

# Hard times or our mutual friend?

An alternative future for Trading Standards

Paul Connolly



Fresh thinking

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# Preface

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Trading Standards has long been an important part of the consumer landscape, enforcing some of the nation's oldest – but still highly relevant – pieces of consumer law. It has a wide remit, which includes: advertising and description of goods or services; safety of consumer goods; estate agents; credit and loans; food labelling, inspections and sampling; weights and measures equipment; hallmarking and counterfeit goods; animal health; underage sales and pricing<sup>1</sup>.

These are not the most glamorous tasks, but they can make an important contribution to ensuring markets operate fairly for consumers and businesses alike.

We are however approaching a critical period that will determine, at least in some parts of the country, whether Trading Standards continues in any meaningful form.

Trading Standards is not a single organisation but rather a network of local services sitting within local councils. Their funding largely comes at local level, leaving them vulnerable to the kind of significant cuts in local authority funding that are presently being experienced.

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<sup>1</sup> <http://bit.ly/jOJQan>

The Government has rightly identified that the current disjointed patchwork of services is not fit for purpose, even if resources were not so constrained. If the ideal Trading Standards structure were being designed now, no-one would dream of creating 200+ different organisations. But the prescriptions for change lack radicalism and vision.

There have been a few good examples of joint working between different authorities. In other instances, individual councils have brought together Trading Standards and Environmental Health services within their area, though these offer fewer obvious consumer benefits.

Various nationwide solutions have also been put in place over the years to try to create greater coherence and connection, ranging from the Trading Standards-inspired Home Authority to Primary Authority and the often valuable work of the Local Better Regulation Office. All have had their merits, but they have in the end proved sticking plasters, of various degrees of effectiveness, rather than representing fundamental change.

Looking ahead, the fear is that we will see further decline in Trading Standards as a result of an insufficiently joined-up approach and severe pressures on council budgets. This in turn may push towards three things:

- A growing divide between the world in which consumers live and the way Trading Standards works and the priorities it has
- Less effective national enforcement, because no-one will be able to, or want to, pick up the big (sometimes risky) national cases and the means of services working together will be less robust, as councils chose to focus scarce resources on local matters
- Enforcement deserts, where there is effectively no Trading Standards function of any consequence, with tiny teams lacking the scale and skills to make a difference. In these places, consumers really will be on their own

These are worrying prospects from a consumer perspective. What makes it all doubly frustrating is that, with a clearer and more radical agenda, there could potentially be a very exciting role for Trading Standards.

Trading Standards could play a key part in empowering consumers; and certainly the emergence of new forms of consumer power, enabled by the internet, should be changing the way Trading Standards services work. But the Government's otherwise-excellent empowerment strategy<sup>2</sup> makes few references to the current work of Trading Standards services and says nothing about its potential role in the future.

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<sup>2</sup> *Better Choices: Better Deal, Consumers Powering Growth*, BIS, April 2011

The forthcoming consumer landscape consultation document seems likely to follow in the same vein, focusing on structural fixes rather than setting out a positive, coherent agenda for the service.

Last year Consumer Focus Scotland published a report on Trading Standards<sup>3</sup>. It highlighted five key themes, which are relevant for the rest of Great Britain:

- Consumers have a poor understanding of the role of trading standards services
- We know little about consumers' experiences of using trading standards services
- The profile of trading standards services within individual councils is poor
- There is a wide variation in the resources available to trading standards services
- There is no effective performance measurement in place

The report identified three key criteria for an effective service: outcome-focused, based on assessments of risk; consistency for consumers and business alike; continuous sustainable improvement. These themes become particularly pertinent if you consider the changing landscape in which consumers operate. It's a world that's increasingly about trust, speed, networks and information flows. A new breed of more active, powerful consumers is emerging. Half the population now think consumers have more power to influence business; and 85 per cent say the internet makes it easier than ever to get the best deal<sup>4</sup>.

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<sup>3</sup> *Up to Standard? A review of Trading Standards Services in Scotland*, Consumer Focus Scotland, June 2010  
<http://consumerfocus.org.uk/g/4pi>

<sup>4</sup> Philip Cullum, *Unleashing the new consumer power*, Consumer Focus, 2011

Consumers are spending more time helping one another too. More than nine out of 10 people tell someone else if they have a good or bad experience with a company. Most consumers say that sites where consumers can share experiences, such as TripAdvisor, are influential. UK consumers are now leaving well over 100 million comments online every year. More than two-thirds of people say they trust what other consumers tell them more than what companies say.

