information networks and alliances to protect against illegal operations. These relationships can create more “eyes and ears” across London that one company or charity alone cannot. Whilst the market is competitive, creating relationships between legitimate collectors will enable ease of identification of illegitimate collectors on daily collection rounds.
- **Staff training:** collectors should ensure all distribution and collection staff are trained to monitor, identify and report on any suspicious activity and can gather useful data and help generate knowledge on how best to tackle the problem. Ultimately this will protect the confidence of householders that are intending to support a charitable cause through making their donation.
- **Partnerships with local authorities:** local authorities may be in a position to provide guidance for their residents. They are well placed to protect householders and allow them to make informed decisions about donations through providing guidance to householders on door-to-door collections from charitable organisations or commercial collectors operating on their behalf. This is important for all authorities, whether they provide their own household collections of textiles or not.

- **Advice on what to do if suspicious activity noted:** collectors and local authorities could provide appropriate contact information that enables immediate reporting of suspicious activity, including information on appropriate communications about how residents can contact their local neighbourhood police team, Trading Standards or Clothes Aid's Collection Protection Department [collection.protection@clothesaid.co.uk](mailto:collection.protection@clothesaid.co.uk). Details of suspected 'bogus' charitable collection should be sent to Action Fraud on 0300 123 2040.

#### 7.4.3 Further recommendations

- Consideration should be given to promote a new system that assist the public in reporting suspected theft from door to door, textile bank and other used textile collections in London. Based partly on a now defunct initiative set up by the City of London Police following lobbying by the TRA and Clothes Aid, a new initiative led by a range of stakeholders including collectors, charities, local authorities, trade bodies, the police and trading standards should be established. It would provide a single point of contact to which the public could report suspected theft of used clothing and bogus charity activity. This could then be referred to the appropriate body and if necessary reported as a potential crime.
- Monitoring the market: The value of used textiles can be considered to have a positive relationship with instances of theft. There have been significant falls in the value of UK used textiles in 2014 which may account for the absence of bogus collectors observed during the study. However, should the value of used textiles rise in the future, then it is possible that we will see a return of the Bogus/Fake Charity Clothing collector and a rise in theft. Understanding the market and dedicating greater resources and mechanisms during times of high value may help protect against theft and fraudulent collections.

## Appendix I: Background information on the fall in the value of used clothing in 2014

Both Eastern Europe and Sub-Saharan Africa are vital markets for the used clothing industry in the UK. About 70% of all used clothing exported from the UK are sent to these two global markets.

In Eastern Europe, political unrest in Ukraine adversely affected the value of the Russian Ruble and Ukrainian Hryvnia currencies. Coupled with the increased problem of moving goods around, exporters with markets in Ukraine and other parts of Eastern Europe, which trade with Ukraine and Russia, are lowering their selling prices to shift goods and stay in businesses.

In Sub-Saharan Africa, there has been civil unrest in a number of countries including Nigeria, Chad, Central African Republic, South Sudan and Somalia. Somali terrorists have been also been blamed for a number of terrorist attacks on the Gikomba Market in Nairobi (Kenya), which is East Africa's largest open air market. In addition, there have been severe problems with a number of currencies including Ghanaian Cedi, the value of which has halved since 2013. Ghana is a vital market and a fall in its currency value against the Pound make imports from the UK relatively expensive, so prices have had to fall. In addition the outbreak of Ebola has restricted the movement of goods across the region, putting further pressure on prices.

## Appendix II: Literature Review Findings

A total of 56 items of literature were reviewed covering a combination of bank theft, door-to-door theft and bogus collections. Table 7 provides an overview of the types of literature that were reviewed by the key area of used textiles theft they focussed on:

**Table 7: Summary of types of literature reviewed**

Area of theft covered	Academic	Report	Guidance/campaign	News article	Other	Total
<b>Total</b>	<b>3</b>	<b>4</b>	<b>13</b>	<b>34</b>	<b>2</b>	<b>56</b>
<i>Bank Theft</i>	1	0	0	16	0	17
<i>Door-to-door Theft</i>	0	1	5	2	0	8
<i>Bogus Collectors</i>	0	0	4	9	0	13
<i>All areas of theft</i>	2	3	4	7	2	18

As anticipated, the majority of literature arises in the realm of local, national and international news reports and articles. The number of news articles reviewed is by no means exhaustive but covers a number of key incidences reported in the past 4 years and gives a good indication of the increasing concern, awareness and investigative action of used textiles theft.

