

Which?

Trading Standards in Crisis: rebuilding an effective and accountable consumer enforcement system

This publication reflects the view of Which?.

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Executive summary

Imagine a critical defence system protecting consumers from harm eroding. That's what's happening to the role of Trading Standards Services within the national consumer enforcement system. These services are a fundamental part of the frontline fight against crime that should stop rogue traders from ripping off vulnerable people, prevent dangerous products from flooding our markets and ensure the food on our plates is actually what it claims to be. They protect the public against unfair, unsafe and misleading practices that directly drain money from people's pockets and erode trust in our economy. They also support responsible businesses by ensuring that they are not undercut by businesses that break the law, creating a level playing field and supporting economic growth.

But these vital services are failing to meet the needs of many communities across the country. The consumer enforcement system they are part of is opaque and fragmented. And the government lacks the vital data to understand what's actually being delivered and how this fits with the real-world problems people face.

Our research based on a Freedom of Information (FOI) request sent to all 187 local authorities that are responsible for Trading Standards, extensive engagement with people in the system, and testimonies from our supporter base reveals an alarming reality. The system is in decline with very little accountability for delivery and this is putting consumers and businesses at risk.

Remarkably the [Which? FOI request](#) is the only comprehensive source of information on how local authorities are resourcing and prioritising Trading Standards work, reflecting a lack of digital infrastructure and accountability within the system. We found places where an entire London borough relies on just one lone officer to protect its citizens from an avalanche of consumer threats - a single person against the might of global businesses and cunning criminals. We also found swathes of Trading Standards responsibilities that appear to get very little attention. It's a David and Goliath struggle, where David is losing the battle and consumers suffer as a result.

While the threats become more complex – from online marketplaces teeming with unsafe goods to the relentless flood of illegal vapes on our high streets – the teams meant to combat them are shrinking, starved of resources, steadily seeing a draining away of skills and losing the ability to act proactively. New laws are piled on them with little thought for how they'll enforce them - and no system in place to monitor whether or not they do.

This isn't just about abstract regulations; it's about real people and real suffering - people being defrauded and ripped off, falling victim to unsafe products, and legitimate businesses being undercut by unscrupulous competitors not complying with the law. When consumer enforcement fails, consumers are put at risk, and confidence in the marketplace withers.

We are at a tipping point. The current system is not just outdated; it's broken. Ignoring this will cost far more in the long run – in consumer harm, and in a growing sense of injustice.

This report sets out our detailed findings and crucially a plan both for immediate interventions to safeguard consumers within the current system and for fundamental reforms to remodel this essential regime.

This closely aligns with the government's wider priorities of tackling crime, driving economic growth and reforming public services so that they are more accountable. Tackling the decline of Trading Standards Services and ensuring a more accountable consumer enforcement system fit for the future needs to be high up these agendas. We can't afford to let this crisis continue. It is time for urgent action.

Short-term improvements

- **More effective use of intelligence to understand current and emerging risks:** There needs to be strengthened mandatory Intelligence sharing between local authorities and other regulators in line with the government's vision for public sector digital reform to enable more effective targeting of resources according to risk. As part of this, more effective use should also be made of complaints data through Citizens Advice's Consumer Helpline and the Consumer Advice helpline in Scotland.
- **Ensuring there is accountability for delivery.** Local authorities need to be able to respond to local priorities, as well as fulfil their responsibility for delivery of national priorities. Building on the findings of our FOI request, mandatory reporting on the delivery of the priority national outcomes needs to be introduced. There should be transparent reporting on how these outcomes, along with local priorities, are being delivered including how consumer complaints are dealt with.
- **Coordination and agreement on priorities across government:** This should include the establishment of a national coordination body that brings together all of the government and regulator funders that rely on the work of Trading Standards Services, so they can use the intelligence set out above to inform and agree priorities and expected outcomes from across local authorities. This should help to resolve competing demands from different parts of government.
- **Stronger collaboration across the system as a whole:** Enhanced cooperation and sharing of skills and expertise between national and local regulators and regional groupings is needed to create a more coherent, joined up consumer enforcement system. For example, the Consumer Protection Partnership (CPP), a forum for coordination between bodies operating in the consumer landscape, needs to be reformed so that it has a more strategic and directional role.
- **Safeguarding consumers where there are gaps in enforcement.** High risk areas where local authorities are currently failing to deliver crucial Trading Standards functions need to be identified and consumers safeguarded – by additional or reallocation of expertise and resources to ensure every local authority is fulfilling its duty to protect consumers and responsible businesses. While the above systems for reporting are put in place, the government should undertake a review of capabilities within 12 months, informed by the Which? FOI request.

Longer-term reforms

- **National regulators should take on greater responsibility for the most complex businesses operating nationally.** This is needed given the implications of non-compliance for consumers around the country. It should reflect devolved differences and recognise that some 'on the ground' enforcement will still be required. This includes the Competition and Markets Authority (CMA), Office for Product Safety and Standards (OPSS) and Food Standards Agency (FSA) and should cover provision of national-level guidance.
- **Trading Standards Services should operate as formalised strategic regional hubs that have a 'critical mass' of resources and expertise.** This will help to ensure that the needs of the local community are met and should form a key part of local economic policy. This should be considered as part of the government's proposals for local government reorganisation in England and establishment of strategic authorities, including appropriate mayoral oversight.
- **National expert teams should lead on key areas of national risk that require specialist expertise and have a statutory basis (and therefore powers).** This will require a review of the existing teams under National Trading Standards (NTS) and Trading Standards Scotland (TSS) responsibilities in order to establish more permanent teams with the necessary enforcement powers. These teams should be informed by evidence of the areas of highest consumer detriment (eg rogue traders), where local authorities are deprioritising issues that have national consequences (eg. counterfeiting and weights and measures) and where it may be beneficial for national regulators to take a greater lead (eg. product safety).

