



Trading Standards workforce survey 2023

The Society of Chief Officers of Trading Standards in Scotland conducts a regular workforce survey to identify trends and give an overall picture of the officer resource deployed by Scottish local authorities in trading standards services, this is a 100% return from all Scottish councils.

In summary, there has been a further reduction in capacity to the end of July 2023, a marginal increase of under 1FTE in qualified officers, but a reduction of 3.7FTE across the other staff categories resulting in a 1% reduction in establishment since 2021 and over 50% since 2002, when Audit Scotland first noted concerns over the viability of this local authority service, which is critical in protecting Scotland's consumers and supporting Scotland's businesses. In addition, the number of vacant posts has decreased by almost 50% in the past 4 years illustrating the risks of not filling posts in an environment where local authority budgets are stretched to breaking point.

There remain significant difficulties to bringing new recruits into the service, and trainee numbers have reduced again this year, with the qualification route itself presenting challenges to local authority employers, with no viable Modern Apprenticeship scheme in Scotland. This failure in workforce planning is acute in the Trading Standards Officer category where the age demographic is such that over 58% of qualified officers are over the age of 50, and over 60% of other officers are in the same age bracket. Alarming, only 10% of qualified officers are under the age of 40. SCOTSS and the Scottish Branch of CTSI have worked hard over the past few years to mitigate this issue, and a new (Scottish) Modern Apprenticeship in Regulatory Services is almost ready to start, with two colleges willing to support it. This should be capable of providing a stream of new officers in Scotland and it is imperative that local authorities are willing to sustain it.

We are concerned that budget pressures are continuing to mount on Scottish local authorities, after what was a lull in the past few years due to the Covid pandemic. The likelihood is that Trading Standards services in Scotland are not yet at the bottom of the capacity curve because of the age demographic risk, and immediate support is required from government to protect its long-term viability. But we are heartened by the introduction of a new Consumer Duty in the Consumer Scotland Act, which should raise the profile and priority and role of trading standards services in protecting consumers in local communities across Scotland.

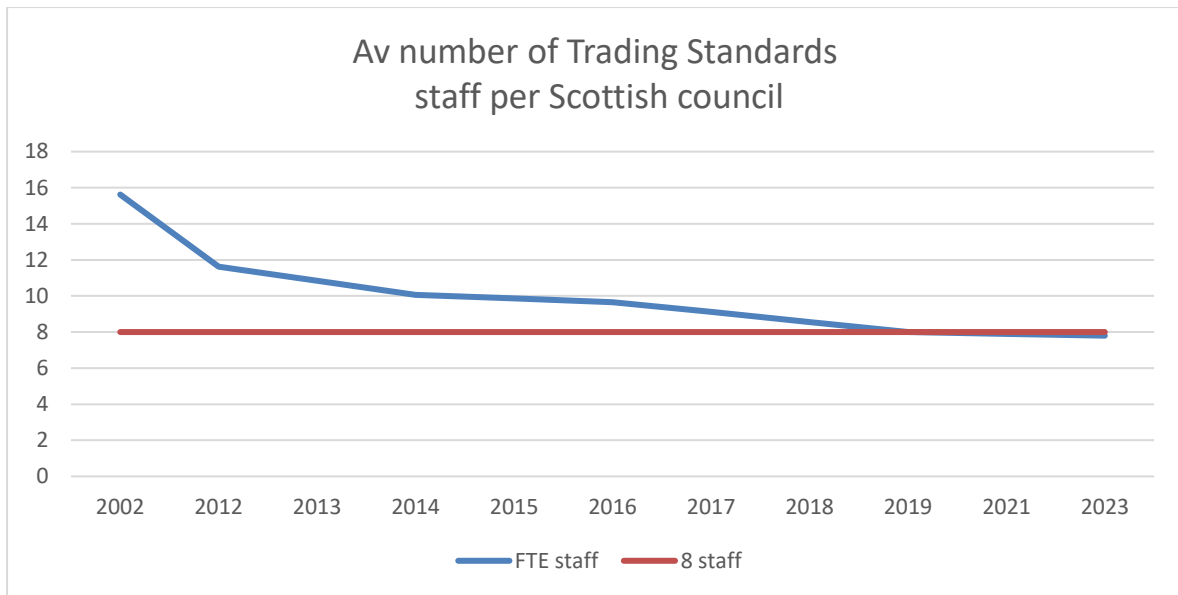


Figure 1

In 2002 Audit Scotland carried out a performance audit across all Scottish Trading Standards services and used a benchmark of 8 or fewer staff to categorise 'small' services. It found that small trading standards services performed worse overall than larger services and had little capacity to improve or develop their services. At that time there were 10 'small' services, and in 2013 when Audit Scotland revisited the service, warning that there was a real risk to the viability of trading standards services, there were 15 Scottish councils with 8 or fewer staff.