The used textiles trade is complex and influenced by an ever-changing range of economic, geographical and political factors.<sup>22</sup> Within the industry, the average price per tonne for used textiles soared between 2005 and 2012 and held firm until early 2014 due to the high demand from overseas territories for used textiles. The high value of textiles has attracted illegal practices that appear to be exploiting the apparent lack of enforcement and effective deterrents to control such criminal activities.

Theft of used textiles can be opportunistic, but it is believed that the majority of this activity is taking place through organised gangs and criminal networks. Research into this activity has found that the gangs are also involved in other serious criminality including violent crime and fraud.

The used textiles sector is heavily intertwined with the charity sector and donated goods are a crucial source of income to many charities. Less than 1% of registered UK charities have shops, so for the vast majority of charities, door-to-door collections and textile banks are the only way in which they can raise money through clothing collections.<sup>23</sup> Theft from charity organisations via clothing bank theft and door-to-door theft is considered to not just cause detrimental impact on the work of charities but also impacts the public's willingness to donate.<sup>24</sup> Therefore, not only is the actual physical theft footprint difficult to quantify but the wider impact on charity used textiles yields from donations is also difficult to quantify.

### **Academic**

There is scarce academic research into clothing theft either in the UK or internationally. Only recently have papers been published that explore the wider textiles market and identify the rising instances of theft, highlighting that the issue is prevalent at an international level. A recent assessment of the Nordic textile industry by Palm et al (2013) estimates losses due to illegal operations range between 4% in Sweden and 10% in Norway.<sup>25</sup> Bank theft was considered a higher risk than doorstep collections, and also one that is difficult to estimate the level of stolen textiles, as most containers are emptied rather than broken in to. Placement of containers was considered key to avoiding theft, namely recycling centres offer the greatest protection.

The Institute of Fundraising (IoF) highlighted in 2011 that the number of charity bags being delivered seems to have increased over time. Searley (2013) undertook a small scale exploration of charity bags in the UK including analysis of clothing collection bags received over a 12 month period. An average of one charity bag per week per household was delivered in the period. 52 charity bags were delivered in the period from 21 different organisations. 86% of charities provided charity numbers and 78% of collectors were from third party collectors operating on behalf of charities. The bags were checked using the Charity Commission's website and details on the charitybags.org website, the majority of collections were considered to be valid charitable collections, with only two not being found on the charity commission website. There were a number of organisations that provided just leaflets, but these tended to be linked with non-charities and/or suspicious bogus organisations.

The most problematic issues were considered to be the information that charities provided in relation to who was actually carrying out their collections, and enabling them to check the veracity of collecting organisations. Most organisations only provided a website as a

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<sup>22</sup> Brooks and Simon (2012)

<sup>23</sup> Textiles Recycling Association (2014)

<sup>24</sup> British Heart Foundation (2014)

<sup>25</sup> In Finland and Iceland however, used textiles theft is not reported as a common problem.

point of contact, with no direct phone number. Where a phone number was provided; this was usually for the outsourced collecting organisation and not the charity, with the predominant use of non-geographic (0845/0844/0870) numbers, and no information on call charges for these numbers. This was considered confusing to customers and problematic as they tend to cost, meaning fewer calls to these numbers would be made. It should be noted that from June 2014, under *The Consumer Contracts Regulations 2013*,<sup>26</sup> it is illegal to provide an 0845, 0870 or similar number for a customer complaints line. A geographical number (i.e. with an STD code) or an 03 number must be provided.

The research concluded that the Give with Care campaign has attempted to minimise the risk of mistakenly giving unwanted clothing to a commercial company rather than to a registered charity. However, charities need to provide better mechanisms to enable potential donors to make a more informed decision about who they are giving to.

## Reports

Three key reports were reviewed; two were produced by Clothes Aid who has done a great deal of work in this area. All conclude there is a need to explore the best use of legislation, detection and prevention:

- **Clothes Aid & Great Ormond Street Hospital Children's Charity (2006)** '*Theft of Charitable Donations: Serious Organised Crime & Tax Evasion*': During the six months between January 2006 and July 2006, GOSHCC and Clothes Aid closely monitored the increase in thefts of donations and in the course of this monitoring have uncovered indications of what appears to be large scale organised criminal activity and possible tax evasion. 94 different companies were witnessed conducting illicit clothing collections during this period, with 8 companies responsible for over 50%.
- **Clothes Aid (2011)** '*Organised theft in the clothing collection sector – an overview*': The report provides a review of collection methods, clothing collection theft, regulation and enforcement of clothing collections, licensing and trading standards. The report estimates losses to the sector are between £15m and £24m per annum. Since 2006 and the publishing of this report, Clothes Aid received over 3000 reports from members of the public of incidents of theft. Fewer than 1 in 10,000 illegal clothing collections in the UK were found to be subject to enforcement action/prosecution by the local council.
- **National Fraud Intelligence Board (NFIB) (2011)** '*NFIB Pen Picture: Charity Fraud*': The report informed interested parties of intelligence uncovered during a study carried out between 06 January and 18 February 2011 in to charity fraud, in order to allow further decisions to be made. Initial information was received and compared to information received from other police forces, ongoing operations, HMRC and SOCA and an overview of the scale of the problem was mapped.

