

TRADING STANDARDS

WORKFORCE STRATEGY 2020-24

This Workforce Strategy aims to build on the visions, aims and objectives of the corporate NCC People Strategy 2019-2021 to develop the highly skilled and flexible workforce needed to enable the continued future delivery of a high performing Trading Standards service within Nottinghamshire.

Nationally there is a recognised shortage of qualified Trading Standards Officers (TSO) and Nottinghamshire like many other authorities is struggling to both recruit and retain TSOs. As a result, the Trading Standards part of the Trading Standards & Communities Service is currently carrying numerous TSO vacancies with the associated impacts this has on effective Service delivery, staff morale, and well-being.

A Trading Standards workforce strategy and associated delivery action plan is needed to address the shortfall in qualified TSO resource in both the short term (next 2 years) and the medium term (2 to 4 years).

The Short Term (next 2 years – 2020-2022)

- 1) ***Recruitment to vacant Trading Standards Officer (TSO) roles:*** We are adopting a flexible and proactive approach to recruitment, encouraging applications from both fully and part-qualified TSOs, who can be appointed at the appropriate level within our 4- tier career structure, and then further developed to attain the full Trading Standards qualification.

All officers are being encouraged to do all they can to raise awareness of our advertised vacancies and to encourage interest from suitable applicants they know within the profession.

- 2) ***Re-allocation of work:*** We will ensure that our qualified TSOs are being deployed on the Trading Standards work that requires specific professional Trading Standards qualifications and experience, such as food, feed, product safety and metrology. Tasking processes will be used to carefully manage the allocation and workload of our staff.
- 3) ***New “Trading Standards Investigator” role:*** Ex-police investigators are currently employed within the Service on an agency basis. They are employed on “Fair Trading”

investigations into rogue traders, car clocking etc, where their investigatory skills and ability to enforce legislation such as the Consumer Protection from Unfair Trading Regulations 2008 and Fraud Act 2006 are transferrable.

To reduce our reliance on agency workers, a new Grade 5 “Trading Standards Investigator” role has been developed. The person specification requires substantial proven experience of working in an investigatory role and the associated knowledge of legal procedural legislation etc. The new role would enable the Service to recruit experienced investigators, from other law enforcement backgrounds, on a more permanent basis within the Service.

- 4) **Level 1 TSOs:** The Service employs three level 1 TSOs, who were recruited in October 2018. They are currently undertaking the Regulatory Compliance Officer (RCO) Apprenticeship. Officers who successfully complete the RCO apprenticeship gain exemptions from all but the Trading Standards Law Part 1 exam in Stage 1 of the CTSI Professional Competency Framework. Stage 1 is needed for the level 1 TSOs to advance to level 2 TSO in our career scheme.

It has been agreed that the three level 1 TSOs can undertake the training for their Trading Standards Law Part 1 exam in tandem with their training for their RCO apprenticeship. This should accelerate their advancement to level 2 TSO and expedite them gaining detailed knowledge of key “Fair Trading” legislation that will enable them to undertake doorstep crime and related investigations.

To advance to level 2 TSO in the career scheme, level 1 TSOs must also have completed the Service’s Legal Competency. This Legal Competency, which has recently been refreshed, complements the national qualifications to ensure that new officers have the legal skills and knowledge needed to conduct effective and procedurally robust investigations.

- 5) **Training Contracts:** Training up a highly skilled level 3 or level 4 TSOs takes a considerable investment of both time (4 years) and funding (£11.8k+). When trained, due to the current situation with the job market within the profession, there is a high chance of officers being poached by other authorities offering higher salaries or locations more favourable to the officers’ circumstances or preferences.

