

Agenda Item	12
Report No	RES/24/26

# The Highland Council

**Committee:** Corporate Resources

**Date:** 4 June 2026

**Report Title:** Trading Standards Performance 2025/26 and Operational Plan 2026/27

**Report By:** Assistant Chief Executive – Corporate

## 1. Purpose/Executive Summary

1.1 This report provides details of the performance of the Council's Trading Standards team in the last financial year and sets out its Operational Plan for the current year. Additionally, there is an update on a developing approach to performance measurement. This approach currently covers about a third of the work of the team, which was calculated to produce a community impact benefit of £1.2 million in the last year.

## 2. Recommendations

2.1 Members are asked to:

- i. **Note** the performance of the Trading Standards team during the year 2025/26 as detailed in its Annual Report.
- ii. Consider and **approve** the Trading Standards Operational Plan for 2026/27
- iii. **Note** the steps being taken to modernise performance measurement in relation to Trading Standards.

## 3. Implications

3.1 Resource: Highland Council's Trading Standards service is delivered by a team of fifteen officers and all work carried out involves statutory duties which are required of the Council. Resources must be strictly prioritised, with a focus on public health and safety, cases of significant economic detriment and fairness to reputable local businesses. The team are high users of technology to enable more efficient working while still ensuring that all parts of the Highlands receive a good service.

3.2 Legal: The team's legal responsibilities and powers come from a wide range of devolved and reserved legislation. All work planning and delivery is done in accordance with legal requirements in the legislation and the principles of both the Scottish Regulators' Strategic Code of Practice and the UK Regulators' Code. Both codes require a reasonable and balanced approach that takes account of the needs of consumers, businesses and society at large. This is summarised in the Scottish Code as "Proportionate, Consistent, Accountable, Transparent and Targeted".

- 3.3 Risk: In common with Trading Standards services across Scotland, the team faces resource challenges in tackling increasing and changing demands, e.g. the upcoming legislation on vapes and tobacco sales. This is exacerbated by an ageing workforce and the potential loss of key skills.
- 3.4 Health and Safety (risks arising from changes to plant, equipment, process, or people): There are no specific health and safety implications from this report (all work activities are routinely risk assessed in line with health and safety legislation).
- 3.5 Gaelic: There are no specific Gaelic implications from this report.

## 4. Impacts

- 4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken
- 4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.
- 4.3 For the Operational Plan 2026-27, as set out in **Appendix 3** to this report, impact assessments will be undertaken as part of project initiation for each of the associated workstreams.

## 5. Background on Trading Standards Team

- 5.1 The team is part of the Legal and Corporate Governance service. It undertakes a wide range of statutory duties in relation to the regulation of trade and protection of consumers and reputable businesses. There are two sub-teams organised on a functional basis and a total of 14 operational officers and a manager. See **Appendix 1** for an organisational chart for the team. Operational activities include investigation of complaints, inspections of business premises, advice and guidance to businesses, and various crime prevention initiatives. Work is largely "intelligence-led" and based on tackling significant economic or physical harm. Work planning and prioritisation is informed by the needs of the Council's Programme for the Highlands. See **Appendix 3** for more details.
- 5.2 The specific functions are from a mix of reserved and devolved law. Topics include:
- Fair Trading: a broad category which includes tackling unfair practices such as false claims, and regulation of the basic consumer rights that underpin trade (e.g. product quality, online buying, fair contract terms).
  - Doorstep Crime, Scams and Illicit Trade: tackling organised crime in these areas through a mix of investigation and preventative work.
  - Product safety: ensuring that consumer goods are safe, e.g. toys, electrical products, cosmetics.
  - Petroleum and Explosives: safe storage and sale of these potentially very hazardous products.
  - Weights & Measures: ensuring quantity is correct in both retail and commercial environments.

- Taxis and Private Hire Cars: promoting quality and safety in this key local industry affecting both visitors and local residents.
- Controls on sales of Tobacco and Nicotine Vapour Products (Vapes) and Age Restricted Sales (including fireworks, spray paints and lighter fuel).
- Animal Feed Quality: both in terms of inland supply to farmers and other users, and importation at Border Control Posts, this is a key intervention for a safe food chain.

## 6. Performance in 2025/26

6.1 In 2025/26, the Team delivered on its Operational Plan across the different topic areas, with a focus on tackling emerging problems around some “High Street” shops with links to organised crime selling illegal and harmful products. Headlines included:

- Detailed business interactions numbered 1275, up from 1172 in 2024/25 (e.g. visits, guidance on request, etc)
- 84 full investigations into substantial breaches of trading laws were completed, resulting in a range of formal and informal outcomes. The figure for the previous year was 77.
- A total of 159 interactions with businesses around continuing issues involving vapes and cigarettes, including underage sales and the ban on single use vapes to children. This included advisory visits and “test purchases” using young volunteers. Eleven Fixed Penalty Fines were issued. The statistics reflect an improvement in compliance levels on the back of widespread activity on this topic
- A concerted campaign to tackle sales of counterfeit and illicit tobacco led to seizures of 26,000 cigarettes and over 12kg of hand rolling tobacco. Six substantial fines were issued to perpetrators.
- A portion of the worked carried out (estimated at about a third of the team’s activities) is calculated to have had a total community benefit of £1.23 Million.

6.2 The report in **Appendix 2** provides details of the activities of the team last year.

## 7. Operational Plan for 2026/27

7.1 The Operational Plan for 2026/27 is set out in **Appendix 3**. The main contents are in the table which lists the specific work activities under various topic headings. Progress on each piece of work is monitored at monthly meetings of the two sub-teams, assisted by a “RAG” assessment. The plan has been compiled by the Manager after extensive discussions with staff on what initiatives are necessary and how to prioritise resources most effectively. Some of the activities are entirely local initiatives (e.g. engaging with the growing number of mobile car mechanics in the Highlands), while others involve participation in wider projects, usually overseen by the Society of Chief Officers of Trading Standards in Scotland (SCOTSS) (e.g. a national project to tackle online fake reviews). The team has a strong influence on SCOTSS through the Manager being a longstanding member of its executive and several other members of the team leading for SCOTSS on specific technical subjects. This ensures that matters of concern to the Highland community are prominent in the national planning for Trading Standards activities. Examples of that from recent years include national initiatives on internet delivery charges, work to protect users of off-grid fuels such as heating oil and activities around rural petrol filling stations. Additionally, SCOTSS has enjoyed very good access to Scottish Government in recent years and has been able to influence policy in a positive way, with Highland inputs to this work prominent.