Consumer enforcement in crisis

Trading Standards Services protect consumers from a broad range of crimes and rip offs and help maintain public safety by enforcing over 300 pieces of legislation. From ensuring the safety of products and accuracy of food labelling to dealing with rogue traders when building work goes wrong, this vital work undertaken by local authorities can easily be taken for granted, but faces enormous challenges and is falling apart.

A Which? Freedom of Information (FOI) Act request to all 187 of these services across Great Britain¹, based within either unitary or county authorities, has shown that they are struggling to do their work effectively as a result of reductions in funding and a lack of accountability for delivery. The national picture is mixed, with some services faring better than others. But some are now so depleted it is impossible to see how they can effectively protect consumers.

Difficult decisions are being made about prioritisation at a local level which leaves crimes unpoliced putting consumers at risk nationally. This erosion of the UK's consumer enforcement system undermines consumer confidence, is unfair to responsible businesses and runs counter to the government's economic growth mission. At the same time that resources have become more scarce, the work that they do and the businesses they police have become more complex. The system is therefore desperately in need of reform.

The threats to these services are not new. Almost ten years ago, the National Audit Office (NAO) looked at the consumer enforcement system² and raised concerns about the level of resourcing and lack of accountability. Audit Scotland also raised concerns that the viability of Trading Standards Services were under threat and urgent action was needed to strengthen consumer protection in 2013³. The FSA has repeatedly highlighted the risk that lack of local authority resourcing poses for food standards⁴. The Trading Standards profession has also previously published the results of its own surveys showing a gradual decline in resourcing and work that is able to be undertaken⁵.

Despite these warnings, there has been a repeated failure to address this decline and modernise the system. Instead, responsibilities have continued to be piled on to Trading Standards teams with very little oversight of whether or not these are able to be delivered or

¹ Northern Ireland is excluded from our analysis as it has a different model with a national service for fair trading and weights and measures enforcement that is reasonably well-resourced and therefore able to take a more pro-active approach to the areas within its remit.

² Protecting Consumers from scams, unfair trading and unsafe goods, National Audit Office, December 2016

³ Protecting Consumers, Audit Scotland, January 2013

⁴ Local Authority Performance Update to Food Standards Agency Board 24th September 2024, FSA 24/09/04; Our Food 2023 and Our Food 2024: an annual review of food standards across the UK, 8th October 2024 and 19th June 2025, Food Standards Agency and Food Standards Scotland.

⁵ Workforce survey 2018-19: Trading Standards Services Statistical Analysis of Changes and the Current Views from Heads of Service, Chartered Trading Standards Institute and Department for Business, Energy and Industrial Strategy, 18th February 2020; The Impact of Local Authority Trading Standards in Challenging Times: Research Report; John Raine and Catherine Mangan, Birmingham University, 21st March 2015 (commissioned by the Trading Standards Institute and the Department for Business, Innovation and Skills).

monitoring of the level of enforcement activity that is being undertaken. This not only matters for consumers and businesses within these individual local authorities - it has huge consequences for people and businesses across the country.

Trading Standards are responsible for supporting local communities by tackling issues such as high street and doorstep crime, and dealing with products and services sold through local businesses. But they are also responsible for enforcement of businesses that operate nationally and, in many cases, globally. This can include a highly complex range of businesses and supply chains, including digital goods and services.

Dealing with this complex mix of issues requires a very broad range of expertise. It also requires a varied toolkit in order to help those businesses who want support in compliance, while having the ability to clamp down on firms that breach legislation and adversely affect consumers, as well as other responsible businesses operating within the sector. At the same time, Trading Standards Services also need to be responsive to community needs and priorities and have responsibility for enforcing laws that help tackle anti-social behaviour, such as controls over vapes and tobacco and underage sales.

Our research, based on our FOI request and wider analysis, shows that the current system urgently needs modernising if it is to effectively protect consumers and support businesses. There is now a real opportunity to reform these crucial services given that the actions needed align so closely with government priorities of driving economic growth, tackling crime and reforming public services:

- The government's mission to tackle crime and make our streets safer. Trading Standards teams should be on the frontline, alongside other national crime agencies, protecting people from rip offs, rogue traders and unsafe products. The depletion of this service risks leaving many vulnerable consumers with a sense of helplessness that these crimes are not being dealt with, when they cause serious financial and emotional harm.
- The government has [set out a vision for regulatory reform](#) that will support growth⁶. It is crucial that the role that Trading Standards Services play within the consumer protection landscape is looked at as part of this reform programme; not only national regulators. When people feel they are protected, they are more likely to invest in our economy, and responsible businesses will feel able to compete against those not playing by the rules.
- There are a series of reforms underway to improve the delivery of the public sector, and make services more efficient. Proposals for [devolution and local government reorganisation](#) in England⁷ are being considered in Parliament which will lead to the creation of more strategic and unitary authorities and more authority for mayors. Alongside this, The government has also set out [a blueprint for modern digital government](#) that includes aims to join up public services, harness the power of artificial intelligence (AI) for public good, improve transparency and drive accountability. There are opportunities to consider how these initiatives can be used to improve the delivery and accountability of consumer enforcement teams.

⁶ New approach to ensure regulators and regulation support growth policy paper, HM Treasury, 31st March 2025

⁷ English Devolution White Paper, Ministry of Housing, Communities and Local Government, 16 December 2024

Weaknesses of the current system

As there is no publicly available data on how local authorities are delivering Trading Standards functions Which? sent a FOI request to all 187 local authorities that have responsibility for Trading Standards in July 2024. All of these authorities responded, although there was some variation in the level of detail that could be provided. In addition, we have engaged extensively with key players in the system, businesses and directly with our members and supporters on their experiences in dealing with the system.

