

WS

Chartered Trading Standards Institute Workforce Survey 2017

There is an urgent need to improve funding, training, resources and procedures for Market Surveillance – the enforcement authorities whose job it is to make the system work effectively. Stakeholders consider the lack of adequate market surveillance to be a major problem in the UK, possibly the biggest problem. Trading Standards are at present the main Market Surveillance Authorities (MSAs) for consumer products. Their job includes preventing unsafe products from entering the country, sampling and removing products already on the market, dealing with recalls, plus offering business advice.¹

Recommendation 3, Lynn Faulds Wood, *UK Consumer Product Recall: An Independent Review February 2016*

The loss of resource and downsizing of Local Trading Standards services have led to gaps in coverage at the local level. Effective consumer protection relies on sufficient coverage across the local level, in particular to prevent enforcement gaps.²

Key Point 15, National Audit Office, *Protecting Consumers From Scams, Unfair Trading And Unsafe Goods December 2016*

1. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509125/ind-16-4-consumer-product-recall-review.pdf, Page 6.

2. <https://www.nao.org.uk/wp-content/uploads/2016/12/Protecting-consumers-from-scams-unfair-trading-and-unsafe-goods.pdf>, Page 9.

Preface

Consider the quotes on the first page from two separate reports published in 2016. Both make it clear that the important role that trading standards plays in consumer protection is being degraded by falls in resources.

This trend of resource reductions in the majority of services has been shown in previous workforce surveys.³ Yet despite this evidence, the two reports quoted on page one, and at least three other reports in the past three years, there have been no substantial steps by central government to address the erosion of trading standards as the frontline of consumer protection.

What is most striking, especially when you consider the urgency in these quotes, is that this survey shows there are now 48 fewer qualified trading standards professionals protecting the public than there were last year. With the survey showing that trading standards services have an average of 9.6 fully qualified staff, this drop is the equivalent of losing nearly five full services in a year.

The Institute's thanks goes to heads of service, managers and others in the profession who have contributed to the survey. It is crucial that we continue to work together to use this evidence to best address the collective challenges facing our profession, and by extension the consumers we protect.

Executive Summary

- There has been a further 4.3% fall in average spending on trading standards.
- Long term budget analysis confirms that there has been a 50% fall in actual trading standards spending in the last seven years.
- 43% of services report that they cannot deal with the consumer detriment in their area.
- 64% feel they cannot recruit or retain skills.
- Of the 82 services which responded to both this year's and last year's surveys, a further 48 trained professionals have left the profession.

Methodology

In designing the survey we looked, where possible, to ask questions that would provide us with answers that could be directly compared with the previous (2014 and 2016) trading standards workforce surveys. We have used the data gathered by this survey alongside 2016 and 2014 data to infer trends.

Where possible we have compared the same authority's submissions over the three workforce surveys. When this was possible the specific sample size has been reported along with the results of the analysis.

The survey design contained 20 predominantly closed questions and took approximately 15 minutes to complete. It was distributed via email to CTSI regional co-ordinators (who were encouraged to share it with their authority members), and via the Association of Chief Trading Standards Officers (ACTSO) and the Society of Chief Officers of Trading Standards in Scotland (SCOTSS), to trading standards heads of service across the UK. The survey remained open for five weeks.

At the closing date of the survey we had received 148 submissions. Not every respondent answered every question and we had a number of incomplete and duplicate entries. Through a process of data standardisation we assessed that of the original 148 responses, 113 respondents provided enough information for the results of their submission to be deemed usable for the statistical analysis presented in this report. With a total population of 195, this sample provides us with a confidence interval of 5.99% at a 95% confidence level.

2017

	Responded	Total
Central England Trading Standards Authorities	9	14
East of England Trading Standards	6	10
London Trading Standards	17	32
North East Trading Standards Association	9	12
South West England regional co-ordination of Trading Standards	9	15
Trading Standards East Midlands	8	8
Trading Standards North West	5	22
Trading Standards South East	11	18
Wales Heads of Trading Standards	10	22
Yorkshire and The Humber Trading Standards	5	11
Society of Chief Officers of Trading Standards in Scotland	24	32

Budgets

We asked a number of questions on each trading standards service's budget for 2016-2017, 2017-2018, and projections for 2018-2019.

Service budgets

This survey indicates that in the past year there has been a 4.3% fall in average budgets, compared to the average budget in 2016-17, with individual councils spending an average of £690,574 on trading standards.

