

Future of Trading Standards in Scotland: How it can work better for consumers

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1. Executive Summary

In March 2026, Scottish Ministers requested proposals from Consumer Scotland, under section 3 of the Consumer Scotland Act 2020, on the future viability of trading standards and consumer enforcement in Scotland.

Trading standards: a vital service for consumers and the economy

Trading standards are a critical part of Scotland's frontline infrastructure to deliver economic growth and play a vital role in creating the conditions that enable consumers and businesses to thrive by:

- preventing consumers being ripped-off, **putting more money into people's pockets**
- giving **consumers confidence** that they are going to get a fair deal
- delivering a **level playing field for businesses**
- providing a **key preventative service**, supporting legitimate businesses and acting as deterrent to rogue traders

Challenges facing trading standards in Scotland

Despite their economic importance, trading standards services in Scotland face a range of challenges, many of which are long-standing. These issues increasingly present a significant threat to the future viability of trading standards services in Scotland and include:

- **Workforce size and composition:** There have been significant reductions in trading standards officer capacity in recent years. The workforce is ageing with nearly 60% of qualified officers over the age of 50. Career progression routes are also limited and sector capacity to support staff development is highly stretched.
- **Outcomes focus:** Trading standards services experience significant challenges in consistently demonstrating the key outcomes that their work achieves for consumers and the economy across Scotland. These challenges are caused by:
 - the number of statutory responsibilities
 - the need to balance national and local priorities
 - the cross-boundary nature of many trading issues
 - challenges in quantifying the impact of vital preventative work, and
 - the risk of prioritisation decisions being driven by funding pressures.

There is currently no overarching framework in Scotland which determines the 'core' activities of trading standards teams to guide decision-making.

- **Emerging markets:** The increasing consumer demand for online goods and rise in online crime is changing the nature of what trading standards must deliver. Responding to these changes requires a balance across new consumer threats and existing obligations.
- **Evidence-led decision making:** There are systems in place to support trading standards teams apply evidence in their decision-making. However, there is not a consistent approach to how this is delivered across local authorities, linked to capacity challenge and to the lack of an overarching outcomes framework.
- **Balancing enforcement and prevention:** Trading standards deliver a vital role in supporting businesses to comply with regulations and prevent consumer harm. The capacity constraints facing trading standards, combined with the diversity of issues the service covers, present challenges to delivering this preventative work.

The strategic context for action to secure effective trading standards services for the future

Immediate action is required to respond to the challenges facing trading standards to enable it to deliver improved outcomes for Scottish consumers, businesses and the economy. The following factors are central to identifying the actions that can deliver the greatest impact:

- **The case for structural change in the delivery of trading standards**
- **The need for enhanced coordination and development**
- **Public service reform**
- **UK-level reform**
- **Workforce stability**

Our overall assessment is that while evidence presents a powerful case for structural reform in how trading standards services in Scotland are organised, progressing such reforms presents significant challenges, risks and dependencies. These include the time and cost involved in such a process, and the level of uncertainty generated in any major structural change process, which may further destabilise an already fragile service. Any major structural change would benefit from being aligned with wider public service reform in Scotland, particularly in relation to other regulatory services and economic development, to ensure coherent and efficient delivery for consumers.

Given this context, we have not recommended an immediate change to the core trading standards delivery structures but have made a medium-term recommendation in relation to this issue. There is however, **a pressing need to take practical action at pace to address the challenges facing trading standards services and improve the consumer outcomes achieved.** Through our review we have identified a number of priority areas where there are clear opportunities for urgent action that can help build resilience within trading standards services and also be beneficial to any longer-term fundamental reforms.

Recommendations

Our recommendations seek to strike the right balance for consumers by supporting local flexibility in decision-making while strengthening collaboration, consistency and innovation across Scotland and are designed to:

- deliver action at pace
- strengthen trading standards services
- support the stabilisation of the workforce
- deliver improved consumer outcomes
- ensure alignment with the wider public service reform strategy

We provide: **8 ‘action now’ recommendations** and **1 medium-term recommendation**, to progress in line with the wider public service reform strategy.

‘Action now’ Recommendations

1: We recommend the development of a National Outcomes Framework for trading standards in Scotland. There is a need for a more consistent outcomes-based approach to the delivery of trading standards to strengthen the ability of the sector to deliver excellent, consumer-focused services that prevent and reduce consumer harm. A new national outcomes framework can underpin this by providing a clearer and more consistent set of strategic outcomes for all trading standards services in Scotland.

2: We recommend the creation of an office of the chief trading standards officer, located within an existing body, independent of local government. This office would consist of a small team responsible for the delivery of the national framework. The major issues facing trading standards in Scotland are being faced by small local teams across 31 local authorities simultaneously. There are currently no formal systems with the authority to drive a service-wide response to these major challenges. There is good practice in Scotland of different models that can be deployed to address the types of strategic challenges facing trading standards services, balancing local, on-the-ground delivery with the need for national visibility, coordination and improvement. For this model to be effective it will require central resourcing and the authority to drive forward the actions described above. The model has the potential to position trading standards as pioneer in public service reform, driving more collaborative, consumer-focused and preventative action, while ensuring the service is well placed to support any future structural reform as part of the wider PSR process.

3: We recommend the development and delivery of a national Workforce Strategy for trading standards services across Scotland. The fragility of the trading standards workforce in Scotland requires immediate action to secure a more resilient and stable workforce to deliver the outcomes that consumers, businesses and the wider economy in Scotland require. A new national Workforce Strategy for trading standards should be developed to support the business case for sustained investment in trading standards workforce, develop and expand the modern apprenticeship programme, consider a new ‘fast-stream’ development programme, develop a shared services model for recruitment and development across Scotland, and support local authorities to establish centres of excellence within single or cross-local authorities.

4: In partnership with the UK Department for Business and Trade, a review should be undertaken of the number of statutory responsibilities currently held by trading standards in Scotland, with a view to reducing these to enable the service to focus on the most important outcomes for consumers and businesses

5: The Business and Regulatory Impact Assessment Toolkit should be augmented with specific guidance to support consideration of the particular implications for trading standards services in the introduction of new legislation or regulation.

Trading standards services across Scotland must currently deliver around 250 statutory responsibilities. Each year, new legislation is passed which also requires enforcement by trading standards. A review of existing responsibilities is required, alongside action to ensure a more rigorous assessment is carried out if any new responsibilities are to be given to trading standards.

6. To complement the National Outcomes Framework, an Evidence Framework should be developed to support a more consistent approach to categorisation and application of evidence across trading standards services. This should be supported by guidance with good practice examples.

7. Local Authorities and COSLA should consider a joined-up approach to application of digital technologies to support the monitoring of ever-advancing online crime. This should include action to provide all trading standards services with access to the most powerful technological tools, including artificial intelligence.

Action is required to ensure trading standards services have the capability to rapidly identify and respond to emerging consumer threats. At present, capacity challenges are limiting the ability of services to make use of the full range of evidence sources available. There is also no agreed framework for how local trading standards should respond to different sources of evidence available to them to inform decision making. Alongside this, as a frontline delivery service, at the cutting edge of establishing the conditions for Scotland's economic growth, it is essential that trading standards have access to the most up-to-date technologies to deliver their work. This does not currently happen on a consistent basis.

