



**Chartered Trading
Standards Institute**

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Mr Nick Boles MP
Minister of State for Skills
Department for Business Innovation & Skills
1 Victoria Street
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Dear Minister

On behalf of the Chartered Trading Standards Institute, I would like to welcome you to your new ministerial post. Although we appreciate that consumer protection forms only a small part of your extensive remit as Minister for Skills, we believe that it presents some real challenges and opportunities which require urgent attention.

The Chartered Trading Standards Institute is the professional body representing trading standards professionals in local authorities and businesses across the UK. We have been gathering evidence on the state of trading standards from our members and other stakeholders for a number of years, and most recently worked with your department to commission research from Birmingham University which was published in March this year. As a result of this period of reflection we have been able to put together an evidence based vision for the future of trading standards which we believe will create a resilient and sustainable service making the best use of limited resources. I attach a copy of the vision which we urge you to consider.

The current state of trading standards

The evidence indicates that the current system of local authority trading standards services is broken. In early 2014 we published our Workforce Survey, showing that staff numbers in trading standards had halved since 2009. The recent judicial review case in Liverpool indicates that staff numbers are continuing to fall drastically as local authorities seek to make further savings, with the trading standards team reduced to just a fifth of its former size (from 19 staff to just 4). In fact Liverpool's case is only one example of a growing number of local authorities seeking to reduce their trading standards service to a statutory minimum, in many cases without a proper understanding of what this might look like. [The Impact of Trading Standards in Challenging Times](#) report concluded that 'no departments would now be operating with the levels of resources available to them in, say, 2008-9 or earlier'.

While we appreciate that all local authority services have faced budget reductions, we believe that many trading standards services have now reached the limit of efficiency savings. The huge variation in the size of services, from over 50 staff in the larger county councils to just one part

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time officer in some boroughs, means that a postcode lottery of protection for consumers is now a real threat.

The biggest challenge for local government in this area is the cross border impact of trading standards activity. With elected members under growing pressure to focus on specifically local challenges and high profile services, the impact of trading standards on problems that cross borders can be undervalued. It is important to recognise that weaknesses in enforcement in one area can allow rogue traders to operate out of that area and cause detriment more widely, with implications for neighbouring authorities and those further afield.

Both local and central government have expressed a desire to see innovative and radical solutions explored in response to diminishing public sector funding for local services. The system of almost 200 individual local authority trading standards services is no longer fit for purpose against a background of further reductions in resource coupled with the increasing complexity of investigations in an internet age. Moreover the lack of progress in the last couple of years has shown that central government intervention is required to ensure a sustainable and resilient service for the future. Shared services have not emerged as a long term solution and CTSI believes that structural change must go further to be effective.

Our vision for trading standards

We are putting forward a vision of strategic trading standards authorities larger than the current units which recognise the contribution trading standards services can make in supporting economic growth, preventing crime and improving health. These larger services will ensure that the best use is made of available resources by pooling staff and creating economies of scale to ensure all consumers in the UK are adequately protected and businesses receive the support they need.

Our vision document outlines some initial ideas about what would need to be considered when scoping the size of these authorities and which governance and funding models would be most likely to support a successful trading standards service for the future. However, the work we have done focuses on the concept and must be followed up with further detailed research exploring these ideas.

What next?

A strategic review of the structure of trading standards in the UK is overdue and must be initiated as soon as possible. We urge you to commission detailed work on the future of the trading standards service, considering:

1. A new map of strategic trading standards authorities for the UK which establishes the appropriate size for these authorities and includes consideration of population, number of businesses, geographical distance and infrastructure links, key partners and emerging structures of government including combined authorities and city regions.
2. A funding model which will allow strategic authorities to be flexible in drawing in resources from a number of sources, including government and businesses and retain resilience in the face of diminishing public sector funding.
3. A governance structure for these strategic authorities, including whether it is appropriate for the service to be based entirely within current local government structures.

When the National Audit Office reviews the consumer landscape changes later this year, we can say with confidence that coordination between the different bodies in the consumer

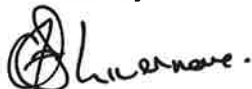
protection has improved, and the system to tackle national level crime has been considerably strengthened. However, the focus on regional and national issues has left problems at a local level to grow to the point where they now threaten to undermine the whole system. While we welcome the funding which government has provided for the National Trading Standards teams, it is not a substitute for the loss of trading standards capacity at a local level.

With a changing local government landscape and further reductions in the resources available to trading standards unsustainable, we need to take this opportunity to redesign a service fit for the 21st century and the increasingly complex challenges trading standards faces.

We recognise that there are a variety of views among trading standards professionals and other stakeholders, and the Birmingham research has put forward a number of different options for the future of the service. However, it is clear that urgent action is needed to establish an agreed plan for the future of the service and we urge you to open this discussion.

Thank you for taking the time to consider our concerns, and I look forward to working with you in the near future.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Leon Livermore'.

Leon Livermore
Chief Executive

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Copy to: Marcus Jones MP, Minister, Department for Communities and Local Government