- 7.2 The team has also been able to influence Trading Standards policy at a UK level through the manager being the current Chair of the Chartered Trading Standards Institute (CTSI). The CTSI annual UK Conference – which is seen as the premier consumer affairs event in the country – is coming to Scotland for the first time in 15 years and will be held in Glasgow in June.
- 7.3 All activities included in the plan are key to promoting the goals of the service in the Highlands. Among the more prominent and newsworthy issues are:
- Using Trading Standards functions and powers to address community concern around the decline of Highland “high streets”, in particular tackling illegal sales of tobacco and vapes.
  - Continued work to protect children from exposure to unsuitable and unsafe products that are subject to age restricted sales laws.
  - Further development of income-generating services in relation to animal feed, business advice and fee-charging services to neighbouring authorities.

The team is also actively involved in the service’s Investors in People (IIP) initiative and will support the Action Plan in the delivery of its functions in 2026/27 and beyond.

## 8. Performance Management

- 8.1 The diverse and impactful work of Trading Standards enables qualitative reporting on work activities to be carried out without difficulty. It is much more challenging to find meaningful quantitative measures for performance. In the past, these were based either on “inputs” (e.g. number of inspections done, regardless of how effective these were) or periods of time (e.g. number of days to close an enquiry, regardless of how well that enquiry was handled). Neither approach is meaningful or useful.
- 8.2 A more modern approach is to focus on outputs and outcomes and in 2025-26 a new system has been trialled. The first aspect of this approach assesses work activities such as investigations, inspections and advice given to businesses for six specified impact types. The total numbers recorded for each are listed in the Table 1.

*Table 1*

	<b>Impact Type</b>	<b>Number of interventions</b>
1	Prevention of Financial Detriment	101
2	Legitimate business is not disadvantaged through unfair competition	152
3	Bring business into compliance with applicable legislation	197
4	Safeguard the health and wellbeing of consumers	123
5	Prevent inappropriate consumer access to restricted products	27
6	Reduce consumer exposure to unsafe products	29

- 8.3 The pilot year has been judged a success, and these measures will be routinely recorded on an ongoing basis.
- 8.4 The second element of the new approach to performance measurement involves calculating community impact expressed in financial terms. This is a more challenging prospect as there is not a straightforward mechanism for all work activities. Each Trading Standards topic requires a bespoke mechanism for calculating impact and each mechanism is not straightforward to design.
- 8.5 However, several of these have been successfully trialled during the year and Table 2 shows the resulting calculations. **Appendix 4** shows details of how one of these impact measurements systems works.

*Table 2*

<b>Topic</b>	<b>Aggregate Community Impact 2025/26</b>
Call-blockers to prevent vulnerable householders suffering scams	£172,000
Product Safety (removal of dangerous goods and assisting business compliance)	£22,232
Fair Trading investigations*	£450,400
Testing Weighbridges (large weighing machines at industrial and agricultural sites)	£480,000
“Operation CeCe” (tackling illicit tobacco in high street shops)	£64,312
Testing taximeters	£46,500
<b>TOTAL</b>	<b>£1,235,444</b>

\*Calculations only cover some of these.

- 8.6 The trial involved activities that make up about 30-35% of Trading Standards work. A full figure covering all activities will be much higher. The year 2026/27 will see this approach extended to all areas of Trading Standards work.

## **9. Proposals for Service Development**

- 9.1 The Trading Standards Manager is working with the Assistant Chief Executive – Corporate and the Chief Officer Legal and Corporate Governance to explore new ways to further improve the services provided and mitigate risks as detailed at 3.3.
- 9.2 The risks associated with an ageing workforce in Trading Standards have been recognised by the Scottish Government and COSLA who are working with SCOTSS to boost resilience and sustainability. One strand of that is the creation of a Modern Apprenticeship for Regulatory Services which is now fully operational. Successful apprentices may be appointed at a basic Enforcement Officer level, or go on to complete the full Chartered Trading Standards Institute (CTSI) qualification and become fully qualified Trading Standards Officers.
- 9.3 Two further Modern Apprenticeship posts have been created in the team and recruitment is underway, with an expectation that the successful candidates will take up their posts in the early summer.

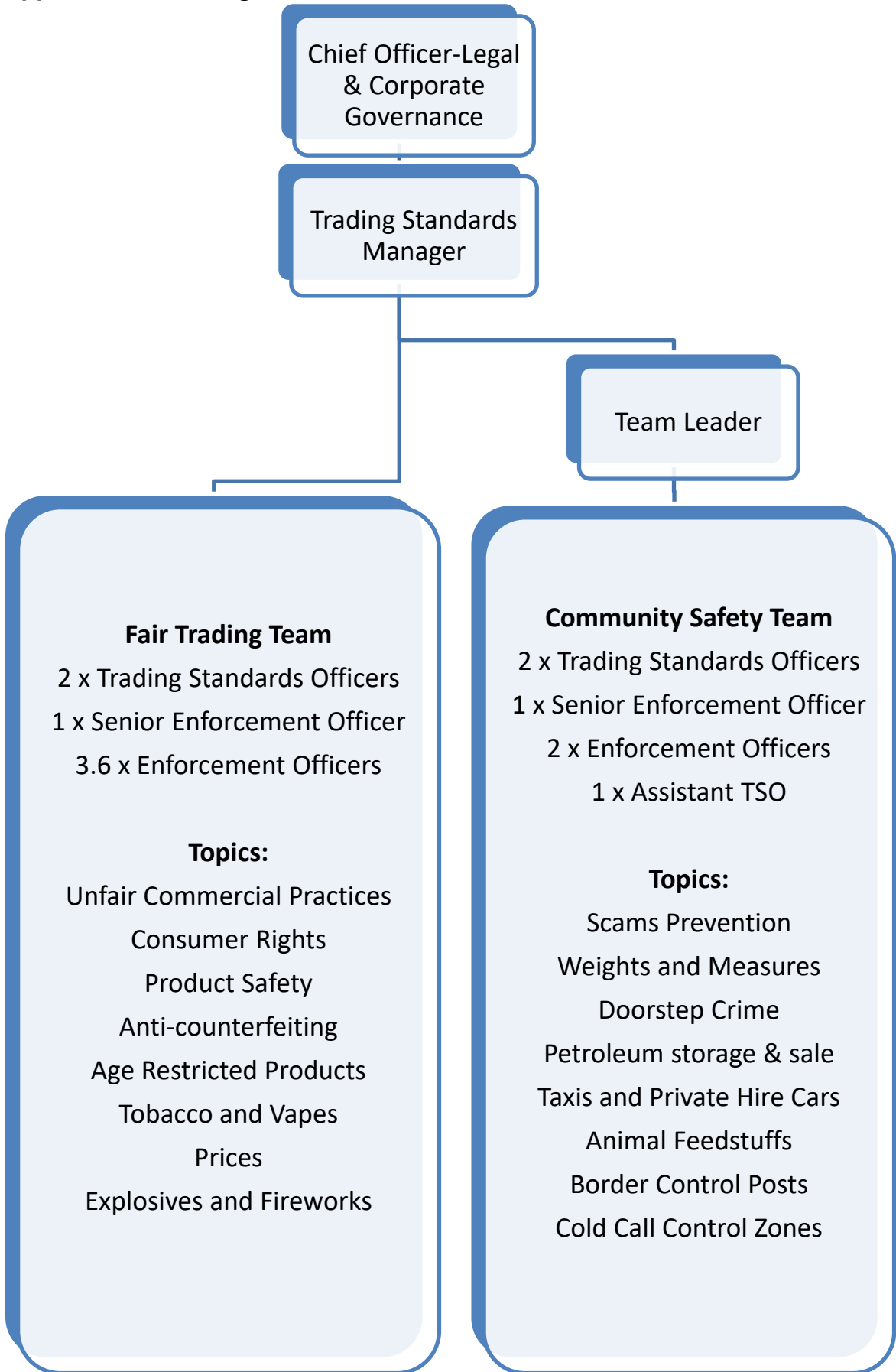
Designation: Assistant Chief Executive – Corporate