This showed that a broad range of work is still undertaken by Trading Standards teams, many having to do their best despite diminishing resources and an increased workload. But the results from the FOI request also show that the system as it currently operates is not fit for purpose in terms of adequately protecting consumers.

Rather than a 'sticking plaster' approach to try and address the many gaps in current consumer enforcement, consumers and businesses need to have greater confidence that the system is designed to effectively identify and respond to consumer harms in today's complex and fast-changing markets - while also dealing with more traditional and long-standing compliance issues.

Crucially, our research and engagement has highlighted the need to ensure that there is much greater accountability for delivery of vital consumer protections that consumers should be able to rely on.

There are five aspects of the current system that are particularly concerning:

- **a lack of shared intelligence, reporting and accountability** that enables understanding of whether the work that is being done is focused on the most important issues
- **a lack of resources and expertise** as Trading Standards work can be poorly understood and valued - and therefore traded off against competing priorities by local authorities
- **variation around the country** as to how consumer enforcement issues will be dealt with, business advice provided and whether businesses that breach consumer protection laws will be identified and dealt with - with national consequences
- **an inadequate response to consumer complaints** and failure to make effective use of them to determine prioritisation
- **a lack of a coherent approach** between Trading Standards Services and others across the enforcement landscape including national regulators.

Lack of shared intelligence, reporting and accountability

Finding out how well this system that consumers and businesses rely on is functioning is challenging. Because of the diversity of the work Trading Standards Services carry out, a wide range of government departments and regulators fund the work that they do. Results from our FOI request confirmed that the majority of this comes from the Ministry of Housing, Communities and Local Government (MHCLG), but other government departments and regulators, such as the Department for Business and Trade (DBT), Department for Health

and Social Care (DHSC), Home Office, Scottish Government and FSA may also fund work, either directly or through National Trading Standards (NTS).

There is however generally no reporting and resulting accountability for how this funding is allocated, its impact and how cost-effective it is. There is a basic lack of understanding centrally of what issues are being enforced across the country and the extent to which the system tackles the areas with the most risk of consumer harm. Given the government's focus on reforming the delivery of our public services, and building a digital state, this lack of reporting and accountability is deeply worrying.

Local authorities should be taking a risk-based approach to enforcement, informed by intelligence as well as market surveillance. Our FOI request found significant deficiencies in the way that data is collected, with little standardisation across services. It also found that many authorities are taking what they describe as an 'intelligence-led' approach and also that some have had to deprioritise routine market surveillance and become more reactive. Where this intelligence comes from and the extent to which it reflects the harm that consumers are experiencing seems to vary considerably. There have been efforts made to improve intelligence-sharing between local authorities in recent years, including the development of a national database (IDB) that local authorities input into and a National Trading Standards Intelligence Operating Model (IOM)⁸ but this is still far too limited - and as local authorities become more constrained and have to prioritise, their ability to input into this intelligence is likely to become more limited. Our analysis also showed a disconnect between the issues that are being prioritised and the issues consumers are complaining about (see pages 11 and 12). Services use of complaints data, which should be a valuable source of intelligence, seems to vary a great deal.

Back in 2016, the NAO [looked at the consumer protection landscape](#)⁹, raised concerns about the lack of resourcing and downsizing of local Trading Standards Services and highlighted the absence of system-wide reporting of the impacts of consumer protection work. It recommended that the business department *"work with relevant departments, and the Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government), towards a shared understanding of risks to consumers. The governance, accountability, and incentives should be aligned with the delivery of outcomes at the appropriate level in line with the risks identified. This should include setting clear and realistic expectations of what each body should deliver, alongside reporting progress, so as to ensure that system priorities are met alongside local priorities"*. Unfortunately, almost ten years on, the recommendations of this report have not been fully acted on, but consumer detriment has continued to rise. The CMA now estimates the financial cost of harm caused to consumers as a result of problems with a product and/or service stands at £71.2bn, for the year ending in May 2024.

⁸ Building an intelligence led approach to support Trading Standards' work, National Trading Standards, December 2020.

⁹ Protecting Consumers from scams, unfair trading and unsafe goods, National Audit Office, December 2016

Limited resources and expertise

The Trading Standards professional body, the Chartered Trading Standards Institute (CTSI) has conducted workforce surveys, with [the last one conducted for 2018-19](#)¹⁰, that have shown a general decline in local authority resourcing of Trading Standards Services over time and therefore a decline in level of activity that is possible. This is in line with the wider funding challenges facing local authorities. Our FOI request has clearly reinforced this as a challenge.

As Trading Standards Services are at County or Unitary council level, they are competing for funding with a broad range of services and have often been seen as the lower priority. Despite the national consequences of much of the work they undertake - and the national source of most funding - decisions about how budgets provided by central government are allocated are made at a local level. Our findings show a lot of variation.

As services have been reduced, expertise has been lost. There is still remaining expertise within the system, and a recent increase in apprenticeships should help to support this, but the range of issues that these services have to deal with has also broadened and the types of businesses that they are responsible for have become more complex. This requires a diverse mix of skills to be able to deal with problems from doorstep crime through to policing digital markets - and often linked to organised crime. Our FOI confirmed just how much the system is collapsing in some areas and struggling to deal with today's challenges.

While the FOI revealed enormous variation around Great Britain, there was a consistent picture of services under strain. In the worst case, there was only one full time equivalent (FTE) Trading Standards officer responsible for undertaking all of the work needed in that authority (the London Borough of Enfield). Other local authorities are faring better and still managing to maintain a larger service, but overall the FOI shows that services are generally having to limit the areas of work they cover. It is not possible to set out what an effectively resourced service looks like, in terms of FTE and expertise, unless there are improvements in the data and intelligence to inform this. This will vary according to the authority and the risks.