In 2023, there are now 21 councils whose Trading Standards Service has 8 or fewer staff, showing a dominance of small services that do not have the capability to provide good quality service across the range of statutory functions, risking inadequate consumer protection for Scottish consumers and a lack of support and advice for Scottish businesses, particularly small businesses at a time when they need it most.

In 2002 Audit Scotland found that the two largest Scottish councils (in trading standards terms) both had complements of 50 or more staff **each** in trading standards. In 2023 those two councils added together have a staffing of 37FTE.

In addition to simple numbers, the age demographic has worsened terribly since just 2019 with just under 60% of enforcement staff now over the age of 50 (2019: 45%), and over 58% of TSOs over the age of 50. The loss of experienced staff is accelerating, and councils are facing a crisis within a service that has a direct role in many devolved policy areas such as Community Safety, Health, Economy, and Consumer Advocacy and Advice, as well as reserved matters.

SCOTSS is engaged with COSLA and the Scottish Government as part of a Workforce Strategy but real commitment to support trading standards is required if this service is to remain viable.

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Table 1 - DTS or equivalent officers (TSOs)

Age	2012 survey	2014 survey	2016 survey	2017 survey	2019 survey	2021 survey	2023 survey
<= 24	0	0	0	0	0	0	0
25 to 29	5	3	1	1	3	1	1.00
30 to 39	34	20.7	24	22.2	20.3	15.6	11.71
40 to 49	78	64.5	55	46.45	39.41	34.52	37.86
50 to 59	45	56.2	51	54.39	51.96	63.56	65.08
60 plus	3	2	5	6	5.73	6.73	6.60
Total	165	147.2	136	130.04	120.4	121.41	122.25

The professional officer resource has been stable since our last survey but is still over 25% less than in 2012. This core resource includes up to a quarter of non or semi operational management staff, so the active body of day-to-day frontline operational officers is significantly smaller.

The risk has worsened however because of experienced officers leaving the service, with 58% of professional staff being over 50 years of age, and only 10% being younger than 40. This trend can only worsen, and we expect a significant number of additional retirements in the next 18 months, with insufficient numbers to backfill these posts and maintain current operational levels. The external recruitment from central government funded teams and agencies, usually on significantly better terms and conditions, is another real threat to the local authority service as it draws the most experienced staff from local council teams and does nothing to help regulatory capacity where it is needed.

Table 2 - Other enforcement and advice staff (non-DTS)

Age	2012 survey	2014 survey	2016 survey	2017 survey	2019 survey	2021 survey	2023 survey
<= 24	0	2	2	3	2	1	1
25 to 29	18	10	8	8	7	8	8.10
30 to 39	33	22.2	23	23.83	22.74	21.4	14.60
40 to 49	71	58.7	62	52	38.1	28.51	22.10
50 to 59	43	42.4	44	44.6	46.71	48.32	56.84
60 plus	6	7	9	9.5	6.86	11.55	13.45
Total	171	142.3	148	140.73	123.41	118.78	116.09

The complement of non DTS qualified enforcement officers has decreased slightly since 2021 the decrease no doubt mitigated by the year-on-year continuation of grant funding for Nicotine Vaping Products duties from the Scottish Government.

There is an opportunity to upskill this officer base to the Trading Standards Officer level, however as the professional officer base reduces, so it becomes more difficult to support learning and development inhouse. SCOTSS and the CTSI Scottish Branch have worked tirelessly over the past two years to produce a Regulatory Services Modern Apprenticeship in Scotland, and that is now available through two Scottish colleges. If suitably supported by local authorities, this should have a significant impact on bringing younger officers into the service.

