

# **Which?**

## **Trading Standards resources and activities**

**Findings from freedom of information  
requests to local authority Trading  
Standards Services**

This publication reflects the view of Which?.

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## Executive summary

Trading Standards fulfills a crucial role in enforcing consumer law and protections across the economy, from tackling doorstep crime and rogue traders to ensuring that petrol pumps and drinks measures are accurate and that food standards are upheld. Overall, Trading Standards Services based within local authorities enforce around 300 pieces of legislation.<sup>1</sup>

However, there have long been indications that the system is not working as it should. The National Audit Office identified systemic and structural issues such as a lack of coordination between consumer protection bodies and difficulties in prioritisation and intelligence sharing.<sup>2</sup> Meanwhile, professional bodies such as the Chartered Trading Standards Institute (CTSI) have highlighted dwindling resources within teams.<sup>3</sup> These issues reduce the effectiveness of Trading Standards to the detriment of consumers and law-abiding businesses.

Unfortunately, there is little publicly-available data on Trading Standards Services, so it is impossible to establish an accurate picture of the current state of local services and to understand where reforms to the system are most needed.

To address this lack of useful data, Which? sent Freedom of Information (FOI) requests to all 187 services in England, Scotland and Wales in July 2024.<sup>4</sup> We collected data on their resource levels, demand for their service, prioritisation of issues and enforcement activities. We received responses from every service, though they varied in completeness.

This report sets out the findings from the FOI returns, as well as what we learned about services from the data collection process itself. From these findings we have identified a number of challenges and shortcomings in the way the Trading Standards system currently operates:

- **There are significant deficiencies in the way data is collected, with little standardisation across services.**

The FOI highlighted a wide discrepancy in what data is collected and recorded by TS Services. The data returned to us on complaints is particularly sketchy, while enforcement data is incomplete and difficult to interpret for a number of reasons, including differing metrics collected by services, or simply different approaches to enforcement. A small number of services were even unable to provide specific budget data for their service. **This makes it very difficult to assess and compare performance and productivity of different services, or strategically allocate**

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<sup>1</sup> CTSI - Annual Impact and Outcomes Report April 2022 – March 2023, accessed at:

<https://www.tradingstandards.uk/media/3179520/low-ressingle-pagea4-impact-reportfinal.pdf>

<sup>2</sup> National Audit Office (2016) - Protecting consumers from scams, unfair trading and unsafe goods, accessed at

<https://www.nao.org.uk/reports/protecting-consumers-from-scams-unfair-trading-and-unsafe-goods/>

<sup>3</sup> CTSI (2020) - CTSI Workforce Survey Report raises concerns over the future of Trading Standards, accessed at

<https://www.tradingstandards.uk/news-policy-campaigns/news-room/2020/ctsi-workforce-survey-report-raises-concerns-over-the-future-of-trading-standards/>

<sup>4</sup> Northern Ireland is excluded because it operates differently, as a national service.

**limited resources where they are needed most.** The lack of standardisation also limits how intelligence can be used at a broader level than the individual service, for example to identify systemic or national issues in need of addressing.

- **Resources vary drastically between different Trading Standards Services, with some operating with clearly inadequate resource levels.**

It has long been known that Trading Standards has limited resources which have diminished over time. However, the FOI data has uncovered extreme examples of Trading Standards teams of just one or two qualified staff members serving hundreds of thousands of people, particularly in populous areas like London boroughs. Across England, Scotland and Wales, 101 of the 187 services have eight or fewer staff, which is a number previously identified by Audit Scotland as being insufficient to meet all the 'accepted minimum standards'.

Budgets are similarly inconsistent - 12 services reported a 2023-24 budget of more than £5 per head of the population, whilst 14 services reported less than £1 per head. Extreme variation in resources exists even between areas that are similar in terms of characteristics like population, business numbers and authority type, indicating a disconnect between resource allocation and need.

- **Services have shifted to an 'intelligence-led' approach, but we have concerns about the adequacy of the data used to inform this.**

The FOI data indicates a number of potential problems with the way services may be using data to inform their work. For example, services' use of complaints data from Citizens Advice, which should be a major source of intelligence, varies a great deal - with some seemingly interacting very little with this data source. Fair trading and motor vehicles are by far the most common subject of consumer referrals and notifications received by services, but these issues are infrequently prioritised.

Of course, services may be placing greater weight on other data, and focussing on issues that are more likely hidden to the general public. However, many services reported deprioritising proactive surveillance, such as routine inspections, that would create data to inform prioritisation decisions. This deprioritisation carries risks. Proactive surveillance can be a source of intelligence for services, picking up on issues that may otherwise have gone undetected.

- **There are wide swathes of Trading Standards responsibilities that appear to have very limited focus.**

The most commonly prioritised activity is illegal tobacco and alcohol (including vapes) and this appears to take up a substantial share of trading standards resources. Nearly a third of all criminal prosecutions reported to us were related to this issue. Whilst this is undoubtedly a very important issue responsible for a high level of societal harm and requiring substantial intervention, it is one part of a vast remit of Trading Standards responsibilities. If a large proportion of their resources are dedicated to a particular issue, **it raises serious questions about whether the multitude of other issues within the Trading Standards remit are sufficiently monitored and enforced.**

Other areas of responsibility such as counterfeit goods as well as weights and measures have been deprioritised by a large number of services. Counterfeit goods could risk consumers' safety if not sufficiently monitored, while issues like weights and measures are fundamental in ensuring that consumers get what they pay for and a lack of enforcement in this area erodes consumer confidence and disadvantages law-abiding businesses.

- **There is an overall lack of accountability in the system.**

There is only a partial sense of accountability in how services prioritise and take action. There is a lack of clarity about how consumer complaints are processed and investigated, and seemingly no set standard for the role consumer complaints play in Trading Standards work. At the same time, levels of enforcement activity such as numbers of criminal prosecutions and civil enforcement actions vary drastically between services. More than 30 services reported no criminal prosecutions enforcement action at all in the financial year 2023/24 and 25 reported just one. However, it is impossible to draw firm conclusions and to fairly compare services with this data because **there are no commonly agreed metrics that capture the breadth of the activities carried out by Trading Standards teams**. Such metrics are needed to understand performance and formulate best practice.

These findings paint a concerning picture: Trading Standards Services are **fragmented, under-resourced, and operating without the data infrastructure needed for effective intelligence-led enforcement**. The result is a postcode lottery of consumer protection that risks letting harmful beaches of consumer law go unchecked. Our data makes clear that urgent reform is needed to rebuild a system capable of properly protecting consumers in today's economy. In our companion policy report, we set out our proposals to address these challenges and build a better fit-for-purpose enforcement system.<sup>5</sup>

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<sup>5</sup> Which (2025) - Addressing the decline of Trading Standards and strengthening consumer enforcement, accessed at <https://www.which.co.uk/policy-and-insight/article/trading-standards-in-crisis-rebuilding-an-effective-and-accountable-consumer-enforcement-system-an4VO5l57tgr>

## Introduction

Trading Standards Services are essential. They have a crucial role to protect consumers from the harm caused by unfair or unsafe business practices, and to support businesses to comply with consumer law. Their vast remit includes, but is not limited to: product safety, fair trading, weights and measures, intellectual property, scams, doorstep crime and rogue trading, illegal tobacco and alcohol, underage sales and animal health and welfare. According to the Chartered Trading Standards Institute (CTSI), they enforce nearly 300 pieces of legislation.<sup>6</sup>

However, there is increasing concern that these services as a whole are becoming less effective. The National Audit Office (NAO) identified a number of issues within the consumer protection landscape in its 2016 report, such as a lack of coordination between consumer protection bodies and difficulties in effective prioritisation and intelligence sharing.<sup>7</sup> The CTSI's 2018-19 workforce survey highlighted dwindling staff numbers and concerns among heads of service that they did not have the expertise in their service needed to comprehensively cover their statutory duties.<sup>8</sup> A lack of capacity or capability in the Trading Standards system could limit their ability to properly protect consumers from harm. For example, the Food Standards Agency has expressed concern that reduced capacity to assess authenticity, labelling and allergens compliance may compromise food standards in the future.<sup>9</sup> More broadly, poor enforcement of consumer protections damage competition by creating an uneven playing field, and this is corrosive for economic growth. Firms who flout the rules are unlikely to be the best and most productive, but they may undercut good businesses who invest in their products and train their staff, and undermine consumer confidence.

It has been impossible to make an accurate and comprehensive assessment of the Trading Standards landscape as there is only limited data about Trading Standards Services in the public domain. Central government does not routinely collect data about them and CTSI's Workforce Survey was discontinued after the 2018-19 publication. The Society of Chief Officers of Trading Standards in Scotland (SCOTSS) does still conduct a regular workforce survey, but this covers workforce only and not any wider metrics on demand or activity within services, and of course is limited to Scotland only.<sup>10</sup> The Association of Chief Trading Standards Officers (ACTSO) publishes an annual impacts and outcomes report that gives details on outcomes across England and Wales, but it suffers from having only a partial response from Trading Standards Services to its survey and it gives little indication of the

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<sup>6</sup> CTSI (2023) - Annual Impact and Outcomes Report April 2022 – March 2023, accessed at: <https://www.tradingstandards.uk/media/3179520/low-ressingle-pagea4-impact-reportfinal.pdf>

<sup>7</sup> National Audit Office (2016) - Protecting consumers from scams, unfair trading and unsafe goods, accessed at <https://www.nao.org.uk/reports/protecting-consumers-from-scams-unfair-trading-and-unsafe-goods/>

<sup>8</sup> CTSI (2019) - Workforce Survey 2018-19, accessed at: <https://www.tradingstandards.uk/media/documents/news--policy/surveys/final-ctsi-workforce-survey-2018-19.pdf>

<sup>9</sup> FSA (2022) - Our Food 2022: an annual review of food standards across the UK, accessed at: [https://www.food.gov.uk/sites/default/files/media/document/FS%20AnnualReport2022-accessible\\_for\\_web.pdf](https://www.food.gov.uk/sites/default/files/media/document/FS%20AnnualReport2022-accessible_for_web.pdf)

<sup>10</sup> SCOTSS (2023) - Trading Standards workforce survey 2023, accessed at <https://scotss.org/files/workforce23.pdf>

performance or challenges experienced at a local level.<sup>11</sup> As such, current sources of information on Trading Standards Services do not allow for a comprehensive analysis of the state of local services.

To address the lack of data, Which? sent freedom of information (FOI) requests to all 187 local Trading Standards Services in England, Wales and Scotland. We used this to gather data about their resources, demand on their services and their enforcement activities. Northern Ireland is not included since it has a national rather than local service.

We received returns from every service, although the completeness of returns varied substantially. By combining this data with various other publicly available information on different areas across the country such as population data, we are able to build a more comprehensive picture of the current state of local Trading Standards Services than has previously been available.

In this report we set out our findings from the FOI requests and the questions they raise about how Trading Standards currently operates. Chapter 1 outlines the methodology, including the FOI request design and analysis approach. Chapter 2 sets out our observations from the data collection process and what this tells us about Trading Standards Services. Chapters 3-6 set out findings from each topic covered by the FOI request: resources, demand, prioritisation and enforcement. Chapter 7 discusses the issues these findings raise about the current state of local Trading Standards Services.

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<sup>11</sup> ACTSO - Impacts & Outcomes Reports, accessed at <https://www.actso.org.uk/impacts-outcomes-reports/>



## Chapter 1: Methodology

### Freedom of Information requests

#### Question design

The Freedom of Information request asked services for information on their current resource levels, demand on their services and their enforcement activities in the 2023-24 financial year. The full FOI request is contained in the Annex.

In designing the FOI questions, we were conscious of the potential time implications for stretched services of answering the request. However, we also felt it was important to collect a comprehensive source of data. In order to balance these two issues, we consulted with a number of sources to design our questions in a way that we felt was as reasonable as possible for services to respond to, whilst also providing us with the data we needed to explore the Trading Standards landscape. Those sources included:

- The last published CTSI Workforce survey, which we used to inform how we asked some questions, in particular those on staff numbers and which categories to cover in sections on complaints and enforcement across different issues;
- The ACTSO Impacts and Outcomes report, which we used to inform the types of enforcement activity we asked for data on;
- A set of referral protocols between a Trading Standards Service and Citizens' Advice, which we used to understand how referrals and notifications can be categorised by Citizens' Advice when they are sent to services;
- Feedback from those working within Trading Standards on the question design, including from CTSI and from other individuals working within local Trading Standards Services;
- Input from colleagues within Which? who have previously worked within the profession.

#### Data collection

We sent FOI requests to 187 Trading Standards Services on 15th July 2024. We did not send an FOI request to Northern Ireland Trading Standards, since this is a single national service with differences in the way it operates, meaning many questions contained within the request would need to be asked differently for the Northern Ireland service, and data would not be comparable.

Requests were sent to the FOI or information management email addresses of each local authority with a Trading Standards Service. The email included a link to a Qualtrics form where services could input their answers. A pdf version of the questions was also attached for services to refer to. The majority of services refused to complete the request via the Qualtrics form due to council policy, for example information security policy. Several requested a Microsoft Word version of the request to fill in, which we provided.

The Information Commissioner's Office (ICO) sets out a time limit of 20 working days for public bodies to respond to requests under the Freedom of Information Act 2000 (FOIA). Whilst the majority of local authorities did respond within this time limit, a large minority were

delayed, in some cases quite considerably. The final response was received in November 2024, four months after the original request.