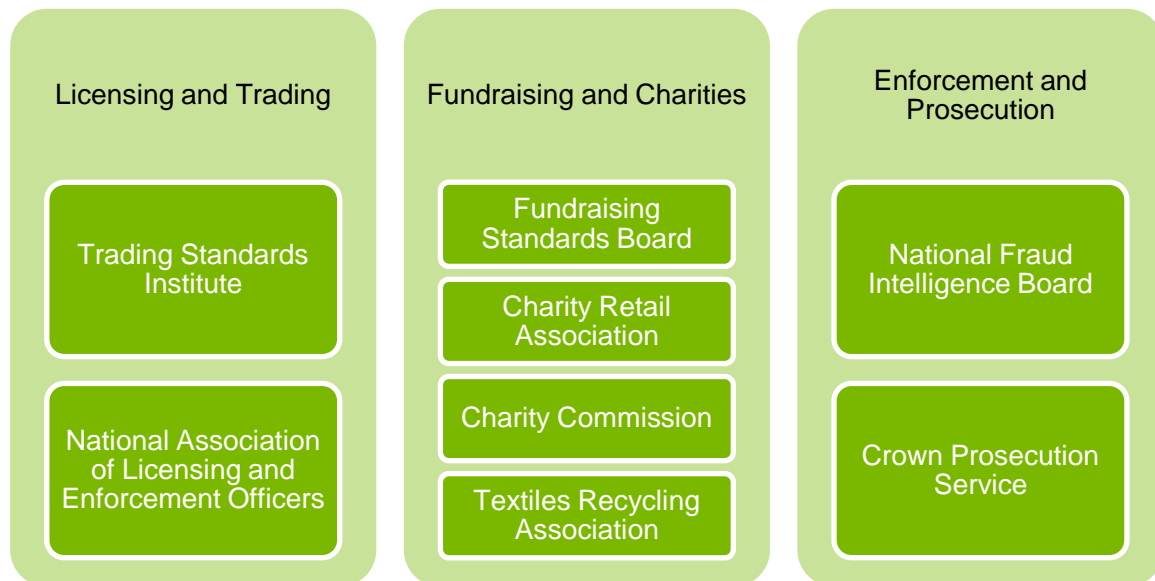
## Guidance and Support

<sup>26</sup> The Regulations can be read in full here:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265898/consumer-contracts-information-cancellation-and-additional-payments-regulations-2013.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265898/consumer-contracts-information-cancellation-and-additional-payments-regulations-2013.pdf)

The Charity Commission, the Fundraising Standards Board (FRSB)<sup>27</sup> and others have published advice and information about how to ensure that donations go to a genuine charity and what to do to report a suspected bogus collection. The Advertising Standards Authority and the Office of Fair Trading have powers to address misleading advertising. A summary of some of the guidance that is available is below:

**Figure 16: Stakeholders providing guidance and information on correct practice and conduct for charitable and other textile collectors**



- **National Fraud Intelligence Board (NFIB):** Established a charity desk that collates and analyses intelligence about bogus and stolen collections (amongst other charity related fraud). The NFIB uses millions of reports of fraud to identify serial offenders, organised crime gangs and established and emerging crime types.
- **Trading Standards Institute (TSI):** The Enforcement Tool-Kit is designed to give Trading Standards and other enforcement officials a quick reference guide to the legal issues connected with tackling this problem so that enforcement authorities are able to identify and take swift assured action as appropriate.
- **National Association of Licensing and Enforcement Officers (NALEO):** developed guidance for licensing officers to help them ensure that they make decisions on applications for charitable collections that are legally compliant
- **Charity Retail Association (CRA):** runs an online reporting tool in conjunction with the NFIB, where members of the public and charity retailers can report their suspicions of bag theft and fraud. In 2007, Clothes Aid and the Charity Retail Association working with the Crown Prosecution Service (CPS) produced guidance to police forces in the UK.