Table 3 - Other staff (officers with no direct enforcement role)

Age	2012 survey	2014 survey	2016 survey	2017 survey	2019 survey	2021 survey	2023 survey
<= 24	0	1	1	2	2	1.5	2
25 to 29	3	3.6	6	3	1	2	0
30 to 39	11	11	3	1	1	1.6	0.30
40 to 49	12	8.2	7	9	1	2.25	2.33
50 to 59	5	6	5	5	5.033	2.75	4.28
60 plus	5	3	3	1	1	2.55	2.96
Total	36	32.8	25	21	11.033	12.65	11.87

This category of staff (e.g. intelligence officers, technical assistants) has seen a dramatic reduction over the past ten years, although some of that is down to changing roles, with enforcement officers taking on more office-based duties as lower grade posts are lost.

Table 4 - Total staff resources

Year	2002	2012	2014	2016	2017	2019	2021	2023
Staff numbers	511.6	372	322.1	309	291.77	255.84	252.84	250.20
Vacant posts	n/a	n/a	23	15	25	32.8	25	18.1

Staff numbers overall have continued to decline as outlined above, albeit at a slower rate than in the past. Despite the profile given to capacity issues within the trading standards service nationally, there has also been a decline in vacant posts as local authorities continue to experience budget constraints and delete posts when they cannot be filled, in truth largely because there is no additional capacity in the employee pool to fill vacant posts.

Table 5 – Trainees and staff development

Year	2012	2014	2016	2017	2019	2021	2023
Trainees in post	2	2	7	7	7.75	12.8	11
Other staff in qualification route	25	21	22	18	19	10	10.5

Numbers of trainees and other staff studying toward the CTSI qualification remains low, but as outlined above we have worked with the Chartered Trading Standards Institute Scottish Branch and others to bring a Modern Apprenticeship in Regulatory Services to market - a route to qualification that should be more easily accessible by interested individuals. Such a qualification route has been available in the rest of GB for some years and has proven very successful in attracting students.

SCOTSS also has a role as a training partner with CTSI for the delivery of qualification framework training, and we are committed to continuing in this role as one of our charitable purposes, but it needs councils to continue to support it by supporting the qualification.

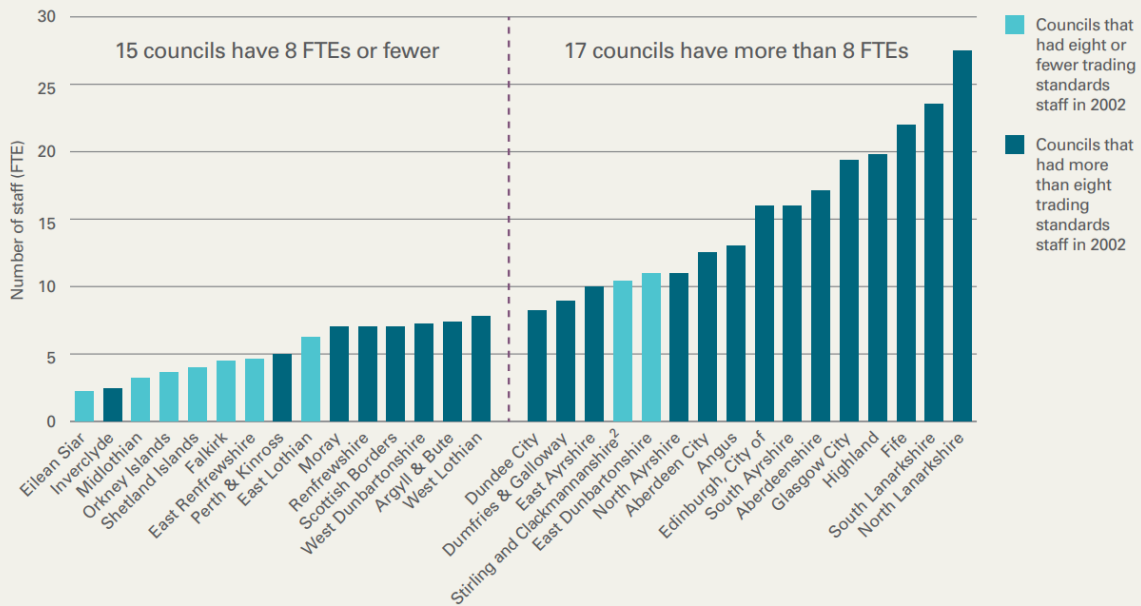
Conclusion

Scotland's local authority trading standards services are at the vanguard in protecting consumers and supporting businesses. We accept that many services across all local authorities have suffered resource cuts, but the fragility of this service is irrefutable, and it is the regulatory service whose viability is most at risk.