Trading Standards should be at the heart of this new consumer power. Just think about Trading Standards doing more to enable consumers to share information about their experiences and support one another; gathering information from a huge consumer network to help focus their work; and in turn services opening up their own data, so that the information they discover about poor performers can be shared easily with consumers.

Consumers could be not just a powerful information source for Trading Standards, but front-line reinforcements. The authors of 'Wikinomics', Don Tapscott and Anthony Williams, have talked about a role for what they call '*Citizen Regulators*'<sup>5</sup>. '*Open up the regulatory process*', they say. '*Make everything transparent on the Web and let citizens and other parties contribute their own data and observations. Where possible, let citizens help enforce regulations, too.*' This could have exciting implications for Trading Standards.

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<sup>5</sup> 'Putting power in the consumer', *Toronto Globe and Mail*, 27 December 2010 <http://bit.ly/kqULsR>

Trading Standards services have fought valiantly for consumers. But it is important that they now change substantially, to ensure their survival and that they play a valuable role in a world where consumer power is changing and growing.

This pamphlet by Paul Connolly sets out an alternative, mutualised future for Trading Standards. One that offers the potential of a more joined-up approach while continuing to embracing the spirit of localism and that capitalises on the skills, experience and commitment of the people working in Trading Standards around the country.

Consumer Focus doesn't have an established policy position on this idea. We publish Paul's paper in the hope that it will prompt some lively, forward-looking discussion. Our belief is that Trading Standards can and should have a key role to play in the consumer landscape for years to come.

**Philip Cullum**  
**Deputy Chief Executive**  
**Consumer Focus**

# An alternative future for Trading Standards



In 2005, I worked on the Hampton Review of the UK regulatory system, running the local authority work stream<sup>6</sup>. At a public meeting during the Review, a senior Trading Standards officer challenged me.

‘Hampton. It’s about cuts, isn’t it?’ he probed. ‘You want us cut, right?’ ‘Wrong,’ I replied. ‘If I wanted you cut, I’d just stand back and watch.’

Hampton was not a charter for cuts to regulatory services. The Hampton thesis was that risk-based and targeted regulation enhanced both protection (by focusing on where the greatest dangers in the regulated system lie) and business growth (by minimising burdensome and intrusive practices). Accordingly, our remit was to consider how existing regulatory spend could be better managed, not to suggest whether it should go down or up.

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<sup>6</sup> *Removing Administrative Burdens* (the Hampton Review), 2005, <http://bit.ly/m9yv2z>

In the case of Local Authority Regulatory Services (LARS<sup>7</sup>), we were unsure whether the existing resource was sufficient. What we were sure of was that local government was not trustworthy when it came to funding LARS. Anyone wanting to see LARS funding decline simply had to watch local regulators continue fighting their losing battle for council resources.

Sadly my joke has become a sick one. The funding predicament for Trading Standards and other LARS looks set to worsen to crisis point soon.

## Spending challenge



The financial challenge for local government is well documented. The Department for Communities and Local Government (CLG) spend will contract by 28 per cent over four years<sup>8</sup>. Current spending on Local Authority Trading Standards Services (LATSS) is about £213 million. It is debatable whether even this level of funding is adequate. A proportionate 28 per cent reduction in Trading Standards funding would be disastrous. But if history repeats itself, the service can expect even worse.

In common with wider LARS, most funding for Trading Standards has never been ring-fenced. Notionally allocated to councils as part of the environment and protection services funding calculation and then composed of a mix of central grant and local taxation, the resource is vulnerable. Local politicians rarely pay LATSS the attention they accord education or social care. Local electors do not vote cast votes for better regulation.

<sup>7</sup> Throughout this paper I refer to the totality of Trading Standards and Environmental Health, well over £1 billion of services, as LARS, and the Trading Standards service part of it as LATSS (Local Authority Trading Standards).

<sup>8</sup> For a succinct summary of the wider local government position, see *LGA Opposition Day Debate Briefing*, 6.12.2010, <http://bit.ly/IYWQ11>

Previously, in times of plenty, the national political prioritisation of education and health squeezed other areas. Children's and adult services comprised the lion's share of local authority allocations. Politicians 'passported' those allocations and deployed the squeezed environmental remnant on politically 'visible' services, such as waste management, streetscene and libraries. Local regulation suffered. It contracted even while other services grew.