8: As the statutory body for consumer information and advice Consumer Scotland should be asked to lead the strategic coordination of consumer information and education across the sector. Complementing this, a 'prevention through education outcome' should be included in the proposed new national framework for trading standards. Trading standards services work well with local businesses, helping them to comply with legislation and preventing harm from occurring. Trading standards do not currently have capacity to undertake prevention work with consumers, to build understanding of consumer rights. Action is required to strengthen this part of the consumer landscape and this sits most naturally with Consumer Scotland as the statutory body for information and advice.

Medium-term recommendation

9: The Scottish Government, local authorities and other relevant bodies should work together to examine the viability, merits of, and barriers to fundamental changes to the governance arrangements for trading standards delivery in Scotland in the medium-term, in alignment with the implementation of the public service reform strategy. As part of the wider public service reform process, there is an opportunity to consider different governance arrangements for the sustainable delivery of trading standards services, including national or regionalised models. Consideration must be given to how any such approach would align with the approach taken to the delivery of related regulatory services and to economic development activity.

2. A vital consumer service

Trading standards are a critical part of Scotland's infrastructure to deliver economic growth. Rooted in local communities across Scotland, the work of trading standards officers, when properly resourced, puts them at the frontline in delivering the economic conditions that will enable consumers and businesses to thrive. The work of trading standards includes:

- **Tackling rogue traders, consumer fraud, doorstep crime and scams**
For example, Trading Standards may investigate reports of rogue traders targeting consumers in vulnerable circumstances with unnecessary roofing, driveway or insulation work, charging excessive fees, or pressuring people into unfair deals on their doorsteps.
- **Protecting consumers by identifying and removing dangerous or counterfeit goods from the high street and online markets**
For example, Trading Standards may help protect safe supply chains, including the seizure of unsafe electrical products, counterfeit cosmetics, non-compliant toys, or fake branded goods that could pose safety risks, mislead consumers or harm legitimate brands.
- **Supporting legitimate businesses and preventing consumer harm by providing advice and support to help companies comply with the law**
For example, Trading Standards may advise and inspect businesses across the supply chain, from manufacturers, importers and wholesalers through to retailers and service providers. This can include checks on product labelling, safety requirements, pricing accuracy, weighing and measuring equipment, and a wide range of regulatory compliance. This work helps responsible businesses meet their obligations, supports fair competition, and prevents consumer harm before it occurs.
- **Protecting children and young people by tackling underage and illegal sales of tobacco or vapes**
For example, Trading Standards may carry out test-purchasing exercises, inspect retailers to support compliance, remove illegal vapes from sale, and take action against shops repeatedly selling age-restricted products (such as tobacco, fireworks or solvents) to children.
- **Making sure consumers get what they pay for by ensuring that prices, product descriptions, and weights and measures are accurate**
For example, Trading Standards may inspect petrol pumps, heating oil suppliers, weighing equipment in retail, service and manufacturing settings, weighbridges, pub measures and packaged goods to ensure they are accurate and compliant. They also verify that pricing is clear and fair, and that businesses do not misdescribe products, vehicles, services or promotional offers.

- **Protecting animal health and welfare and supporting safe rural supply chains**
For example, Trading Standards may inspect livestock records to ensure animals can be traced through the supply chain, carry out checks on animal feed businesses, and investigate breaches of animal health and welfare rules. This work helps protect farmers, consumers and the wider rural economy by reducing the risk of unsafe products entering the food chain and helping to prevent or contain disease outbreaks that can cause significant harm to the rural and wider economy.

These interventions are highly important to Scotland's economy. Household spending accounted for 58% of UK GDP in 2025¹, but consumers can experience a range of problems when accessing goods and services. In Scotland, 69% of consumers experienced detriment in 2023-2024, at a total cost of £4 billion². Trading standards play a crucial role in tackling these problems. The work of trading standards services:

- Prevents, or stops, consumers from being ripped-off – **putting more money into people's pockets** that can be spent on other goods and services
- Helps give **consumers confidence** that they are going to get a fair deal, enabling them to be active contributors to the economy
- Delivers a **level playing field for businesses** – ensuring that fair, legitimate and hardworking businesses are not undermined by those who break the law
- Delivers a **key preventative service**, acting as deterrent to rogue traders or bad actors who may otherwise be able to exploit consumers and damage local businesses

Some short case studies of trading standards' work on behalf of consumers are attached at **Annex B**.

While the work of trading standards is highly important, it is often complex, technical and regulatory. Its value lies not only in responding to harm but in preventing it. Where prevention is successful, poor outcomes for consumers and businesses may be avoided altogether, but the impact of this work is not always visible or properly quantified.

As a result, the significance of the role that trading standards play in Scotland's economy and in local communities can be understated and its importance is not universally understood.

¹ [Components of GDP: Economic indicators - House of Commons Library](#)

² [Consumer Detriment Survey 2024 - Consumer Scotland Insight Paper \(HTML\) | Consumer Scotland](#)

3. A service under threat

Despite its economic importance, trading standards services in Scotland face a range of challenges.

Previous reviews

Many of the difficulties currently facing trading standards are long-standing and have existed for many years. A series of substantial policy reports, proposals and interventions over the past two decades have put forward solutions to address these challenges³.

In August 2025, the Society of Chief Officers of Trading Standards in Scotland (SCOTSS) commissioned a strategic outline case and options appraisal from CIPFA. The report set out the case for change, highlighting the driving factors as:

- under-resourcing and inability to meet statutory obligations
- fragmentation of the function across 32 local authorities
- severe risk to workforce sustainability and the need for a coordinated, locally delivered intelligence-led approach to national threats such as illicit trade and unsafe products

The options considered within the CIPFA report were:

- retaining the current local authority delivery model
- developing specialist service hubs within local authorities in the form of centres of excellence
- a centrally commissioned model where a national body commissions services from individual local authorities or
- the preferred option of a directly Employed National Model: a single national trading standards organisation discharges the service for Scotland.

The CIPFA report follows others which have previously considered the challenges facing trading standards and regulatory services more generally. This includes the report by Which? [Trading Standards in Crisis: rebuilding an effective and accountable consumer enforcement system](#) and less recently but still relevant [Hampton Report](#) and Audit Scotland's [Made to Measure Report](#).

Findings within these reports also highlighted a need for more joined up working through recommendations including:

- a reduction in the number of trading standards or regulatory bodies

³ We provide a list in Annex C of previous relevant reports on this issue, each of which we have considered as part of our review.

- regional approaches across local authorities to core trading standards work such as inspections or business advice
- the importance of consumer and business advice provision including onsite visits to businesses
- ensuring there is accountability for delivery and stronger collaboration across the system as a whole

While some issues have evolved over time, the enduring nature of many of the challenges facing trading standards suggests that simple, easy-to-implement solutions are unlikely to be readily available. Creativity, collaboration, and a spirit of shared endeavour from all interested parties will be required to deliver meaningful change, at pace.

This report

In March 2026 Scottish Ministers requested proposals from Consumer Scotland (CS), under section 3 of the Consumer Scotland Act 2020, on the future viability of trading standards and consumer enforcement in Scotland.