Exhibit 6

The number of council trading standards staff, 2012

Nearly half of councils now have eight or fewer trading standards staff.¹



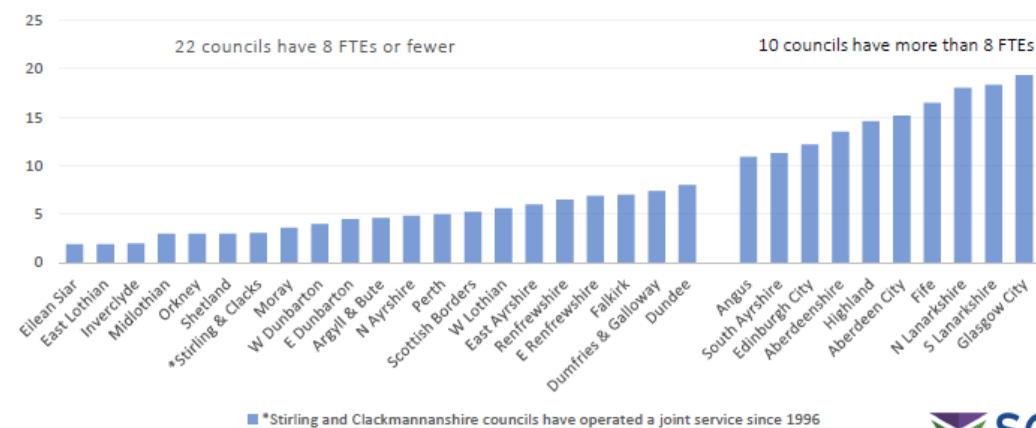
Notes:

- Staff include; Trading Standards Officers (TSOs) who hold the statutory weights and measures qualification, TSOs who do not hold the statutory weights and measures qualification, consumer advisers, trainees who are not included in the previous categories and administration and clerical staff.
 - Stirling and Clackmannanshire Councils deliver trading standards as a shared service between the two councils.
- Source: Audit Scotland



The number of trading standards staff (FTE) by council, 2023

Nearly three-quarters of councils now have eight or fewer trading standards staff



*Stirling and Clackmannanshire councils have operated a joint service since 1996

Note:

Accounts Commission reports in 2002 and 2012 into the viability of Scottish local authority Trading Standards services found that councils with eight or fewer staff had insufficient flexibility and range of expertise to meet all the accepted minimum standards.



The Society of Chief Officers of Trading Standards in Scotland (SCOTSS), is a Scottish Charitable Incorporated Organisation. SC047951

The bar charts above are a good illustration of the fall in capacity and resilience of Scotland's Trading Standards teams, in the last eleven years from 2012 to 2023. The top figure is taken from Audit Scotland's report [Protecting Consumers](#) which was published in 2013, the bottom figure constructed from SCOTSS' 2023 workforce survey.

In 2012 there were 15 Scottish councils with 8 or less full-time equivalent trading standards staff, but by 2023 this had increased to 22 councils, an increase by 50% of LA teams that are too small to provide a service that meets minimum standards for the discharge of statutory duties. There are some examples of collaborative working, but these are coming under increasing pressure as cost saving exercises are carried out, and without the added resilience that a national service might bring, we can only conclude that the viability of this key service for consumers and business in Scotland remains under threat.

SCOTSS prepares this workforce survey every two years to highlight the reduced capacity of local authority services to protect local consumers and businesses, and we hope that local councils, COSLA, Scottish Government, and others, can step up and safeguard a sustainable service for Scotland in the years to come. Action from Government is required now.

Any queries about this report can be directed to

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The Society of Chief Officers of Trading Standards in Scotland (SCOTSS), is a Scottish Charitable Incorporated Organisation (SC047951). Our members are professional trading standards managers representing every Scottish local authority trading standards service.

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