The full findings of the FOI are set out in a [separate research report 'Trading Standards resources and activities'](#). It revealed a very concerning picture.

- Trading Standards are now so thin on the ground in some areas they are unable to fulfill their responsibilities and as a result essential aspects of consumer protection are having to be deprioritised. This includes work preventing scams, dealing with counterfeit products and weights and measures work. Some authorities have also stopped doing proactive inspections to check on business compliance.
- The budgets allocated to Trading Standards work vary greatly, with a median budget of £2.04 per head of the population. Twelve services had a budget of more than £5 per head, but 14 services had less than £1 per head. Welsh services tended to have

¹⁰ Workforce survey 2018-19: Trading Standards Services Statistical Analysis of Changes and the Current Views from Heads of Service, Chartered Trading Standards Institute and Department for Business, Energy and Industrial Strategy, 18th February 2020.

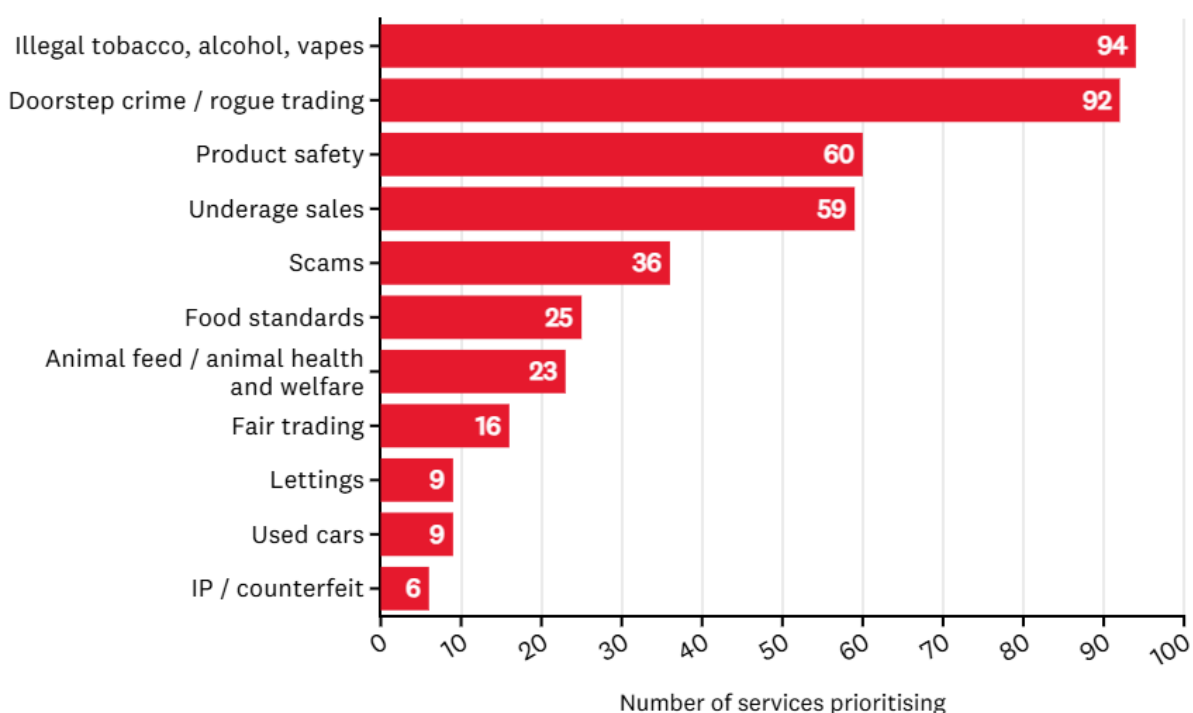
a slightly higher budget per head of the population, compared to Scotland and England.

- We found that 17% of services have fewer than two staff per 100,000 people, and 57% have fewer than four per 100,000 people. Services with the least staff are predominantly London boroughs. Enfield had only 0.43 staff per 100,000, with Lambeth, Redbridge and Barnet also having less than one member of staff per 100,000 people. In absolute terms, this amounts to 1.4 full time equivalent (FTE) staff in Enfield and 2 FTE in each of Lambeth and Redbridge (including their admin support). These boroughs each have more than 13,000 businesses to enforce against and populations of more than 300,000 to protect.
- Areas outside of London that fall within the least staffed areas also tend to be urban areas, for example Liverpool and Southampton. We found that services in Wales and Scotland have comparatively more staff for their population than England.
- There can also be significant differences between local authorities that have similar profiles. Southwark and Enfield, both London Boroughs, share similar population sizes and business numbers. But Southwark reported 3.8 FTE staff per 100,000 people compared to Enfield's 0.4, and had a budget nearly three times as high in 2023-24. Manchester's population is around 15% higher than Liverpool's, and they are both city authorities, but its staff numbers and budget were more than twice as high.