In some cases, responses were delayed because authorities requested clarifications regarding some of the questions, or refused the original request on account of it requiring more than the 'reasonable' (as set by the ICO) amount of resource to fulfill an FOI request. They then restarted the 20 day time limit from when the clarification or refined version of the FOI was provided. In other cases, no such explanation was given, or the delay was due to a lack of resources. In some cases, securing a response required several follow-ups via email and/or telephone.

### Missing data

Not all Trading Standards Services responded to all questions within the FOI request. Public bodies can refuse to provide information on a number of grounds set out by FOIA. In the case of this FOI, this was most frequently because they did not hold a specific piece of data or because the time taken to comply with the request would exceed the appropriate limit of 18 hours set out by the FOIA.<sup>12</sup>

All services provided us with information on the number of staff within their service. All other sections have at least some missing data. For example, much data is missing for referrals and notifications to Trading Standards Services. To give an accurate picture of the data, throughout this report we specify numbers of responses for different questions within the FOI.

The vast majority of missing data is due to the relevant authority not providing this data. However, some data has been intentionally excluded:

- To avoid incorrect interpretation, some individual data points that were given in an ambiguous way, or not exactly as requested, have been excluded.
- There are some instances where the data related to a particular question has been excluded in its entirety from the report. We have done this where we judged the data to be of insufficient quality to report on, for example where a question was interpreted very differently by different services.

More detail on this issue is provided in chapter 2, which covers insights from the data collection process, including data that could not be provided or is difficult to interpret in each section of the FOI request.

### Other data sources

We have drawn on sources of secondary data to help contextualise our FOI findings in order to draw out more useful insights. Those include:

- Population estimates in local areas from the Office for National Statistics (ONS);
- Business numbers in local areas from the ONS;
- Geographic files and lookups from the ONS Geoportal;

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<sup>12</sup> ICO (2023) - Requests where the cost of compliance exceeds the appropriate limit (section 12), accessed at <https://ico.org.uk/for-organisations/foi/freedom-of-information-and-environmental-information-regulation/section-12-requests-where-the-cost-of-compliance-exceeds-the-appropriate-limit/>

- The Primary Authority register, held by the Department of Business and Trade (DBT).

### **Creating maps of Trading Standards Services**

In this report we set out staff numbers in map form to show distribution of resources across the country. Geographic data for Counties and Unitary Authorities was taken from the Open Geography Portal. Trading Standards Services typically correspond to a county or unitary authority area. However, some operate a combined service, so there is not necessarily an individual service for each county or authority. For example, Buckinghamshire and Surrey operate a combined Trading Standards Service. Where this is the case, boundaries of counties or unitary authorities were merged during analysis to reflect the whole area falling within a given service for map visualisations.

## Chapter 2: Data collection and use

In addition to analysis of the information obtained through the FOI requests, the data collection process itself gave us insights into the way data is currently being collected and used by Trading Standards Services. This chapter will set out our observations from the FOI collection process in terms of what data is collected by services and the challenges in interpreting this data.

The responses to our FOI request varied considerably in completeness, with some services providing responses to all questions, and doing this within a short timeline, and others being unable to provide much of the data at all. This shows the variability in how services collect and use data. There were particular bits of data that services could provide more easily than others. Table 1 sets out the number of responses to each question.

**Table 1: Number of responses to key FOI questions**

Section	Question	Number of completes	Proportion of completes
Resources	Staff numbers	187	100%
	Budget 2023-24	169	90%
Demand for services	Overall referrals	140	75%
	Overall notifications	109	58%
	Referrals by categories	75-107*	40-57%
	Notifications by categories	58-82*	31-44%
Prioritisation and resource allocation	Reasons for not investigating complaints	119-131	64-70%
	Prioritised areas	167**	89%
	Deprioritised areas	147**	79%
Enforcement	Number of routine inspections	166	89%
	Formal warning notices	162	87%
	Enforcement orders	161	86%
	Criminal prosecutions	178	95%
	Civil enforcement actions	167	89%

*\*Note: for most categories of referrals, response rates were 100-107, and 75-82 for notifications. The lowest number of completes for both referrals (75) and notifications (58) were for E-crime, which several services told us they could not distinguish from scams and so could not provide a figure for.*

*\*\*Note: this is the number of services who gave an answer to this open-ended question - in some cases the answer may simply have been "we have not prioritised / deprioritised anything".*

## Data on resources

All services provided data on full-time equivalent (FTE) staff within their service. Overall budget figures for the 2023-24 financial year were provided by the majority of services, as were figures on what proportion of the budget came from different sources. However, a handful could not provide this information. The reason for this was usually because they did not hold a trading standards budget that is distinct from a wider budget (like regulatory services as a whole, for example).

One service did not provide it as they said budget figures are already publicly available, directing us to GOV.UK local government budget data.<sup>13</sup> However, after examining this data we found that it had some figures that called into question the data quality - for example, a negative budget for one local authority. It also differed from our FOI data significantly and the total differs drastically from other sources too, like the ACTSO reports. In some cases this variation was drastic - for example, one London Borough budget was reported as £58k in the GOV.UK data, but as £303k in the FOI data provided by the Trading Standards team itself. Since there is little information on how this budget data was defined and collected, and some of the figures are not as expected, we believe we have a more accurate picture from our FOI data.

The request also included a question on specialist competencies held by staff in the service. However, there appeared to be a great deal of variation in how this was interpreted. A qualified Trading Standards Officer will receive a basic level of training across the range of the Trading Standards remit, which some services interpreted as a specialist competency and others did not. Others did not respond to this question as they were unsure how to interpret it. Data from this question is therefore not included in this report.

## Data on demand for services

Demand was the section for which we received the most incomplete data, limiting our ability to determine and compare demand levels for different local authority Trading Standards Services.

## Referrals and notifications

We asked services about the number of referrals and notifications received to their service in the 2023-24 financial year. Cases from consumers are typically received through the Citizens' Advice consumer service or Advice Direct Scotland, who receive Government funding to fulfill this function.

Cases can be sent either as a referral or a notification, which fulfill slightly different purposes:

- A **referral** is used for issues that could be directly investigated by trading standards and lead to enforcement action. Cases are typically sent as a referral when the issue appears to involve serious or persistent breaches of consumer protection laws.

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<sup>13</sup> GOV.UK - Local authority revenue expenditure and financing England: 2023 to 2024 budget individual local authority data, accessed at <https://www.gov.uk/government/statistics/local-authority-revenue-expenditure-and-financing-england-2023-to-2024-budget-individual-local-authority-data>

- A **notification**, on the other hand, is for informational / intelligence purposes rather than immediate action. It's logged and may be used to build intelligence over time, but it doesn't usually trigger immediate action. They may then be investigated later if a pattern of complaints emerges or if Trading Standards is already investigating a related issue.

The majority of services provided a figure for the overall number of referrals and of notifications received to their service. Only around half, though, could provide a breakdown by the categories we requested (e.g. 'motor vehicles', 'doorstep crime', 'product safety'). There were also some authorities that could provide an overall number for referrals but not for notifications, or just one total figure for both.

A number of different explanations were given for being unable to provide some, or all, of this data. These included:

- That the data is not held at all by an authority because the data belongs to Citizens' Advice;
- That the data is held in the portal authorities use to receive data from Citizens' Advice, but is not downloaded by the local authority itself;
- That data is recorded only for referrals that the authority takes action on;
- That referrals and notifications cannot be differentiated from one another in their database.

Where services could provide overall numbers of referrals and notifications but not categorical breakdowns, this was usually because data is not stored in this way so providing this would involve retrospectively categorising each record individually. We did take steps in the design of the FOI to request appropriate categories, for example by consulting an example Citizens' Advice referrals protocol, looking at the categories included in the CTSI Workforce survey and on the CTSI website, and consulting people working within Trading Standards. However, it seems that in practice the categories that this data is stored under (if any) vary between different services and so there is no standard or agreed set of categories to cover.

## Investigations

We also asked services how many of the referrals received in the 2023-24 financial year they took forward / investigated. The same issues applied with providing categorical breakdowns for this question as with providing the same for referral and notification numbers. However, there were additional challenges with this question in that the responses suggested that authorities interpreted this question differently, and there is no agreed understanding of what it means to 'investigate' a referral.

Some responded that they investigated all because they had assessed the need to pursue each referral, whilst others only counted cases they had actively taken steps to investigate. As such, although we have reported an overall proportion of referrals that were reported as 'investigated' we do not think it is accurate or fair to compare the activity of individual services on the basis of this data.

We also asked services what proportion of their investigations pertained to the online activities of a business. This was an attempt to assess the extent to which Trading Standards Services have adapted their work to reflect the way consumers shop, with a large proportion of sales now being online.<sup>14</sup> Though the majority of services did respond to this question, there were again differences in interpretation of the question, making it difficult to interpret the results. Some services counted an investigation as pertaining to online activities simply if the business involved had an online presence, and not necessarily if the investigation itself was in relation to their online activities. Some also pointed out that it was not always an easy distinction to make, depending on the case.

### **Data on enforcement and compliance activity**

The vast majority of services provided enforcement figures, with a small number refusing on the ground that it would take more than the 'reasonable' amount of time set out for an FOI. There were also reasons why some services could not provide particular bits of the enforcement data. For example:

- Some services did not answer the question about the number of routine inspections in the 2023-24 financial year because they could not distinguish between routine and reactive inspections from their records.
- Data on seizures of products is difficult to compare between services because some reported seizures (as in instances of seizing products) whilst others reported the total number of products seized, which could number in the thousands per instance.

Even when provided, there are considerable challenges in comparing the enforcement data across Trading Standards Services. Some services noted that the enforcement figures requested do not reflect the full breadth of their activities, for example if they focus on preventative rather than enforcement work. Furthermore, there are factors external to Trading Standards that may influence enforcement figures, like delays in the courts meaning planned prosecutions are delayed considerably.

Overall, the data collection process in itself provided us with a great deal of insight, revealing the varying approaches among services to collecting and using data. Despite these instances of missing or ambiguous data, there is still a great deal of insight we can draw from the data we have, which is covered in chapters 3-7.

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<sup>14</sup> ONS (2025) - Internet sales as a percentage of total retail sales, accessed at <https://www.ons.gov.uk/businessindustryandtrade/retailindustry/timeseries/j4mc/drsi>

## Chapter 3: Resources

This chapter explores the resources in terms of budgets and staff numbers that are available to Trading Standards Services to cover their statutory duties. We will also examine how resources are distributed across the country and how they match up to the characteristics of the area in terms of population and business need.

### Budgets

Services reported a total of £117 million in funding across all services in England, Scotland and Wales in the 2023-24 in response to our FOI.<sup>15</sup> The Association of Chief Trading Standards Officers (ACTSO) estimated £107.9 million revenue budget for 2023-24, but this was for England and Wales only.<sup>16</sup>

18 services did not provide budgetary information. ACTSO's report also has missing data - they had responses from 111 services compared to our 142 for England and Wales only. However, their figure is an estimate for all services because they estimated based on the response rate and population for the services with missing data. We have opted not to estimate based on population because there is such wide variation in the budget per head of population in the sample we do have.

Among those who did respond, the median budget was £2.04 per head of the population in that area. However this figure varied greatly - 12 services had a budget of more than £5 per head, whilst 14 services had less than £1 per head.

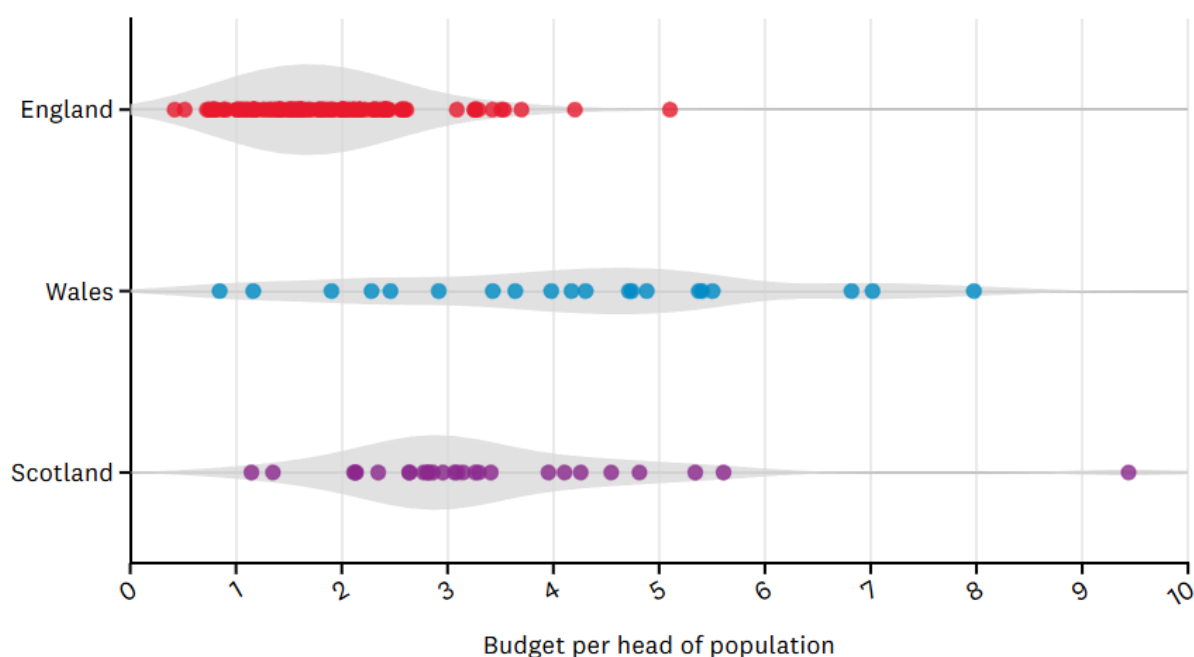
Welsh services tended to have a higher budget per head of the population, with a median of £4.20, compared to £3.08 in Scotland and £1.74 in England.