Date: 15 May 26

Author: David MacKenzie, Trading Standards Manager

Appendices: Appendix 1 – Trading Standards Team Organisational Chart  
Appendix 2 – Trading Standards Report for 2025/26  
Appendix 3 – Trading Standards Operational Plan 2026/27  
Appendix 4 – Community Impact Calculator

**Appendix 1 – Trading Standards Organisational Chart**



## Appendix 2 – Trading Standards Report for 2025/26

### Highland Council Trading Standards - Overview of Activities 2025-26

#### Introduction

The Trading Standards Team is part of the Highland Council's Legal and Governance section under the Assistant Chief Executive for Corporate. It undertakes a wide range of statutory duties in relation to the regulation of trade and protection of consumers and reputable businesses. The Team conducts its functions using a variety of activities including investigations, inspections, advice to business, crime prevention initiatives and formal actions including prosecutions and court orders. There follows a brief summary of each area of work.

#### Tackling Problems in Highland High Streets

Societal changes such as the rise of online shopping have contributed to a challenging environment for High Streets across the Highlands. While Trading Standards cannot solve all the issues around this complex problem, the Service can make an important contribution through assisting reputable businesses to thrive and dealing with the small minority who do not want to obey the law or treat consumers fairly.

An example that came into sharp focus in 2025/26 was the sale of counterfeit and otherwise illicit cigarettes and tobacco, a trade closely linked to organised crime networks. This has long been a problem in the UK's big cities but the last couple of years have seen the problem spread across the length and breadth of the country, including to the Highlands.

To respond to a significant increase in complaints and intelligence received from consumers and concerned business owners, officers used sniffer dogs to search suspected premises for illicit products, enabling concealed stashes to be found. The table below summarises the outcomes of this work.

<b>Table of seized Illicit Tobacco Products 2025/26</b>				
<b>Month</b>	<b>Cigarettes</b>	<b>Hand Rolling Tobacco</b>	<b>No. of shops visited</b>	<b>No. of Fines issued</b>
June 2025	8500	3.7kg	3	1
September	10,720	6.3kg	4	2
October	5240	1.6kg	1	2
March 2026	1780	500g	8	1
<b>TOTAL</b>	<b>26,240</b>	<b>12.1kg</b>	<b>16</b>	<b>6</b>

In addition to disrupting the illegal activities and depriving offenders of illicit stock, these investigations also led to a number of fines being issued through a joint Trading Standards - HMRC initiative "Operation CeCe", totalling tens of thousands of pounds.

The links to Organised Crime Gangs have led to a re-assessment of Health and Safety considerations. In two shops knives were found under the counter and a police officer working with Trading Standards was assaulted by a shop owner on another visit. Each operation is strictly risk-assessed, and Police presence is usually required. Stab vests have been purchased for officers for use when required by the associated risk. These criminal enterprises are growing in sophistication, often concealing tobacco and vapes in purpose-built hidden compartments rather than displaying them openly.

These can include magnet-released panels, false drawers, or storage spaces built into counters, shelving, or behind refrigerated units. The sniffer dogs enable such concealments to be detected. Image 1 below shows a hidden compartment behind a kitchen cupboard, and the Image 2 is a concealment under the counter of a shop.

*Image 1*



*Image 2*



## **Vapes and Tobacco Control**

Public concern about the sale of vapes to children has continued throughout 2025–26 and remains a top priority for Trading Standards. The number of complaints has reduced slightly this year, reflecting the sustained enforcement activity undertaken in previous years, including targeted action against problem sellers and the successful use of Vape Banning Orders against the worst offenders.

During the year, officers carried out 97 advisory visits to businesses selling vapes and tobacco products. In addition, 62 test purchases were conducted using trained young volunteers who, under strictly controlled conditions, attempted to buy cigarettes or vapes. Eighteen per cent of retailers failed these test purchases (down from 25% in 2024/25), resulting in the issue of 11 Fixed Penalty Fines (down from 18). Overall, the increase in test purchasing activity and the improved failure rate demonstrates a positive impact from ongoing compliance and education work.

The Single-Use Vape Ban, which came into force on 1 June 2025, prohibited the sale of vapes that are neither rechargeable nor refillable. Trading Standards adopted a proactive approach, issuing early advice and guidance to businesses ahead of the ban's implementation. As a result, levels of compliance have been high. To date, only 137 single-use vapes have been seized from one trader, who was issued a Fixed

Penalty Fine. Further, the Team's tobacco and vapes work was not restricted to advisory work and test purchasing as the following case studies illustrate.

### **Case Study 1: Successful prosecution**

A shop already subject to a Vape Banning Order was found to be continuing to sell vapes illegally. Over 3,000 vapes were seized during the investigation, some of which were identified as unsafe. The business owner was reported to the Procurator Fiscal, found guilty in Court, and received a £900 fine. All the vapes were destroyed.

### **Case Study 2: Using expert knowledge to support other Local Authorities**

Highland Trading Standards used its specialist expertise in underage test purchasing to support three other local authorities during the year. Officers travelled to Comhairle nan Eilean Siar, Shetland Islands Council, and Orkney Islands Council to carry out joint underage test purchasing exercises for cigarettes and vapes, working alongside local Trading Standards officers.

This collaborative approach enabled essential enforcement activity to be delivered in these areas while also providing practical, hands-on support to local officers. The work helped build confidence and capacity within these teams, supporting them to undertake future test purchasing activity independently and strengthening consistency across the island authorities. All the work was chargeable and so this is also part of the Team's income-generation initiatives, raising a significant sum.

## **Scams**

Scams continue to grow in number and form, with criminals exploiting the ongoing Cost of Living Crisis. They are frequent and constantly adapting and often target the vulnerable and the elderly. Prevention forms the focus of Trading Standards work on the topic as the perpetrators can be anywhere in the world. Financial loss is rarely recovered through enforcement: instead, prevention work encourages everyone to take steps to stop the scammers getting to victims through telephone, email, internet and physical mail conduits. The impact of scams is also felt beyond the financial loss, and Trading Standards plays a part in Adult Protection procedures to address this.