A postcode lottery with national implications

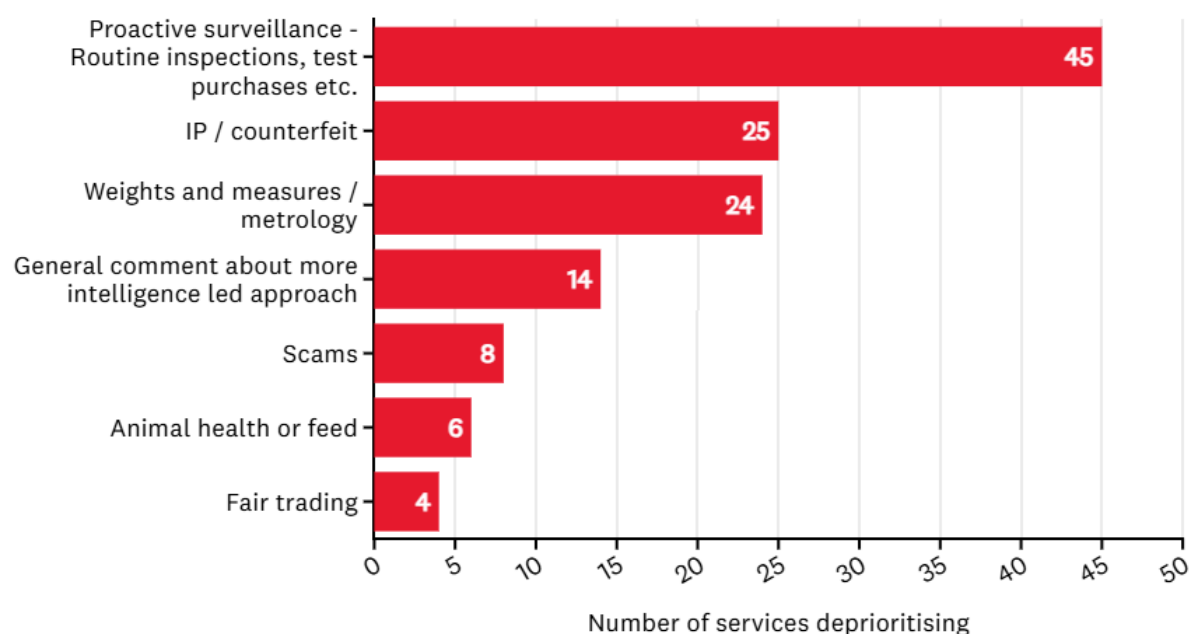
The FOI responses highlighted that as a consequence of the resourcing issues highlighted above, some important consumer protection issues are having to be deprioritised by local authorities. There are wide swathes of Trading Standards responsibilities that appear to have a very limited focus. It also shows how issues with greater political resonance such as policing illegal tobacco, alcohol and vapes are getting more attention. There is also a disparity between the issues that local authorities are prioritising and deprioritising (Figures 1 and 2) and the issues that consumers are complaining about (Figure 3). While these would not necessarily be fully aligned, it does show that some basic consumer protection issues are not getting sufficient attention.

Figure 1: Top three Priority areas for Trading Standards Services



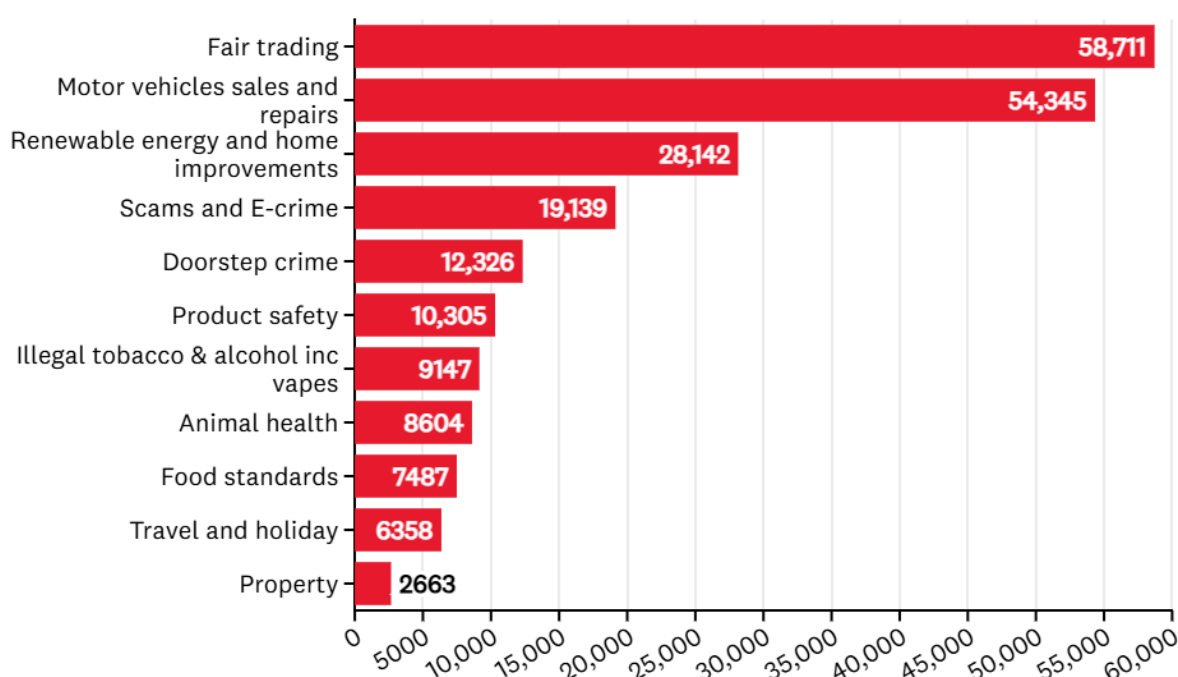
Note: Services were asked what the top three current priority areas are for their service. The base for this chart is 169 services who provided information about their top priority areas. Please note that some areas will overlap. Most notably, many prioritise underage sales specifically for tobacco, vapes and alcohol.

Figure 2: Areas that have been deprioritised by services in the past five years



Note: Services were asked if they have had to deprioritise any areas of their work in the past five years. 147 services provided an answer on areas deprioritised, even if this was simply to say that they had not deprioritised any

Figure 3: Numbers of referrals and notifications to Trading Standards Services in different categories



Note: many services were unable to break down referral and notification numbers by category. Around 100 were able to give numbers for each category. As such this chart will not give a full picture of the number of referrals and notification in each category for all services, but it does give us an indication of the spread across different areas of the TS remit.