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<sup>15</sup> This is the total for 169 of 187 services who provided budgetary information.

<sup>16</sup> ACTSO (2024) - The Impacts and Outcomes of Local Trading Standards Services 2023/34 in England and Wales, accessed at <https://www.actso.org.uk/impacts-outcomes-reports/folderpub/535dfe84f7e928363a307eff7b969f578c64edaa/>



**Figure 1: Spread of budgets per head of population in England, Scotland and Wales**

*Note: This chart contains values for 169 services who provided budgetary information. Most missing values are services in England. The City of London is excluded from this map as it is an outlier due to being very different in nature (being a highly visited area with many businesses but a small population of residents).*

Among 156 services who told us the sources of their budget in response to our FOI, an average of around 80% of their 2023-24 financial year budget came from Central Government local authority funding or devolved government funding where relevant. There were a range of other budget sources including regional funding and funding from National Trading Standards (NTS). Many services also reported revenue from fees and penalties, as well as from services like licensing and from business advice delivered through Primary Authority Partnerships.

50 services reported having funding from NTS. In total, this amounted to £2.7m of funding, but the funding was concentrated in a fairly small number of services. Whilst most services reported no revenue from NTS, Derby City Council reported that NTS funding accounted for half their budget, and Salford City Council reported that it accounted for a quarter of their budget.

**Table 2: Services with the highest proportion of funding from NTS**

Service	Overall budget 2023-24 (£)	Budget from NTS (£)	Budget from NTS (%)
Derby City Council	£674,195	£337,098	<b>50.0</b>
Salford City Council	£641,238	£166,722	<b>26.0</b>
Southampton City Council	£182,977	£36,595	<b>20.0</b>
Lincolnshire County Council	£1,313,990	£256,228	<b>19.5</b>
City of York	£673,300	£89,549	<b>13.3</b>
Westmorland & Furness Council	£345,111	£44,864	<b>13.0</b>
Public Protection Partnership (Bracknell Forest, West Berkshire and Wokingham)	£1,533,830	£153,383	<b>10.0</b>

*Note: This table shows the services who reported 10% or more of their funding coming from NTS, out of a total of 156 services who provided budgetary breakdown information in response to our FOI. Services provided the total budget figures in £s and the funding from NTS as a proportion of overall budget. From this we have calculated the NTS budget in £s.*

Another source of revenue for services can be Primary Authority Partnerships (PAPs) that some services hold with businesses. They can charge businesses for Primary Authority services on a cost recovery basis. This statutory framework allows a local authority to form a partnership with a business or group of businesses that operates nationally, taking responsibility for providing advice on the areas agreed and also providing assured advice on compliance. The Primary Authority helps shape how those businesses are regulated across all local jurisdictions. Businesses can rely on this Primary Authority assured advice in their interactions with other local authorities, as any intended enforcement action must first be notified to the designated Primary Authority.

39 services reported revenue from PAPs, with a total reported value of £1.4 million. Four services reported more than 10% of their 2023-24 budget coming from PAPs.

**Table 3: Services with the highest proportion of revenue from PAPs**

Service	Overall Budget 2023-24	Budget from PAPs (£)	Budget from PAPs (%)
Oxfordshire County Council	£1,320,000	£167,640	12.7
Nottinghamshire County Council	£1,983,173	£237,981	12.0
Hertfordshire County Council	£2,596,157	£303,750	11.7
Cambridgeshire and Peterborough Trading Standards	£397,830	£43,761	11.0
Portsmouth City Council	£378,900	£26,523	7.0
Buckinghamshire and Surrey Trading Standards Service	£2,908,800	£180,346	6.2
Salford City Council	£641,238	£32,062	5.0

Note: This table shows the services who reported 5% or more of their funding coming from PAPs. Based on 156 services who provided budgetary breakdown information in response to our FOI. Services provided the total budget figures in £s and the funding from PAP as a proportion of overall budget. From this we have calculated the PAP budget in £s.

## Staffing levels

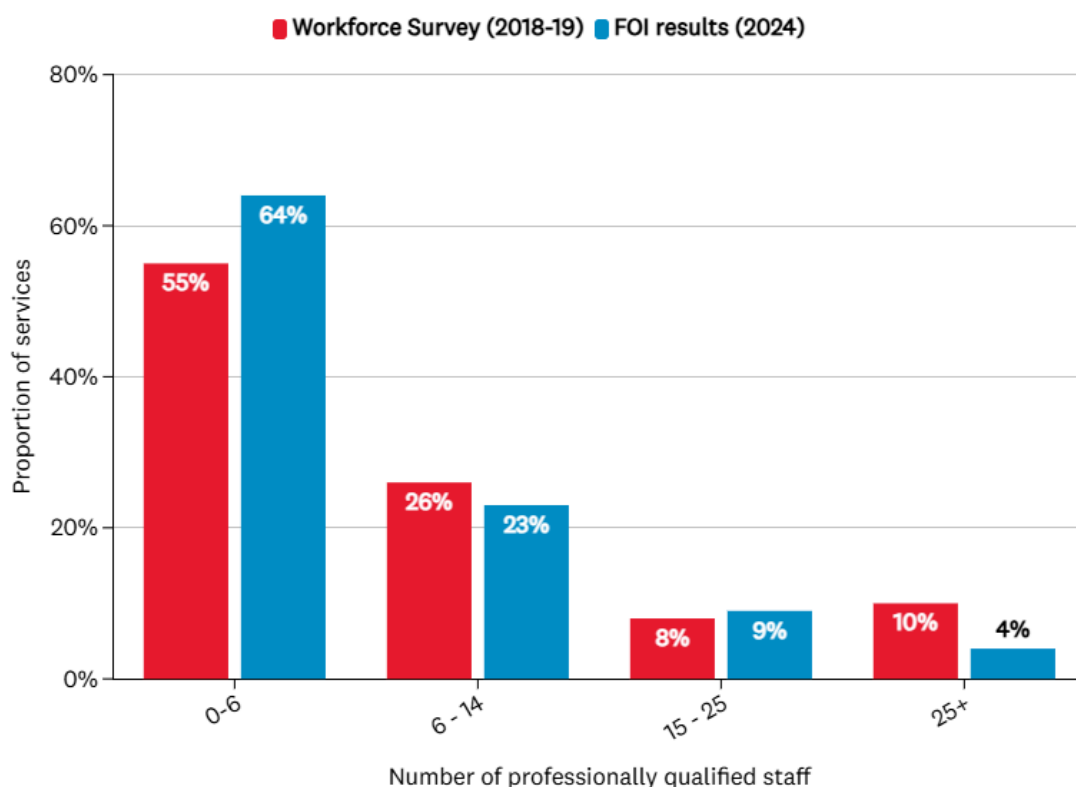
Across England, Scotland and Wales, services reported a total of **2,284 full-time equivalent staff**. This figure is all staff working within the service so it includes contractors, administrative support staff and apprentices.

A lack of publicly available data on resources in Trading Standards Services makes it challenging to compare this to historical staffing figures and caution must be exercised, but comparing the FOI data to the most recent CTSI workforce survey indicates staffing levels have continued to fall in recent years. The CTSI workforce survey reported average staffing levels in Trading Standards Services but has not been run since the 2018-19 edition. In this final publication of the survey they reported an average of 15.4 total staff per service, including non-qualified staff (for example apprentices) and admin staff. The average total number of staff in our FOI data is 12.2.

CTSI also reported on numbers of professionally qualified staff in teams: this will not include admin staff and trainees. They reported an average of 9.4 full time equivalent (FTE) professionally qualified staff per service, with the majority (55%) of services having six or fewer and a few larger services having much more.<sup>17</sup> We collected the same data in our FOI requests, and found an average of **7.5 FTE professionally qualified staff** per service, with 63% having six or fewer.

<sup>17</sup> CTSI (2019) - Workforce Survey 2018-19, accessed at <https://www.tradingstandards.uk/media/documents/news--policy/surveys/final-ctsi-workforce-survey-2018-19.pdf>

**Figure 2: Trading Standards team sizes according to FOI request data compared to CTSI's workforce figures from 2018-19**



*Note: This chart is based on figure 5 from the [CTSI's 2018-19 workforce survey](#), with figures from our 2024 FOI added for comparison. Comparisons should be taken as indicative and not exact due to differences in data collection methods. Our 2024 FOI data has staff figures for all 187 services in England, Scotland and Wales whilst the workforce survey is based on 96 of 197 services that existed at the time.*

*Note: Proportions are rounded to the nearest whole number and as such may not sum to 100%*

These comparisons should be approached with caution due to differences in data collection methods - the Workforce Survey was an optional survey with staff figures provided by 96 services, whilst we had data for all of the 187 services we contacted. Also, the number of services in existence has likely changed either due to changes in Local Authorities or more opting to operate a combined service. CTSI estimated that there were 197 services in existence at the time of their last survey, compared to 187 now, so on this basis we might expect services to be slightly larger in size now given that there are fewer of them. However, our FOI request data indicates that team sizes have in fact reduced further.

Alongside budget cuts, CTSI's last Workforce Survey also highlighted the issue of Trading Standards being an ageing profession, with over a third of the workforce having more than 20 years' experience at the time.<sup>18</sup> Some efforts have been made to mitigate this by hiring and training apprentices. In response to our FOI, services reported 448 FTE staff in the "other staff including apprentices" category, which excludes professionally qualified and admin staff. This is not a universally adopted initiative though - 56 services reported no staff in this category, whilst Buckinghamshire and Surrey Trading Standards and Kent County Council reported 22 and 21, respectively.

<sup>18</sup> CTSI (2019) - Workforce Survey 2018-19, accessed at <https://www.tradingstandards.uk/media/documents/news--policy/surveys/final-ctsi-workforce-survey-2018-19.pdf>

Given the extent of the Trading Standards remit and the sheer volume of legislation they are responsible for enforcing, it is concerning that so many services are currently operating with very small teams. There is no accepted standard for an 'adequate' number of trading standards staff per service, and due to the complexity of trading standards' duties and the varying needs of different local authorities, it is difficult to determine a 'one size fits all' minimum level of staffing that a service should have. However, when CTSI last ran its Workforce Survey in 2018-19, they said that the team sizes raised major concerns about how services with so few staff could cover the full range of their statutory duties. And back in 2002, Audit Scotland reported that the smallest services (with eight or fewer staff) had insufficient flexibility and range of expertise to meet all the 'accepted minimum standards' for delivery of their Trading Standards Services.<sup>19</sup> At the time, there were ten councils with eight or fewer staff in Scotland, whereas according to our FOI data, there are now 19. Across England, Scotland and Wales, 101 of 187 services had eight or fewer staff.

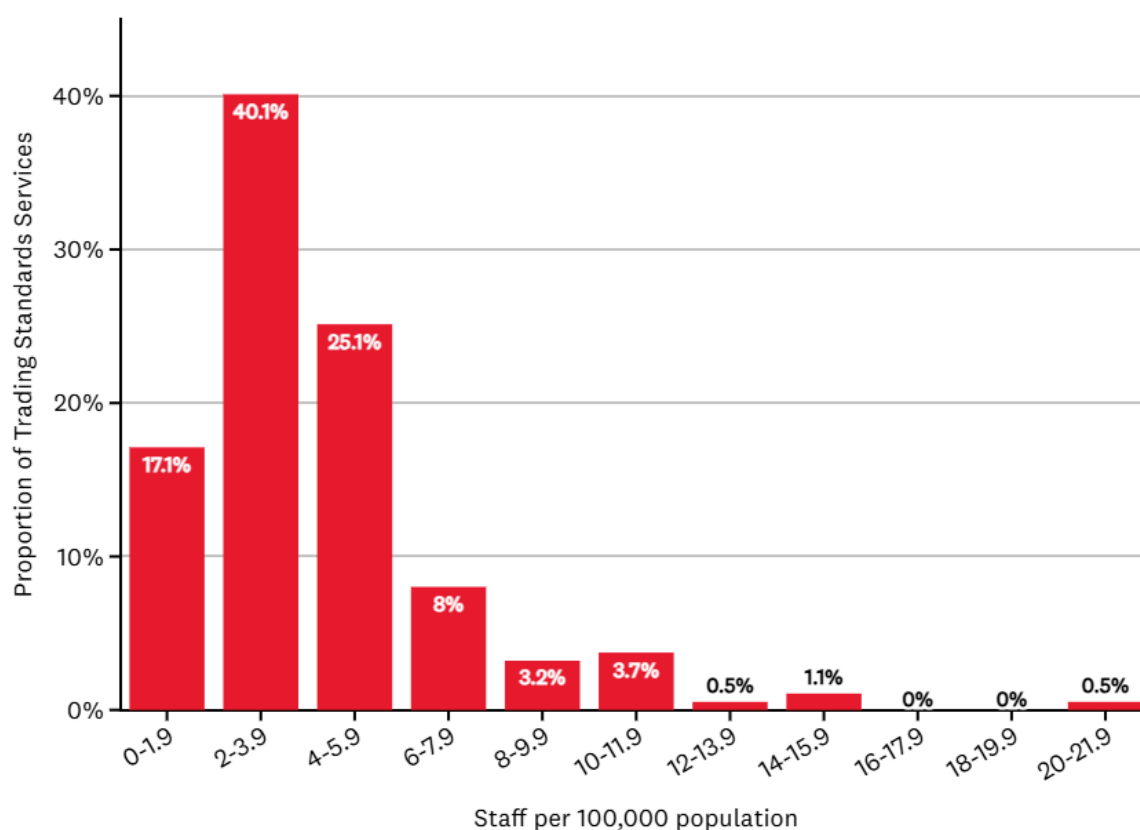
### **Distribution of staff across the country**

It is clear that Trading Standards Services are struggling with low staff numbers, but an important consideration is how resourcing is distributed across the country and how reflective this is of the needs of the area.

