CONSULTATION RESPONSE

Fraudulent Advertising Code of Practice

Category 2A Services

Response to Ofcom

September 2026



Master Locksmiths Association
Promoting standards, skills and consumer protection across the locksmithing industry

Master Locksmiths Association response to Ofcom's consultation on the Draft Fraudulent Advertising Code of Practice for Category 2A Services

About the Master Locksmiths Association

The Master Locksmiths Association (MLA) is the UK's largest trade association for locksmiths and has a longstanding role in promoting professional standards, consumer protection and public confidence within the locksmithing and physical security sector.

The MLA welcomes the opportunity to respond to Ofcom's consultation on the Draft Fraudulent Advertising Code of Practice for Category 2A Services.

Our response focuses particularly on the use of paid search advertising to facilitate **bait-and-switch practices in the emergency locksmith market**, an issue the MLA has been actively seeking to combat.

The MLA strongly supports the introduction of measures addressing fraudulent paid-for advertising appearing in or via search results. The draft Code expressly addresses fraud indicator assessments, search advertising moderation, complaints, advertising libraries and account integrity.

However, evidence collected by the MLA suggests that the proposed measures need to deal more explicitly with fraudulent and misleading service-sector advertising where the deception arises not only from the wording of an individual advertisement, but from the complete business model operating behind it.

MLA evidence of consumer harm

The MLA has analysed 1,988 complaints received between January 2021 and 18 July 2026, after duplicates and partial 2020 data were removed.

The evidence suggests that the problem is both growing and becoming more sophisticated.

Complaints increased from 238 in 2021 to 400 in 2025. By 18 July 2026 the MLA had already received 427 complaints – more than during the entirety of 2025. At that point complaints were running 116% higher than at the equivalent point in the previous year.

The geographical pattern has also widened. Between 2022 and July 2026, complaints from outside London increased by 152%, compared with a 20% increase in London, and the majority of complaints for which a location was recorded now originate outside London.

The financial harm reported by consumers is also increasing. The median amount reported within complaints rose from £315 in 2021 to £512 in 2026. Complaints involving charges of

£500 or more have almost quadrupled and charges exceeding £1,000 are now regularly reported.

Having investigated initial Q3 figures, complaints continue at over double the rate from the year before.

These figures demonstrate that this is not an isolated problem involving occasional poor service. It is a significant and growing consumer-protection issue.

However it is not only consumers who are being adversely affected, but also legitimate businesses, who struggle to compete for visibility against high-budget rogue ads at the top of search engines.

The bait-and-switch model

The recurring pattern found within the MLA's complaint evidence is particularly relevant to the proposed Code.

Many consumers describe a broadly similar sequence:

- an online advertisement promotes a low call-out charge or attractive starting price;
- the consumer contacts the advertiser believing they are contacting a local locksmith;
- a locksmith attends;
- the consumer is told that the lock cannot be opened without drilling or that additional work is necessary;
- an expensive replacement or additional work is recommended; and
- the final amount charged is substantially higher than the price the consumer reasonably expected when responding to the advertisement.

Almost half of complaints received during 2026 refer to quotations, advertised prices or call-out charges.

Nearly half of 2026 complaints also specifically mention drilling, with consumers frequently reporting that little or no attempt was made to gain entry using non-destructive techniques before the existing lock was destroyed. Once that has happened, consumers can feel they have little practical option but to agree to replacement work and the associated charges.

This is important for the design of the Code.

Bait-and-switch fraud cannot always be identified by examining the wording of one advertisement in isolation.

The deception may emerge only when the complete consumer journey is considered:

search advert → apparent business identity and location → telephone or website contact → attending trader → work undertaken → final price.

We recommend that Ofcom explicitly recognises this type of end-to-end service-sector fraud within its guidance on fraud indicators and moderation.

Emergency searches create particular vulnerability

Emergency locksmith services have characteristics which make consumers especially vulnerable to misleading search advertising.