Most consumer referrals related to fair trading issues, whereas the most common priority for local authorities was illegal tobacco, alcohol and vapes, reflecting an increase in crime in these areas. Even when issues have national significance, decisions about compliance and the nature of enforcement activity are decided at a local level. How well a local authority's service is functioning and what it decides to prioritise matters to consumers across the UK, not just in the particular local area, if the local authority deals with a business that operates nationally.

National businesses

It seems quite incredible that some of the largest and most complex businesses in the world are held to account for compliance with consumer law by these struggling local authority Trading Standards teams, rather than the might of a national regulator. The current system can mean that national businesses that operate in many parts of the country could interact with many different Trading Standards Services. Primary Authority Partnerships (PAPs) were established as a way of giving greater consistency so that a business operating in different parts of the country or with multiple outlets has a single point of contact. But these businesses pay local authorities for their time managing these partnerships and agree the scope of these relationships. Where a business and a local authority have a PAP, the local authority, whose advice the business pays for, can provide 'assured advice' that applies nationally. Other local authorities who find a problem and want to take action have to have

regard to that advice or otherwise look to challenge it via the OPSS that oversees the primary authority partnership scheme. The structure of a PAP relationship is set out in national guidance. Primary authorities should maintain their expertise and independence and focus solely on supporting compliance with relevant regulations. But it can be difficult to see how this can be maintained when PAPs fundamentally change the relationship between the business and their enforcement body.

Our FOI revealed a large variation in the number of PAPs that local authorities have. Some have large numbers which brings into question whether they really have the level of expertise and also the independence to do this effectively, as well as how they maintain sufficient independence to take enforcement action against the company if it becomes necessary. Data from the Department for Business and Trade's Primary Authority register shows that a small number of services hold a large number of PAPs for Trading Standards.¹¹

The Buckinghamshire and Surrey combined service holds 158¹² partnerships whilst the Cambridgeshire, Peterborough and Rutland combined service holds 135. West Yorkshire Joint Services, Milton Keynes and Hertfordshire each have more than 70 partnerships. On the opposite side of the scale, 89 services do not hold any PAPs and 18 hold only one.

Enforcement activity

The FOI also revealed a great variation in the nature and level of enforcement activity across Trading Standards teams to address non-compliance. While a tailored approach will be needed – from supporting businesses to comply to taking more formal criminal or civil enforcement action when needed - this would not appear to account for why some authorities are more proactive in using their legal powers than others. A few services had much higher numbers of criminal prosecutions than others, for example. West Sussex reported the largest number by far, with 159 prosecutions reported across multiple categories. West Yorkshire Joint Services and Bristol also reported a large number of criminal prosecutions at 41 and 40, respectively. Meanwhile, there were a striking number of services, 36, who reported no criminal prosecutions in the 2023-24 financial year. A further 25 services reported only one criminal prosecution.

Limited response to complaints

Our FOI also revealed a lack of predictability for consumers; not just for businesses, in terms of what to expect from local authorities. Trading Standards are the main route for consumers to have their consumer rights enforced where a business treats them unfairly or unsafely. This is particularly the case in the wide range of sectors where consumers have no option of alternative dispute resolution (ADR) or where urgent action is needed to prevent other consumers from being put at risk.

¹¹ Department for Business and Trade (2024) - [Primary Authority Register](#). Note: we obtained a list of PAPs in csv form directly from DBT in December 2024

¹² Note: this is a snapshot based on data obtained in December 2024. PAP numbers do change over time so figures may not be absolutely accurate to the number held now.

There is a central route for consumers to make complaints via Citizens' Advice's Consumer Helpline and the Consumer Advice helpline in Scotland. These helplines will then refer consumer complaints on to the relevant Trading Standards service. However, the likelihood of whether a consumer's complaint will be looked into varies depending on where people live. Our FOI found that fair trading issues, followed by issues with motor vehicle sales and repairs was the next most common category of consumer complaints. These two areas had considerably more referrals than any other area, with home improvements and renewable energy being the next most common category. As resources become more constrained, the extent to which consumers can expect their complaints to be dealt with will vary depending on where they live and the issues that the local Trading Standards team prioritises for action. Which? has heard of many cases from our members and supporters of people no longer being able to get the support they need, for example, when dealing with rogue traders.

This is not only important for the individual consumers, but means that the Trading Standards and wider consumer enforcement system as a whole is missing out on crucial intelligence about consumer problems and therefore harms or legislative breaches that may be more widespread and present a much bigger risk. Citizens Advice do publish high level reports on the categories of complaints that they receive, but there is no detailed reporting on the types of complaints that are received by their helpline and whether these are being followed up by local authorities and successfully resolved.

A lack of coherence

While mechanisms for coordination of activity across local authorities exist, they are limited, meaning that the system is far too disjointed. This is also the case for the relationship that Trading Standards Services have with national regulators that share responsibilities.

The national teams through NTS and TSS do provide some vital national and regional coordination. They work to different models and still have limitations, both in terms of their status and the scope of their activity. NTS is hosted by the Association of Chief Trading Standards Officers (ACTSO) and overseen by a National Trading Standards Board. Funding is provided from DBT. It does not have a statutory basis. It relies on individual local authorities to take the lead for its teams and also take forward legal action. TSS has its own staff that can take action with some enforcement powers provided by Glasgow City Council and any civil action still has to be undertaken by a Scottish local authority. These both conduct vital work which has led to action across many sectors to protect consumers - but they reflect the way that efforts have been made to 'patch up' the system through temporary fixes over time, rather than establishing the correct balance of responsibilities and national teams on a more sustainable and solid footing based on a national understanding of the nature of potential harms.