To standardise staffing levels according to the number of people the service is responsible for protecting, we calculated the total number of staff per 100,000 people in the area covered by a service. This revealed that 17% of services have fewer than two staff per 100,000 people, and 57% have fewer than four per 100,000 people.

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<sup>19</sup> Audit Scotland (2002) - Made to Measure - An overview of Trading Standards Services in Scotland, accessed at <https://audit.scot/publications/made-to-measure-an-overview-of-trading-standards-services-in-scotland>

**Figure 3: Histogram showing the distribution of team sizes per 100,000 people**

Based on FOI data from 187 Trading Standards Services and population figures from [ONS 2022 population estimates](#). Note: the City of London is excluded from this map as it is an outlier due to being very different in nature (being a highly visited area with many businesses but a small population of residents).

Table 4 shows how average staffing levels by population vary between England, Scotland and Wales. Generally speaking, the services with the most staff per 100,000 people tend to be rural areas in Scotland and Wales. In terms of staff both by population and by number of business, Wales is the most well staffed nation overall and England is the least.

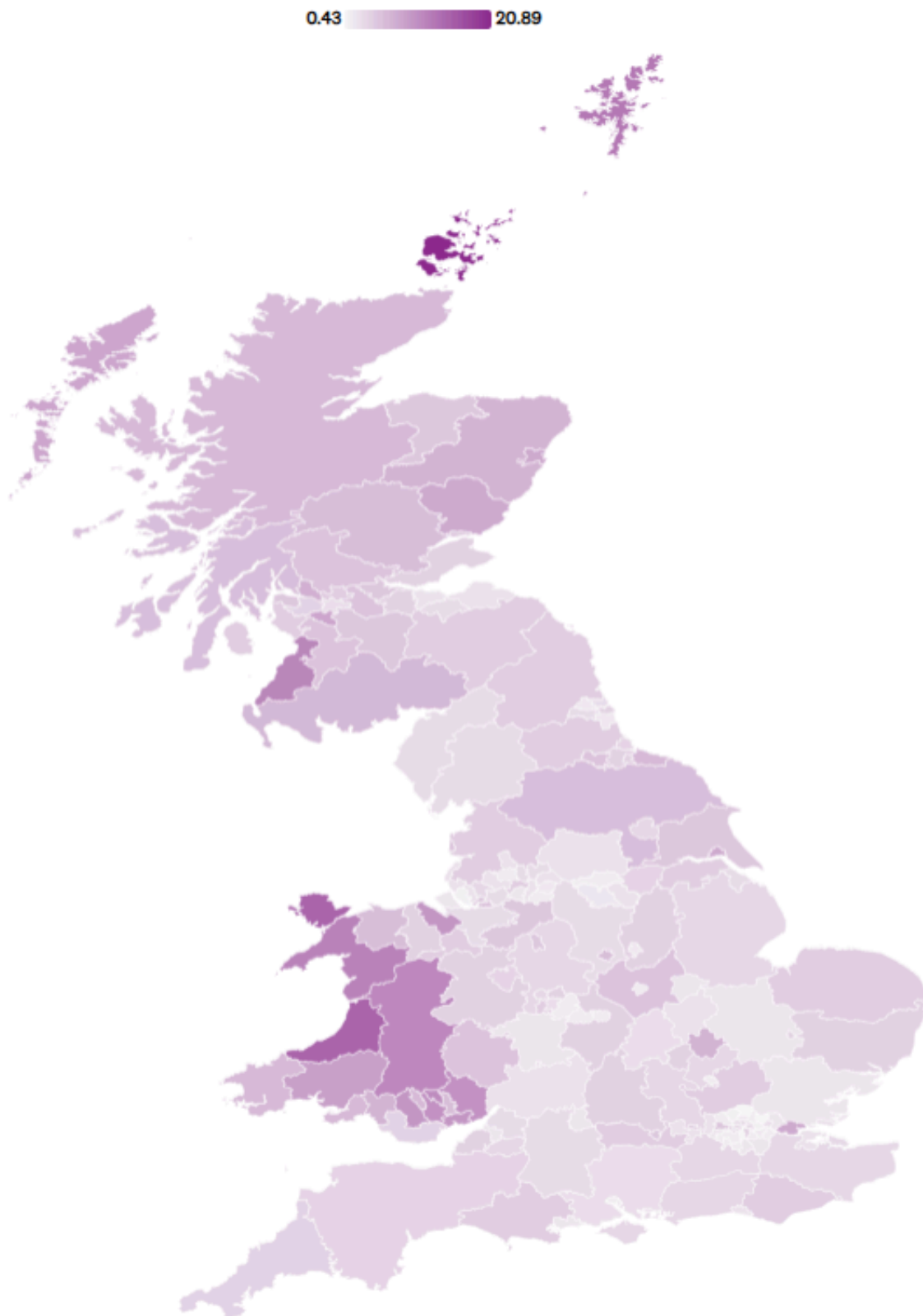
**Table 4: Average staffing levels by nation**

Nation	Staff per 100,000 people	Staff per 10,000 businesses
Overall (Great Britain)	3.70	9.65
England	3.11	7.50
Scotland	4.94	15.62
Wales	7.72	22.96

Note: the average is taken as a median due to the skewed distribution of staff figures.

Sources: Which? FOI data from Trading Standards Services, [ONS population estimates 2022](#), [ONS UK business: activity, size and location data](#).

Our map (figure 4 below) highlights this variation, with many of the highest staffed services relative to population being in Wales and Scotland. In fact, six of the ten services with the most staff per 100,000 people were in Wales, and three were in Scotland. That being said, staff levels varied a great deal within these devolved nations too - in Scotland, Edinburgh reported 2.25 members of staff per 100,000 people compared to 20.89 in the Orkney Islands. Wales, Bridgend, Cardiff and the Vale of Glamorgan's combined service reported 3.84 staff per 100,000 people compared to Anglesey's 15.13.

**Figure 4: Map showing staff per 100,000 population for Trading Standards Services**

Source: FOI data from 187 Trading Standards Services. [County and Unitary Authority boundaries were taken from the Open Geography Portal](#) and boundaries were merged where necessary to reflect combined services. Note that the City of London is excluded from this map as it is an outlier and skews the map shading. It is an exceptional case because despite having large numbers of businesses and high visitor numbers, the residential population is very small.



Within England, there is also variation in staffing levels between different types of service. Unitary authorities as a whole have more staff relative to population and business numbers, whilst London Boroughs and Metropolitan Districts, and combined services to an extent, have proportionally fewer staff. Combined services typically have a high number of staff in absolute terms, but they also serve large populations.

**Table 5: Average staffing levels among different types of Local Authority**

Authority type	Staff per 100,000 people	Staff per 10,000 businesses
Unitary Authority	3.74	9.81
County	3.56	8.74
Combined service	2.80	6.50
Metropolitan District	2.33	7.51
London Borough	2.27	3.65

*Note: This table includes services in England only since Scottish and Welsh Authorities are not split into types in the same way. The average is taken as a median due to the skewed distribution of staff figures.*

*Sources: Which? FOI data from Trading Standards Services, [ONS population estimates 2022](#), [ONS UK business: activity, size and location data](#).*

Services with the fewest staff per 100,000 are predominantly London boroughs. Enfield has 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 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 and populations of more than 300,000. Areas outside of London that fall within the least staffed areas also tend to be urban areas, for example Liverpool and Southampton.

**Table 6: Top 10 services with the least staff per 100,000 people**

Service	Population	Total FTE staff (inc admin)	Staff per 100,000 people
London Borough of Enfield	327,224	1.4	<b>0.43</b>
London Borough of Lambeth	316,812	2	<b>0.63</b>
London Borough of Redbridge	310,911	2	<b>0.64</b>
London Borough of Barnet	389,101	3.75	<b>0.96</b>
Liverpool City Council	496,770	5.5	<b>1.11</b>
London Borough of Newham	358,645	4	<b>1.12</b>
Southampton City Council	252,689	3	<b>1.19</b>
Barnsley Borough Council	246,482	3.1	<b>1.26</b>
Luton Borough Council	226,973	3	<b>1.32</b>
Brent & Harrow Trading Standards	602,406	8	<b>1.33</b>

Sources: Which? FOI data from Trading Standards Services, [ONS population estimates 2022](#), [ONS UK business: activity, size and location data](#)

The number of businesses in an area is an important consideration, in addition to population, since Trading Standards Services will be responsible for monitoring and enforcing against businesses in their local area. We calculated the number of staff per 10,000 businesses and found that this was strongly correlated with staff per 100,000 population, but with some notable outliers.

The City of London appears to be the most well staffed service for its population (at 51.63 per 100,000). However, this is a result of the low resident population rather than high staffing levels. Whilst the City of London has only around 10,000 residents, it has many businesses serving the millions of visitors to London each year, and a large number of workers employed in the area. The City of London is actually within the top ten least staffed services per 10,000 businesses in the area. Similarly, whilst Westminster and Camden are very close to the average in England in terms of staff per 100,000, they are 2nd and 6th least well staffed per 10,000 businesses.

**Table 7: Top 10 services with the fewest staff per 10,000 businesses**

Service	Number of businesses	Total FTE staff (inc admin)	Staff per 10,000 businesses
London Borough of Enfield	14,910	1.4	<b>0.94</b>
City of Westminster	54,140	7	<b>1.29</b>
London Borough of Redbridge	14,640	2	<b>1.37</b>
London Borough of Barnet	25,115	3.75	<b>1.49</b>
London Borough of Lambeth	13,190	2	<b>1.52</b>
London Borough of Camden	36,290	7	<b>1.93</b>
London Borough of Hackney	25,730	5.5	<b>2.14</b>
City of London Corporation	22,485	5.6	<b>2.49</b>
Regulatory Services Partnership (Merton, Richmond and Wandsworth)	38,560	10	<b>2.59</b>
Brent & Harrow Trading Standards	30,760	8	<b>2.60</b>

Sources: Which? FOI data from Trading Standards Services, [ONS population estimates 2022](#), [ONS UK business: activity, size and location data](#)

It should be noted that there are factors beyond staff and business numbers that may influence the resource needed in a given area. For example, there are many very rural areas, especially in Wales and Scotland, that are not densely populated areas and so look well-staffed per 100,000 people. However, they may be covering large geographical areas with fewer transport links, and so there are time implications of the travel required in areas like this. They may also have additional requirements due to the agricultural nature of the area, like having animal health and welfare and feed teams that are not required in metropolitan centres. That being said, metropolitan areas typically have a more dense population of people to protect, and a large number of businesses to enforce against, and so there are many factors to consider in determining what a sufficient level of staffing looks like in a given area.

The drastic variation in resource levels does not only exist between very different types of authorities though. Resources vary notably even among authorities with ostensibly similar characteristics:

- Southwark and Enfield, both London Boroughs, share similar population sizes and business numbers. But Enfield reported 0.4 FTE staff per 100,000 people compared to Southwark's 3.8, and its budget was several times smaller.
- Liverpool and Manchester are both city authorities, and Liverpool's population is only around 13% smaller, but it has less than half the staff numbers and budget.
- These contrasts are particularly striking given that neither Southwark nor Manchester themselves have particularly high staffing levels relative to their population:

Southwark's is very close to the median across Great Britain of 3.7 per 100,000 people, and Manchester's is below the median, at 2.3 per 100,000.

This is indicative of a level of variation in resources that is not easily explained by the characteristics of the area and so could be related to other factors such as the financial position or wider priorities of individual councils.

## Chapter 4: Demand for services

Trading standards receive complaints and referrals from a number of sources, with the main route for consumer complaints being the Citizens' Advice Consumer line in England and Wales or Advice Direct Scotland.

They also provide business advice on compliance with consumer law, which can be paid for by businesses as part of the Primary Authority Partnership (PAP) model. This chapter describes the data we have on the demand for Trading Standards Services in the different areas of their remit, including the referrals and notifications they receive from Citizens' Advice in different categories, the numbers of Primary Authority Partnerships they hold, and the hours of advice they provide as part of these.

They can also receive cases through other regulators, the police or other organisations like the Advertising Standards Authority (ASA) or Action Fraud, though we do not have data on referrals received in this way.

### Referrals and notifications

The main way that trading standards receive complaints from consumers is via the Citizens Advice consumer service or Advice Direct Scotland.<sup>20 21</sup> Consumers contact the consumer advice line, and cases are referred to the relevant trading standards department. In our FOI request, we asked services how many referrals and notifications<sup>22</sup> they had received to their service overall, and within different categories.

