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Communications Consumer Panel
Riverside House
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Dear Sirs,

Making a Difference for Communications Consumers.
Strategic Plan update: 2021- 2022

Thank you for the opportunity to respond to this consultation. The Society of Chief Officers of Trading Standards in Scotland is a Scottish Charitable Incorporated Organisation (SC047951), and is the professional body representing the heads of service for trading standards services in Scottish local authorities. We are represented on the Communications Consumer Hub for Scotland.

SCOTSS welcomes the Panel's Strategic Plan and would make a few comments about the main four priorities below.

Ubiquitous availability of communications services

We strongly agree with the proposal to retain and expand on this priority. The COVID-19 pandemic has significantly accelerated the trend of increased use of electronic communication. Scottish local authority Trading Standards services ("SLATS") have observed the rising demand for good electronic connections in three key areas:

- To facilitate necessary increases in e-Commerce buying by consumers and small businesses.
- To enable many small businesses to continue to trade, and to diversify and enable the survival of the business.
- To enable citizens to work from home, either part-time or full-time.

We think that these recent developments will result in permanent societal changes and good and reliable connectivity is more important than ever. In particular, post-COVID

economic recovery in our localities will be heavily dependent on the availability of communications services.

Excellent standards of service and of customer service.

SCOTSS and individual SLATS have long championed the view that businesses can only succeed and prosper in the longer term by treating their customers very well and going beyond minimum legal requirements, an approach that provides a “win-win” outcome of business growth and happy consumers. This may be more challenging for some small businesses due to the difficulties of the pandemic but now is not the time to deviate from treating customers well. SLATS and other public bodies are committed to assisting local businesses through this difficult period, and SCOTSS is delighted to highlight our [Approved Trader Portal](#) which allows easy consumer access online to every small business that is a member of any Scottish, local authority managed, assured trader scheme. These schemes are built on great customer relationships and consumer feedback, and promote small businesses as well as protecting consumers from the potential of scams or shoddy workmanship.

No consumer ‘left behind’ regardless of circumstances.

Scottish Trading Standards services work for everyone but do prioritise vulnerable consumers, e.g. elderly victims of scams. The Panel has strong representation from groups that protect the interests of vulnerable groups and so is well-placed to liaise effectively with Government and the communications industry to ensure that no one is “left behind”. We understand the logic behind merging this priority with Priority 1 and we are confident that this issue will continue to be central to the Panel’s work.

Prevention of consumer harm – including citizens and micro businesses.

This is another priority that is well understood by SCOTSS and SLATS. With resources tight, SLATS work is targeted on the areas of largest consumer detriment and this is in line with this priority’s determination to tackle consumer harm.

Further, we again welcome the Panel’s commitment to also protecting micro-businesses. There are around 275,000 such businesses in Scotland and many receive assistance from their local Trading Standards. These businesses – and similar new start-ups – will play a key role in post-COVID economic recovery and it is vital that they are protected from unfair practices and are able to utilise effective communications services.

I hope our comments are helpful. If you have any queries, please do not hesitate to contact me.

Yours sincerely



Graeme Paton
Chair SCOTSS