As a comparison, the 2016 survey showed an 11% budget cut between 2014 and 2016, while the 2014 survey showed a 40% cut between 2011 and 2014.⁴

	Responses	Minimum	Maximum	Average
Budget in 2016-17	98	£114,200	£3,039,000	£721,580
Budget in 2017-18	107	£113,500	£2,850,000	£690,574
Projected budget 2018-19	70	£104,126	£2,724,000	£671,225

Table 1

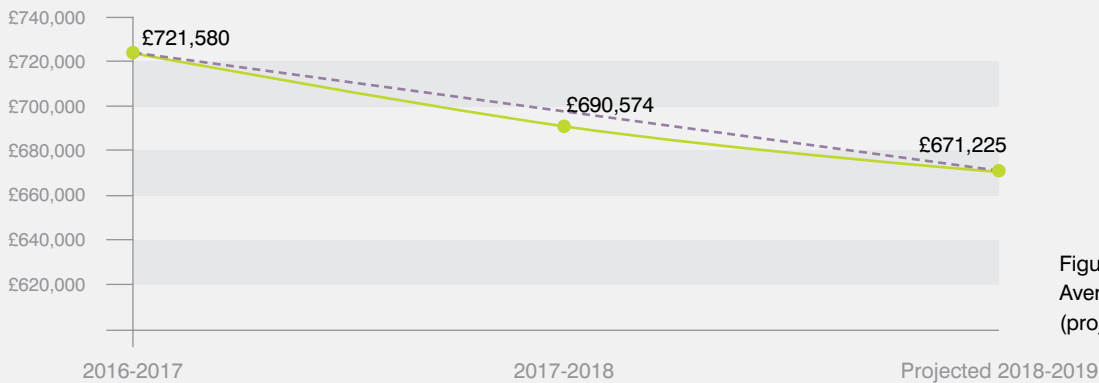


Figure 1:
Average budget 2016-2019
(projected)

This data suggests that there is a continuing trend of falling budgets across services, though this fall has flattened somewhat compared to the 2014 and 2016 surveys.

Looking at the individual responses there were vast differences in the budget changes between services. Some services have seen budget increases, the largest being 20%. However, other services have seen drastic cuts, with one service seeing a 61% fall in its budget over a single year. There are also a large number of services that have seen budgets remain the same year on year – effectively meaning that in real terms budgets continue to fall.

This survey shows four services have a budget of less than £200,000, with the lowest budget being £143,000.

Long term budget analysis

This being the third in a series of workforce surveys we were able to create like-for-like comparisons between the same authorities. 39 services responded with actual budget figures for 2010-11, 2013-14, 2016-17, and 2017-18.

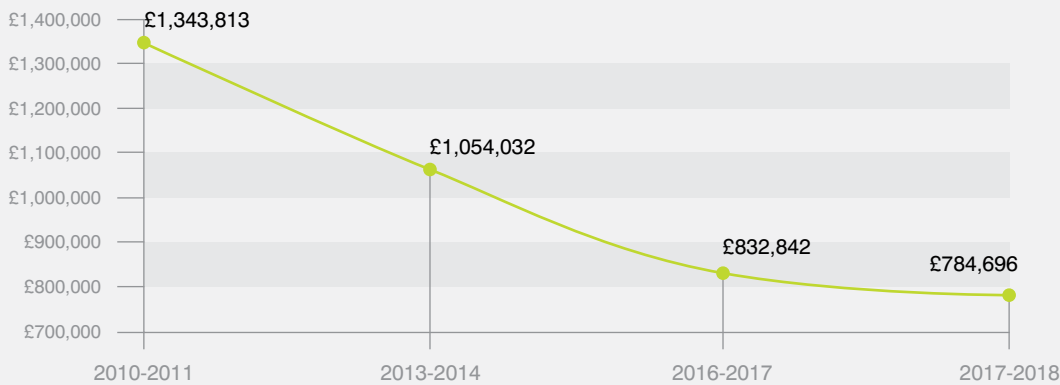


Figure 2:
Long term average budget

Figure 2 shows that, in less than a decade, the average budget for these trading standards services has nearly halved. This reinforces with far more confidence the snapshots that the previous surveys have provided: that budgets have fallen over the past seven years by around 50%.

The average budgets of the services in figure 2 are higher than the overall average in the equivalent survey year. Thus in figure 2, where the 2016-17 average spend is £832,842, the average for the whole 2016 workforce survey was £642,520. The 2017 survey average spend overall was £690,574, compared to an average spend of £784,696 in 2017-2018 in figure 2.

Projected budgets

In 2016 we noted the challenges that services face in providing projected budgets. In this survey, only 70 services could provide a figure on what they thought their budget would be next year (2017-18).

19 services⁵ across all surveys provided data from 2010-11, 2013-14, 2016-17, 2017-18 and the projected budget for 2018-19. The green line shows actual declared spending while the dashed line is the budget projection declared in the 2016 and 2017 surveys.