During the year Trading Standards scam prevention work continued with rolling out "call-blocker" devices. These devices prevent vulnerable householders from receiving scam calls, while at the same time permitting contact from family, friends, and trusted professionals such as the GP or care worker. The infographic below details impact.

A member of the Team chairs the Highland Adult Support & Protection Community Awareness group, which this year organised a well-attended Highland Teams event in February as part of a national Adult Protection Day bringing financial harm caused by Scams into the Health Care provider conversation. The Team continues its engagement with the UK National Trading Standards (NTS) Scams Team in their Scam Marshal, Scam Mail interceptions, and scam learning programmes. This helps identify community members who can help those who are scam victims and provide them with up-to-date information on how to tackle scams.

# Protecting Vulnerable Adults From Scam Phone Calls

Since 2017 Highland Trading Standards have installed 226 call blockers to protect older and vulnerable people from nuisance and scam phone calls. So far 110,093 calls have been blocked, and we estimate that 178 scams have been prevented.



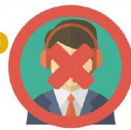
**16**

average nuisance and scam calls received per unit per month



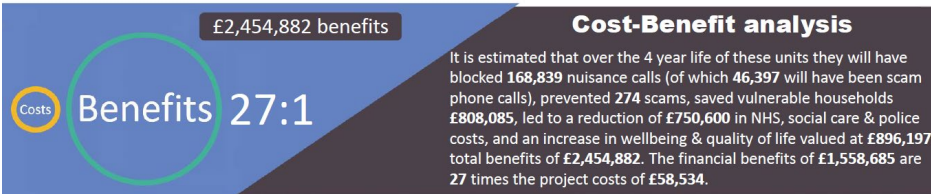
**25%**

of all calls received were nuisance or scam calls



**99%**

of nuisance and scam calls were blocked by trueCall call blocking technology



Comments from those protected by the trueCall call blockers



This made a huge difference and enable my mother to live in her own home for longer



My mother no longer gets anxious and agitated. I cannot impress on you the positive impact this has made.



Thanks for making my phone my friend again!



26/02/2026

## Trusted Trader Scheme

The Highland Trusted Trader scheme aims to protect consumers from dishonest practices and is part of the national Trusted Trader network. The objective is to help consumers find trustworthy and reliable businesses. Officers vet traders against strict criteria, including legal compliance, customer service standards, and fair trading practices. Businesses that meet these standards are included on an approved list, giving consumers greater confidence when choosing services such as builders, mechanics, or home improvement specialists. The scheme aims to protect consumers from rogue traders and promote high standards in local commerce. It also helps prevent unfair competition to good local businesses and promote sustainable growth. Following a “soft launch” to gather initial members, a full public launch took place bringing the scheme to the attention of the Highland public and trades alike. There are currently 16 full members on the scheme and a further 14 in the application process. 2026 is the first year of renewals with membership level anticipated to remain constant. Publicity campaigns through local media are ongoing, with a particular focus on ensuring that there is a spread of members across all Highland communities.



## Public Messaging

A significant part of modern Trading Standards work is advisory and preventative: to protect consumers from bad purchases and advise businesses on how to comply and be successful through good practice. Posts highlight consumer rights, business advice, product safety information, and latest scams as well as from a wide variety of stakeholders demonstrating a part of the varied remit of enforcement and activities of the Team. Statistics for 2025/26 were:

- Followers of the Highland Council Trading Standards Facebook page rising to 1932.
- 936 posts (up from 810) published on the page during the year.
- Page views were 119,159 (this a new metric).
- Eight full news releases issued throughout the year to react to emerging issues.

## Weights and Measures

The use of weighing and measuring as a basis for trade transactions underpins consumer confidence and ensures a level playing field for business. Across the UK, these have an estimated value of £262 Billion p.a. with the Highland portion estimated at £100s of millions.

During the year Trading Standards continued to respond to complaints, requests for business advice and chargeable service requests. The Team's activities included the testing of weighbridges, medical weighing equipment and equipment used in the supply of alcohol. All of these are important for the Highland economy; ensuring accuracy is essential as consumers and businesses continue to be subject to difficult economic circumstances. Examples include:

- At quarries, bio plants and ports, weighbridges are used to calculate heavy aggregates used in road construction, whole crop materials to supply the gas network, and weight limits for seagoing vessels.
- As part of a national enforcement project, the Team made checks on medical weighing equipment used to determine a person's weight for pharmaceutical prescription. This follows national guidance to ensure equipment used is suitable and accurate.

## Product Safety

Tackling the supply of dangerous consumer products is a fundamental part of Trading Standards work. Some examples from 2025-26 are below.

- **Electrical Safety:** a consignment of lighting units imported by a Highland business was stopped at a port by another trading standards service and some problems identified. The Highland business was advised of its responsibilities and helped into compliance. The business had been importing the products while the UK was in the EU. At that time, it was classed as a "distributor", with limited responsibilities. The business did not realise that after Brexit, it became an "importer", with far greater responsibilities for the products' safety.
- **Cosmetic Products:** these items must comply with strict safety standards due to their mode of use, and Highland has a significant number of producers. Three new manufacturers were identified in Highland and all received detailed advice to enable them to produce the relevant compliance documents, labels with prescriptive information and notification to the UK cosmetics portal. This can be a challenging process for small producers and Trading Standards can play a key role.

- **Toy Safety:** Toys are another potentially high risk product but the regulatory approach by Trading Standards is always proportionate. For example, a local crafter was making bespoke memorial or keepsake teddy bears. These are exempt under the toy safety regulations as not “designed or intended” for children. The crafter submitted labels and accompanying documents to explain this exemption and received advice. General product safety laws still apply.
- **Knife Dealers:** Trading Standards is responsible for the licensing of knife dealers. These important public protection requirements are another priority for the Team and last year saw 19 visits carried out across the Highlands. Many of the dealers needed assistance to improve their record-keeping. Two unlicensed businesses were found selling knives; after intervention, one successfully applied for a licence and the other has stopped selling knives.

## **Explosives and Fireworks**

Another important area of product safety for the Team is regulation of explosives. For example, sellers of fireworks must store the products in an approved safe manner and only sell during specified daytime hours and in quantities under 5kg. Recent trends have seen fewer businesses involved in this activity and just twenty licences now remain, fifteen for fireworks sales and only one held by an independent local business. Ten unannounced visits were carried out during the year, six jointly with the Police and the Fire and Rescue Service. Half had non-compliances and officers worked with the businesses to resolve these. Rules are applied strictly to ensure public safety.