As Scotland's statutory, independent consumer organisation Consumer Scotland has welcomed the opportunity to contribute to this vital agenda and its importance to securing positive outcomes for Scotland's consumers, businesses and economy.

Our work has built on the detailed previous reviews carried out on this issue. It focuses primarily on action that can be taken to help trading standards services deliver positive outcomes for consumers.

Addressing the challenges facing other regulatory and enforcement spheres was not within the scope of our work. We recognise however that a number of the issues and proposals set out in this report will be relevant to these other spheres and note the importance of a strategic approach to this in our medium-term recommendation.

To deliver the review, CS carried out extensive desk research and a series of engagements with key stakeholders from across the public and third sector in Scotland and the wider UK, between March and June 2026. CS is grateful to the following organisations for their input to the review: Trading Standards Scotland, SCOTSS, Chartered Trading Standards Institute (CTSI), Cosla, SOLACE, Department for Business and Trade, Trading Standards Northern Ireland, Advice Direct Scotland and Which?.

This engagement, combined with consideration of the strategic and political environments trading standards services currently operate within, informed the recommendations made in this report.

The wider factors considered included: the devolution settlement, local government delivery models, the public service reform (PSR) strategy, wider regulatory and enforcement challenges facing the public sector, and changing consumer behaviours reflective of evolving markets.

As Scotland's independent, statutory body for consumer advice and advocacy, Consumer Scotland's review has been carried out within the context of the [Consumer \(Scotland\) Act 2020](#). Recommendations have been made in line with CS' statutory outcomes:

- reducing consumer harm
- increasing consumer confidence in dealing with businesses that supply goods and service
- increasing the extent to which consumer matters are taken into account by public authorities
- promoting the sustainable consumption of natural resources and other sustainable practices
- advancing inclusion, prosperity and other aspects of wellbeing in Scotland

4. Current delivery of trading standards in Scotland

To provide the context for our analysis we include here a short description of the key parties currently involved in delivery or trading standards services in Scotland.

Local trading standards teams: There are 31 local trading standards teams in Scotland, who are part of local authorities. Stirling and Clackmannanshire deliver a shared trading standards service. Funding for local services is provided by Scottish Ministers through the annual allocation to local authorities, who each determine the funding and staffing resources for trading standards in their area as part of their overall budget decisions. In line with the Verity House agreement, there are no national stipulations regarding the size and composition of local trading standard services. Local trading standards teams sit alongside other key regulatory services within a local authority, including environmental health, licensing and building services.

Society of Chief Officers of Trading Standards in Scotland (SCOTSS): SCOTSS is the membership body for trading standards managers from across all local authorities in Scotland. It delivers a range of projects and activities to represent the trading standards sector with decision makers, to support professional learning and development and to coordinate activity across the sector.

Trading Standards Scotland (TSS): TSS provides national level support to local trading standard services by coordinating and enforcing cross-boundary and national casework and carrying out specialist functions of tackling illegal money lending and e-crime. It is funded by the UK Department for Business and Trade (DBT) and is managed by COSLA. TSS also delivers an intelligence gathering and analysis function, to identify and support action to tackle Level 2 criminal activity taking place across local authority boundaries. Current TSS priorities include doorstep crime, misleading energy marketing, scams and counterfeit goods online. TSS also currently delivers some specific prevention activities supported by additional DBT funding.

Advice Direct Scotland (ADS): ADS runs the national advice and information service for consumers in Scotland through their helpline and online advice centre. This service is funded by Consumer Scotland. ADS provide free, independent advice on all consumer matters and support consumers to understand and exercise their rights. They help consumers to resolve their problems and where appropriate will escalate issues to relevant trading standards teams, including both local teams and TSS.

Chartered Trading Standards Institute (CTSI): CTSI is the professional membership body for all those working in trading standards across the UK. It delivers a wide range of tools, products, events and learning opportunities to support its members, and represents the profession in policymaking forums. It provides qualification-based courses for trading standards professionals and a range of other training and CPD opportunities.

5. Challenges and opportunities for trading standards

We set out below our analysis of the main challenges and opportunities for trading standards in Scotland identified through our review. A number of these issues are similar to those facing other public services in Scotland but are exacerbated by sector-specific challenges.

We identify five key issues as follows:

- Workforce size and composition
- Outcomes focus
- Emerging markets
- Evidence-led decision making
- Balancing enforcement and prevention

Workforce size and composition

Stakeholder feedback, and recent reports, such as those produced by SCOTSS and Which?, highlight the continued decline in the number of trading standards officers in Scotland in recent years. This decline has been precipitated by continuous real-term cuts to trading standards budgets across local authorities. Combined with the ageing profile of the remaining workforce, it presents an existential threat to the delivery of effective trading standards services in Scotland.

Key trends, as reported in the [Trading Standards Workforce Survey 2025](#)⁴, include:

- **Significant reductions in trading standards officer capacity in recent years:** since 2002, the number of trading standards staff across Scotland as a whole has declined by 50%
- **An ageing workforce:** 58% of qualified trading standards officers are over the age of 50 and only three officers across the whole of Scotland are under 30.

⁴ [workforce2025.pdf](#)

- **Increasing variation in provision across local authority areas:** the number of trading standards staff ranges from 2 officers in some local authority areas to over 15 in another.
- **An ongoing rise in the number of ‘small services’:** Audit Scotland previously classified trading services with 8 or fewer staff members as being ‘small’ and at greater risk of underperformance. Twenty-two out of 31 trading standards services (Clackmannashire and Stirling operate a shared service) now fall into this category.

While vacancies are limited due to funding restrictions and the requirement for local authorities to reduce headcount more generally, our engagement highlighted that when vacancies are advertised for trading standard roles, they tend to attract a high level of interest. However, many job applicants do not have a trading standards qualification and tend to have only a proportion of the skills required to carry out the role of a trading standards officer from day one. This places pressure on those already in post who are required to help with training and upskilling of their colleagues.

In 2025 a Modern Apprenticeship in Regulatory Services was launched with support from SCOTSS. It is supporting 12 apprentices across two further education colleges. This is a positive development but is not of sufficient scale and pace to meet the challenges facing the sector. In England, a more ambitious apprenticeship scheme has been supported with funding of £5 million per year over four years, through tobacco and vapes legislation. This is recruiting an additional 80 apprentices, offering different tiers of qualification and providing external training resource to mitigate the training and development burden on the existing workforce.

Membership organisations such as SCOTSS and CTSI are working hard to promote the trading standards profession, support the existing workforce and identify opportunities to tackle recruitment and development challenges. However, decisions about recruitment, retention and development of the trading standards workforce are ultimately taken separately across 31 local authorities, as part of wider local workforce decision-making.