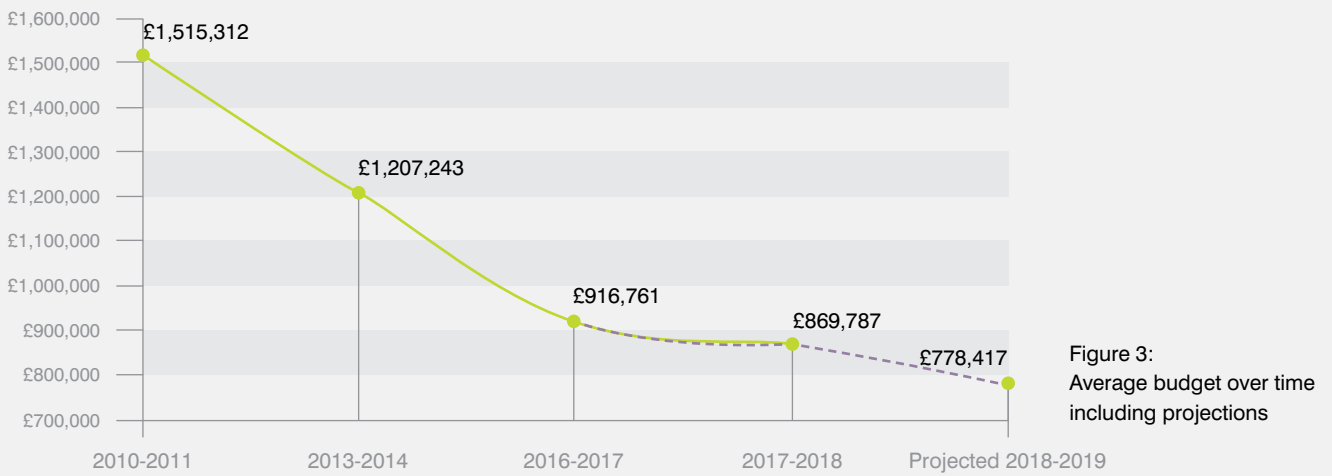


Figure 3: Average budget over time including projections

The dashed line in figure 3 shows that future predictions were generally lower than the actual budget delivered. This highlights the uncertainty that trading standards services face each year in projecting their budgets.

Budget per head of population

Using the 2017-2018 budget figures and population estimates for each local authority we have produced the average amount spent per person on trading standards in each administrative region.

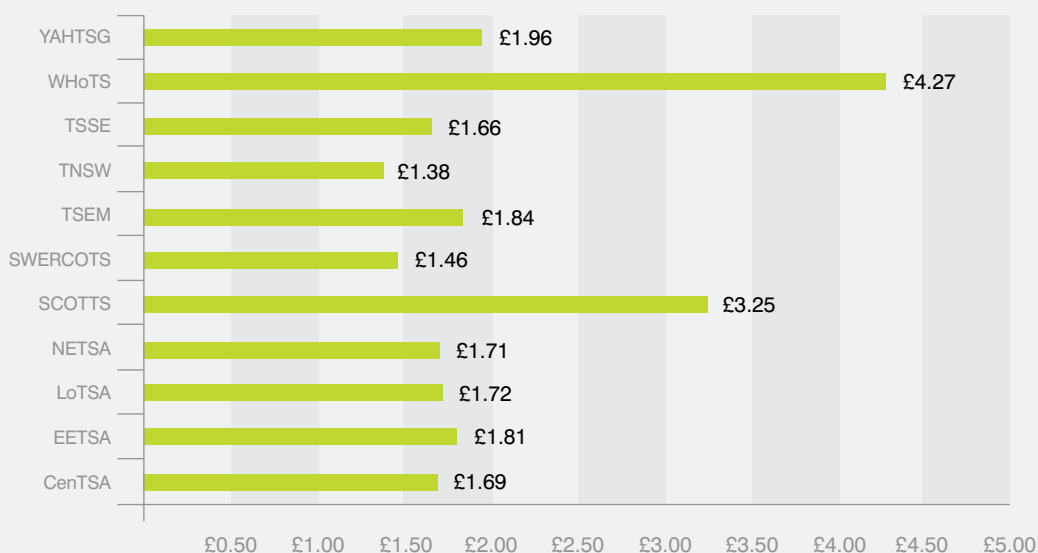


Figure 4:
Average budget per head

Figure 4 shows huge variations in the overall budget per head across different trading standards regions.

There were nine authorities that spend less than a pound per head (of local authority population) on trading standards, six of these being in London. Of the top 20 per-head spenders (ranging from £3.32 per head to £30 per head) in the UK, only two are from outside Scotland or Wales, and both of those are in London.⁶

In this sample, the England only spend per head was £1.69, down from £1.76 in the 2016 survey. Overall across the UK, the average spend per-head was £1.87.

National Trading Standards grant funding

Respondents were asked whether they receive funding from National Trading Standards (England and Wales only; Scotland does not receive this funding). 21% of English and Welsh respondents received NTS grant funding.