Of 140 services who responded to this question, a total of **372,000** referrals and notifications were reported across England, Scotland and Wales for the 2023-24 financial year. With nearly 50 services missing, and 31 reporting only referral numbers and not notifications, this figure will be substantially lower than the true amount. Extrapolating based on population, the estimated number of referrals and notifications across all services in England, Wales and Scotland is **518,000**.<sup>23</sup> This is very much in line with The Association of Chief Trading Standards Officers (ACTSO) Impacts and Outcomes Reports estimate of 476,000 referrals and notifications in England and Wales in 2023-24, if we take into consideration that Scotland is not included in this.<sup>24</sup>

According to our FOI data, cases related to fair trading were most common, with nearly 60,000 referrals and notifications reported in this category. Motor vehicles sales and repairs

<sup>20</sup> Citizens Advice - Reporting to Trading Standards, accessed at <https://www.citizensadvice.org.uk/consumer/get-more-help/report-to-trading-standards/>

<sup>21</sup> Advice Direct Scotland, accessed at <https://advisedirect.scot/>

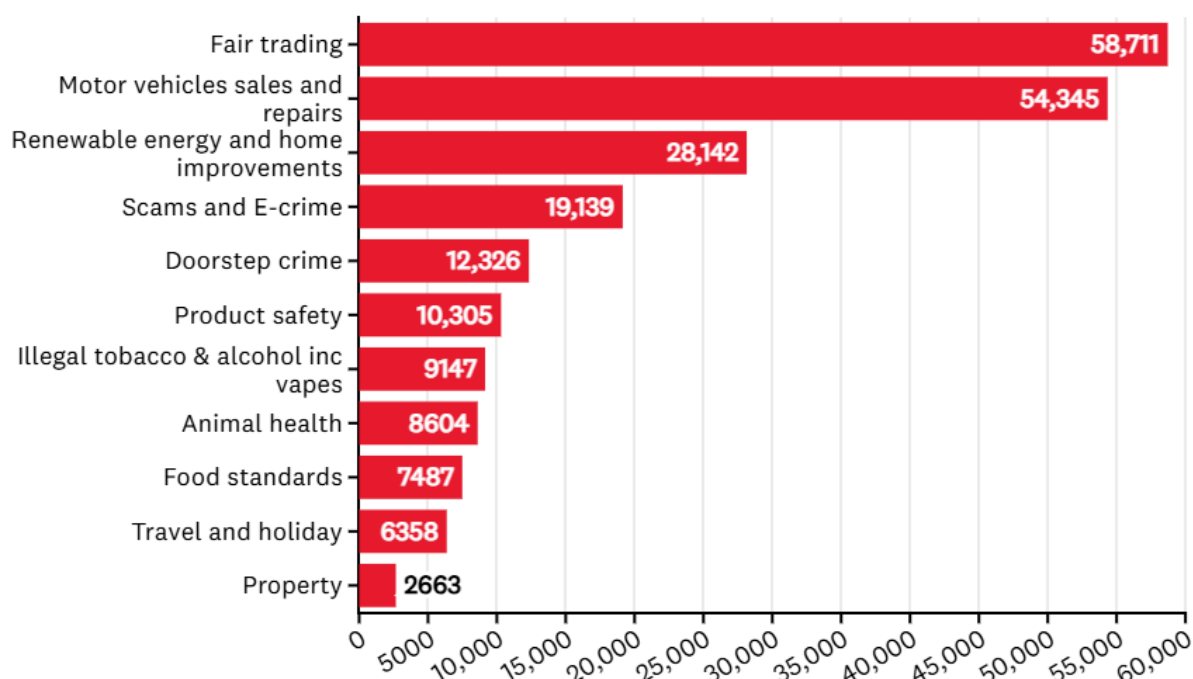
<sup>22</sup> A referral is used for issues that could be directly investigated by trading standards and lead to enforcement action. Cases are typically sent as a referral when the issue appears to involve serious or persistent breaches of consumer protection laws. A notification, on the other hand, is for informational / intelligence purposes rather than immediate action. It's logged and may be used to build intelligence over time, but it doesn't usually trigger immediate action.

<sup>23</sup> 109 services who provided overall figures for both referrals and notifications reported a total of 327,230, which covered a population of 41.5m people out of a total population of 65.7m.

<sup>24</sup> ACTSO (2023-24) - Impacts and Outcomes Report, accessed at <https://www.actso.org.uk/impacts-outcomes-reports/> Note, ACTSO received responses from 111 services and adjusted these figures according to population to estimate the total for England and Wales.

was the next most common category, at more than 54,000. These two areas had considerably more referrals than any other area, with home improvements and renewable energy being the next most common category at just over 28,000. Only just over half of services (around 100) were able to break down referral and notification numbers by category and so these figures will be an underrepresentation of the true numbers. However, it does give us an indication of the spread of referrals and notifications across different areas of the Trading Standards remit.<sup>25</sup>

**Figure 5: Numbers of referrals and notifications to trading standards 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 does 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 Trading Standards remit.*

### Primary Authority Partnerships and business advice

Another important aspect of Trading Standards Services' work is Primary Authority Partnerships (PAPs). Trading Standards Services are traditionally responsible for monitoring and enforcing against businesses in their local area. However, there are many businesses that operate nationally or internationally. This has led to the introduction of the Primary Authority model whereby many such businesses can partner with an individual service that provides them with advice regarding compliance, and where this is assured advice any intended enforcement action against this business by other services must first be notified to the designated primary authority.

<sup>25</sup> Missing data for referrals and notifications by category was spread across the different nations and types of local authority so we have no reason to believe that the missing data would substantially distort the spread of referrals and notifications that we are able to report from the data we have.

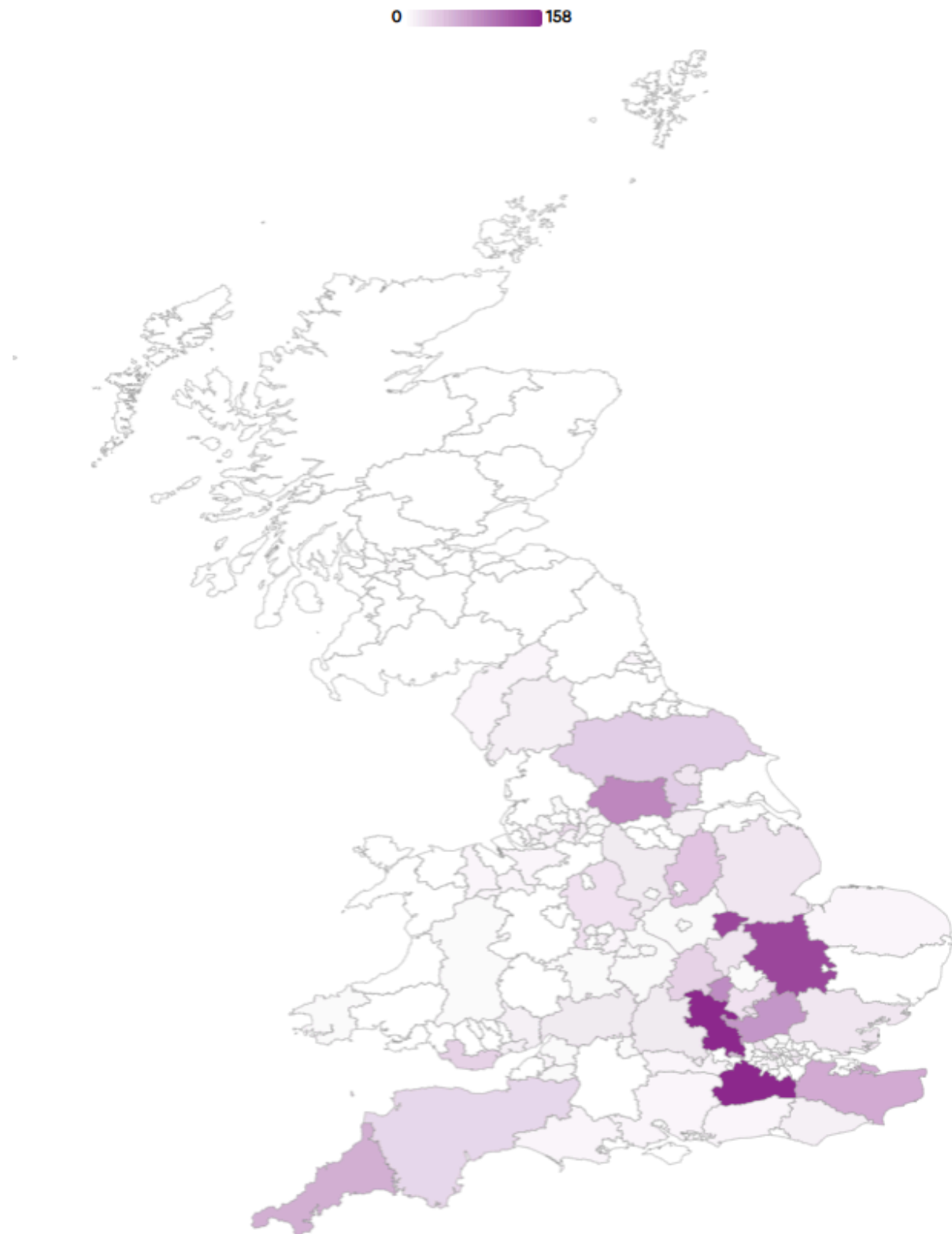
Businesses pay for advice provided to them by the service they hold a PAP with. This can be beneficial in that the businesses that operate nationally can have a single point of contact within trading standards as opposed to dealing with disparate teams, which should reduce regulatory compliance costs. On the other hand, it leaves individual local authority Trading Standards Services responsible for advising on compliance for large companies that operate nationally or even internationally.

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.<sup>26</sup> The Buckinghamshire and Surrey combined service holds 158 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. Generally speaking, the services that hold a high number of PAPs tend to be large or combined services. The three with the most partnerships are all combined services. With the exception of a small number in Glasgow, Scottish services do not hold any PAPs. The highest number held in Wales is the 33 held by Shared Regulatory Services (which covers Cardiff, Bridgend and the Vale of Glamorgan).

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<sup>26</sup> Department for Business and Trade (2024) - Primary Authority Register, accessed at <https://primary-authority.beis.gov.uk/par> Note: we obtained a list of PAPs in csv form directly from DBT in December 2024. Therefore this is a snapshot based on data on one time point. PAP numbers change over time so figures may not exactly match the number held now.

**Figure 6: Map of Primary Authority Partnership numbers held by services across England, Scotland and Wales**



Source: Information on PAP numbers was obtained from the Department for Business and Trade's [Primary Authority Register](#) in December 2024. PAPs can exist for other regulatory functions such as fire safety and licensing. This map has been filtered to only partnerships related to trading standards.



The time spent advising businesses as part of these partnerships can be significant. Some services reported hundreds or even thousands of hours of advice provided to PAP businesses in the 2023-24 financial year. Hertfordshire reported nearly 4,000 hours worth of advice. Taking a working year as 37.5 hours per week over 48 weeks, this equates to 2.2 full-time roles. Oxfordshire and Buckinghamshire and Surrey also reported a large number of hours of advice equating to more than one full-time role.

Despite reporting the most hours of advice given, Hertfordshire does not have the highest number of PAPs. However, different companies will seek varying levels of advice so certain services may have PAPs that are much more demanding on their time. Hertfordshire has many PAPs for large companies - for example, they are the Primary Authority for Amazon UK, Tesco, Costco and EE. Similarly, Oxfordshire reported 3,452 hours of advice given but they hold only 16 PAPs. They informed us that this was driven largely by advice given to a single partnership with Sainsbury's / Argos.

**Table 8: Primary Authority partnership numbers, hours of advice given in the 2023-24 financial year and the number of staff needed to fulfill these advice hours**

Service	Number of PAPs	Hours of advice reported 2023-24 FY	Number of staff needed to fulfill advice hours
Hertfordshire County Council	77	3929	2.18
Oxfordshire County Council	16	3452	1.92
Buckinghamshire and Surrey Trading Standards Service	158	2308	1.28
Shared Regulatory Services (Vale of Glamorgan, Cardiff and Bridgend)	33	1066	0.59
Cambridgeshire and Peterborough Trading Standards	135	976.5	0.54
Nottinghamshire County Council	42	933.4	0.52
West Yorkshire Joint Services (Leeds, Bradford, Kirklees, Calderdale & Wakefield)	88	823	0.46
Milton Keynes Council	85	706	0.39
Essex County Council	17	415	0.23
Central Bedfordshire Council	20	390	0.22

*Note: We have taken a working year of 1,800 hours (37.5 hours per day for 48 weeks per year - assuming 4 weeks of holiday).*

*Sources: DBT Primary Authority register for number of PAPs. Which? FOI for hours of advice given in 2023-24 financial year.*

Trading Standards Services also provide advice to businesses outside of the formal arrangement of PAPs, for example businesses in their local area that do not have a Primary

Authority. We covered this in our FOI request but most services did not hold data on hours of advice outside of PAP relationships. However, among those who did (circa 90), 20 reported 100 or more hours of advice given.

## Chapter 5: Prioritisation and resource allocation

When a Trading Standards Service receives consumer referrals, they may or may not investigate those further. In our FOI, we asked services how many of the consumer referrals received by their service they had investigated. Notifications are not included here as they tend to be sent solely for informational purposes to build intelligence, and so we would not expect services to investigate these at an individual level. Among the half of services that were able to clearly quantify both the number of referrals and the number of these investigated, around a third of referrals were investigated.<sup>27</sup> What was defined as ‘investigating’ a referral seemed to vary between services. Nevertheless, this does indicate that a large proportion of referrals are not investigated.