Overall, the current outlook for the trading standards workforce size and composition in Scotland presents the following **risks**:

- Some trading standards teams are unable to meet their **statutory obligations**, which stretch to more than 250 responsibilities, eroding service delivery and **undermining consumer protection and business support** in some parts of Scotland
- With significant numbers of senior staff due to retire in the coming years, there is a **risk of significant imminent loss of professional expertise**
- The **‘hollowing out’ of middle grade roles** limits opportunities for staff development and progression, presenting challenges to recruitment, retention and succession planning
- Stretched senior staff capacity **limits resources for supporting staff development** and training for those joining the service
- **The rise in the number of small services**, with a handful of staff:
 - creates **resilience risks in service delivery** in case of absence or leave

- **limits staff capacity for innovation and collaboration** to drive high quality service delivery
- reduces opportunities for staff to develop the knowledge and skills required to tackle protection, fair trading and prevention issues in **new and emerging markets such as online scams and artificial intelligence**

Combined, these risks represent significant challenges to the future viability of trading standards services in Scotland. **At present, there is no single organisation with the authority to take ownership of this issue across Scotland as a whole and drive forward the interventions required to tackle it.**

Outcomes focus

Our review identified that trading standards services in Scotland can experience significant challenges in consistently determining and demonstrating the key priorities that they deliver and the outcomes that their work achieves for consumers and the economy.

There are a number of factors that contribute to this challenge:

- **The number of statutory responsibilities:** Trading standards have over 250 statutory responsibilities to manage. It is not possible for increasingly small and stretched services to simultaneously focus on each of these responsibilities, so prioritisation is continually required. This can dilute clarity and understanding of the core purpose of the trading standards service and what it delivers. This presents challenges for the workforce, senior decision makers, consumers and businesses.
- **National v local priorities:** Trading standards in Scotland are delivered across 31 local services, each of which have different competing local priorities, which shape the prioritisation decisions made by local services. Combined with the 250 statutory responsibilities noted above, this means there is significant variation how in trading standards services' priorities are ranked and delivered across Scotland.
- **Cross-boundary nature of issues:** Many of the issues that trading standards tackle are not confined to the boundaries of a single local authority. This presents challenges for determining which trading standards service has responsibility for taking action if the consumers experiencing harm, and the traders responsible for this, are dispersed across different areas. While this is a long-standing issue, it is exacerbated by the continued rise in online markets.
- **Funding-driven decision making:** Due to the continued decline of core funding, decision-making by local trading standards teams can be shaped by the availability of external funding sources, outside of the local authority grant from Scottish Ministers. For example, HMRC has provided funding to trading standards across Scotland to support the safe trade of vapes on the high street. While issues such as the safety of vapes or underage sales of tobacco are extremely important, there remains an inconsistent approach to how this UK-wide work is delivered across Scotland, while the availability of funding can drive decision-making.

- **Lack of outcomes framework:** There is no overarching framework in Scotland which determines the 'core' activities of trading standards teams, to help guide local decision-making. There is also no mechanism which presents these activities in a way which clearly demonstrates how trading standards across Scotland are contributing to an overall set of outcomes that benefit consumers and businesses, or to key national and local strategic priorities, such as economic growth.

These current arrangements for determining trading standards priorities present a number of **challenges and risks**:

- **Inconsistent consumer and business protection:** Local areas across Scotland face different priorities in terms of trading standards activities. For example, the consumer protection issues that are most important for rural consumers and businesses may be very different from those in a more urban area. It is therefore important that there is local flexibility and choice in decision-making in the delivery of trading standards services. Additionally, the relationships that trading standards hold with local stakeholders are also key to the successful outcomes that the service delivers. However, at present, in a highly challenging prioritisation context, with trading standards services facing significant competing priorities, increasingly stretched resources, and no clear, shared set of guiding outcomes, it is likely that consumers across Scotland will receive quite different levels of service from trading standards depending on where they live. There is a risk that the extent of this variation is leading to some consumers and businesses being less supported or protected than others. There is currently no formal mechanism through which this risk can be robustly assessed or mitigated.
- **Lack of profile, visibility and support:** The significant number of statutory responsibilities, the challenges in quantifying the impact of vital preventative work, risks of activity being driven by funding pressures, the small size of the trading standards service and the often technical nature of the work, can make it difficult for trading standards to consistently and powerfully communicate the critical value they are delivering for consumers and businesses. In the context of highly stretched budgets, these issues can hinder trading standards services in demonstrating how they are delivering against key national and local strategic priorities. This presents a challenge in making a compelling case for investment in the resources that trading standards require.
- **Challenges to collaboration and sector resilience:** The different approaches taken by TS teams across Scotland to prioritising their activities means that knowledge and expertise on a particular issue is held individually rather than universally, and sharing happens informally due to relationships rather than in a structured way. Not all local authorities are able to have experts in all the areas that TS have responsibilities for. As a result they may instead have to rely upon individual colleagues in another local authority who may possess in-depth knowledge in a particular field if they need support with an issue. Despite the resource pressures, trading standards officers across Scotland have created a strong network where expertise held by each other is well known and there is a willingness to support each other. However, the ageing workforce and the likelihood of knowledge and

experience disappearing as people reach retirement age presents a considerable risk to this network.

Emerging markets

The evolving nature of how markets are developed and how consumer behaviour towards purchasing goods has changed over recent years presents new challenges to trading standards enforcement.

The increasing consumer demand for online goods and increase in online crime, scams and manipulative practice means trading standards officers need access to high quality digital infrastructure and tools to deliver their responsibilities effectively.

There are a number of challenges and opportunities for the trading standards service in responding to emerging markets:

- **Balancing new threats against existing priorities and responsibilities:** Changing the way in which enforcement is carried out to reflect the change in markets does not happen in isolation. While more traditional functions such as investigating fair trading and educating businesses remain important, other statutory responsibilities may become less relevant with the ongoing rise of online markets.
- **Access to the right tools:** As the nature of enforcement continues to evolve, so do the resources and technologies required to deliver it. Stakeholders reported to us a lack of consistency across local authority cyber security and internet access policies. In some instances, local trading standards officers are unable to access online resources that can help prevent or identify where harm is impacting on consumers. Alongside this, stakeholders reported trading standards services in different local authorities having to separately go through time-consuming approval processes in order to access to technology-based tools, including artificial intelligence tools, that could support them to deliver their work. The Digital To Be project, part of the SOLACE/Improvement Service Transformation Programme, aims to develop a shared vision and implementation strategy for local government digital transformation and may have a role to play in supporting action in this area.
- **Skill development:** Online markets are evolving rapidly and trading standards officers need to quickly respond to this changing landscape, developing their skills and knowledge to enable them to do so. The challenges outlined previously in this report around staff recruitment, training and development, within small and stretched services, present challenges to enabling this vital professional development.

Evidence-led decision-making

Trading standards have a very wide range of statutory responsibilities and are also required to respond to new and emerging markets and risks to consumers and businesses. As outlined in this report, trading standards services face a range of competing choices when examining the issues facing consumers in their communities and deciding where to concentrate their stretched resources.