Other mechanisms for coordination between local authorities and between Trading Standards and other regulators vary depending on the area of responsibility. For fair trading matters, for example, the Consumer Protection Partnership (CPP) exists in order to share intelligence and coordinate action. In Scotland, the Consumer Network has more recently been established for intelligence sharing. The CMA, as the national regulator in this space, can intervene in certain circumstances eg where an issue is precedent-setting. Stronger

consumer enforcement powers came into effect for the CMA in April. These were provided in the Digital Markets Consumer and Competition Act 2024 and mean that the CMA can take direct action against businesses without having to go through the courts and issue fines up to 10% of turnover. However, the CMA has been clear in the guidance that it has issued that it will focus on the most egregious cases. It still has no powers to direct or monitor the work of Trading Standards other than cooperation through these networks.

In the case of Trading Standards work on food, the FSA has statutory duties [to monitor and report on local authority performance](#)¹³. This includes TS work on food standards and animal health. In the case of product safety, the OPSS based within DBT, provides advice and support to help local authorities regulate consumer product safety, as well as having wider responsibilities for product regulation, including weights and measures, standards and accreditation and oversight of Primary Authority advice. For product safety, for example, it provides training and supports more complex cases that may require specialist expertise or legal advice. OPSS does not, however, have a monitoring role for delivery of product safety enforcement although it has proposed that it should have a stronger oversight role, as part of its Product Safety Review.¹⁴

There is therefore no fully joined up consumer enforcement system operating across Great Britain. There is some coordination and sharing of intelligence but overall it lacks a coherent and strategic approach to assessing risk and allocation of resources at the right level based on it.

The need for regulatory reform

The government has prioritised regulatory reform as part of its focus on economic growth and has [set out a series of objectives for regulatory policy](#), including that it supports growth, it is targeted and proportionate, it is transparent and predictable and it adapts to keep pace with innovation. Our analysis shows that the system of Trading Standards Services is generally failing to live up to these aims.

The government has also [set out proposals](#) for how local authorities can operate more strategically, be more accountable and how national and local policy can be better coordinated, while allowing local authorities to address community priorities. In July, the Deputy Prime Minister also announced that there would be a review of local authority statutory duties¹⁵.

The government's focus on [digital transformation of public services](#) also goes to the heart of the reforms that are needed to ensure that consumer enforcement is focused on the areas where consumers are most likely to experience harm and that the system can operate transparently and be more accountable. The collection, reporting and use of data across the system is currently very variable.

¹³ Food Standards Scotland also has this responsibility in Scotland, but Trading Standards do not do food standards work in Scotland. This is undertaken by Environmental Health teams.

¹⁴ Smarter regulation: UK product safety review, OPSS, August 2023

¹⁵ Local Government Association Conference 2025: Speech from the Deputy Prime Minister, 3rd July 2025.

Some fundamental shifts in approach are therefore now needed to ‘future proof’ the consumer enforcement system in line with these government priorities and make sure that it delivers more effectively for consumers and businesses - and at a national and local level.

A coherent and risk-based system, which is data and intelligence-led, transparent, accountable and more predictable for consumers as well as businesses needs to be created. There needs to be a more strategic approach with resources, skills and expertise allocated according to the nature of risk and a more appropriate balance of responsibilities at national, regional and local level. Our proposals for key elements of that shift are set out below.

A system prepared for current and future challenges

From

- A lack of strategic oversight, leading to an absence of a national risk picture and no accountability for delivering on key priorities.
- An overwhelmed and under-resourced workforce, tasked with policing a vast number of complex laws, while competing for attention and funding with other local government priorities.
- A decentralised and inconsistent approach to enforcement, where multiple local authorities and regulators issue different advice and struggle to hold large, global companies accountable.
- A steady erosion of expertise, leaving the system vulnerable and reliant on isolated pockets of innovation rather than systemic strength.

To

- A central, data-powered system that uses intelligence to provide a real-time, in-depth understanding of consumer risks across the entire country, enabling proactive and preventative action.
- A strategic and tiered approach to enforcement, where resources, specialisms, and expertise are deployed at the most appropriate level—national, regional, or local—based on the scale and nature of the risk.
- Coherent and predictable enforcement, a consistent application of both soft and formal powers, creating clarity for businesses and confidence for consumers.
- System-wide accountability, through agreed-upon metrics that measure impact and ensure every part of the regime is working in concert towards shared national goals.

An intelligence-led, coordinated and accountable system

The consumer protection system that we have has evolved over many years. The system now needs to be designed so that it is tailored to the nature and extent of the risk of harm that face consumers and businesses and more capable of adapting as these inevitably change. Responsibilities should be shared between national regulators and local authorities within a coherent national framework that sets out clear lines of responsibility, ensures collaboration and is informed by shared intelligence. The system needs to be more proactive and targeted in how it deals with risks across markets - but also better able to anticipate new risks and adapt as needed. Multiple government departments and regulators place demands on Trading Standards and are dependent on their performance for achieving their own objectives. The most significant funding comes through MHCLG, but local authorities will determine how this is spent as most of it is not ring-fenced. There therefore needs to be much better coordination so that there is agreement on how these demands are prioritised and the key outcomes that need to be ensured so that local authorities can be held to account. This should be looked at as part of the recently announced government review of local authority statutory duties and Outcomes Framework.

The Which? FOI request is the only source of information on how local authorities are resourcing and prioritising Trading Standards work. There should therefore also be a clear and consistent reporting framework with local authorities obliged to report annually on how their services are performing based on key metrics related to these outcomes.

