



### Trading Standards workforce survey 2021

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 2021, and despite efforts by SCOTSS to highlight the critical workforce situation in Scottish Trading Standards, there are no signs that the capability crisis in Scotland is being addressed. Despite welcome funding for new duties around tobacco and NVPs continuing, there has been a drop in staff resource of 32% in the last nine years, and over 50% since 2002 when Audit Scotland first highlighted the viability issues in this local authority service. The fall in numbers is across all officer types, although most critical in Trading Standards Officer posts where the age demographic is such that 58% of officers are over the age of 50, up from 48% in 2019. We feel sure that Trading Standards services in Scotland are not yet at the bottom of the capacity curve because of the age demographic risk, and a significant investment needs to be made by government within the next 18 months to maintain even the current borderline viability of this service.

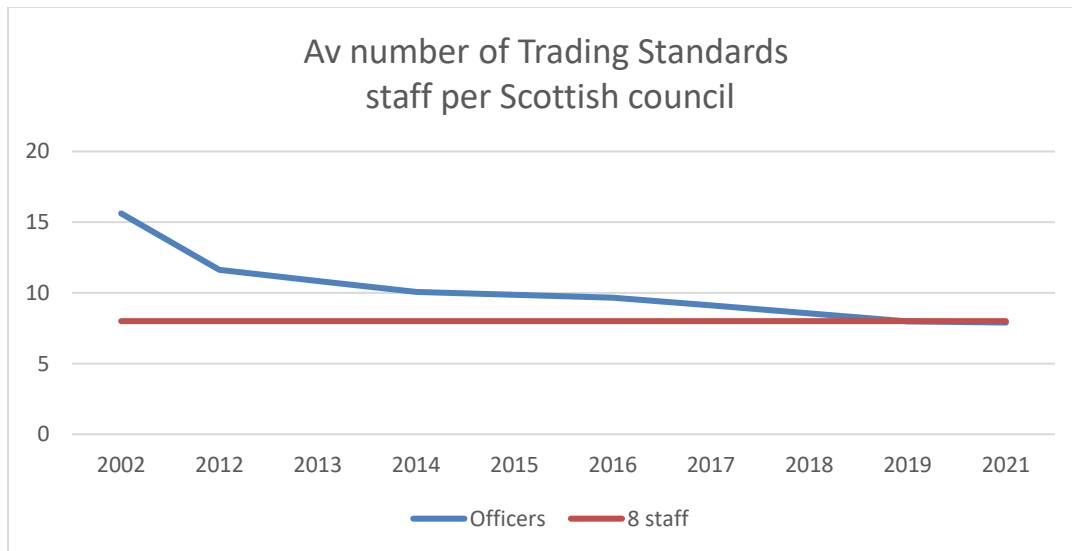


Figure 1

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 2021, there are 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) had complements of 50 or more staff each in trading standards. In 2021 those two councils added together have a staffing of 36FTE.

In addition to simple numbers, the age demographic has worsened since 2019 with over 53% of all staff now over the age of 50 (2019: 45%), and again nearly 60% of all TSOs are over 50 years old. 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, just at a time when the impact of Brexit is starting to be appreciated.

SCOTSS is engaged with COSLA and the Scottish Government as part of a Workforce Strategy and in 2018 presented a proposal to add professional workforce over the next ten years to help prevent further erosion in capacity. The coronavirus emergency has set plans back but much more needs to be done now, to fill vacant posts and get more frontline staff and trainees working in this key area for consumers and businesses.

**Table 1 - DTS or equivalent officers (TSOs)**

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

The professional officer resource has been stable since our last survey but is still over 26% 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 compared to 48% two years ago, indeed three trading standards managers have retired since this 2021 survey was completed. 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
<= 24	0	2	2	3	2	1
25 to 29	18	10	8	8	7	8
30 to 39	33	22.2	23	23.83	22.74	21.4
40 to 49	71	58.7	62	52	38.1	28.51
50 to 59	43	42.4	44	44.6	46.71	48.32
60 plus	6	7	9	9.5	6.86	11.55
Total	171	142.3	148	140.73	123.41	118.78

The complement of non DTS qualified enforcement officers has decreased slightly by 5% since 2019 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.

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

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

This category of staff (e.g. intelligence officers, technical assistants) has seen a dramatic reduction of 50% over the past five years, most likely as an impact of cost saving, 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
Staff numbers	511.6	372	322.1	309	291.77	255.84	252.84
Vacant posts	n/a	n/a	23	15	25	32.8	25

Staff numbers overall have continued to decline as outlined above, despite the profile given to capacity issues within the trading standards service nationally, and there has also been a decline in vacant posts, although in truth there is no additional capacity in the market to fill vacant posts. Opportunities that arise merely displace officers who move from one authority to another..

**Table 5 – Trainees and staff development**

<i>Year</i>	<i>2012</i>	<i>2014</i>	<i>2016</i>	<i>2017</i>	<i>2019</i>	<i>2021</i>
<i>Trainees in post</i>	2	2	7	7	7.75	12.8
<i>Other staff in qualification route</i>	25	21	22	18	19	10

Numbers of trainees and other staff studying toward the CTSI qualification remains low, and we are working with the Chartered Trading Standards Institute and others to try and ensure there is a route to qualification that is more easily accessible by interested individuals, for example through Modern Apprenticeship schemes.

SCOTSS has also taken on a role as a training partner with CTSI for delivery of qualification framework training, but if support given to training and development by councils continues to decline, then there is little chance in maintaining even current levels of enforcement staff in councils, given the existing age demographic.

### **Conclusion**

Scotland's local authority trading standards services are at the vanguard in protecting consumers and supporting businesses to flourish. A remarkable job has been done throughout the Covid-19 pandemic, working with Environmental Health colleagues, and much more is to come when the full impact of Brexit is felt on trade and divergence from Europe. We accept all local authorities have suffered resource cuts, but the fragility of the service is irrefutable, and it is the regulatory service whose viability is most at risk. Action from Government is required now.

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.

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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