## **Fair Trading**

The category “Fair Trading” covers a broad spectrum of matters, including:

- False and misleading descriptions and other unfair commercial practices.
- Enforcement of consumer rights in sales of goods, services and digital content.
- Intellectual property rights including Trademarks, Copyright and counterfeit goods.
- Regulation of online sales including information, cancellation and performance.
- Provisions requiring prices to be marked on goods and all price comparisons to be fair.
- Measures to protect reputable business buyers from unfair practices.
- Unfair contract terms such as denial of liability and unfair penalty charges.

Most of this work is carried out through investigations into complaints and intelligence received about possible and significant breaches of the law. There is a variety of ways that such investigations can be successfully concluded. These can be informal outcomes such as a business changing its practices and giving credible assurances as to future conduct. Where necessary, more formal outcomes are used such as a warning letter, a binding written Undertaking about future conduct, a civil court order or a prosecution. In addition to the responsive work, Fair Trading activities also included a series of projects and initiatives, including those below.

## **Second-hand Cars**

This Scotland-wide project focused on assessing compliance within the motor trade with key consumer protection legislation, including the new Digital Markets, Competition and Consumers Act 2025. The sector continues to generate a high level of consumer enquiries and complaints, although many relate to more obvious issues such as faulty vehicles rather than less visible practices. The project therefore concentrated on identifying hidden detriment, including drip pricing, vague

administration fees, misdescriptions and unclear terms. Initial scoping identified potential concerns in online advertising, as well as e-Commerce compliance. The project involved a combination of online compliance checks, pre-visit advertisement assessments, and physical forecourt inspections, with findings discussed directly with businesses. Engagement and advice were provided where issues were identified. Eighteen car dealers were visited across Highland, representing around 12% of the total 157 car dealerships visited across Scotland.

This project has not resulted in any formal actions being taken and this is considered to be a positive outcome. Resolving problems in such a way that businesses improve and respond to advice and guidance is usually the goal, except with a small number of rogue traders and scammers. This project enabled a re-engagement of the Team with an important local sector that has received less attention in recent years.

### **Online Investigations Training and Process Review**

This initiative focused on strengthening and standardising online investigation practices through joint Highland and SCOTSS work. Highland officers played a key role in developing the Internet Research and Investigations (IRI) Protocol alongside partners from SOLACE, SOLAR and SLA-ISG. While many of the protocol's core principles were already in use locally, the project aimed to formalise these approaches and support consistent implementation. Training was developed and delivered to Trading Standards officers across Scotland, based on the practical application of the IRI Protocol and supported by demonstrations of laptop and browser-based tools for evidential capture. The initiative is partially complete, with further rollout and embedding of the protocol planned across Highland and nationally.

### **Doorstep Crime**

Doorstep Crime involves bogus workers cold calling members of the public at their homes. They are often linked to organised crime groups and focus on exterior home maintenance and provide either seriously substandard, or completely non-existent works for ever increasing prices, and often make aggressive demands for payments. Doorstep criminals are very persuasive and go to great lengths to appear legitimate whilst obscuring their identities to escape detection, often travelling long distances to commit their crimes. Tackling these actions is a national priority for both Trading Standards and Police Scotland.

The Team continues to work in partnership with Police Scotland, and the year saw an increase in joint investigation work taking place, including prevention campaigns, news releases, newsletter articles, and joint reporting to the Procurator Fiscal. It included an investigation which concluded with a 12-month prison sentence for an individual who continually approached the vulnerable at their homes with a view to obtaining monies for little or no works being completed. The Team continues to be involved in local and national investigations and tactical operations. This work is different from Scams as the perpetrators are present in the area and where possible a "hard enforcement" approach is taken.

### **Petroleum Licensing**

The Team is responsible for ensuring the safe storage of petroleum spirit, mainly at retail filling stations. This is a highly explosive substance and strict compliance with rules is required to protect public safety. A series of inspection visits took place during

the year, and overall compliance levels were high. Officers worked with site owners on any non-compliances found and these were rectified. Officers also worked with developers during the year on new builds and alterations to existing filling stations as well as the decommissioning of old redundant sites.

In the past year, the Team have engaged productively with the industry, and the following are some examples of the types of requests and enquiries that were dealt with:

- Requests from businesses that have decided to upgrade their filling station. Such engagements allow the petrol sites to be upgraded whilst ensuring compliance with the latest safety standards, including EV charging points.
- Requests from Environmental companies for historical records searches on land where petrol may have been stored. This allows for safe land redevelopment and is a chargeable service provided by Trading Standards.

### **Taxis and Private Hire Cars (“PHCs”)**

Trading Standards is responsible for the enforcement of the licensing regime for taxis and PHCs. This involves monitoring the safety and standards of the vehicles and their drivers, and ensuring customers pay the correct fare. Trading Standards operates a “penalty points” system – unique in Scotland – whereby failings by drivers and operators are penalised. When a driver or operator reaches a set threshold of points, a report is submitted to the Licensing Committee for possible further action. Serious breaches are dealt with immediately. The Penalty Points System remains an effective way to monitor and control compliance in this trade sector. The testing of taxi meters ensures suitability and accuracy. In the year, a number of licence holders attracted Penalty Points and were dealt with by either advice or officer warning, with one being reported to the Licensing Committee.

The Team works closely with the Council’s Licensing Team and Police Scotland as many of the complaints received require joint working to deal with effectively.

### **Animal Feedstuffs and Fertilisers**

Officers undertake Official Feeds Controls for Food Standards Scotland, on a commercial contractor basis. This ensures the animals we eat have been fed safely. The Team met its commercial obligations again in the provision of physical inspections of 92 premises, alongside taking samples of feed and having it tested for nutritional value. These activities showed a high level of compliance. Trading Standards are confident that Highland businesses providing animals into the human food chain are receiving feed that is safe and of appropriate quality. The contract has recently been renewed for a 2-year period.

### **Border Control Posts (BCP)**

This involves checks of a phytosanitary nature with document checking, inspection and sampling of products of animal origin being imported into Great Britain at ports in the Highland Council area. The Team have continued engagement with Central Government and industry in what is very much an industry demand-led border control operation. This post-Brexit duty has resulted in two current BCPs within Highland, the sub-contracting of an Official Veterinarian, and the establishment of a contract with a testing laboratory. The BCPs regularly receive materials used to make animal feed, mainly for the farmed fish industry.

## Appendix 3 – Operational Plan 2026/27

### The Highland Council Trading Standards Team

#### Operational Plan 2026-27

#### Part 1: Policy

##### 1. Trading Standards Team

The Highland Council's Trading Standards Team is part of the Council's Legal and Corporate Governance section of the Corporate service cluster. It undertakes a wide range of statutory duties in relation to the regulation of trade and protection of consumers and reputable businesses.

##### 2. Statutory Duties

The Council has numerous Trading Standards statutory duties from UK and Scottish sources. The full list of this legislation is contained in Annex D to the Council's Trading Standards Enforcement Policy.<sup>1</sup> The main subject areas are: Fair Trading; Doorstep Crime; Scams and Illicit Trade; e-Enforcement; Petroleum and Explosives; Safety of consumer products; Business Advice and Protection; Weights & Measures; Taxis and Private Hire Cars; Tobacco, Vapes and Age Restricted Sales; Animal Feed & Fertiliser Quality Standards; Border Control Posts – Animal Feed.