Where services had referrals that had not been investigated further, we asked services how frequently different reasons contributed to the decision not to pursue the referral. They may be limited by resourcing issues, or the referrals in question may simply not warrant investigation. Of 125 services who responded to this question, the majority (64%) said that insufficient staff hours were a reason at least some of the time. 31% said this was often or always the case. Services were much less likely to report a lack of the relevant skills as a frequent driver in not investigating referrals, indicating that resourcing is the bigger issue than skills from their point of view.

**Table 9: Reasons why services did not investigate referrals further**

	Always / often	Sometimes	Rarely	Never
The referrals did not fall into our priority areas	35%	39%	10%	16%
We did not have the staff hours required	31%	33%	14%	23%
The referrals did not merit investigation	69%	28%	2%	2%
We did not have the relevant specialist skills	3%	13%	43%	41%

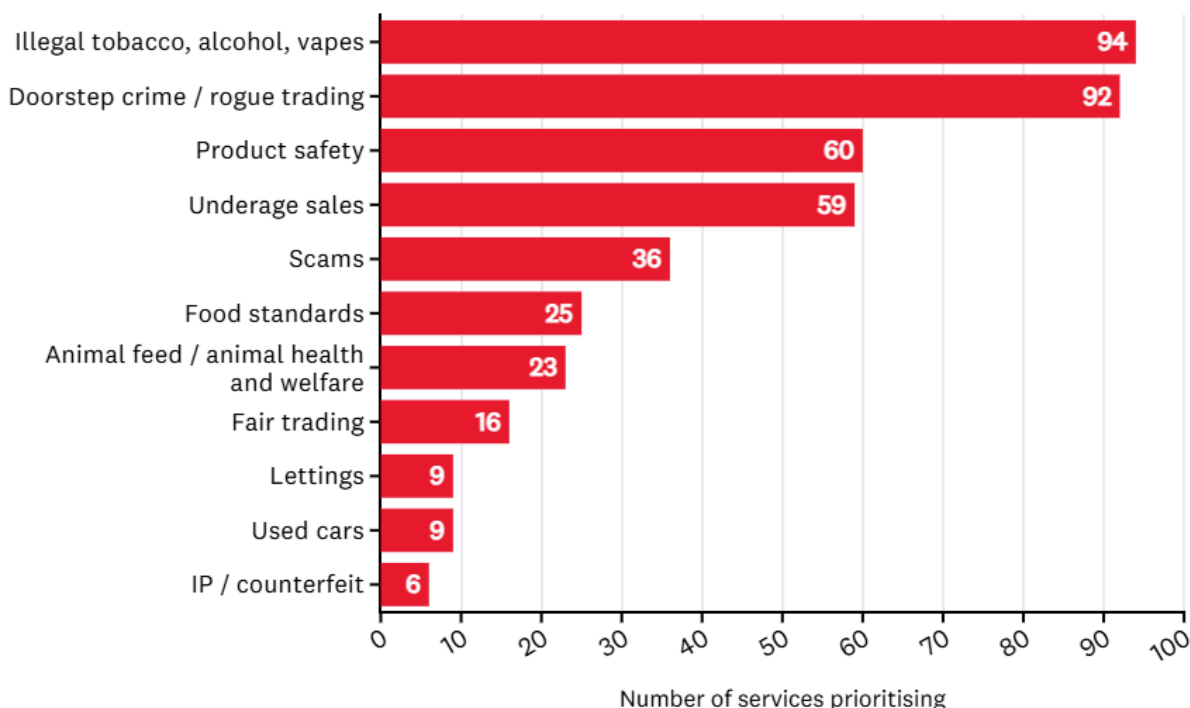
*Note: Only between 120 and 131 services answered each statement in this question. Please note that proportions are rounded to the nearest whole number and so may not sum to 100%.*

Referrals not falling into a service’s priority areas was also a common reason for not investigating - 74% of services who answered told us this was a reason at least some of the time. In order to establish where these priorities lie, we asked services about their top three priority areas for the 2023-24 financial year, as well as any issues they have had to de-prioritise in the past five years. The most commonly prioritised areas were illegal tobacco / vapes and alcohol (94 services) and doorstep crime / rogue traders (92 services). Nearly 60 services mentioned underage sales as a priority area, though this was often a specific

<sup>27</sup> Only half (93) of services provided both figures in a clearly interpretable way, and there was variation in how ‘investigating’ a referral was interpreted by services. Therefore, this proportion of referrals investigated should be treated as strictly indicative.

priority within tobacco and alcohol (including vapes) - in other words, their priority area is underage sales of those specific products. Areas like fair trading and used cars were much less frequently prioritised, despite the large number of referrals received by trading standards in these areas.

**Figure 7: Most common current priority areas for services**



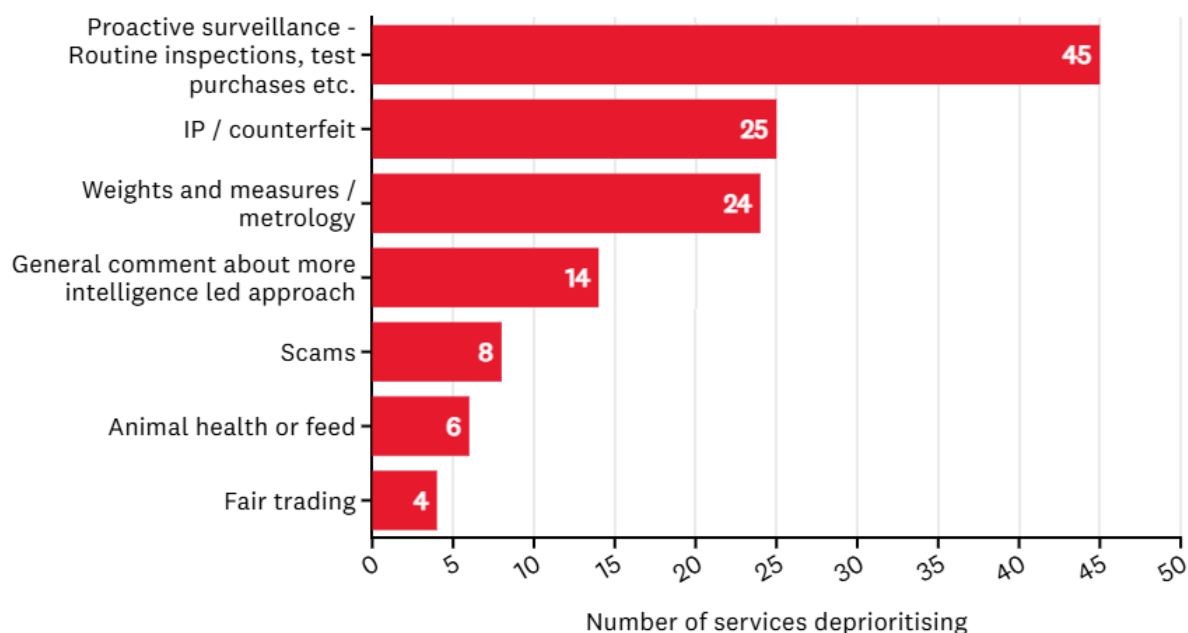
*Note: The base for this chart is 169 services who provided information about their top priority areas. Please note that some areas will overlap. Most notably, many prioritise underage sales specifically for tobacco, vapes and alcohol.*

High prioritisation of doorstep crime and tobacco and alcohol (including vapes) was true for all authority types. However there was some variation in prioritisation of other issues:

- All but one of the services prioritising lettings are in London
- London Boroughs were also the most likely to be prioritising underage sales
- Welsh authorities were least likely to say they were prioritising product safety
- Unitary authorities made up most of the small number prioritising used cars
- Counties were most likely to be prioritising food standards

Services are also having to deprioritise certain areas in light of resourcing issues. Proactive work like routine inspections and test purchases were the most commonly deprioritised areas - of 147 services who answered the deprioritisation question, 45 services told us they had reduced these activities in the past five years. Despite this, services reported more than 50,000 routine inspections in total in the 2023-24 financial year, and more than 10,000 test purchases. This work varied substantially between services as a handful reported more than 1,000 routine inspections, but 19 services reported no routine inspections at all in 2023-24.

Other commonly deprioritised areas were intellectual property / counterfeit goods and weights and measures, both of which had been deprioritised by 25 services.

**Figure 8: Issues most commonly deprioritised by services in the past five years**

*Note: 147 services provided an answer on areas deprioritised, even if this was simply to say that they had not deprioritised any.*

Several services commented more generally on a reduction in proactive work and a shift towards reactive work in response to complaints, or an 'intelligence led' approach whereby resources are allocated where most needed.

**“We do less and less proactive work. Inspection programmes for non food businesses are very limited, sampling and test purchasing of anything that isn't food or vape related is also limited”**

**“Due to resources we have to operate mainly on an intelligence led basis in response to complaints rather than a proactive basis”**

**“We have become more reactive in our work than proactive. So the number of routine proactive inspections have significantly been reduced”**

## Chapter 6: Enforcement and compliance activity

Trading Standards Services have a range of possible enforcement options to take action where there is a breach of consumer law. These range from cautions and formal warning notices, to other civil enforcement actions and criminal prosecutions. This chapter sets out our freedom of information request data on the enforcement and surveillance activities of services in England, Wales and Scotland.

### Challenges in interpreting and comparing enforcement figures

Although most services did provide us with data on their enforcement activities, this data is more difficult to interpret than the data on resources, demand and prioritisation. There is a limit to the conclusions that can be drawn from the enforcement figures, particularly at a local comparison level. There are a number of reasons for this:

- Nation comparisons are difficult because devolved nations may have a different approach to enforcement to others. For example, Scotland reported far fewer criminal prosecutions than England and Wales, but the process for bringing these in Scotland is different. Trading Standards Services in Scotland cannot bring their own criminal prosecutions. The Crown Office and Procurator Fiscal Service (COPFS) serves as the main prosecuting authority for serious breaches of consumer law. Trading Standards gather evidence, which they submit to COPFS to decide whether to prosecute. COPFS enforces compliance through prosecutions and enforcement orders where needed.
- The nature of a local authority or the functions it covers can affect the enforcement actions taken. For example:
  - Warning notices are most common for food standards, but food standards are covered by Environmental Health in Scotland, so Scottish authorities are unlikely to be reporting warning notices related to this issue.
  - Functions like animal health and welfare or feed are not covered by all authorities, so we would expect enforcement numbers to be zero for these functions among services that do not cover them.
- Some enforcement actions, like prosecutions, might take a long time to come to fruition and be impacted by things beyond a Trading Standards team's control like court delays, so data relating to a single financial year may give an inaccurate picture.
- There were some instances of a number of prosecutions related to one matter (like a single call centre fraud in one example) so we would expect some significant variation in prosecution figures depending on factors like this.

More fundamentally, individual services may choose different approaches to improving compliance with and enforcing against breaches of the law - some might focus more on surveillance and prevention of crimes, whilst others operate on a more reactive basis or are more likely to pursue prosecutions. Some services seemed to prefer one enforcement tool like warning notices or prosecutions, whilst others reported a range of different activities. This variation in approach makes it difficult to establish common metrics with which to compare services, or to confidently identify what 'good' looks like in terms of numbers of enforcement activities.

These issues are reflected in our analysis of the enforcement figures, which looks at broad trends in the figures and pulls out examples of where approaches can differ drastically between services, but does not seek to rank the success of different services by their enforcement figures.

### **Enforcement across different issues**

Across 178 services in England, Scotland and Wales who reported a clear number of prosecutions, there were 1,215 criminal prosecutions reported for the 2023-24 financial year.<sup>28</sup>

Prosecutions for illegal tobacco and alcohol (which can include vapes) made up around a third of all prosecutions reported, at 398. Criminal prosecutions for doorstep crime were next most common, at nearly 200. This reflects the areas that many services said they were prioritising.