If Trading Standards services suffered then, they can expect few favours in the now much harsher fiscal climate. All remaining ring-fence protection has now gone, and an already underfunded service will be drastically cut. There are already stories of threadbare LARS departments, comprising a handful of overstretched officers. Some LATSS are already experiencing 50 per cent cuts now or will do over the next two years. This is unsustainable.

## The central/ local issue



The current predicament throws new light on known LATSS issues: inconsistency and sub-optimal integration.

In common with other local regulators, Trading Standards is often perceived as a national service. In reality, though answerable to mandates from central government departments and regulators, all LARS owe their first loyalty to the councils – well over 400 for LARS as a whole and over 200 for LATSS – that employ them. Far from a national system, Trading Standards and Environmental Health exist largely in semi-autonomous operational units, embedded in local government, overseen by numerous central functions, of varying powers, that do not directly fund them.

The Hampton Review hypothesised that this structure was likely to cause inconsistency. Fieldwork found numerous instances of inconsistent practice. Hampton found a wide spectrum of LARS investment with no discernible correlation to population or business density.

Business umbrella groups notably, but also other interest groups, including consumer bodies, highlighted the varying ways the same regulatory requirement could be enforced locally, with consequent variations in both the ‘burden’ on enterprise and the protection provided. LARS themselves said the constant flow of regulatory regimes passed ‘down’ to them to discharge by Government and national regulators pulled local officers’ days into strange shapes. Inconsistency was inevitable.

However, though the Hampton hypothesis was proven, it was controversial and not a conclusive case for wholesale reform. Many in the regulatory field argued that the inconsistencies Hampton cited were not grave and their detrimental impact was outweighed by benefits inherent in service localisation. LARS' position as part of local government, some argued, makes them responsive to their localities and thus able to align their regulatory activity with local priorities, such as regeneration and promoting business growth. Local 'loyalty' thus limits the adversarial dynamic between business and regulators. LARS' position as locally accountable members of a quasi-national service inevitably creates some tension, but the benefits outweigh the problems, it is argued.

Some went further. They argued that one way of addressing central Government's often doomed attempts to standardise local service was to abandon the effort. The philosophy of *localism* suggests that the centre should retreat from micro-management and confine itself to setting high level outcome goals. Further, where possible, central control should be replaced by local accountability. *Inconsistency* becomes locally tailored *variation*.

This is sound management theory. But as we have seen, localism alone is unlikely to serve LARS interests, by substituting local accountability for central oversight, since the service is politically invisible locally.

One theme on which there was agreement – and which has received significant attention since Hampton, especially in the area of Trading Standards – was that local organisation alone was insufficient to address certain threats to consumer welfare. The cross-boundary mobility of rogue traders necessitates Trading Standards co-ordination, while the global networks in which criminal scammers are embedded and the emergence of the internet as a vehicle for fraudulent sales require national and international collaboration.

Hampton considered alternative ways of organising and funding the service, including commissioning models or a national inspectorate. In the end however, weighing the various opinions, we decided to prescribe evolutionary steps towards national co-ordination, which left the basic local government regulatory structure intact.

A proposed Consumer and Trading Standards Agency recognised the need for central sponsorship to support regional, national and international collaboration by LATSS. This idea was later dropped by Government and instead the Local Better Regulation Office (LBRO) was created. LBRO was charged with integrating the dispersed LARS system by managing ‘Primary Authority’ – which co-ordinates advice, inspection and enforcement for multiples – and overseeing a national regulatory priorities scheme.

## The coalition agenda



With the formation of the coalition Government, the Regulatory Reform agenda has gone up a gear. It has a new deregulatory emphasis, consistent with the Government's growth strategy. Committed to eradicating 'gold plating' of EU regulation and enforcing a 'one in, one out' principle for new regulations, the Government cemented its deregulatory credentials in the Budget 2011. There, its *Plan for Growth*<sup>9</sup> announced measures including a thematic review of the existing regulatory stock and implementation of Lord Young's Health and Safety Review<sup>10</sup>.