To enable trading standards to operate as efficiently and effectively as possible, and deliver high quality consumer protection, a robust and easily navigable evidence-base is essential. At present, there is not a shared framework for how services should apply the broad evidence-base available to them to inform decision-making. This relates to the lack of an overarching framework for the outcomes that trading standards deliver. Particular issues include:

- **Inconsistent use of intelligence database:** Trading Standards Scotland runs a tactical assessment process to identify and enable action to tackle Level 2 criminal activity taking place across local authority areas. Each local trading standards service should conduct a regular Level 1 tactical assessment based on intelligence gathered on issues in their area. This intelligence can then be shared with trading standards across Scotland through an intelligence database, providing an important platform for cross-boundary intelligence sharing. This system, supported by the tasking and allocation process run by TSS, works well for some local trading standards teams and helps to inform national activity. However, other local services use this approach much less regularly, with limited capacity often cited as a constraining factor.
- **Limited resources to respond to intelligence sources:** The tier 1 consumer advice provider, ADS, operates a consumer data portal which members of trading standards services have access to and provides an overview of cases, where the advice service considers enforcement as the next appropriate step, that are escalated from the tier 1 advice service. The lack of resource within trading standards departments means that many escalated cases are not able to be dealt with, preventing positive outcomes for consumers being reached.
- **A lack of consistency with regards to the data and evidence pipeline:** An evidence-led approach is an effective way of ensuring that trading standards activity is reflecting the needs of consumers in Scotland. At present, evidence supplied to trading standards comes from a range of sources which can include consumer bodies such as Advice Direct Scotland (ADS), Citizen's Advice, and local Citizen's Advice Bureaux (CAB), trading standards departments from across the UK and findings from national market studies delivered by the Competition and Markets Authority (CMA). Trading Standards is required to expend resource triangulating these sources to develop a comprehensive understanding of consumer harm not only because issues can be defined differently but also viewed through different lenses.

Balancing enforcement and prevention

The work carried out by consumer advice and enforcement bodies in Scotland is critical in ensuring the impact of harm upon consumers is mitigated and does not evolve into more complex issues.

The information that advice and enforcement bodies are able to proactively provide to consumers is equally as important in ensuring consumers themselves are empowered to take decisions that prevent them from experiencing harm in the first place.

The Scottish Government's [public service reform strategy](#) has a clear focus on prevention. In the context of trading standards, a more preventative, intelligence-led approach would enable trading standards officers to identify where harm to consumers is occurring and deliver the necessary programmes such as education to businesses and consumers to help prevent the harm re-occurring. This is beneficial to consumers and businesses and can relieve pressure on advice and enforcement bodies.

There are a range of challenges that need to be addressed if the service were to shift towards this type of delivery approach:

- **Prioritisation and resource constraints:** Our engagement with trading standards bodies highlighted that a lack of resource has shifted the priority away from the provision of consumer information towards more reactive enforcement. This limits the capability of the service to increase awareness of consumer rights and reduces access to support for many businesses who are keen to work proactively with trading standards to ensure they are abiding by relevant regulations.
- **The diversity of activity delivered by trading standards services:** As a result of the significant number of statutory responsibilities, competing national, local and funding priorities and the lack of an overarching outcomes framework, inconsistency of how evidence is captured can contribute to limit the ability of the service to deliver the provision of clear, consistent and compelling preventative information to businesses to ensure compliance.
- **Increasing consumer demand and funding model challenges:** As the statutory body for consumer advocacy and advice, Consumer Scotland (CS) holds a statutory function for the provision of information to consumers. At present, this function tends to be exercised through CS' delivery partners; Citizen's Advice Scotland (CAS) and ADS, and in the past, funding specific TSS campaigns. For example, ADS, as the national provider of the [consumeradvice.scot](#), will deliver four information campaigns to consumers based on intelligence gathered from the advice line for 2026-27. Previous campaigns have included information for consumers around scams and measures consumers can take to avoid becoming victim to a scam and steps to take if they do experience harm from scams. Consumer advice bodies continue to face pressure in terms of one-year budget funding and the uncertainty that brings while the demand on advice services continue to grow. This means that it is exceptionally difficult to balance the need for information to help mitigate harm that has already occurred and provide information that can support consumers to take preventative steps and avoid harm occurring.

In order to strengthen the delivery of more preventative activity within the current fiscal climate, a more strategic and coordinated approach to the provision of consumer information across the Scottish and GB-wide consumer sector is required.

6. The strategic context for action to secure effective future trading standards services

The role of **trading standards and the functions it can deliver is a critical part of the consumer landscape and the wider economy in Scotland**. The service's potential to help deliver economic growth along with other national objectives such as tackling climate change should not be underestimated. It can do this by protecting consumers from harm and providing a supportive environment for businesses to comply with the law. The work of local trading standards officers makes a real difference for consumers in their daily lives. However, the evidence indicates that if the sector is to continue to achieve these ambitions across Scotland, then **immediate action is required**.

Action is necessary to secure **a resilient pipeline of expertise and a clear framework** for the trading standards sector to operate within that helps connect the valuable work in local communities to the priorities of the national economy. When considering positive outcomes for consumers and economy, it is clear that a better resourced trading standards service that is aligned to national priorities within a flexible framework can help to:

- **prevent harm** coming to consumers
- **increase consumer confidence** in dealing with business
- **increase business confidence** in supplying goods and services
- deliver a significant contribution to the national objective of **increased economic growth**

In preparing our report and recommendations for change, CS has considered the strategic context for interventions to bolster trading standards services in Scotland and the implications of this context for delivering change. The following factors are important in determining the actions likely to have the greatest impact:

- The case for structural change in the delivery of trading standards
- Public service reform
- UK-level reforms
- Workforce stability

The case for structural change in the delivery of trading standards

The evidence, both from this review and from a number of previous reports, indicates that the current arrangements for the delivery of trading standards services in Scotland present significant hurdles to delivering the best possible outcomes for consumers.

These challenges are likely to persist, as the budgets available for trading standards provision across 32 local authorities in Scotland continue to be under significant pressure, and as the rapid growth of online markets continues to change the nature of the work that trading standards are required to deliver.

Our analysis indicates that **in the medium-term**, fundamental changes may be required to how trading standards services in Scotland are organised. These changes will be needed to overcome the challenges set out in this report and sustainably secure excellent consumer outcomes.

Options for such future changes could include:

- **Delivery of trading standards through a single, national entity:** This approach, which has previously been recommended to the Scottish Government, could help to achieve better economies of scale, better position trading standards to deal with the shift to online markets and provide a clear platform to address existing challenges of trading standards workforce capacity, staff progression and development, sharing of expertise and resilience. However, such a change could require significant public investment within a challenging fiscal environment. A legislative and structural change process, within the context of the Verity House Agreement and the fragile workforce demographic described above, would be needed. It would also present some risks in terms of a perceived shift away from a local community presence, local relationships and local flexibility, which support the public service reform ambition of delivering public services to empower local communities. This latter risk could be mitigated by the appropriate design of a nationally coordinated, but locally delivered service.
- **Increased use of shared services models across local authority boundaries:** This may go some way to addressing the challenges facing trading standards services set out in this report. This approach could usefully align with a move towards a stronger regional approach to economic development in Scotland and associated systems to deliver this. However, the extent to which this approach could overcome the issues set out in this report would be dependent on the number and nature of the shared service arrangements. We note that a number of shared service approaches for trading standards delivery have been explored in the past and subsequently not progressed due to difficulties reaching agreement between participating local authorities. The significant variation that already exists between authorities in trading standards provision is seen by some stakeholders as presenting a barrier to agreement being reached on appropriate shared services models.
- **Ring-fenced funding for trading standards delivery:** The Scottish Government could require local authorities to spend a specific level of funding each year on trading standards services, potentially alongside a specification of the staff

numbers required for a minimum viable service in any given local area. This could help to ensure that local services operate at a guaranteed baseline level of capacity. However, such an approach may result in the diversion of resources from other important local services and would represent a significant change in the relationship between national and local government in Scotland and the long-standing principles which underpin this.