##### 3. Work activities

The work of the team is carried out in a number of ways, including:

- Investigation of breaches of consumer and trading laws: taking statements from witnesses, gathering documentary evidence, online research, CCTV, etc.
- Visits to business premises to check goods, equipment, records and procedures.
- Specific advice to individual businesses and general recommendations to trade sectors to ensure future compliance.
- Crime prevention activities targeted at both consumer and business audiences.
- Formal legal actions such as prosecutions, civil court enforcement orders, accepting formal legal undertakings, issuing statutory notices and issuing fixed penalty fines.

##### 4. Priorities

The team has two guiding themes to focus its work activities:

- "Intelligence-led": in previous decades much Trading Standards work was carried out through untargeted cyclical "inspections" of all businesses in the area. This is not an efficient method of operation in the modern world, and, in any event, there are insufficient resources to work in that way. Now, resources

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<sup>1</sup> [www.highland.gov.uk/downloads/file/11630/enforcement\\_policy](http://www.highland.gov.uk/downloads/file/11630/enforcement_policy)

are targeted at areas of trade and specific businesses that have been involved in breaches of consumer and trading law. This approach is heavily dependent on information received from a wide variety of sources including: consumer complaints; information from agencies such as other Trading Standards offices, the Police, local CABs and Citizens Advice Scotland (CAS); “tip-offs” from businesses and the public; observations of officers.

- “Detriment”: work is focused on breaches of the law that cause significant harm. Consumer detriment is judged in a variety of ways, including: the amount of money involved in related transactions; level of physical danger to consumers; effect on vulnerable consumer groups; effect on rural consumers; effect on young people (e.g. age restricted products). Business detriment includes: high-value losses by local businesses; non-compliant companies gaining an unfair advantage over their law-abiding competitors; negative reputational effects on key Highland industries, e.g. tourism.

The analysis of intelligence and detriment is central to all apportioning of resources in the team on the basis of priority topics. The detailed priorities of this Operational Plan are guided by “Our Future Highland” Programme of The Highland Council 2022-27<sup>2</sup>, in particular relating to the following high-level aims to promote:

- A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.
- Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people

The work activities that put the priorities into practice in 2026-27 are in Part 2.

## **5. Regulators’ Codes**

The contents of the Plan and all work carried out under it must be in accordance with the requirements of the UK Regulators’ Code<sup>3</sup> and the Scottish Regulators’ Strategic Code of Practice.<sup>4</sup> These are governed by the “five principles of Better Regulation”, i.e. work done is: Proportionate, Consistent, Accountable, Transparent and Targeted.

## **6. Partnership Working**

The desired outcomes of this Plan can only be achieved through a series of well-established and confident partnerships with other organisations. There are a number of these, the most prominent of which are:

- Joint working and liaison with other local authority Trading Standards services and the specialist team at Trading Standards Scotland. These partnerships are long established and effective, including bilateral arrangements with individual

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<sup>2</sup> [https://www.highland.gov.uk/downloads/file/4611/programme\\_of\\_the\\_highland\\_council\\_2022-27\\_-\\_english](https://www.highland.gov.uk/downloads/file/4611/programme_of_the_highland_council_2022-27_-_english)

<sup>3</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/300126/14-705-regulators-code.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf)

<sup>4</sup> <https://www.gov.scot/publications/scottish-regulators-strategic-code-of-practice/>

authorities and wider networks that are often overseen by the Society of Chief Officers of Trading Standards in Scotland (“SCOTSS”).

- Police Scotland: Highland Trading Standards has a close partnership with “N” Division of Police Scotland. This is particularly important in tackling the serious crime elements of Trading Standards work such as doorstep crime, scams and anti-counterfeiting. The partnership encompasses both intelligence sharing and operational matters and is one of the closest in Scotland.
- NHS Highland: the Highland Tobacco Strategy brings the Council together with the NHS to tackle tobacco use in Highland. Trading Standards take the lead on enforcement of retail tobacco and NVP (“vaping”) laws, including combatting underage sales. In a separate topic area, the team works closely with NHS Highland on adult protection matters, such as providing call-blocking devices to protect vulnerable adults from scam calls.
- National bodies: very regular contact with Competition and Markets Authority (CMA), Office for Product Safety and Standards (OPSS), HMRC, Advice Direct Scotland, Food Standards Scotland, the Chartered Trading Standards Institute, and the business departments of both Scottish and UK Governments enables Highland Trading Standards to influence national policy in favour of Highland interests and be well-informed of current practice and future developments.

## **7. Details**

The individual initiatives and work activities are listed in Part 2. Many of these are Highland-specific although several involve collaboration with other local authorities (through SCOTSS). The “economies of scale” created by such joint working can be more effective in bringing about the outcomes desired. The team only participates in initiatives that are relevant to the objectives of the Highland Council Programme. The ongoing “Cost of Living Crisis” affecting both consumers and businesses is a prominent part of the planning for the year ahead and initiatives to tackle it in the Highlands are spread across various work activities.

## Part 2: Detailed Work Activities

<b>Topic</b>	<b>Fair Trading</b>
<b>Priorities</b>	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people</li> </ul>
<b>Objective</b>	<p>To ensure that Highland consumers are treated fairly by assisting legitimate businesses and taking firm action against rogue traders.</p> <p>To target resources on areas of highest consumer detriment and on topics for which intelligence shows that consumers are being treated unfairly.</p> <p>To reduce the supply of illicit goods in the Highlands, including counterfeit consumer products.</p>
<b>Details</b>	<p>The largest portion of this work involves investigating cases originating from consumer complaints and other sources of intelligence. All intelligence will initially be considered on a daily basis by the Duty Officer and further analysed at fortnightly tasking meetings. Cases will be progressed to an appropriate conclusion, including both formal disposals (e.g. prosecution or Enterprise Act Court Order) and informal disposals (e.g. written warning or advice to trader).</p> <p>The sale of counterfeit and other illicit goods has a variety of negative impacts on the Highlands: buyers receive shoddy and often unsafe products; legitimate local businesses unfairly lose out on sales; regional and national organised crime groups receive profits. Officers will follow up intelligence received to prosecute offenders and disrupt supply.</p> <p>In addition to the individual casework described above, there will be a series of planned initiatives to tackle areas of trade identified through complaints and other intelligence to require attention Trading Standards in the Highlands from. These are:</p> <ul style="list-style-type: none"> <li>• Home Heating – SCOTSS Project. The Scottish Government’s Heat in Buildings Initiative (“HiBS”) seeks to remove all polluting fuels from Scotland’s homes and is arguably the most ambitious plan since devolution. For it to be successful, consumers must be protected from false claims and unsatisfactory work by businesses. There will be much for Trading Standards to do in the future on this topic, but already complaints are being</li> </ul>