Of this number, most indicated that funding was for specific projects rather than ongoing local spending. Examples of this were funds for safety at ports, regional investigations teams, or feed work.

6. The notably high per-head spend in Scotland and Wales reflects similar data from 2016's survey, which we feel reflects geographic differences and sparser population density.

Income generation

The survey asked whether, as part of their budgets, services looked to generate income.

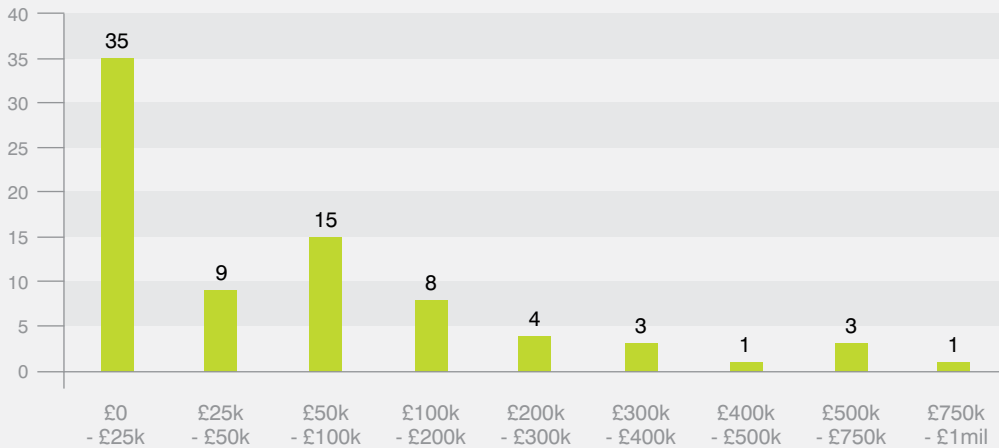


Figure 5: Income generation target

71% of local authorities who responded are looking for some form of income generation, with the highest target of nearly £1m per year and the lowest only £2k per year. This is similar to the roughly two thirds of services looking for income generation in 2016.

Figure 5 shows that 74% of services that declared their income targets are looking to raise £100k or less.

Staffing

Respondents were asked the number of qualified staff that their service holds: those holding DCATS, DTS, CTSP or equivalent. They were also asked the number of supporting staff (those who carry out trading standards work but are unqualified, or staff who provide administrative support).

Staffing costs

Staffing costs make up 84% of expenditure with only 0.8% of budgets allocated to training costs. This could be compared to 87% of budgets in the 2016 survey or 80% in the 2014 survey.

Some authorities indicated that training came from pooled funding; however, in the majority of cases it was not clear where training funding came from, nor whether it was ring fenced.

Year-on-year actual staff comparisons

From the 82 services which responded to our questions on qualified staff in both the 2016 and 2017 surveys, there has been a fall of 48.4 qualified trading standards professionals working within these services in a single year. The average trading standards service has 9.6 fully qualified officers, making this fall equivalent to the loss of nearly five services in a year.

This is a dramatic fall considering that these are some of the stronger services that are consistently responding to our surveys.

As figure 6 shows, there has been an increase in non-qualified staff undertaking trading standards work. This is a concern as the work of a trading standards officer, across 263 statutory duties, prosecuting criminals and advising business on their compliance, is often technical and is criticised when not delivered in a bespoke manner, reflecting the expertise of the trading standards officer.

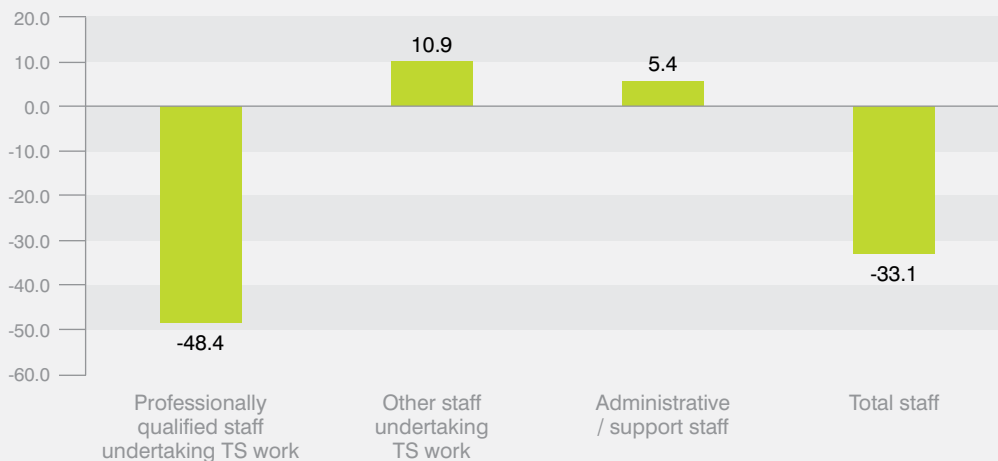
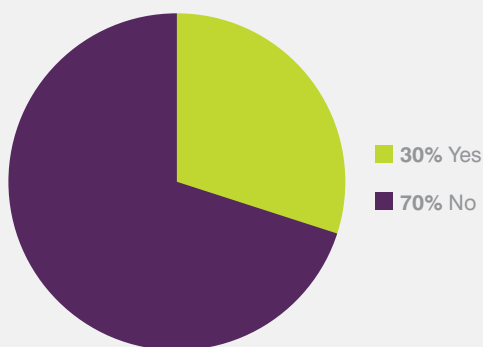