Consumers may be locked outside their home, dealing with a failed lock, responding to a burglary or trying to secure a property urgently. They frequently have little time to research the business appearing in front of them.

The MLA's analysis finds that many complaints begin with consumers urgently searching online and relying upon the businesses presented within search results or advertisements.

Approximately one in five complaints also describe circumstances which may have made the consumer particularly vulnerable, including elderly residents, people with disabilities, people living with dementia, lone occupants and households with young children. This raises the question as to whether these demographics are being specifically targeted by the adverts. To add to this we are informed that these bait and switch ads are excluding areas with lower income.

Almost one in four 2026 complaints contain language relating to pressure, intimidation or aggressive behaviour.

These circumstances increase the importance of preventing misleading advertisements from appearing in the first place rather than relying primarily upon consumers to report them after harm has occurred.

Verification must go substantially further

The MLA particularly welcomes Recommendation FAS H1 concerning checks on advertising accounts.

The draft proposes that a provider should identify the relationship between the person using an advertising account and the person being advertised, and verify that the advertiser works or acts for or on behalf of at least one of the persons being advertised.

This is a valuable starting point, but in our view it is not sufficient.

For emergency and local service advertising, search providers should be required to establish **who the consumer is actually dealing with, whether the identity presented in the advertisement is genuine, and whether claims concerning the trader's location are accurate**.

The MLA's complaint evidence demonstrates why this matters. Consumers frequently report selecting advertisements or websites which appeared to represent local businesses, before subsequently discovering that they had contacted a national call centre or a different trading company.

We therefore recommend that Ofcom strengthens FAS H1 or its accompanying guidance to require proportionate verification covering the following.

1. Verification of the legal and trading identity

The provider should establish the legal person or sole trader responsible for the advertised service and ensure that the identity presented to the consumer is materially consistent with that verified identity.

Where a trading name is used, the provider should establish the legal entity operating behind it.

The identity shown in the advertisement, landing page and advertising account should not create a misleading impression that the consumer is dealing with a different organisation. This could help avoid companies originally identified as advertising fraudulently from re-branding and being able to advertise again.

Further to this we are aware of rogue locksmiths cloning the details of legitimate locksmith companies, using their trading name, quite often their images etc. but putting their own contact details. More in depth verification must address and stop this from happening.

2. Verification of who will actually provide the service

The provider should establish the relationship between:

- the party purchasing the advertisement;
- the business name shown to the consumer;
- any call centre or intermediary receiving the enquiry;
- the business with which the consumer will contract; and
- the trader or business which is expected to attend the consumer's property.

The fact that an advertising account holder is technically authorised to advertise on behalf of another entity should not, by itself, amount to sufficient verification where the overall presentation conceals from the consumer who will actually supply the service.

3. Verification of claimed physical address

This is particularly important.

If an advertiser presents itself as having a physical address or local business presence, the search provider should take reasonable steps to establish that the business **genuinely operates from that address**.

It should not be sufficient merely to establish that:

- an address has been entered into an advertising account;
- correspondence can be received there;
- the address appears on Companies House;
- a virtual office or mail-forwarding service is available there; or
- the advertiser has created an online business listing associated with that location.

The relevant question should be whether the address represents a genuine operational location for the business being advertised.

Proportionate verification could include a combination of independent business records, documentary evidence, utility or occupancy evidence, verification with the property occupier or landlord where appropriate, and technological or other checks capable of establishing that the advertiser genuinely operates from the location claimed.

Search providers should also have controls capable of identifying circumstances in which the **same operator uses multiple apparently local addresses to create the impression of separate local businesses**.

4. Verification of "local" claims

Where the wording, business name, telephone number, landing page or search presentation gives users the impression that a business is local to the search area, that representation should be capable of verification.

An advertiser should not be permitted to create multiple geographically specific identities simply by producing separate landing pages for different towns or cities where there is no genuine corresponding business presence.