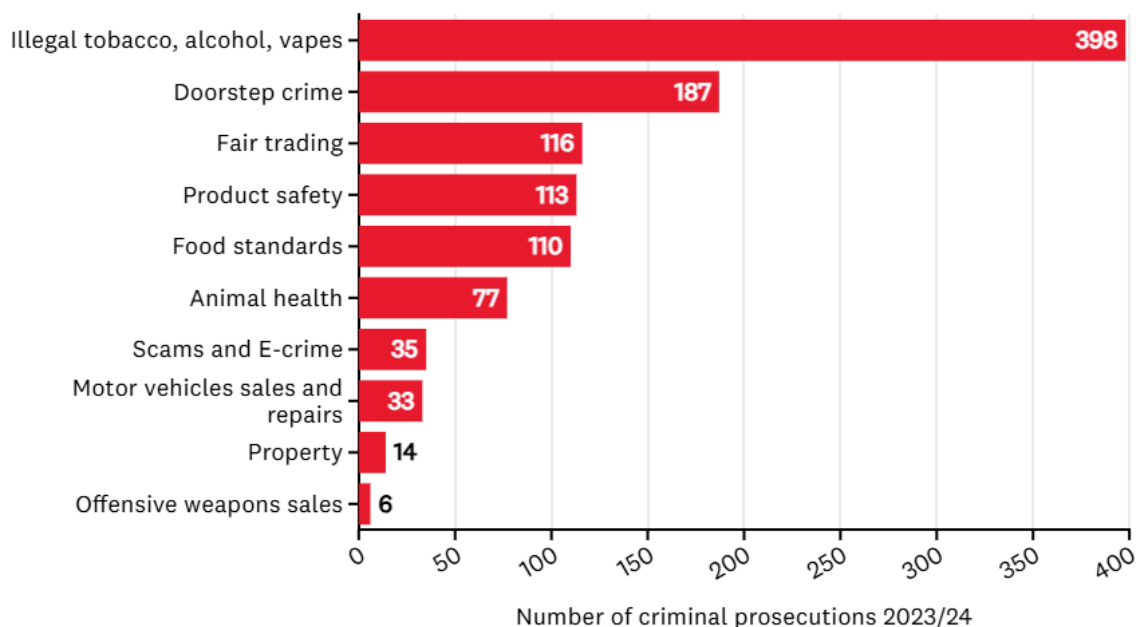
It does not, however, seem to reflect the areas in which services reported the largest numbers of referrals and notifications. Fair trading and motor vehicles had by far the highest reported number of referrals and notifications at more than 50,000 apiece. However these issues were the subject of relatively few enforcement actions. There were just over 500 formal warning notices and 116 criminal prosecutions reported for fair trading and 153 warning notices and 33 criminal prosecutions reported for motor vehicles sales and repairs.

There are some additional factors to consider here. Cases in some categories will be less likely to justify a criminal prosecution, for example minor fair trading infringements. Furthermore, there are other sources of intelligence that might prompt trading standards to look into issues, and so referrals and notifications are not a complete picture on the demand in different areas. However, the prioritisation of and focus of enforcement activity in particular areas does indicate that some of the issues consumers are most commonly affected by receive relatively less attention than other issues.

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<sup>28</sup> Some services did not provide prosecution numbers, and some did not provide it in the requested format. These services have been considered missing data and excluded to avoid inaccurate reporting.

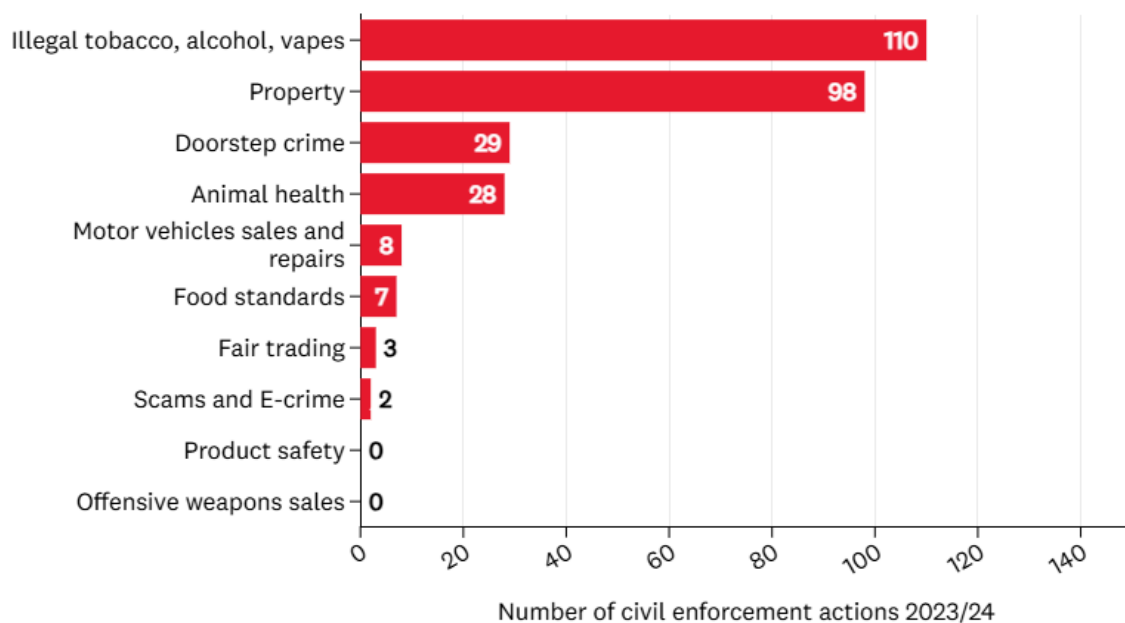
**Figure 9: Criminal prosecutions brought in 2023-24 across different areas of the trading standards remit**



*Note: there was some variation in the number of services who responded to different categories, but it typically was between 160-170.*

In terms of civil enforcement actions: these were less frequently used, with a total of less than 300 reported across 168 services who provided this figure. Again, illegal tobacco / alcohol / vapes dominated here, with a large number of civil actions also taking place in property. 125 services reported no civil actions in the 2023-24 financial year.

**Figure 10: Civil enforcement actions brought in 2023-24 across different areas of the trading standards remit**



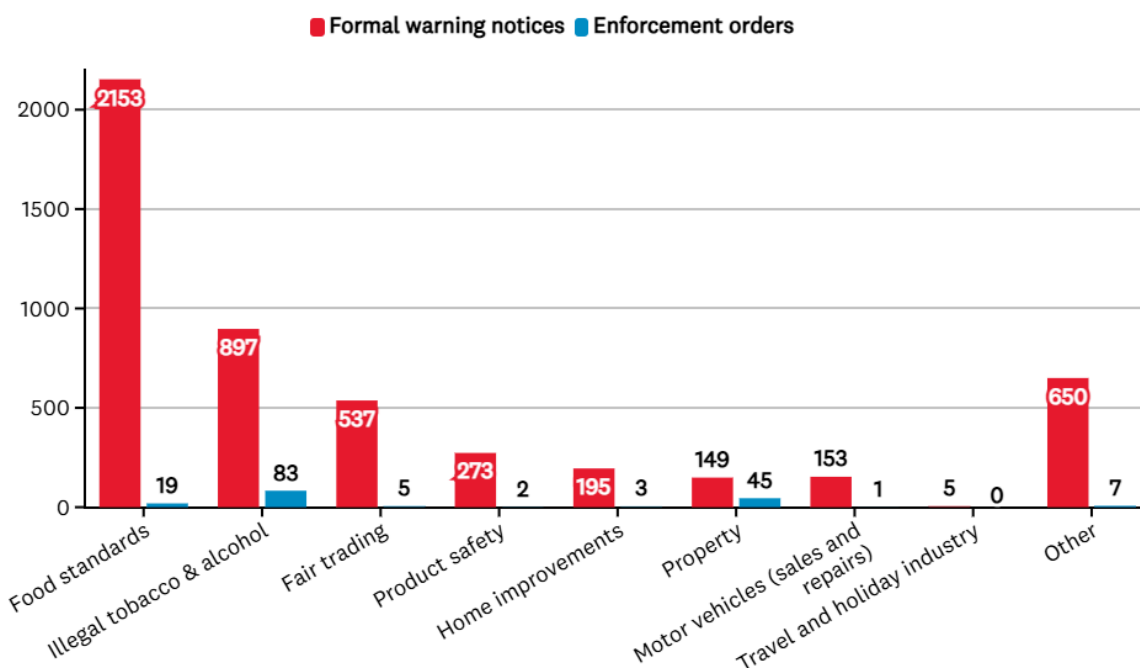
*Note: there was some variation in the number of services who responded to different categories, but it typically was between 145-160.*



We also collected data on the numbers of formal warning notices and enforcement orders in different areas of the trading standards remit. In total, services reported more than 5,500 formal warning notices. These were most commonly related to food standards. Warning notices were second most common for illegal tobacco / alcohol, and third most common for fair trading.

Only around 180 enforcement orders were reported, and most of these were for illegal tobacco and alcohol and property.

**Figure 11: Formal warning notices and enforcement orders served in 2023-24 across different areas of the trading standards remit**



*Note: response rates for warning notices and enforcement areas by category were typically around 150 services.*

Services also reported a total of 623 cautions issued, but this was not broken down by category.

### Enforcement across different services

As seen with the variation in resources, enforcement figures also varied a lot according to area. Enforcement activities were spread very unevenly across individual services. Taking criminal prosecutions as an example: a few services had much higher numbers of criminal prosecutions than others. 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. Among those who reported no criminal prosecutions are a combined service of 10 staff covering a population of more than 700,000 and a metropolitan district covering a population of nearly half a million.

London Boroughs had the highest ratio of criminal prosecutions to staff members. They reported 132 prosecutions in the 2023-24 financial year, and there are a total of 162 FTE staff across the boroughs, amounting to 0.84 prosecutions per member of staff. Metropolitan boroughs reported 0.50 prosecutions per member of staff, and combined services 0.33.

**Table 9: Criminal prosecutions per member of staff in different types of Local Authority in England**

Authority type	Total criminal prosecutions 2023/24	Total staff inc admin	Criminal prosecutions per staff member
London Borough	132	157	0.84
Unitary Authority	398	514	0.77
County	313	596	0.53
Metropolitan District	100	201	0.50
Combined Service	82	248.8	0.33

*Note: A small number of services did not report criminal prosecution numbers. Where this is the case, we have also excluded the staff numbers for that service, so criminal prosecutions per staff member are based only on services who reported both figures.*

Similar to the pattern with prosecutions, many services reported no or very few formal warning notices and enforcement orders, and a small number of services made up a large portion of them. For formal warning notices, more than half of those reported were from only 10 services, and 28 services made up all the enforcement orders served.

There was only a weak correlation between staff numbers or population and enforcement activities reported. Below is an example of two services that have a large number of staff, but the number of enforcement actions reported is drastically different.

**West Sussex County Council** reported the largest number of criminal prosecutions by far, at 159, and these were spread across a range of issues like product safety, food standards, illegal tobacco and alcohol and fair trading. It also reported 178 formal warning notices, but no civil enforcement actions or enforcement orders. The service has a relatively large team of 31 FTE staff, but 12 services had larger teams than this.

**Buckinghamshire and Surrey Trading Standards** has a very large team of 65 FTE staff but reported much smaller numbers for these activities - one formal warning notice, two enforcement orders, five criminal prosecutions and no civil enforcement actions. On the other hand, it does hold a large number of PAPs and so may have a greater focus on the business advice side.

## Chapter 7: Summary and discussion

The findings from the FOI requests are a strong indication of a consumer enforcement system that is not working as it should. The findings highlight a number of significant issues within the current Trading Standards system that need to be addressed to make it an effective enforcement regime in an increasingly complex consumer landscape.

### **There are significant deficiencies in the way data is collected, with little standardisation across services.**

The data collection process revealed significant inconsistencies across Trading Standards Services in how data is recorded, categorised, and interpreted. Responses to FOI requests varied widely, with some authorities providing detailed data promptly while others were unable to supply basic figures. For example, a small number of services could not provide a budget for their service, as they could not separate this from a wider council budget. Data on referrals and notifications was particularly variable, with little standardisation in how this data is collected across different services. This makes it very difficult to compare performance and productivity of different services, or strategically allocate resources where they are needed most. These issues underscore how the absence of a consistent and coordinated approach to data collection hinders effective oversight, benchmarking, and strategic planning across the Trading Standards system.

### **Resources vary drastically between different Trading Standards Services, with some operating with clearly inadequate resource levels.**

Trading Standards covers a vast remit and enforces around 300 pieces of legislation with very limited resources - the median budget for a service was £2.04 per head of the population, and more than half of services (57%) have fewer than four staff members per 100,000 people. In the most extreme cases, very small teams of one or two professionally qualified members of staff are providing Trading Standards Services for authorities covering thousands of businesses and hundreds of thousands of people. Data indicates that resources have dwindled over time, and at the same time 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.

These limited resources have an impact on what work can be undertaken. Of 125 services who responded to the relevant question, the majority (64%) said that insufficient staff hours prevented them from investigating referrals at least some of the time. Many services also said that they have deprioritised key areas like proactive surveillance, weights and measures and counterfeit goods in the past five years.

### **There is not always a clear link between resources and the needs of the area, with resources varying dramatically even between services with similar characteristics.**

Some of the variation in resources between services may be related to the needs or characteristics of the area: counties and unitary authorities might have animal health teams that urban authorities do not, and rural areas might require more resources for travel in a

less densely populated area. However, our FOI request results show that there is a great deal of variation in resource levels even between areas with similar characteristics like population, business numbers and authority type.

**An intelligence-led approach is seen as increasingly important in light of limited resources, but there is little clarity or consistency in what data is used to inform such an approach.**

A clear theme in the comments in FOI request responses was that services are taking a more 'intelligence led' approach, whereby proactive surveillance work like routine inspections has been decreased, and services are trying to focus their resources where there is a higher level of risk, or where intelligence sources suggest there are issues. Such an approach is increasingly important in a profession that has significant resource constraints and needs to focus these resources as efficiently as possible.