Figure 6:
Change in staffing levels
2016 to 2017



To put this fall into context, figure 7 shows that only 30% of respondents felt their staff have the expertise to cover trading standards legislation effectively. This comparison indicates the continuing disconnect between the expectations of the law and the ability of local authorities to maintain skills to reflect this.

Figure 7: Do you have the expertise to cover comprehensively the 263 statutory duties required of trading standards

Qualified staff

The survey indicated that there were a total of 1,054 qualified staff across 111 authorities in England, Scotland and Wales. This was slightly up from last year, though this can be explained by the different authorities that responded to this year's survey.

The average number of professionally qualified staff per service in the UK is 9.6 officers, with the average total staff in each service being 14.6.

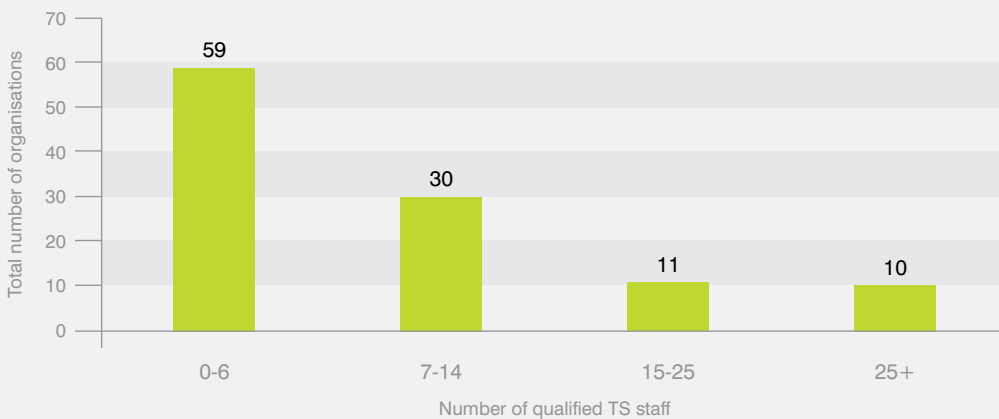


Figure 8:
Qualified trading standards staff by organisation

48% of services have six members of staff or less, with 10 reporting they have two full-time officers or less. For the first time there was a service that reported it has zero qualified trading standards officers.

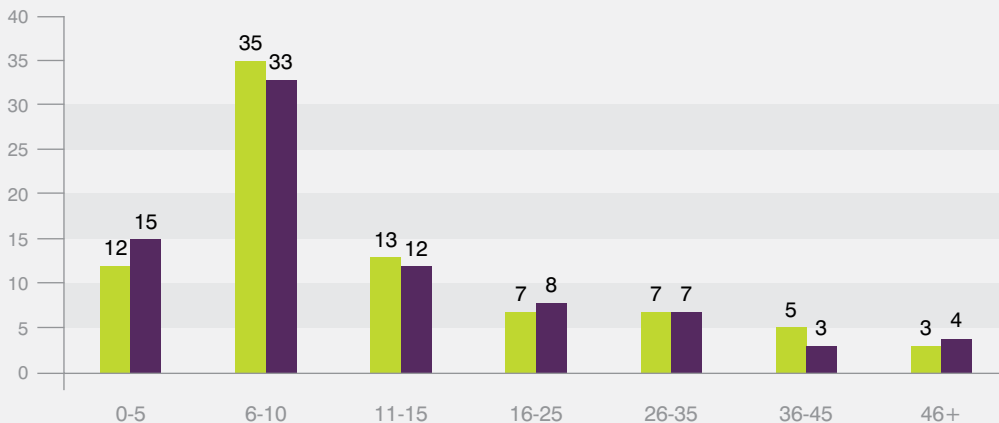


Figure 9:
Total staff by organisation 2016 to 2017

The total staff (qualified, admin and unqualified) continues to show a large number of services with 10 total staff or less.

Due to the complexity of the work of trading standards, and the varying priorities between services, CTSI has avoided stating a minimum number of staff that are required to protect consumers. However, the Audit Scotland report Made to Measure, which cited that small services with fewer than eight fully trained staff are increasingly unable to provide adequate protection⁷, is a useful indication. This data (figures 8 and 9) shows that the vast majority of services who responded are either below or close to this line in both qualified staff and total staff.