	<p>received in relation to retrofit work in homes. This project will involve working with local businesses to ensure that consumers are treated fairly, with a focus on fair contract terms and realistic claims being made for products and services.</p> <ul style="list-style-type: none"> <li>• Illicit Tobacco: SCOTSS Initiative. “Operation CeCe” is a project funded by HMRC to tackle the supply of illicit tobacco at retail level. The last year saw a significant increase in intelligence received about counterfeit and non-duty paid cigarettes and tobacco in the Highlands, resulting in significant seizures of illicit product and several “sanctions” (fines) issued in partnership with HMRC. Now, Operation CeCe funding is being increased further to tackle the growth of sales of these illicit products.</li> <li>• Bulk Heating Fuel: SCOTSS project. A major factor in the Cost of Living Crisis is the price of fuel, and off-grid oil heating plays an important role in their Highlands. This project looks at issues around pricing and terms and conditions that have been identified as potentially problematical. Local and national businesses will be advised of their obligations and enforcement action taken if necessary. The project is already underway and is carried over into 2026/27 due to delays caused by the need to get expert legal opinions on some matters of interpretation.</li> <li>• “Virtual Offices”: SCOTSS project. Sometimes referred to as a mail forwarding or holding business or an accommodation address, virtual offices are addresses which are used by a business or individual for the receipt of mail despite the business or individual not actually being there. This approach is legal, but problems can arise when the user does not collect mail, e.g. consumer complaints or communications from regulators. This project will involve engaging with providers to ensure they are complying with company law and not enabling rogue businesses to avoid their obligations.</li> </ul>
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<b>Topic</b>	<b>Domestic Fraud</b>
<b>Priorities</b>	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people</li> </ul>

<b>Objective</b>	<p>To protect vulnerable Highland consumers from doorstep crime through close collaboration with partner agencies such as Police Scotland, NHS and other Trading Standards authorities.</p> <p>To protect Highland consumers from scams perpetrated through a range of media – e.g. by letter, telephone, email, online – with particular attention to the effect on vulnerable consumers.</p>
<b>Details</b>	<p>Domestic Fraud encompasses both Doorstep Crime and Scams. Doorstep Crime refers to the activities of rogue traders offering home improvement services door-to-door. Scams can be perpetrated by a range of techniques, including by letter and by telephone cold-call. Although any householder could be scammed, these activities are often targeted at elderly and vulnerable people and the potential for consumer detriment is very high. The response of Trading Standards on this subject involves close partnership working with Police Scotland and adult protection services and includes:</p> <ul style="list-style-type: none"> <li>• Reacting to complaints and intelligence received and taking appropriate action.</li> <li>• Continue to manage and monitor “callblocker” installations and the intelligence they produce.</li> <li>• Engaging in multi-agency operations to detect itinerant trading activity.</li> <li>• Promote “Students Against Scams” initiative at UHI.</li> </ul>

<b>Topic</b>	<b>e-Enforcement</b>
<b>Priorities</b>	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul>
<b>Objective</b>	<p>To recognise the importance of online sales to the people of the Highlands by focusing on the laws relating to the delivery of goods and services to remote communities.</p> <p>To help foster the growth potential of e-Commerce for new and existing Highland businesses.</p>
<b>Details</b>	<p>The term e-Enforcement encompasses a wide range of activities, from combatting serious and deliberate e-Crime to assisting local e-Commerce businesses to thrive through treating customers well. There are two specific initiatives</p>

	<p>for 2026/27:</p> <ul style="list-style-type: none"> <li>• Online Investigations Process Review: Highland and SCOTSS initiatives. Highland officers have been heavily involved in the production of a protocol for internet investigations, along with colleagues from SOLACE, SOLAR and SLA-ISG (LA's information security group). Many of the standard approaches are already in operation in Highland but the protocol will now be implemented in full.</li> <li>• Fake Reviews: SCOTSS project. The Digital Markets, Competition and Consumers Act 2024 introduced detailed provisions around the publishing of consumer reviews. Businesses operating online must take appropriate steps to make sure that reviews are not misleading and that negative reviews are not suppressed. This project will involve engagement with relevant businesses to advise on their obligations and will trial innovative approaches using AI to identify suspicious reviews.</li> </ul>
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<b>Topic</b>	<b>Petroleum Licensing</b>
<b>Priorities</b>	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people</li> </ul>
<b>Objective</b>	To protect the Highland public by ensuring the safe storage of petroleum and the safe operation of petrol filling stations.
<b>Details</b>	<p>Including:</p> <ul style="list-style-type: none"> <li>• Liaising with developers, site owners and others to ensure safety requirements are being achieved.</li> <li>• Responding to complaints and intelligence received.</li> <li>• Working with site owners, developers and others to decommission sites where necessary.</li> <li>• Participation in SCOTSS/PELG projects when available</li> <li>• Carry out a programme of visits to rural filling stations.</li> </ul>

<b>Topic</b>	<b>Business Advice and Protection</b>
<b>Priorities</b>	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul>
<b>Objective</b>	<p>To help Highland businesses comply with consumer laws through advice and guidance and promote a culture of “economic success through best practice”.</p> <p>To provide advice to Highland businesses who are the victims of unfair trading in their purchases.</p>
<b>Details</b>	<p>There are various strands to this work:</p> <ul style="list-style-type: none"> <li>• Providing “enforcement by advice” through both reactive and proactive action, ensuring compliance in a measured and proportionate way. This mainly involves responding to specific queries from businesses about how they can comply with consumer laws. It also involves providing general guidance, e-newsletters and seminars where appropriate.</li> <li>• Investigating breaches of the Business Protection from Misleading Marketing Regulations 2008 and taking appropriate action.</li> <li>• Providing “1<sup>st</sup> Line” advice to local SMEs who make a complaint about purchases they have made from other traders.</li> <li>• Developing a more “commercial” approach to business engagement when appropriate through increasing opportunities to provide chargeable services.</li> </ul> <p>There are two particular initiatives for 2026-27:</p> <ul style="list-style-type: none"> <li>• Primary Authority Partnerships: these are income-generating contracts between businesses and local authorities for the provision of detailed “assured advice” on Trading Standards legal compliance. There are many of them which work very effectively and to the benefit of both parties in England and Wales. There are very few in Scotland but with most Trading Standards laws being reserved to Westminster, Primary Authority is equally applicable in Scotland. This will involve the team approaching a range of local businesses to explain what the scheme can offer, with a view to signing up one or more of them to such a partnership.</li> <li>• Approved Trader Scheme: This new local scheme lists local businesses which have been vetted by Trading</li> </ul>