However, the responses to our FOI request raise questions about the data sources that underpin this approach. Two key sources of intelligence for Trading Standards Services are referrals and notifications received from Citizens' Advice (i.e. consumer complaints), and surveillance work to monitor business compliance. However, the FOI requests responses indicate that these sources are not always effectively used:

- **Different services appeared to interact in vastly different ways with referrals and notifications from Citizens' Advice.** Some held referrals and notifications as a dataset categorised by issue, which could be used to continually analyse complaints coming from consumers in different categories and therefore inform the work of the service. Other services said they could not provide this data as it belongs to Citizens' Advice and is not held on their system. Some services said they only record referrals and not notifications and some only recorded referrals that fit their requirements to be taken forward. For example, one service said ***"Please note that in our case only referrals and notifications meeting our priorities, as well as direct contact, are recorded and not the total received"***. Contradictory to this approach where there is a major distinction between referrals and notifications, there were also services who could give us a figure for referrals and notifications combined but not distinguish between the two. For many services with such varying approaches, what could and should be a major source of intelligence is left largely unused. Even where referrals and notifications are collected and categorised into different issues, they do not always appear to be stored under the same categories by different services, which has implications for data sharing between services. Ideally, this data should be stored and used consistently at local, regional and national levels to inform prioritisation and activity within Trading Standards.
- **Proactive surveillance work has been deprioritised by many services.** 45 services told us they had deprioritised proactive work like routine inspections and test purchases in the past five years, whilst 19 services said they had done no routine inspections at all in the 2023-24 financial year. Several services commented on their work being increasingly reactive as opposed to proactive in light of limited resources. Proactive surveillance, though, is a source of intelligence in itself, which can pick up instances of non-compliance with consumer law that may otherwise have gone

unnoticed. For issues like fair trading and weights and measures, consumers will often not be aware when businesses break the law and so Trading Standards Services will be less likely to receive intelligence from consumers on certain issues. One service told us that they had deprioritised weights and measures as they are an intelligence-led service and do not receive many complaints in this area. However, they also mentioned a recent project on jewelers' scales where nearly all those tested were wrong.

Ultimately, multiple sources of information are needed for a truly intelligence-led service. Intelligence from partners like the police or Action Fraud will only provide Trading Standards with information on particular issues. Complaints from consumers are a good source of intelligence about issues that are harming consumers, but some consumer detriment is hidden: consumers may not know if they have paid an incorrect price, or received less than what they paid for at a petrol pump. Proactive inspections on fair trading and weights and measures can help uncover this hidden detriment, but they are too resource intensive to carry out indiscriminately. An effective intelligence-led and risk-based approach requires an appropriate balance between multiple sources of intelligence to inform work: sources that give Trading Standards a comprehensive and representative view of the issues that affect consumers both locally and nationally, allowing them to efficiently target their resources.

**There are large areas of Trading Standards responsibilities that appear to have limited focus.**

The areas most commonly prioritised by Trading Standards Services according to our FOI request data do not match the areas consumers most commonly complain about. Whilst fair trading issues and motor vehicle sales and repairs were by far the most commonly complained about by consumers, illegal alcohol and tobacco (including vapes) and doorstep crime were by far the most common priority areas for services. Nine services reported prioritising used cars and 16 fair trading, whilst 94 had prioritised illegal alcohol and tobacco (including vapes).

We would not expect consumer complaints and prioritised areas to match exactly - other factors like the severity of harm caused and other sources of intelligence should factor into prioritisation. For example, we might expect a fair trading issue to be less likely to lead to severe harm compared to doorstep crime targeted at vulnerable consumers. However, if a particular issue takes up a substantial portion of resources, it raises questions about the capacity of Trading Standards to sufficiently cover the numerous other areas under their remit.

In light of the introduction of the Tobacco and Vapes Bill 2024, Trading Standards has received government funding for initiatives to tackle these issues<sup>29</sup>, with a further investment of £10 million recently announced for England.<sup>30</sup> Investment in this issue shows in the enforcement figures - illegal alcohol and tobacco (including vapes) made up nearly a third of

<sup>29</sup> Journal of Trading Standards - Illicit vapes: Six million seized by TS, accessed at <https://www.journaloftradingstandards.co.uk/vapes/illicit-vapes-six-million-seized-by-ts/>

<sup>30</sup> CTSI (2025) - CTSI helps to secure vital investment for Trading Standards, accessed at <https://www.tradingstandards.uk/news-policy-campaigns/news-room/2025/ctsi-helps-to-secure-vital-investment-for-trading-standards/>

all criminal prosecutions reported by services in the 2023-24 financial year, according to our FOI request data. This funding is no doubt well received by stretched Trading Standards Services. But there are many other important areas of Trading Standards responsibilities and there is a risk that some of these areas are left without sufficient monitoring and enforcement.

The areas deprioritised by services indicate which issues receive relatively less attention, with proactive surveillance, weights and measures and counterfeit goods being the most commonly deprioritised areas according to the FOI request data. Whilst difficult prioritisation decisions are inevitable in services under strain, there are inevitable risks to businesses and consumers if particular issues receive less attention. Proactive surveillance can be a source of intelligence for services, picking up on issues that may otherwise have gone undetected. Counterfeit goods could risk consumers' safety if not sufficiently monitored. And although issues like weights and measures are less likely to directly threaten consumer safety, they are fundamental in ensuring that consumers get what they paid for. A lack of enforcement in this area could erode consumer confidence and disadvantage law-abiding businesses.

**There is a lack of accountability in the system, with no commonly agreed metrics to assess performance and no clear picture of how consumer complaints are considered and investigated.**

Enforcement figures were patchy across services, with some reporting a large number of different enforcement activities across different issues, whilst others' activity was more focused on one type of enforcement or a particular issue. Many services reported no criminal prosecutions or civil enforcement actions in the 2023-24 financial year. Some services commented in their response that the enforcement metrics we collected were not a fair reflection of the range of their activities - for example, some services may focus more on prevention and working collaboratively with businesses to encourage compliance, as opposed to going down the prosecution route. We also asked services how many hours of business advice they provided in the 2023-24 financial year, but many services did not hold this data.

It is evident from the responses that there is no clearly defined or consistently collected set of metrics that reflects the activities and performance of Trading Standards teams, making it very difficult to compare across different services.

There are also no clear expectations around how referrals and notifications through Citizens Advice are considered and investigated. It is difficult to establish whether referrals received through Citizens' Advice are being followed up by Trading Standards Services. We asked Trading Standards services how many of the referrals to their service they had gone on to investigate, finding that around a third were, but there is no consistent view of what 'investigating' a referral means. We understand that services each hold their own 'referral protocols' with Citizens' Advice, which sets out which issues they do and do not commit to following up. We attempted to obtain copies of these protocols from Citizens' Advice but they indicated that this information belonged to the local authorities and we should approach them directly. However, some local authorities we contacted about this data believed that it belongs to Citizens' Advice. This suggests that there is a lack of clarity around the ownership of information between Citizens' Advice and Trading Standards.

Overall, the **findings of the FOI reveal a critical need for systemic reform to strengthen consumer enforcement at a local level**. It is impossible not to conclude that a significant number of Trading Standards Services have inadequate resources to provide an appropriate level of service. However, other actions, such as establishing clear, consistent data practices are essential steps and we discuss these in greater detail in our companion report *Addressing the decline of Trading Standards and strengthening consumer enforcement*.<sup>31</sup> Without such changes, the ability of Trading Standards and the wider consumer enforcement system to protect consumers and ensure a fair marketplace will continue to be compromised.

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<sup>31</sup> Which (2025) - Addressing the decline of Trading Standards and strengthening consumer enforcement, accessed at <https://www.which.co.uk/policy-and-insight/article/trading-standards-in-crisis-rebuilding-an-effective-and-accountable-consumer-enforcement-system-an4VO5I57tgr>



## Annex

### Freedom of information request questions

What is the name of the Local Authority your Trading Standards Service covers?

If you operate as a combined service, please enter the names of all the Local Authorities that fall within your service.

#### Section 1 - Resources

What was the total budget for your local authority Trading Standards Service for the 2023-24 financial year (1st April 2023- 31st March 2024)?

What was the total budget for your local authority Trading Standards Service for the 2022-23 financial year (1st April 2022- 31st March 2023)?

What was the total budget for your local authority Trading Standards Service for the 2021-22 financial year (1st April 2021- 31st March 2022)?

In the 2023-24 financial year (1st April 2023- 31st March 2024), what proportion of your Trading Standards Service's funding came from the following sources?

*If you do not have the exact figure, please provide an approximation*

Source	% of funding (please sum to 100%)
Central government local authority funding	
Other central government or regulator funding for specific functions	
Devolved government funding	
Regional funding	



National Trading Standards or Trading Standards Scotland funding	
Primary Authority Partnership funding	
Other, please specify	

How many full time equivalent staff, including contractors, work in your service? Please enter a numerical value next to each category.

Staff type	Permanent full time	Contractors	Part time
Professionally qualified staff undertaking Trading Standards work (this includes staff holding DCATS, CTSP, DTS or equivalent qualification).			
Other professionally qualified staff undertaking Trading Standards work e.g. Environmental Health Officers			
Other staff undertaking Trading Standards work e.g. apprentices			
Administrative/support staff.			

For which of the following do you have Trading Standards officers with specialist competencies in the area?

Specialist competency	Yes/No
Unfair commercial practices	
Consumer Rights Act breaches	
Prices and pricing practices	
Motor trade	
Travel and holiday industry	
Renewable energy and home improvements	
Doorstep crime, including rogue trading	
Product safety	
Intellectual Property	
Metrology / weights and measures	
Age-restricted sales	
Food standards	

Animal feed	
Animal health and welfare	
E-crime - this includes email scams, phishing, fake websites or copycat websites	
Consumer Advice	
Other (please specify)	

Do you share any of the following services with Trading Standards departments in other local authorities? If so, who do you share with?

Area	Shared? Y/N	Who with?
Fair trading		
Product safety		
Intellectual Property		
Metrology / weights and measures		
Age-restricted Sales		
Food Standards		

Animal feed		
Animal health and welfare		
E-crime - this includes email scams, phishing, fake websites or copycat websites		
Consumer advice		
Other (please specify)		

## Section 2 - Demand and prioritisation

How many referrals and notifications did you receive to your services in the April 2023-March 2024 financial year in the following categories?

Category	Referrals	Notifications
<b>Overall</b>		
Doorstep crime - this includes all rogue trading that takes place at the consumer's home		
Scams - this includes mail fraud, telephone scams, and any other outright criminal activity that takes place from a distance (but excludes online fraud)		
E-crime - this includes email scams, phishing, fake websites or copycat websites		

Food Standards		
Motor vehicle sales		
Motor vehicle repairs		
Travel and holiday industry		
Renewable energy and home improvements		
Illegal tobacco & alcohol		
Offensive weapons sales		
Vapes		
Property – including lettings and estate agents		
Fair trading - including pricing, terms and conditions and descriptions of goods		
Animal health		
Product safety		
Other		

How many of the referrals received in the financial year 2023-24 did you take forward / investigate?

*If you do not formally collect this information, please provide an estimate*

Category	Number of referrals investigated
Overall	
Doorstep crime - this includes all rogue trading that takes place at the consumer's home	
Scams - this includes mail fraud, telephone scams, and any other outright criminal activity that takes place from a distance (but excludes online fraud)	
E-crime - this includes email scams, phishing, fake websites or copycat websites	
Food standards	
Motor vehicle sales	
Motor vehicle repairs	
Travel and holiday industry	
Renewable energy and home improvements	

Illegal tobacco & alcohol	
Offensive weapons sales	
Vapes	
Property – including lettings and estate agents	
Fair trading - including pricing, terms and conditions and descriptions of goods	
Animal health	
Product safety	
Other	

Of those referrals that you did not take forward, how often have the following been reasons why?

Reason	Always	Often	Sometimes	Rarely	Never
We did not have the staff hours required					
We did not have the relevant specialist skills					

The referrals did not merit investigation					
The referrals did not fall into our priority areas					
Other, please specify					

Approximately what proportion of your investigations pertain to the online activities of a business?

1. 0-10%
2. 10-20%
3. 20-30%
4. 30-40%
5. 40-50%
6. More than 50%

What are the top three priority issues for your service?

Can you set out any aspects of your remit that you have had to de-prioritise over the past five years?

### Section 3 - Enforcement activities/outcomes

In the 2023-24 financial year (1st April 2023- 31st March 2024)...

1. How many routine (i.e. not responding directly to a complaint) inspections on businesses did you carry out?
2. How many seizures of unsafe/non-compliant products did you make?
3. How many hours of advice did you provide for businesses on their obligations under consumer law (excluding Primary Authority advice)?
4. How many hours of advice did you provide for businesses for which your service holds a Primary Authority relationship?
5. How many voluntary undertakings did you secure from businesses?
6. How many test purchases did you carry out?



## 7. How many cautions did you issue?

How many enforcement orders and formal warning notices did you serve in the following categories in the 2023-24 financial year?

Category	Formal warning notices	Enforcement orders
Overall		
Food standards		
Motor vehicles (sales & repairs)		
Home improvements		
Travel and holiday industry		
Illegal tobacco & alcohol		
Property – including lettings and estate agents		
Fair trading - including pricing, terms and conditions and descriptions of goods		
Product safety		
Other		

How many criminal prosecutions and civil enforcement actions did you bring forward in the 2023-24 financial year?

Category	Criminal	Civil
<b>Overall</b>		
Doorstep crime - this includes all rogue trading that takes place at the consumer's home		
Scams - this includes mail fraud, telephone scams, and any other outright criminal activity that takes place from a distance (but excludes online fraud)		
E-crime - this includes email scams, phishing, fake websites or copycat websites		
Food standards		
Motor vehicles (sales & repairs)		
Illegal tobacco & alcohol		
Offensive weapons sales		
Property – including lettings and estate agents		
Fair trading - including pricing, terms and conditions and descriptions of goods		

Animal Health		
Product safety		

Please could you provide a copy of your latest enforcement policy?



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