This deregulatory intent is underpinned by a recasting of the respective roles of the state and other sectors. The coalition's 'Big Society' thinking suggests that in promoting the common goal, governments have too often deployed direct public provision, rather than fostering community, voluntary or business capability.

As the state retrenches under the Government's deficit reduction strategy, ministers want non-state actors not just to take up the economic slack, but to move into service provision and local strategy development.

A relevant example is Local Enterprise Partnerships (LEPs). These replace the Regional Development Agencies. They are less 'public sector' in feel, with less funding, meaning that in order to succeed they must harness business and community energy and leadership.

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<sup>9</sup> *Plan for Growth*, March 2011, <http://bit.ly/k71DLg>

<sup>10</sup> *Common Sense Common Safety: A report by Lord Young of Graffham to the Prime Minister following a Whitehall-wide review of the operation of health and safety laws and the growth of the compensation culture*, HM Government, October 2010  
<http://bit.ly/joEMaE>

Complementing this approach is a decentralising localism in service provision. Local authorities will see sharp funding reductions, but will be less constrained in how they spend. There has been a bonfire of central controls – the demise of the Audit Commission, the end of ring-fencing, a new power of competence to promote freedom in service delivery. Local accountability will drive improvement and change, not Whitehall supervision.

## Tension and inconsistency



At first sight, this agenda appears coherent, even radical. But it contains tensions. As we have seen, localism may intensify the downward spiral of LARS funding as the services are locally politically insignificant and don't fit the accountability dynamic. Further, the deregulation agenda is accompanied by ministerial interest in regulatory delivery. Ministers share business frustration that, despite Hampton, not enough has happened on the ground to improve business experience of being regulated. The *Plan for Growth* notes that in the last six years, Britain has slipped from 39th globally in business perceptions of regulatory burden to 89th.

So ministers want better practices in regulation, including an end to what they perceive to be 'tick box' enforcement and the introduction of more self-certification by business. But to some degree, these urges are inevitably directive in character, taking us back to the old central/local tension.

Consider the planning system. On its election, in a fit of localist zeal, the Government swept away much of planning's national framework. According to critics, it then introduced a similar set of national drivers and incentives in the last Budget. Central Government wants local officers to be free. Unless they are planners – in which case it wants to influence local planning decisions in favour of housing supply and business regeneration. Localism and central direction collide.

National bodies are inconsistent in their approaches to these tensions. BIS ministers have indicated they want to pass more central resources for consumer protection to Trading Standards<sup>11</sup>. By contrast the Food Standards Agency, concerned at wide variations in resourcing across LARS, is exploring options including centralised enforcement delivery<sup>12</sup>.

Meanwhile conspiracy theorists suggest that the cuts themselves are crudely deregulatory. Fewer LARS officers equals less regulatory activity. But if the conspiracy exists, it will fail.

Hampton found no correlation between the level of local regulatory spend and the burden on business. Some amply-funded LATSS supported business compliance with good advice services, and targeted rogue and dangerous elements. Some less well-funded ones cut business support and emphasised burdensome routine inspections or adversarial activities.

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<sup>11</sup> For example see BIS Minister Edward Davey's speech, 22 March 2011: <http://bit.ly/jNuXS4>

<sup>12</sup> See FSA's January 2011 Board agenda and associated documents: <http://bit.ly/esQBq6>

So the basic Hampton questions rear up again. Despite localist ambitions, is the state's deregulatory intent actually best served by central controls and standards that ensure consistent local practice? Can local provision work? Or does the likely evisceration of the service make such debates academic?

## Mutualisation



I remain convinced that greater co-ordination is needed to address the central/local issue in LARS in general and LATTTS specifically. But whereas during my time on Hampton I flirted with top-down solutions, I have increasingly become impressed by those that are bottom-up.

Since working on Hampton, I have met many people from the LARS world developing imaginative initiatives that seek to ensure that they play an imperfect hand as expertly as possible. This has shifted my focus, especially when thinking about LATSS, towards using techniques found elsewhere in public service reform – shared services, commissioning models, pooled funding – to meet the central/local challenge.

But the situation is now grave. If the answer is to be bottom-up it must contend with dire local funding realities. And it must be radical. I think there may be a way forward.