To combat this risk the Service has in the last few years introduced a training contract that officers receiving professional training must sign. They sign to agree that they will repay the cost of the qualification if they leave the Service within 2 years of being awarded the qualification. A training contract will be signed for each stage of the qualification

- 6) **Intelligence Analyst Apprenticeship:** Our “Understanding Demand Unit” (UDU) acts as the front door of the Service analysing all complaints and other intelligence sources to ensure that the Service’s officer resources are targeted most effectively. In November 2019 we successfully recruited to a new Intelligence Analyst Apprenticeship

post to increase intelligence capacity within UDU and to release TSO resource from UDU that can be deployed elsewhere in the Service.

- 7) **Retention of TSOs:** Managers will work with a TSO working group to consider further steps that can be taken to make Nottinghamshire Trading Standards an “employer of choice” within the very competitive Trading Standards employment market.

In line with the NCC People Strategy 2019-2021, consideration will be given to such issues as:

- Engaging all employees in delivering change and enabling them to maximise their potential and improve performance.
- Continuing to embed a culture of smarter working.
- Maximising the opportunities provided by new technologies and flexible working practices
- Rewarding and celebrating success and tackling inappropriate behaviour.
- Recognising the importance of the contributions of everyone in the Service towards developing and maintaining a positive culture.
- Promoting effective workload management and prioritisation techniques and supporting all staff to maintain their personal well-being and resilience.
- Improving the Service’s operational procedures.
- Adopting a more strategic approach to learning and development within the Service to more effectively identify and address skills and knowledge gaps, as the workforce and demands on the Service evolve.

- 8) **Place Department Values and Behaviours Framework** – Managers will lead work to bring to life and further embed the values and the behaviours set out in this framework. This will ensure that all staff have clarity on what positive values and behaviours are expected of all, and again will help to make Nottinghamshire Trading Standards the employer of choice.

The Medium Term (2-4 years – 2022-2024)

- 1) **Level 1 TSOs:** There is a current drive within Trading Standards authorities within the region and nationally to “grow their own TSOs” to address the staffing shortfall within the profession. At the 7th November 2019 Communities & Place committee approval was gained to create two new fixed term (2 years) Grade 4 level 1 Trading Standards

Officer roles. These officers will again undertake the Regulatory Compliance Officer (RCO) apprenticeship before continuing into the CTSI Professional Competency Framework. Recruitment processes commenced in November 2019.

The posts will be funded by underspends from two unfilled Band A level 3 TSO roles. These level 3 posts will remain on the structure for the future advancement of the current level 1 TSOs, as they progress through stage 2 of the professional qualification. This forward planning will ensure we can retain the new talented officers that we are training up by providing opportunities within the Service for future advancement under the career scheme.

- 2) **Upskilling of our TSOs:** Current TSOs will be actively encouraged and supported to undertake additional modules under the national Trading Standards qualification framework, the CTSI Professional Competency Framework. This will enable the officer to further develop their DCATS professional qualification and the breadth of their knowledge and skills base, whilst providing the Service much needed qualified expertise in pinch areas such as Food, Feed and Product Safety. The cost of the training will be met from within the Service’s training budget.
- 3) **Updated Career Structure:** Trading Standards authorities are adapting their current career structures to incorporate the new national Trading Standards professional qualification, the CTSI Professional Competency Framework, which was introduced in 2019.

The table below shows how the amended career scheme will align with the CTSI Professional Competency Framework:

Level	Grade	Qualification needed
Level 1 TSO	Grade 4	5 GCSE passes (including English and Maths) with at least two at A level.
Level 2 TSO	Grade 5	Stage 1: Trading Standards Practitioner Certificate (TSPC) + Legal Competency.
Level 3 TSO	Band A	Stage 3: Trading Standards Practitioner Diploma (TSPD)
Level 4 TSO	Band B	Trading Standards Practitioner Diploma (TSPD) + experience at level 3 TSO + additional optional unit from Stage 2 (i.e. food, feed or product safety)

To ensure future level 4 TSOs have the breadth of knowledge needed for future service delivery, an additional subject area will be needed in addition to the TSPD for an officer to advance to level 4 TSO. A copy of the updated career scheme is included as **Appendix 1**.