<sup>27</sup> The FRSB is an independent body that has been established to operate the public facing side of the self-regulation of fundraising. The FRSB investigates complaints from the public about the fundraising methods of its member charities and fundraisers if an unsatisfactory response has been received to an initial complaint made directly to the charity by a member of the public.

- **The Institute of Fundraising (IoF):** sets best practice for all those involved in charity goods collection within its *House-to-House Code of Practice* and guidance through the *Code of Fundraising Practice: Public Collections* that covers everything from licensing/permission requirements and exemption licence holders through to training and instructions and collections on private property.
- **Charity Commission:** all charities registered in England and Wales can be checked on the Charity Commission's online register at [www.charitycommission.gov.uk](http://www.charitycommission.gov.uk) and all charities registered in Scotland can be checked on the online Scottish Charity Register published by The Office of the Scottish Charity Regulator at [www.oscr.org.uk](http://www.oscr.org.uk)
- **Crown Prosecution Service:** In April 2012, the Crown Prosecution Service in England and Wales issued new guidance on theft offences which included clarification relating to the theft of charity bags. The guidance states that if items of property are left for the benefit of a particular charity then the property has not been abandoned and it still belongs to the householder until collected. Removal of bags before charities can collect them should therefore be treated as theft. The guidance also notes that the prosecution of such cases is generally in the public interest as this interferes in the relationship between members of the public and the causes they wish to donate to.
- **The Fundraising Standards Board:** The 'give with confidence' tick logo (Figure 18) is available to member charities and fundraisers, reassuring the public that they can give with confidence. The FRSB, TRA, IoF and the CRA ran a national campaign in late 2011/2012.

Figure 17: FRSB Campaign 2011/2012 Leaflet



Figure 18: FRSB Give With Confidence logo



## Theft Reporting, Enforcement and Prosecution

There are legislative requirements charitable textile collections must adhere to:

- Charities Act 2006 – This act requires there to be a notifiable statement on a clothing collection bag and charity textile banks if the collection is being undertaken by a third party on a charity's behalf in England and Wales.
- House to House Collections Act 1939 and 1947 Regulations. These detail the requirements for a permit from the local licensing authorities to be obtained for a charitable collection in England and Wales. The 1939 Act also enables the relevant Minister within the Home Office to issue National Exemptions from licensing.
- It is interest to note that although the legal system is different in Scotland, regulations broadly mirror those in England and Wales.

Fewer than 1 in 10,000 illegal clothing collections in the UK are subject to enforcement action/prosecution by the local council. All the cases resulted in fines only - none led to imprisonment. The level of the fine varied from £100 to £1,000. The costs awarded varied from £150 to £1,000. Where there were two or more defendants, in some cases the fines (and/or costs awarded) were different - indicating different mitigating or aggravating factors.

### Appendix III: Comment by Clothes Aid on Enforcement Action Taken

Over a period of five years up to 2012, 921 formal police reports (actual allegations of crime made) yielded a prosecution rate of 2%. Upon conviction only non-custodial sentences were imposed.

Clothes Aid believes this is because there was a misunderstanding of how to apply the Theft Act by the majority of police officers and the CPS. In 2007 Clothes Aid and the Charity Retail Association lobbied successfully for guidance on charity bag theft which was eventually published by the Crown Prosecution Service as guidance (CPS Circular Nov 2007). The guidance clearly set out that the taking of charity bags is theft and showed the evidential trail needed to prefer charges. However, more campaigning was required before police forces began to act on the guidance, hence the lack of prosecutions. In April 2012<sup>28</sup>, the Crown Prosecution Service published updated guidance, providing further clarification on how to apply the Theft Act and prefer charges.