This needs to underpin the much needed shift to an open and transparent system that is performance driven and delivers greater value for money. The reporting framework should be clear and transparent to enable all stakeholders to understand where enforcement responsibility lies, where appropriate expertise in the system sits and how this is being operationalised. This includes ensuring greater transparency about consumer complaints and the extent to which they are being dealt with effectively across local authorities.

Responsibilities at the right level

The government also needs to ensure that there is appropriate allocation of resources across the landscape according to this improved understanding of the nature of risk and any national variation.

This includes determining which areas of responsibility are more appropriately dealt with at national or local level. National regulators are, for example, much more likely to be equipped to support compliance by complex businesses operating nationally – and take appropriate enforcement action when needed. This would also reflect the importance of a consistent and predictable approach nationally, respecting devolved responsibilities, and better reflect the potential scale of the consequences of any non-compliance, while recognising that ‘on the ground’ audits or spot checks will still have an important role. This would also extend to provision of guidance on interpretation of legislation within their areas of responsibility, rather than this being developed by local authorities. It should be developed in consultation with enforcers across the landscape, businesses and consumer groups. National regulators should also have a role monitoring delivery within their areas of responsibility. Coordination

across specialisms will also be important to avoid unnecessary duplication and to share best practice.

National Trading Standards (NTS) already supports several national teams and Trading Standards Scotland is able to undertake coordinated national investigations in Scotland. There needs to be a review of these teams to ensure that they align with the main areas of risk as well as areas where specialist knowledge needs to be available and sustained and where action is better undertaken across borders. This includes putting national teams on a more permanent, statutory footing and ensuring close cooperation and potentially oversight by national regulators. This multi-tiered approach should ensure that skills and expertise are distributed more appropriately, addressing disparities while being responsive to the needs of each level.

Sustainable regional teams

Trading Standards Services have many responsibilities that require local knowledge and a local presence, but our FOI shows that there is little more than a pretence that this work is being undertaken by some authorities given their level of resourcing and demands. A shift to more formalised strategic regional teams or hubs would therefore help to ensure a 'critical mass' to fulfil necessary responsibilities while maintaining on the ground knowledge and responsiveness to local needs.

As the government takes forward the introduction of strategic authorities across England through the [English Devolution and Community Empowerment Bill](#), there is an opportunity to consider how Trading Standards Services and local enforcement capability be included within the standardised devolution framework in future. This would enable the exploitation of economies of scale at the regional level whilst ensuring services can be strategically tailored to the nature of regional risks, demographics and businesses. Consumer enforcement should be made a key pillar of both national and regional economic policy in line with the government's devolution agenda.

Recommendations

Dealing with the crisis in the short-term

- **More effective use of intelligence to understand current and emerging risks:** There needs to be strengthened, mandatory Intelligence sharing between local authorities and other regulators in line with the government's vision for public sector digital reform to enable more effective targeting of resources according to risk. As part of this, more effective use should also be made of complaints data through Citizens Advice's Consumer Helpline and the Consumer Advice helpline in Scotland.
- **Ensuring there is accountability for delivery.** Local authorities need to be able to respond to local priorities, as well as fulfil their responsibility for delivery of national priorities. Building on the findings of our FOI request, mandatory reporting on the delivery of the priority national outcomes needs to be introduced. There should be

transparent reporting on how these outcomes, along with local priorities, are being delivered including how consumer complaints are dealt with.

- **Coordination and agreement on priorities across government:** This should include the establishment of a national coordination body that brings together all of the government and regulator funders that rely on the work of Trading Standards Services, so they can use the intelligence set out above to inform and agree priorities and expected outcomes from across local authorities. This should help to resolve competing demands from different parts of government.
- **Stronger collaboration across the system as a whole:** Enhanced cooperation and sharing of skills and expertise between national and local regulators and regional groupings is needed to create a more coherent, joined up consumer enforcement system. For example, the Consumer Protection Partnership (CPP), a forum for coordination between bodies operating in the consumer landscape, needs to be reformed so that it has a more strategic and directional role.
- **Safeguarding consumers where there are gaps in enforcement.** High risk areas where local authorities are currently failing to deliver crucial Trading Standards functions need to be identified and consumers safeguarded – by additional or reallocation of expertise and resources to ensure every local authority is fulfilling its duty to protect consumers and responsible businesses . While the above systems for reporting are put in place, the government should undertake a review of capabilities within the next 12 months, informed by the Which? FOI request.

Longer-term reforms

The more immediate actions identified above should inform more fundamental reforms that will help ensure a more coherent, risk-based and sustainable system of consumer enforcement.

- **National regulators should take on greater responsibility for the most complex businesses operating nationally.** This is needed given the implications of non-compliance. It should reflect devolved differences and recognise that some ‘on the ground’ enforcement will still be required. This includes the Competition and Markets Authority (CMA), OPSS and Food Standards Agency (FSA) and should cover provision of national-level guidance.
- **Trading Standards Services should operate as formalised strategic regional hubs that have a ‘critical mass’ of resources and expertise. This will help to ensure** that the needs of the local community are met and should form a key part of local economic policy. This should be considered as part of the government’s proposals for local government reorganisation in England and establishment of strategic authorities, including appropriate mayoral oversight.
- **National expert teams should lead on key areas of national risk that require specialist expertise and have a statutory basis (and therefore powers).** This will require a review of the existing teams under National Trading Standards (NTS) and

Trading Standards Scotland (TSS) responsibilities in order to establish more permanent teams with the necessary enforcement powers. These teams should be informed by evidence of the areas of highest consumer detriment (eg rogue traders), where local authorities are deprioritising issues that have national consequences (eg. counterfeiting and weights and measures) and where it may be beneficial for national regulators to take a greater lead (eg product safety).

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