For example, the use of terms such as "[Town] Locksmith", "Locksmiths in [Town]" or equivalent geographically targeted domains and landing pages should trigger a requirement to establish the factual basis for the claimed local presence.

Where the service is instead being provided through a national dispatch or call-centre model, that should not necessarily be prohibited, but it should be transparent to the consumer.

5. Verification of telephone numbers, websites and destination URLs

Providers should consider whether apparently separate advertisers share:

- telephone numbers;
- call-routing infrastructure;
- website ownership or hosting;
- payment credentials;

- company officers;
- advertising payment methods;
- destination URLs;
- analytics or tracking identifiers; or
- other technical or commercial connections.

These can provide important evidence that multiple apparently independent local businesses are in fact part of the same underlying operation.

6. Ongoing verification rather than one-off onboarding

Verification should not be regarded as a one-time exercise.

The Code already envisages repeated account checks where information changes or previous checks may no longer be reliable.

We strongly support this principle.

Providers should repeat verification where there are changes to an advertiser's:

- business name;
- physical address;
- telephone number;
- destination website;
- legal entity;
- payment details; or
- other material identifying information.

Significant complaint activity should itself be capable of triggering renewed verification.

7. Verification before advertising is displayed

The checks should take place **before** a local-service advertisement becomes visible to UK users, rather than relying predominantly on retrospective enforcement.

This is consistent with the draft, which proposes that relevant account checks should be completed before UK users are able to encounter paid advertisements from the account.

For services such as emergency locksmithing, harm can occur within minutes of a misleading advert being published. Prevention at account and advertiser level is therefore significantly more effective than removal following a consumer complaint.

Fraud indicators should expressly include bait-and-switch characteristics

The MLA supports Recommendation FAS B1 requiring providers to identify characteristics of advertisements and advertising accounts which indicate material risk of fraud.

The Code appropriately provides for fraud indicators derived from previous fraudulent advertisements, wider fraud trends, account behaviour, targeting and relevant external intelligence.

Based on MLA complaint evidence, we recommend that potential indicators should expressly include:

- unusually low headline or "from" prices in sectors where subsequent charges consistently bear little relationship to those advertised;
- frequent consumer complaints concerning the difference between initial quotations and final charges;
- claims of "no call-out charge" followed by call-out fees;
- repeated use of drilling and replacement as part of a subsequent substantial price escalation;
- advertisements apparently representing a local business where the actual service is provided by another organisation or central call centre;
- use of multiple business names, websites or geographically targeted landing pages by connected operators;
- claimed trading addresses which cannot be substantiated as genuine operational premises;
- invoices or payment information identifying a different entity from the one presented in the advert;
- multiple advertising accounts linked by common telephone numbers, payment instruments, URLs or ownership;
- reappearance of previously sanctioned operators through new accounts, business names, domains or addresses.

No individual indicator should necessarily establish fraud. However, combinations of these characteristics should result in enhanced review.

Moderation should operate at network level, not merely advert level

The MLA supports FAS C1 and FAS C2, under which providers should review advertisements where there is reason to suspect fraud and swiftly prevent UK users encountering advertisements determined to be fraudulent.

However, removing an individual advertisement is unlikely to provide effective protection if the underlying operator can immediately purchase another advertisement through another

account or business identity. We repeatedly see this happening where company names are slightly changed, or the same people create new business entities and replicate their activity.

Where an advertisement is determined to be fraudulent, providers should therefore be expected to investigate reasonably identifiable connected:

- advertiser accounts;
- trading names;
- websites and domains;
- telephone numbers;
- addresses;
- payment instruments; and
- other advertisements.

The objective should be to disrupt the **underlying fraudulent operation**, rather than simply removing the individual creative that generated the complaint.

Reporting should enable pattern-based intelligence

The MLA welcomes the requirement for easy-to-find and accessible advertising complaints systems, including the ability for complainants to provide supporting evidence.

However, trade associations and specialist bodies are often able to identify patterns which individual consumers cannot.