Alongside the question of future structural reform, we highlight that **there is currently no single organisation or framework with the authority or mandate to take a Scotland-wide, strategic approach to the challenges facing trading standards services** and to drive a programme of activity to respond to these challenges, bringing stakeholders with them. **This lack of a formal central coordination and development function for the sector is a gap** which should be addressed regardless of the model for frontline delivery.

Public service reform

While we identify the compelling case for fundamental change in the delivery of trading standards in the medium-term, **it is essential that any significant change to trading standards corporate governance structures is closely aligned with the Scottish Government's broader public service reform strategy and its delivery.**

It is clear that steps can be taken to support Scotland's trading standards services to realise the ambitions articulated by the [Christie Commission report on the Future of Public Services in 2011](#) and [Scotland's Public Service Reform Strategy](#) published in 2025. However, the rapidly shrinking workforce and absence of a skilled pipeline heightens the risk to the sector presented by a fiscal efficiencies-only approach.

Trading standards services represent a single part of Scotland's regulatory and enforcement landscape and they form a relatively small part of local authority budgets. The recent strategic outline case by CIPFA commissioned by SCOTSS states that trading standards make up only 0.2% of some local authority budgets. It is therefore particularly **important that any changes in delivery arrangements for trading standards service do not take place in isolation**, but instead form part of relevant wider public service reform activity. Such alignment is critical, to ensure that **any changes in service delivery are coherent, logical and can efficiently deliver positive outcomes for consumers and businesses.**

In this context, the work being undertaken by the Scottish Government and local government to progress the Verity House Agreement in the new Scottish Parliamentary term, alongside local activity such as cross-boundary work by local authorities to **develop better shared approaches to economic development**, will provide important parameters that any changes to the arrangements for delivery of trading standards service must align with. Considering the role of trading standards as part of the wider national and local regulatory infrastructure within any public service reform process will also be essential.

Alongside these strategic considerations, we observe that the relatively small size of trading standards services provides **an opportunity for the Scottish Government and local authorities to work in partnership to pioneer effective change** within this sector, at pace. For example, there are clear opportunities for trading standards services to work more

innovatively, with better use of data, stronger collaboration, a deeper focus on prevention and a sharper focus on outcomes – all key components of public service reform.

UK-level reforms

In partnership with National Trading Standards and other government departments, the UK Government Department for Business and Trade (DBT) **is undertaking a review into the statutory consumer protection duties** that apply to local trading standards teams across GB.

This will include reviewing the requirements of trading standards and understanding how and when they are used, with a view to considering any changes that may need to be made. DBT hope to be able to set out progress later in 2026.

This process provides important context for considering the range of activities currently delivered by trading standard teams in Scotland and determining the most appropriate actions to achieve good consumer outcomes.

Workforce stability

The very small numbers of trading standards officers in some Scottish local authorities, combined with the demographic profile of the workforce, indicates a significant fragility in current local service provision.

In this context, **it is essential that action to secure a highly effective trading standards service across Scotland for the future is handled with considerable care**. Actions must support and empower the existing workforce and should avoid creating heightened uncertainty which may risk further gaps in critical service provision. This is particularly important in the context of the current skills and recruitment pipeline, which is under-developed.

In our assessment, **the key short-term priority is to secure a stable and appropriately resourced trading standards workforce** in Scotland.

Our overall assessment of the strategic context for action

The evidence presents **a powerful case for structural reform in how trading standards services in Scotland are organised**. However, the progression of such reforms presents a number of challenges and risks.

In particular, **a significant structural change process is likely to take considerable time** and may not deliver much-needed consumer benefits quickly. **Structural reform also presents risks in the context of a small, shrinking, under-resourced and ageing workforce**, which requires highly skilled, technical roles. These risks are exacerbated by the underdeveloped recruitment and development pipeline for trading standards professionals across Scotland. Any actions which create a high level of uncertainty for the existing workforce risk further destabilising current service provision, presenting real risks for consumers and the economy.

More broadly, while this review has examined the context for trading standards, **any major structural reform of trading standards services cannot take place in isolation. Such changes should be shaped by and aligned with relevant wider public sector reforms** taking place

across Scotland, particularly in relation to other regulatory services and to economic development, to ensure coherent and efficient delivery for consumers. Until the direction of travel for any such reforms is clear, the implications for future trading standards delivery arrangements cannot be fully determined.

Despite these strategic constraints, **there is a pressing need to take action now** to address the challenges facing trading standards services and improve the outcomes delivered for consumers.

Through our review **we have identified a number of priority areas where there are clear opportunities to take action immediately**, to help tackle the issues and challenges identified, improve the outlook for trading standards delivery and enhance the consumer benefits the service can deliver.

These **immediate actions also have the potential to position trading standards services as pioneers for public service reform** and to better enable trading standards to be a central part of the wider reform process as it develops.

7. Recommendations

Our recommendations respond to the following overarching priorities identified through the review:

- the **urgent need for reform, at pace, to strengthen trading standards services** and deliver improved consumer outcomes
- the criticality of **ensuring wider strategic alignment** as part of the Scottish Government's public service reform strategy, to ensure coherent and efficient service delivery
- the immediate need to **strengthen the stability** of trading standards services and avoid creating significant additional burdens and risks in the context of a fragile workforce profile .

Some aspects of these priorities are in tension with each other. Our recommendations seek to strike the right balance for consumers in navigating the policy choices available. To take forward these issues we provide:

- **8 'action now' recommendations**, to be progressed within the next 12 months
- **1 medium-term recommendation**, to progress in line with the wider public service reform strategy

'Action now' Recommendations

Our recommendations for urgent action are designed to deliver a package of interventions that can help to tackle the issues and challenges identified in this report, at pace. These actions can be taken forward promptly, in line with the current devolution settlement and the current structures and delivery arrangements for local government in Scotland, including the Verity House agreement.

The recommendations are designed to ensure that the trading standards sector achieves the right balance for consumers in enabling local flexibility, autonomy and decision-making, while enhancing consistency and coordination, putting the sector in a much stronger position to tackle the challenges it faces and ensure that it delivers positive consumer outcomes.

National Outcomes Framework

Recommendation 1: We recommend the development of a National Outcomes Framework for trading standards in Scotland
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A key theme from our review is the need for a more consistent outcomes-based approach to the delivery of trading standards to strengthen the ability of the sector to deliver excellent, consumer-focused services. A new national outcomes framework can underpin this by:

- Providing a **clearer and more consistent set of strategic outcomes** for all trading standards services in Scotland to deliver and be measured against
- Supporting local trading standards teams in **prioritisation** decisions, enhancing the consistency and clarity of these decisions across Scotland
- Enabling trading standards teams to more powerfully and clearly demonstrate the **impact of their work** against key national and local priorities, supporting the case for future investment
- **Demonstrating** more clearly how the work of trading standards locally contributes to delivery of national objectives as set out in the [National Performance Framework](#) and Public Service Reform Strategy including empowering local communities, tackling climate change and economic growth.
- Improving the **visibility** and support for the vital role of trading standards, nationally and locally, with decision-makers, consumers and businesses
- Supporting the improved identification and sharing of **best practice** across the trading standards sector
- Providing a clear mechanism for identifying and responding to **emerging markets and new consumer threats**
- Providing a clear set of parameters for ensuring **local authority accountability** in the provision of a highly effective trading standards service that contributes to economic growth

Office of the Chief Trading Standards Officer

Recommendation 2: We recommend the creation of an office of the chief trading standards officer, held within an existing body independent of local government. This office would consist of a small team responsible for the delivery of the national framework.