When BIS Ministers suggest 'Trading Standards' taking control of more consumer protection spend, what exactly do they mean? Trading Standards Institute (TSI) co-ordinating it? The Trading Standards Policy Forum? Plainly, some new governance and enforcement model will be needed here, possibly with input from LBRO, which has shown itself adept in advising on central/local dynamics. Whatever, assuming some new governance settlement is reached, it will provide a modicum of welcome funding security for a service under attack. It may also create a 'centre' from which to co-ordinate stretched local capacity.

To that end, the Trading Standards community should engage with another Government agenda: mutualisation.

Cabinet Office Minister Francis Maude wants to see mutuals widely adopted. He suggests within 10 years they will become '*one of the major types of organisation providing excellent public services*' in a redistribution of power and ownership comparable with 1980s reforms<sup>13</sup>.

His reasoning is clear. First, he wants to continue the process of public service reform by ensuring direct 'in-house' delivery continues to be 'contested'. In the past this primarily meant outsourcing. Plainly under this administration private providers will continue to feature in service delivery. However, the Government has indicated it wants a more diversified range of providers, including more small and medium enterprises (SMEs).

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<sup>13</sup> See <http://bit.ly/liyV7o>

Further, creating mutual structures can contest services, while empowering staff and short-circuiting the public/private antagonism. Indeed, workforce empowerment is key. Mutualisation and outsourcing to SMEs, co-operatives and charities, are both connected with Big Society thinking. Government wishes to divest itself of direct responsibility for state delivery, but to do so in ways which spread associated commercial opportunities to those who have not benefited previously.

This includes giving opportunities to existing public sector staff. Indeed, enthusiasts for mutuals believe workforce energies can be harnessed to support reform. Frontline staff understand their services, but are often inhibited from innovating by constraining bureaucracy. Decoupling mutuals from bureaucracies and giving staff stakes that link productivity to personal rewards encourage entrepreneurship and improve standards.

Mutuals are not a 'fluffy' option. They are run as businesses. But the staff engagement model of mutuals, where rewards are linked to innovation, service improvement and productivity gains, means there is a real prospect of harmonising the interests of service producers and the individuals and communities they serve.

## Many challenges



There are many challenges associated with mutualisation. Is the largest public sector retrenchment in history the ideal moment to encourage people to risk a semi-commercialised model of delivery? Should staff downsizing precede or follow mutual incorporation? And how on current trends will the numbers mutualising substantiate Maude's claims of an importance comparable with privatisation?

The 12 pilots on the Cabinet Office website are pretty small, niche services, mostly in the health and social care arenas. Small and mutualisation might be perceived as a natural match, but there's nothing to stop a whole agency, hospital, or local authority mutualising, John Lewis-style, or a series of small thematically-linked mutuals being incorporated under a franchising umbrella, like the Co-Op. Whatever, a substantial increase in adopters will be needed to match Maude's ambitions. That will mean lots of services taking a risk. The danger for this intriguing agenda – which has attracted interest across the political spectrum – is that it doesn't fly because volunteers are few.

Nevertheless, Government continues to signal its intent in this area. Mutualisation is being strongly encouraged in areas of health, such as community care. The Public Services (Social Enterprise and Social Value) Bill is intended to put wind in the sails of mutualisation, while the Localism Bill calls for staff-managed approaches to be among the options considered in re-engineering local services.

## Practical approaches



The Trading Standards profession could do Francis Maude and themselves a favour by 'going mutual'. Under the leadership of TSI – itself already in effect a social enterprise – and the Trading Standards Policy Forum, with possible input from LBRO, one of two approaches could be adopted.

A national super-mutual, covering England initially, but evolving to the devolved contexts following suitable negotiations, could be formed. It would be a single incorporated body. It would have a national head office. It would co-ordinate the use of any resources it received from central Government (the implied new BIS monies for instance) to address complex, nationwide and international threats. It would oversee and co-ordinate the delivery activities of suitably located regional, sub-regional and local offices. The mutual's services would be purchased by local and central Government to meet statutory Trading Standards obligations.

A second option, perhaps more realistic given that some LATSS partnerships have already incorporated as businesses, would be for TSI and the other players to create a mutuals confederation. This would be a franchise support hub for a national network of local mutuals, each created as and when individual LATSS departments chose to incorporate. The hub would again attract funding for national projects and but would also co-ordinate the activities of the network, providing mechanisms for collaboration between local mutuals, and new sub-regional and regional structures, where appropriate.