Skills

Respondents were asked whether their staff had skills in a number of core trading standards areas. This is a question we have asked in each survey with limited significant changes in each sample.

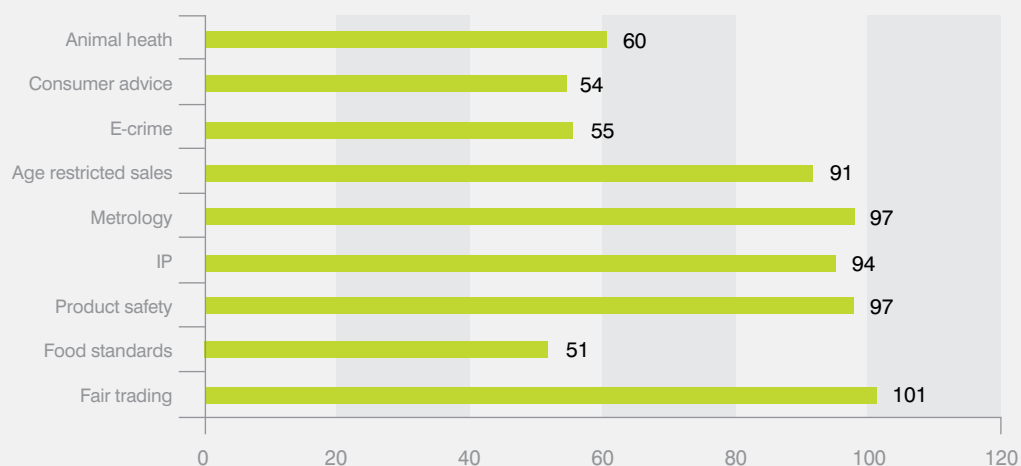


Figure 10:
Specialist skills within
the TS team

To become a qualified trading standards officer, an individual will have studied the majority of these competences. Thus, considering this, a service with even one qualified officer could claim they have expertise. The survey asked questions that looked at whether heads of service believed that they could apply these skills.

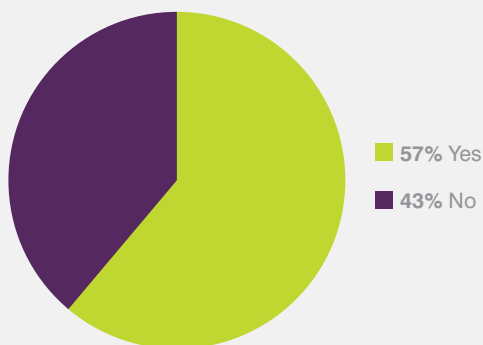


Figure 11: Do you have the expertise to deal with all the issues that impact on consumers in your local area?

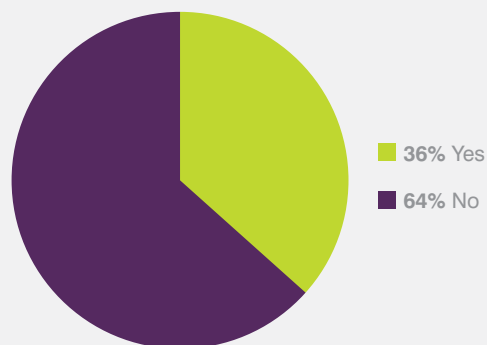


Figure 12: Do you have the ability to recruit/retain expertise to reflect local/regional/national detriment

Figures 11 and 12 both show that while they may report having the expertise there are doubts over application. That only just over 50% of services think they have the skills to protect consumers in their area is a troubling statistic in itself. Paired with the concern expressed that services cannot recruit/retain expertise – along with the evidence shown elsewhere in this survey – this indicates that cutbacks are having detrimental effects on the sustainability of some services, ultimately to the detriment of consumers.

Understanding prioritisation

Respondents were asked whether their staff had skills in a number of core trading standards areas. This is a question we have asked in each survey with limited significant changes in each sample.

‘The governance, accountability, and incentives [of trading standards] should be aligned with the delivery of outcomes at the appropriate level in line with the risks identified’.⁸

NAO Recommendation C

Priority issues

Each trading standards service will have their own locally set priorities. Due to the open nature of this question we had to group several similar responses (‘Other’ is priorities with only one response).