The major issues facing trading standards in Scotland, including complex prioritisation choices, a shrinking and ageing workforce, the need to respond to new markets and an increasingly challenging set of consumer problems to tackle, are being faced by small local teams across 31 local authorities simultaneously.

While there are good practice examples of collaboration and vital work facilitated by TSS, SCOTSS and CTSL, **there are currently no formal systems with the authority or capacity to drive a profession-wide response to these significant challenges.** As a very small public service, which has reduced in size substantially in recent years, the capacity of the existing trading standards workforce to work collaboratively to tackle these strategic challenges while also maintaining a clear focus on delivery, is highly restricted.

This presents a clear risk to the future delivery of a highly effective trading standards service in Scotland and its contribution to consumer wellbeing and economic growth.

A new national outcomes framework, as we have proposed, can provide an important coordinating mechanism for the sector but it will be required to be managed in an independent and streamlined way.

We have set out above our analysis of the significant challenges involved in major structural changes to trading standards delivery arrangements, at least in the short-term. However, there is already good practice in Scotland of different models that can be deployed to address the types of strategic challenges facing trading standards services, which balance local, on-the-ground delivery through local authorities with the need for national visibility, coordination and improvement. For example:

- Planning decisions in Scotland are taken locally, underpinned by a national planning framework. The office of the Chief Planner, based in the Scottish Government, helps to ensure the sector has the appropriate levels of support, visibility, coherence and accountability, nationally and locally.
- [The Food \(Scotland\) Act 2015](#), established Food Standards Scotland as a non-ministerial office with a specific function to monitor the performance of and promote best practice by enforcement authorities in enforcing food legislation.

In our analysis, there appears to be significant potential for a similar model to be developed to enhance the delivery of trading standards services across Scotland and drive action to tackle the issues identified in this review.

Examples of specific actions such a model could drive forward include:

- Development and oversight of the **new national outcomes framework**
- Developing and delivering an enhanced approach to **benchmarking, evaluation and accountability** for trading standards delivery across Scotland. The model would ensure that local flexibility in decision-making is retained while driving an increased level of accountability across local authorities to ensure that trading standards services are being adequately resourced and are delivering more consistent outcomes that can be clearly quantified and demonstrated
- Helping **coordinate** activity across local authorities **to respond to new or emerging issues, at pace**
- Providing a platform for **supporting the sharing of best practice** across authorities and driving its application, formalising the current network of experts and strengthening the resilience of the sector's knowledge base
- Building a **compelling business case for investment in trading standards**, helping trading standards teams to secure adequate resources within their local authority while identifying, securing and managing additional, external funding opportunities to bolster capacity across the system in a planned and strategic way
- Being a **champion** across public services **for the vital role of trading standards** and the contribution the service can make to economic growth and to public service reform at a national and local level
- Supporting local trading standards team to **raise awareness of the impact and contribution** of their work with elected representatives and senior officials
- Owning the delivery of a **new national Workforce Strategy** (see Recommendation 3 below)
- Positioning trading standards to **make a key contribution to wider public service reform** at national, regional and local level on an ongoing basis

All of these actions can help to secure the delivery of adequately resourced and more effective trading standards services across Scotland, enhancing the outcomes achieved for consumers.

For this model to be effective it will require:

- **Central resourcing**, which does not diminish the delivery budgets of local trading standards services
- To be **established on an appropriate basis to give it the necessary authority and remit** to drive forward the list of actions set out above, working in partnership with stakeholders, local authorities and trading standards teams across the whole of Scotland
- To have **responsibility for driving specific activities, while also having some flexibility to generate and respond to new opportunities** that will enhance service delivery and improve consumer outcomes

If Ministers wish to pursue this recommendation in collaboration with local government, Consumer Scotland would be pleased to quickly deliver a further options appraisal, convening key stakeholders to explore practical options for the implementation of the framework and the office of the chief trading standards officer. We would undertake this work in partnership with trading standards bodies, local authorities and consumer bodies.

Workforce Development

Recommendation 3: We recommend the development and delivery of a national Workforce Strategy for trading standards services across Scotland

Many local trading standards services in Scotland are operating below sustainable levels. Teams have shrunk significantly in recent years and there is growing variation in capacity across local authority areas. The service faces increasing challenges in meeting its statutory responsibilities. There has simultaneously been a growth in new regulations that trading standards must respond to, while new and emerging markets, particularly online, are presenting different risks to consumers and businesses.

Given this context, **the fragility of the trading standards workforce in Scotland requires immediate action** to secure a more resilient and stable workforce to deliver the outcomes that consumers, businesses and the wider economy in Scotland require.

A new national Workforce Strategy for trading standards should be developed to take forward the following issues:

- **Build the business case for sustained investment in the frontline trading standards workforce**, as a key preventative service, to bolster the development and progression pipeline
- **Promote apprenticeship opportunities** within trading standards services in education
- **Develop and expand the modern apprenticeship programme**, developing different tiers of qualification to bring Scotland into line with England and Wales, and ensuring that a steady stream of apprentices are recruited to enter the profession each year, to bolster overall capacity
- **Consider a new ‘fast-stream’ development programme** where local authorities develop partnerships to provide opportunities for graduates to spend proportions of time in areas of the trading standards profession to expediate their skills and knowledge development
- **Develop a specific shared services model for recruitment and development** across Scotland to support development of both the modern apprenticeship and fast stream programmes
- **Support local authorities to work together to establish centres of excellence** within single or cross-local authorities to mitigate the risk to the knowledge and skills pipeline being impacted heavily when staff retire.

- **Explore the opportunities for a more joined up approach to workforce recruitment, development and retention alongside regulatory services**, such as environmental health, building standards and licensing

This work requires coordination, capacity, innovation and collaboration across local authority boundaries. As such, we identify that it should be delivered through a central, coordinating entity, such as the proposed new office for chief trading standards officer, in order to deliver results efficiently, at pace.

We also note that the public service reform agenda states that public leaders are being asked to *lead collective shaping systems that put people, communities and place at its heart to meet their needs and maximise public value and ensure fiscal sustainability*.

Therefore, it will also be essential for local authorities and trading standard bodies to have significant input into the strategy development.

Statutory Responsibilities

Recommendation 4: In partnership with the UK Department for Business and Trade, a review should be undertaken of the number of statutory responsibilities currently held by trading standards in Scotland, with a view to reducing these to enable the service to focus on the most important outcomes for consumers and businesses.

Recommendation 5: The Business and Regulatory Impact Assessment Toolkit should be augmented with specific guidance to support consideration of the particular implications for trading standards services in the introduction of new legislation or regulation

Trading standards services across Scotland must currently deliver around 250 statutory responsibilities, which have evolved over time. These include responsibilities established through both UK and Scottish legislation. Each year, further new legislation is passed which also requires enforcement by trading standards. With reducing resources and new emerging markets and consumer threats, this context does not appear compatible with the goals of public service reform, to provide an efficient and effective public service, delivering excellent consumer outcomes.