Critically, the hub would support the local mutuals in funding negotiations. Councils would purchase services from the local mutuals, who would operate in conformity to agreed service levels. But the national support structure would be able to give proper guidance to local mutuals about pricing, resourcing levels, and – supported here by LBRO – enforcement models, including those fostering collaboration with other local services.

Both models imply some concentration and consolidation of existing resources, as well as the need for the service to be realistic about what share of direct public spending power the service can expect to command. But co-ordination could help manage and to some degree staunch the otherwise relentless resource haemorrhage.

Further, the organisational concentrations implied in either model would not come at the expense of localism. Councils would remain in control as commissioners, buying packages suited to their local needs. Indeed, moving LATSS outside councils may paradoxically enhance local accountability. Rather than being ignored by councillors and senior officers, as too often happens at present, the commissioning process would require more strategic engagement on what the scope of the service should be. The discipline of a commercial arrangement, with councils visibly buying services at a price, together with comparative information on what others are buying, could foster local debates on what LATSS can do for communities and what communities would like LATSS to do.

While the adoption of either model would take place at a time of diminishing resources, mutualisation offers ways to mitigate this impact.

Employee ownership structures, such as the co-operative model, in which productivity gains revert to members in the form of a dividend (the 'divvy'), can spur innovation, prioritisation and foster vigilance about unnecessary spend.

They also encourage income generation. A national Trading Standards mutual or the members of a confederation could bid for additional or non-core work, such as the enforcement pilots that emerge periodically from the Home Office. Mutual members could seek work abroad, for instance in emerging economies, in need of mature enforcement practice, or sell enhanced services to businesses, seeking a 'gold standard' of certification to secure (overseas) trading advantage.

## A wider LARS mutual



If LATSS choose to incorporate as a mutual, should they do so alone or with other service areas, notably Environmental Health (EH)? Total UK EH spend is well over £1 billion, far greater than LATSS. Since Hampton there has been pressure to integrate thematically-connected elements of EH and Trading Standards enforcement. EH is an immensely important LARS interface with business, enforcing numerous regulatory regimes – health and safety, food safety.

There are many undeniable overlaps and potential synergies with Trading Standards. However, both have wide-ranging and very varied responsibilities, some of which are focused on consumers or the wider public while others are aimed at businesses. But collaboration options include:

- 1** Joint mutualisation. Francis Maude would be delighted at £1 billion worth of public services mutualised at a stroke! Whether this would be expeditiously achievable is another matter – although the planned Federation of TSI and the Chartered Institute of Environmental Health may provide a starting-point
- 2** Separate mutualisations. EH services could mutualise separately, but alliances at local and national level between the Trading Standards and EH mutuals could be developed, allowing them to offer joint enforcement packages to local authorities
- 3** Relevant business inspection and enforcement services from within EH could voluntarily incorporate within the Trading Standards mutual
- 4** EH could stay unmutualised but continue to collaborate with the Trading Standards mutual

While they are all probably workable, I think 3, though consistent with Hampton, is probably the least workable, since it entails messy boundary issues. 1 is my personal favourite, but may take time, making options 2 and 4 attractive in the short term.

## A bottom-up approach



Inevitably there will be some significant transition and planning issues to grapple with, from pensions to contract terms. Cooperatives UK has recently published useful guidance<sup>14</sup> and with Local Partnerships and the Employee Ownership Association is a partner in the Mutuels Information Service announced last November by Francis Maude<sup>15</sup>. Local and regional co-operative business development agencies will also be a useful source of expertise. In short, there are plenty of organisations and individuals out there with practical experience of mutualisation who stand ready to offer advice.

There are many pluses of a regulatory mutual for me. It addresses the central and local question. It helps realise a core Government ambition. But most importantly, unlike previous solutions suggested, it is consistent with decentralisation. It is bottom-up, not Whitehall co-ordinated, as the Trading Standards profession itself would be in the lead.

And this time if my erstwhile questioner asked me, 'Mutualisation. It's all about cuts, isn't it, right?' I would answer, 'Right. It is all about cuts. All about trying to minimise their impact and create new opportunities for a great profession.' As I'm no longer working for the Treasury, he might believe me.

<sup>14</sup> <http://bit.ly/k0QEJ3>

<sup>15</sup> <http://bit.ly/iUmbW9>



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