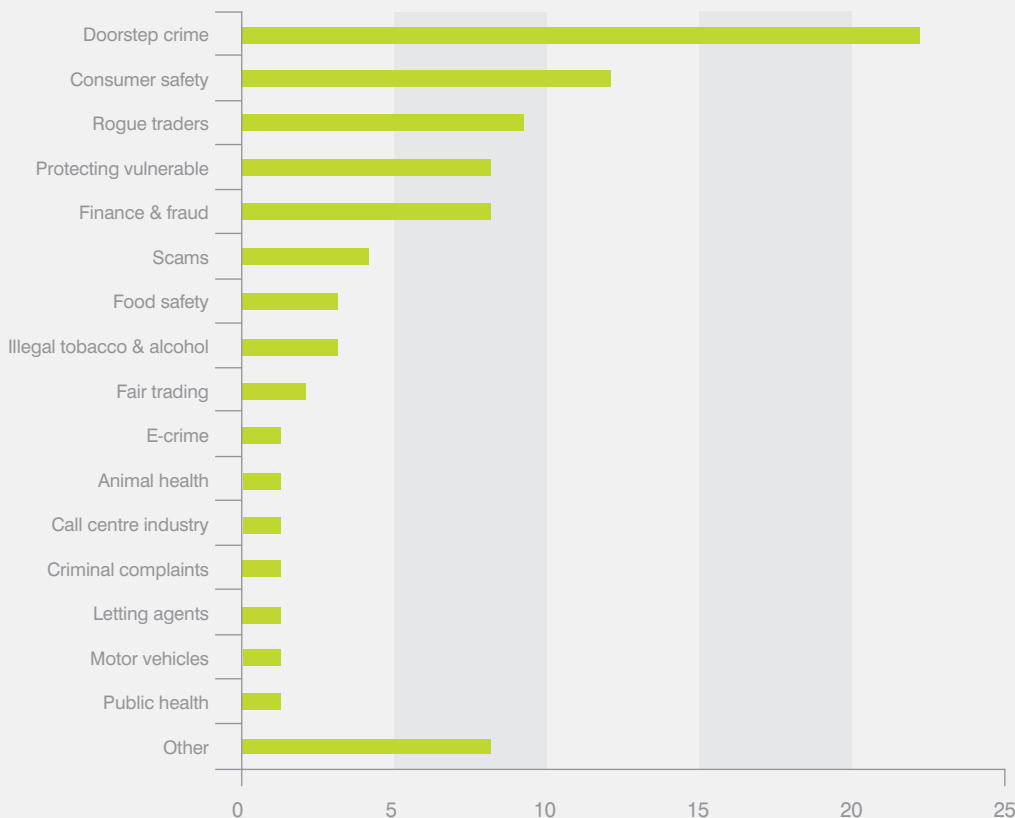


Figure 13: Top formal priority issues

What figure 13 shows is that priorities tend to align with place-based issues such as doorstep crime, whereas issues with less localised detriment, such as fair trading or e-crime, are lower in these priorities.