The UK Government is currently carrying out a review of trading standards service delivery in England and Wales, including a review of statutory responsibilities to identify any changes that are required to these. Stakeholders in Scotland should be active contributors to this work, to ensure that the Scottish context is properly reflected and to deliver any complementary activity that is required to enable trading standards services in Scotland to focus on the most important priorities for consumers and businesses.

Action should also be taken when new legislation or regulation is being established in Scotland to determine the practical implications for trading standards and robustly examine the resource implications of such changes. This is required to ensure that trading standards are able to focus on their core purpose and deliver effectively on key outcomes for consumers and businesses.

The Duties and Powers Portal, which has been developed as part of the SOLACE / Improvement Service Transformation Programme, may provide a valuable resource to help support this work.

Evidence-Led Interventions

Recommendation 6: To complement the National Outcomes Framework, an Evidence Framework should be developed to support a more consistent approach to categorisation and application of evidence across trading standards services. This should be supported by guidance with good practice examples.

Recommendation 7: Local Authorities and COSLA should consider a joined-up approach to application of digital technologies to support the monitoring of ever-advancing online crime. This should include action to provide all trading standards services with access to the most powerful technological tools, including artificial intelligence.

Action is required to ensure trading standards services have the capability to rapidly identify and respond to emerging consumer threats. At present, capacity challenges are limiting the ability of services to make use of the full range of evidence sources available, including data from advice services. Reflecting the lack of shared outcomes framework, there is also no agreed framework for how local trading standards should respond to the different sources of evidence available to them to inform decision making.

Alongside this, as a frontline delivery service, at the cutting edge of establishing the conditions for Scotland's economic growth, it is essential that trading standards have access to the most up-to-date technologies to protect consumers and ensure a level playing field for businesses.

This capacity to clearly categorise and act on evidence and to access high powered digital resources is required on a consistent basis by teams across Scotland, to ensure that consumers and businesses enjoy a consistent level of protection and support.

Prevention, Information and Education

Recommendation 8: As the statutory body for consumer information and advice Consumer Scotland should be asked to lead the strategic coordination of consumer information and education across the sector. Complementing this, a 'prevention through education outcome' should be included in the proposed new national framework for trading standards.

Trading standards services have an important role to play in shifting public service delivery towards a more clearly defined preventative approach, in line with the Scottish Government's public service reform strategy. A shift towards prevention can stop consumers from experiencing economic harm, and the associated impacts this can have on their finances and physical and mental health. It can also reduce the burden on responsive services, including advice and enforcement agencies.

Medium-Term Recommendation

Recommendation 9: The Scottish Government, local authorities and other relevant bodies should work together to examine the viability, merits of, and barriers to fundamental changes to the governance arrangements for trading standards delivery in Scotland in the medium-term, in alignment with the implementation of the public service reform strategy.

As part of the wider public service reform process, there is an opportunity to consider different governance arrangements for the sustainable delivery of trading standards services, including national or regionalised models. Consideration must be given to how any such approach would align with the approach taken to the delivery of related regulatory services and to economic development activity.

The 'action now' recommendations we have proposed provide clear opportunities to build resilience within trading standards services and also be beneficial to any longer-term fundamental reforms.

Annex A: How recommendations respond to the challenges

Table 1 below illustrates how the recommendations respond to each of the challenges and opportunities for trading standards set out previously, in section 4 of this report:

	Workforce size and composition	Outcomes focus	Emerging markets	Evidence-led decision-making	Balancing enforcement and prevention
R1: National Outcomes Framework					
R2: Chief Trading Standards Officer					
R3: Workforce Development Strategy					
R4: Review of Statutory Responsibilities					
R5: Amending the BRIA					
R6: Strengthen Evidence-led Decisions					
R7: Access to Digital Tools					
R8: Strategic Approach to Prevention					

Annex B: Case Studies

Product Safety

2026: 5900 unsafe viral TikTok 'squishy' toys were seized in Glasgow. Based on estimations from the government's Office for Product Safety & Standards, each toy would have cost approximately £71 in terms of health and safety risks posed, damage to property, businesses losing sales, consumers having to replace items as well as time spent dealing with faulty products. With around 5,900 toys seized, approximately £419,000 was saved.

2026: In Edinburgh, the Trading Standards team were granted forfeiture by the court of nearly 2500 unsafe and non compliant toys and other goods which were seized from a store in the Wester Hailes area. These posed various risks of choking, sharp edges and unrestricted access to battery compartment, and no documentation could be provided to demonstrate traceability or safety of the items. These goods were destroyed to prevent them re-entering the market representing £177,500 in savings of potential injury and associated healthcare costs.

Misleading pricing in supermarkets

2023: Trading Standards Officers from 22 local authorities across Scotland been took part in a retail pricing project aimed at identifying where goods in shops were wrongly priced or not priced at all. Officers carried out 118 visits to national supermarket chains, and 228 visits to small or medium sized stores, with a total of over 30,000 products checked in terms of price marking and over 7000 in terms of unit pricing. In addition, over 9000 products were tested 'at the till' in terms of misleading pricing.

In national chains over 4% of goods were not priced at all and 6.5% of products had incorrect unit pricing. In addition, 3.7% of products were wrongly charged at the checkout and 71% of these were to the detriment of the consumer.

For medium and smaller stores the situation was worse, over 14% were not priced properly, and 8.6% of unit pricing information was wrong or missing. Almost 10% of products were incorrectly charged at the checkout, with again 70% to the detriment of the consumer.

Trusted Trader Scheme

The Trusted trader scheme is an unfunded non-statutory non-legislative approach to:

- creating confident consumers
- supporting SMEs
- tackling rogue traders

it uses a combination of consumer empowerment and voluntary codes of practice.

First launched in 2005 in Dundee the number of local 'Trusted Trader' schemes supported by local councils has grown to 22, with SCOTSS operating an equivalent proxy scheme that covers the remaining parts of Scotland.

The SCOTSS Approved Trader Portal at www.approvedtrader.scot provides free access to Consumers to tradesmen local to them that have been vetted by trading standards and backed by an ADR scheme.

With 1219 businesses now part of an assured scheme in Scotland we estimate 'Approved Trader' underpins over £75m of SME business activity across Scotland, funnelling work to those firms that provide the best service and helping shield consumers from rogue traders.

As a specific example, the Edinburgh scheme delivered the following numbers in 2025

31,689 total work requests by local consumers

£2,640,750 Total value of work completed in Edinburgh

£8,773 value of work per member

Annex C: References

1. [Made to measure? An overview of trading standards in Scotland: Audit Scotland. October 2022](#)
2. [Trading Standards in Crisis: rebuilding an effective and accountable consumer enforcement system: Which? August 2025](#)
3. [Reducing administrative burdens: effective inspection and enforcement: Philip Hampton. 2005](#)
4. [Trading Standards Workforce Survey: SCOTSS. 2025](#)
5. Strategic outline case for the future delivery of trading standards in Scotland: CIPFA. August 2025
6. [Workforce and Capacity Report Scotland: Improvement Service. 2024-25](#)
7. [Scotland's local government workforce report: Improvement Service. 2024](#)