



Leading the trading of the profession

Response to the National Audit Office tTi4view

the changes to the consumer landscape in 2011, in particular the value of the Consumer Protection Partnership in improving coordination across the landscape and the outstanding role National Trading Standards (NTS) has played in tackling regional and national level crime. This gives us a solid base from which to implement the NAO's recommendations, in particular consistently estimating and reporting detriment as highlighted in Recommendations A and B.

In this response we will first outline how, based on our own research and supported by the NAO findings, changing how trading standards is delivered offers a comprehensive answer to the challenges outlined. We then look in detail at the two relevant recommendations that gives the department a clear blueprint to work across government to achieve change.

Vision for the future

system priority for market surveillance to be consistent and effective across the country, this is clearly not acceptable.

CTSI therefore believes that the government should develop minimum standards for trading standards services; clearly setting out what each service is expected to deliver. These minimum standards should not be based on staff numbers or budgets but on the outcomes that are expected to be achieved. A performance framework based on outcomes as set out in our Vision would assist in measuring how well the system is performing as a whole as well as highlighting any risks or emerging gaps and identifying those services not achieving the minimum standard. Getting this performance framework right will be difficult, as demonstrated by previous attempts. As a result the Association of Chief Trading Standards Officers have commissioned initial research into outcome based performance frameworks which is intended to inform the development of a new framework. Used properly, this system would protect system priorities and ensure that trading standards are not incentivised to focus solely on local priorities.

Better understanding of performance at a central government level could also become a tool that can identify and combat market imbalances and support businesses. It will be important to design a performance framework that is cost effective and also supports the local government scrutiny role. Local government already measures local priorities, but a consistent performance framework would ensure that central government can measure national priorities and also allows meaningful comparison between services.

In this way, a consistent and centrally endorsed performance framework will ensure that both local priorities and system priorities are met, and that accountability for both parts of the system is located at the appropriate level. This will help to focus limited resources on priorities and improve the effectiveness of the system. In line with our Vision, CTSI believes that to align incentives with delivery of outcomes, core funding for strategic trading standards authorities should be allocated directly from central government to ensure guaranteed delivery of system priorities. Local authorities should also be able to fund strategic services to ensure delivery of specifically local priorities, such as safeguarding of vulnerable adults.

Recommendation D - The Department should work with relevant departments, and the Department for Communities and Local Government, to ensure that consumer protection skills and capacity are deployed strategically to reflect how and where detriment occurs. help manage gaps at the local level and could include defining what a Trading Standards service is intended to deliver.

Setting clear expectations and minimum standards for each service as suggested above would help to manage gaps at a local level. This would be further strengthened by the move to fewer, strategic units of trading standards which are able to deploy skills and capacity strategically against national, regional and local priorities. Clearly the Department for Communities and Local Government will need to be engaged to achieve this agenda and there are some opportunities arising from devolution agreements and the changing shape of local government that could be harnessed. Some of the key benefits of a structural change are that larger units:

have the flexibility to consider the skills of their staff allowing some officers to specialise in particular areas of trading standards law, reflecting the needs of legitimate businesses and responding to the consumer protection challenges they face. In smaller services, specialists, if they are available, are often deployed across the full range of trading standards law -limiting the efficiency of the system.

larger services can establish succession plans to maintain this coverage. Cutbacks have disproportionately removed experienced officers from the workforce with smaller units unable to put in place the planning on how this experience would be replaced.

report makes clear consumer crime is increasingly less localised and no longer restricted to the high street. This solution reflects this shift placing resources where consumer detriment occurs.