Local, regional, or national issues

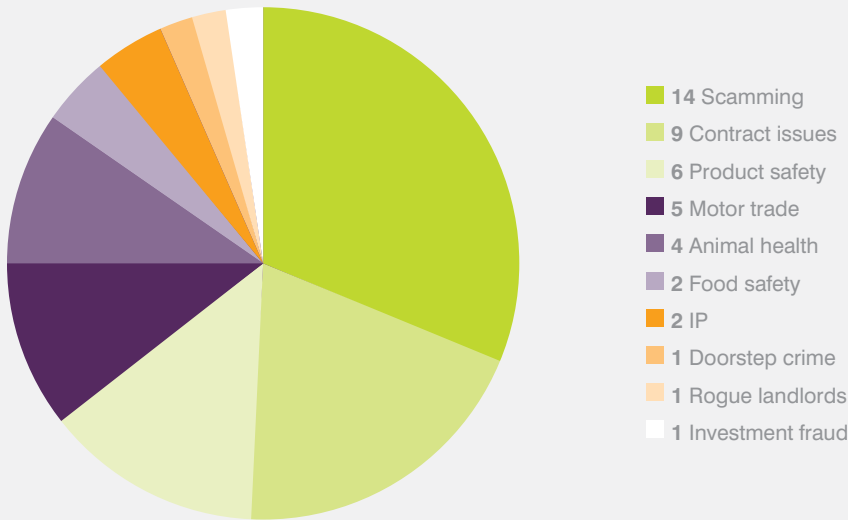


Figure 14 – 15 respondents: Issues considered to be local only

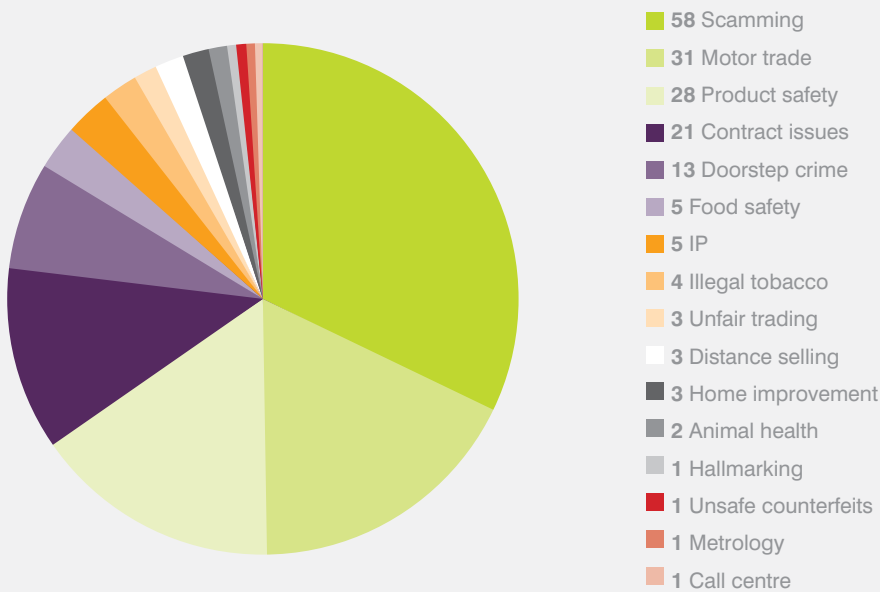


Figure 15 – 64 respondents: Issues considered to be national

The inconclusive nature of the data recovered by these questions highlights that there is little consistent understanding between trading standards services on where an issue has its greatest impact, and thus where enforcement is best placed.

Service arrangements

The survey asked whether the local head of trading standards also managed another department or service. 49% of respondents confirmed that they, as a head of trading standards, also have responsibility for other services.

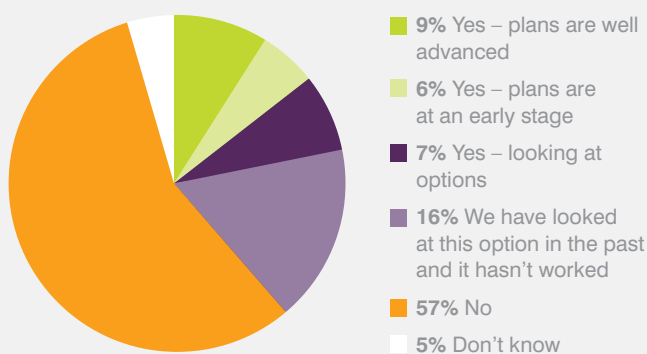
Many of these departments are named similarly. 'Regulatory services' continued to be a common department title as it did in the 2016 survey. 'Environmental health and Trading standards' or 'Trading Standards and Licencing' were also common titles.

The survey showed the breadth of responsibilities that different departments have. Fire and rescue, environmental health, licencing, domestic abuse services, dog warden service, and coroner service are all examples cited.

Formal shared-service arrangements

The survey asked whether councils were looking to formally combine their trading standards services.

In 2015, CTSI published a vision for the future of trading standards,⁹ which advocated services moving into larger units to make them sustainable as well as reflect larger issues. While there is disagreement on the route to this, the LGA similarly agree that: 'Services managed at scale offer the most sustainable future for local trading standards services'.¹⁰



The data in our survey continues to show that, despite a wide acceptance of the challenges facing lone council services, there remains a large majority of services that are not looking to combine their services – 73% who are not planning on combining or who have looked at this option and decided against it.

Figure 16

Management structures

We asked which tier of management the head of service was at, where 1 is CEO.

The majority of heads of service remain at either a level 4 or 5 within their council hierarchy, indicating that the fall in seniority seen between the 2014 and 2016 workforce surveys has stabilised. However, this continues to show that the influence of trading standards services has diminished.

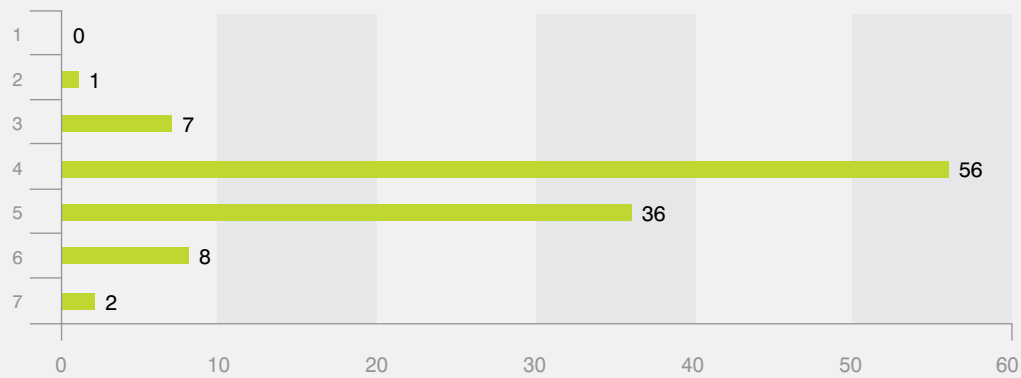


Figure 17:
Tier of management the head
of service sits at



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