### Appendix IV: Stakeholder Interviews

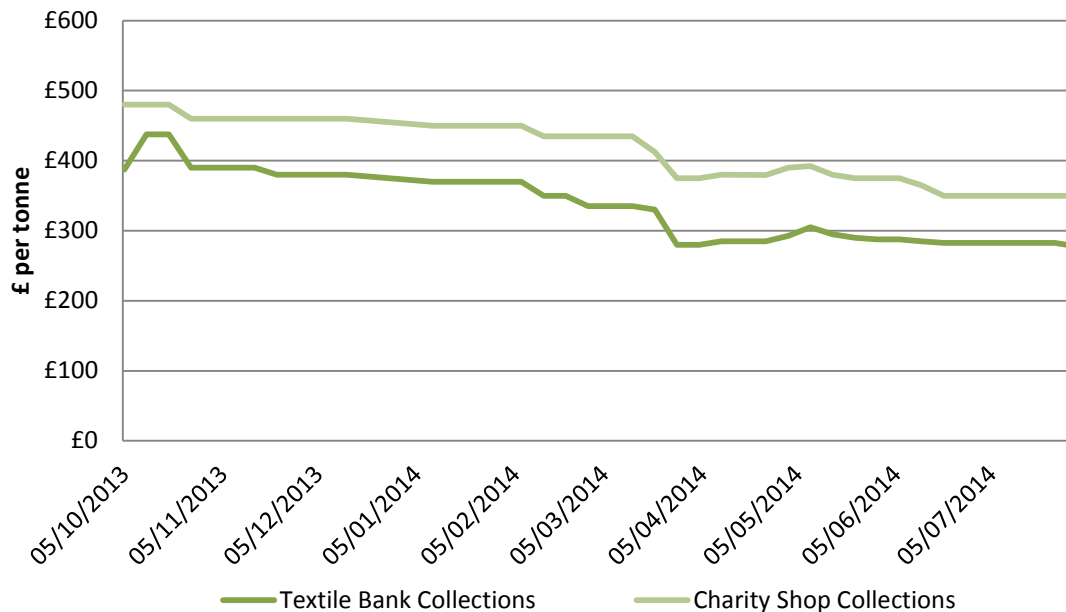
The following questions were asked during semi-structured interviews of stakeholders in the used textile sector:

Questions asked to collection organisations
Do you monitor textile theft? If so, how?
<b>If no:</b> What are the barriers to monitoring theft (e.g. not enough resources, too difficult, does not affect you)?
<b>If yes:</b> How do you report theft (reporting mechanism)?
How do you identify theft hot spots?
How much do you think you are losing (value and tonnage)?
How did you calculate it (e.g. What assumptions did you make, e.g. on kg per bag / grades of textiles?)? Is this based on actual data collected?
Which tools / mechanisms are you using to deter theft?
Questions asked to Charity Retail Association
Would you say the majority of your members monitor textile theft? If so, how (i.e. what methods are used)?
What do you see as the barriers for organisations to monitor textile theft (e.g. not enough resources, too difficult, does not affect you)?
Which reporting mechanism would these organisations use (e.g. through the public)?
Are you aware of your members identifying theft hot spots? How would they go about identifying these?
How much do you think the sector and/or your members are losing in value and tonnage due to textile theft?
Are you aware how the value / tonnage is calculated? E.g.: Are there any assumptions made regarding the weight of an average bag or the grade of textiles stolen? Is this based on actual data collected?
Are you aware of tools / mechanisms used in the sector and/or by your members to deter theft?

<sup>28</sup> [http://www.cps.gov.uk/legal/s\\_to\\_u/theft\\_act\\_offences/](http://www.cps.gov.uk/legal/s_to_u/theft_act_offences/)

All organisations interviewed had recently observed a decline in theft. This was largely attributed to the declining market prices for used textile materials as illustrated in Figure 19.

**Figure 19: Development of the market price for used textiles.**



Source: *WRAP Materials Pricing Report*<sup>29</sup>

**Textile bank collections** – the value that textile bank operators will pay to the bank beneficiaries, such as the named charity or local charity when the banks are owned, sited, serviced etc. by the operator.

**Charity shop collections** - the value that a charity receives for charity shop clothing sold to merchants that collect the garments from the shop

The proportion of different textiles in a tonne of mixed rags, the level of contamination and geographical location can have a significant impact on the price. As such the prices quoted in the Materials Pricing Report may not be reflective of every deal done in the market at any one time.

<sup>29</sup><http://www.wrap.org.uk/sites/files/wrap/Materials%20Pricing%20Report%20%E2%80%93%20material%20grade%20definitions.pdf>, 18/08/2014.

**Table 8: Organisations actively monitoring textile theft.**

Organisation's name	Type of textile collection operation
<b>TRAID</b>	Textile banks Household collections Charity shops
<b>European Recycling (ERC)</b>	Textile banks Household collections
<b>Bag It Up</b>	Textile banks
<b>Oxfam</b>	Textile banks Charity shops
<b>British Heart Foundation</b>	Charity shops

**Table 9: Organisations recording textile theft.**

Organisation's name	Type of organisation
<b>Bag2School</b>	School collections
<b>East London Textiles</b>	Textile banks Door-to-door collections
<b>Chris Carey's Collections</b>	Textile banks Collection services
<b>Phil the Bag</b>	School collections

## Appendix V: Literature Review Bibliography

A full bibliography of the literature review can be viewed in the separate Microsoft Office Excel Worksheet titled Appendix III – Literature Review.