A consumer may know only that they selected what appeared to be a local business, were initially quoted a low amount and subsequently paid several hundred pounds more.

An organisation receiving complaints over time can potentially identify recurring business names, websites, telephone numbers, addresses and trading structures.

Providers should therefore accept and analyse **pattern-based or multi-advertiser intelligence**, not merely individual reports tied to one live advert.

Trusted flagger arrangements should recognise relevant sector expertise

The MLA supports the proposed dedicated reporting arrangements under FAS D7. The current draft identifies a minimum list of trusted flaggers including the City of London Police, FCA, NCA, NCSC and Advertising Standards Authority.

We recommend that Ofcom encourages providers to create similar structured relationships with appropriate professional, trade and consumer organisations able to demonstrate relevant specialist expertise and reliable evidence.

This is consistent with the Code's wider recognition that independent experts and trusted flaggers can provide information which helps providers identify emerging fraud indicators.

The MLA would welcome the opportunity to share relevant intelligence concerning fraudulent locksmith advertising through such a mechanism.

Advertising libraries should support investigation of connected operators

The MLA also supports the proposed advertising library.

The draft proposes that libraries should contain information including advertising account names, the person to whom the account is registered, previous account names, advertisement content, URLs and triggering keywords.

For organisations investigating bait-and-switch fraud, this information could be extremely valuable.

We recommend that advertising libraries be designed so that regulators and legitimate researchers can identify connections between advertisements and advertisers over time, including previous account names and destination URLs.

Historic data is particularly important where businesses repeatedly change identities after complaints or enforcement action.

Performance should include recurrence

The proposed Code requires providers to establish performance targets covering the speed and accuracy of moderation.

The MLA recommends an additional measure: **recurrence**.

A provider should not be considered effective at tackling fraud merely because an individual advert is removed quickly if substantially the same underlying operator can reappear shortly afterwards.

Relevant measures could include:

- how frequently sanctioned advertisers re-enter the advertising system;
- recurrence of substantially similar advertisements;
- re-use of connected addresses, websites or telephone numbers;
- time between enforcement and reappearance;
- number of associated accounts discovered following enforcement; and
- repeat complaints relating to the same underlying operation.

Conclusion

The MLA strongly supports Ofcom's intention to reduce fraudulent paid-for advertising in search.

Our complaint evidence demonstrates that consumers seeking emergency locksmith services are suffering substantial and increasing financial harm and that online search frequently forms the starting point of the consumer journey.

The problem cannot, however, be addressed effectively by considering individual advertisement wording alone.

Bait-and-switch fraud is an operating model, not simply a misleading advert.

The final Code should therefore ensure that providers consider the entire chain:

advertiser → claimed identity → claimed location → advertisement → landing page and contact route → contracting business → attending trader → consumer outcome.

In particular, the MLA recommends that Ofcom:

- strengthens advertiser verification so that search providers verify the true legal and trading identity behind an advertisement;
- requires genuine verification of any physical address or local presence being represented to consumers;
- requires transparency where enquiries are routed through national call centres, lead generators or third parties rather than a genuinely local business;
- requires providers to identify connected advertising accounts and business identities;
- treats bait-and-switch pricing and repeated differences between advertised and final prices as important fraud indicators;
- encourages investigation and enforcement at advertiser-network level rather than solely individual-advert level;
- enables structured intelligence sharing with expert industry bodies; and
- measures repeat entry and recurrence following enforcement.

The MLA believes that these measures would materially strengthen the Code and address one of the principal weaknesses currently exploited by rogue operators: the ability to purchase prominence in search results while presenting an identity, location and service proposition which does not accurately reflect the business the consumer ultimately deals with.

If you would like to see our anonymized data, or we can assist in any way then please do not hesitate to reach out as we are eager to help clean up our industry, and would highlight that we understand the same is happening in other emergency trade industries.

MASTER LOCKSMITHS ASSOCIATION

Contact us

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