	Standards and have made a commitment to treat their customers fairly. Member businesses undergo a series of detailed background checks, including a review of their complaints history and agree to abide by a code of conduct and to be regularly monitored. 2025/26 was the first full year of the scheme and saw a full public-facing launch with a concerted promotion campaign, and further development of the scheme. There will be a further concerted effort to promote and expand the scheme in 2026/27, thereafter it will become part of the Team's "business as usual" work.
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<b>Topic</b>	<b>Product Safety</b>
<b>Priorities</b>	Highland Council Programme- <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul>
<b>Objective</b>	To protect the Highland public from dangerous consumer products and help Highland businesses achieve high levels of consumer safety in their trading activities.
<b>Details</b>	Including: <ul style="list-style-type: none"> <li>• Considering all consumer complaints and other intelligence relating to product safety and taking any action that is necessary to ensure the safety of Highland consumers.</li> <li>• Providing advice and guidance to Highland businesses on all product safety compliance matters.</li> <li>• Participating in SCOTSS Product Safety Group projects and other joint initiatives, to be considered on a case-by-case basis in terms of their relevance to the Highlands.</li> <li>• Proactive engagement with explosives storage licensees, including fireworks sellers, involving visits where necessary.</li> </ul> <p>Three specific initiatives for 2026/27 are:</p> <ul style="list-style-type: none"> <li>• Cosmetic Products in Barbers shops: several new barbers' shops have opened in the Highlands and important safety provisions apply to various cosmetic products supplied. A number of these will be visited to check if businesses are importing cosmetics in the UK and advise them of their responsibilities.</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Mobile Mechanics:</b> There are several mobile mechanics based in the Highlands who visit a consumer’s home or workplace and undertake servicing, repairs or MOT preparation, as opposed to the vehicle being taken by the consumer to a fixed garage. A wide range of legislation applies covering product safety, fair trading and consumer rights. This project will involve systematically contacting these businesses and advising them of their obligations.</li> <li>• <b>Office for Product Safety and Standards (OPSS) initiatives.</b> OPSS takes the national UK lead for product safety and each year funds projects for local authority participation. Opportunities that arise from this source will be closely scrutinised for relevance to Highland and participated in if appropriate.</li> </ul>
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<b>Topic</b>	<b>Weights &amp; Measures</b>
<b>Priorities</b>	Highland Council Programme- <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul>
<b>Objective</b>	To ensure Highland consumers and businesses receive fair measure in their purchases. To provide an efficient high-quality calibration and weighing & measuring equipment service to business.
<b>Details</b>	Including: <ul style="list-style-type: none"> <li>• Maintaining metrological equipment in accordance with national standards.</li> <li>• Responding to complaints and intelligence received.</li> <li>• Responding to requests for service from Highland businesses.</li> <li>• Membership of the joint “Scottish Approval Body” for new equipment initial verifications.</li> <li>• Participating in specialist projects and other joint initiatives relevant to the Highlands.</li> <li>• Conduct market surveillance post Brexit to ensure compliance of new/imported equipment being placed on the market.</li> </ul>

	<ul style="list-style-type: none"> <li>• Conduct market surveillance in response to high value goods in pressured markets e.g. domestic and vehicle fuels at times of high prices to ensure equipment used to determine the price is accurate and performing as it should.</li> </ul> <p>Two particular initiatives for 2026/27 that are under consideration are:</p> <ul style="list-style-type: none"> <li>• Participation in SCOTSS project on compliance of non-automatic weighing instruments (NAWI)</li> <li>• A focus on the local licensed trade through a programme of inspections to local bars, pubs and hotels.</li> </ul>
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<b>Topic</b>	<b>Taxis &amp; Private Hire Cars (PHCs)</b>
<b>Priorities</b>	Highland Council Programme- <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul>
<b>Objective</b>	To ensure that visitors to the Highlands and local residents enjoy high quality taxi and PHC services. To maintain public safety and fair trading standards of Taxis & PHC via the rigorous application of the Penalty Points System and ensuring the accurate calibration of taximeters.
<b>Details</b>	Including: <ul style="list-style-type: none"> <li>• Monitoring licensee performance via Penalty Points system.</li> <li>• Responding to complaints and intelligence received.</li> <li>• Responding to requests for Taxi meter testing.</li> <li>• Participate in arrangements for tariff changes when required.</li> </ul>

<b>Topic</b>	<b>Tobacco, Nicotine Vapour Products (NVPs) and Age Restricted Sales</b>
<b>Priorities</b>	Highland Council Programme- <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul>
<b>Objective</b>	To protect young people in the Highlands by preventing the supply to them of harmful age restricted products. To promote public health through ensuring compliance with Tobacco and NVP legislation.
<b>Details</b>	Including: <ul style="list-style-type: none"> <li>• Carrying out necessary “proactive” work on age restricted sales, tobacco and NVPs as per specific Scottish Government funding.</li> <li>• Responding to intelligence received about underage sales and tobacco and NVP infringements by carrying out investigations and taking enforcement action where necessary.</li> <li>• Providing advice and guidance to Highland businesses on age restricted sales, tobacco and NVP compliance matters.</li> </ul> <p>Specific initiatives for 2026/27 include:</p> <ul style="list-style-type: none"> <li>• Continue to meet the high demand in the community to investigate allegations of legal breaches, particularly in relation to sales of vapes to children, taking all necessary actions including business advice, fixed penalty fines, banning orders and other court actions.</li> <li>• Continued proactive enforcement of tobacco and NVP legislation through inspection visits, publicity campaigns and test purchasing programmes.</li> <li>• Provide clear guidance to all sellers of tobacco and vapes when the Tobacco and Vapes Act comes into force and offer and provide advice on related queries. This will be followed up by visits and other enforcement work on the Act.</li> <li>• Continue to develop a systematic approach to recruiting underage sales volunteers that provides sustainability for future work. Traditionally, volunteers have been recruited on an ad hoc basis and this</li> </ul>

	initiative seeks to set up ongoing arrangements with bodies that have strong links to young people and ensure that existing volunteers are effectively replaced when they reach the age of 18.
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<b>Topic</b>	<b>Animal Feedstuffs &amp; Fertilisers</b>
<b>Priorities</b>	Highland Council Programme- <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul>
<b>Objective</b>	To ensure compliance with quality standards for animal feed and fertilisers by the targeted surveillance of producers and feed businesses. To meet the requirements specified in the contract with Food Standards Scotland (FSS) for the delivery of Official Feed Controls. Providing specialist Service to neighbouring Local Authorities under contract.
<b>Details</b>	Including: <ul style="list-style-type: none"> <li>• Completing Food Standards Scotland (FSS) Official Feed returns.</li> <li>• Conducting an agreed programme of premises inspection and product sampling within Highland.</li> <li>• Conducting an agreed programme of premises inspection in CNES.</li> <li>• Responding to FSS feed incidents.</li> <li>• Taking action as necessary regarding Fertilisers</li> </ul>

<b>Topic</b>	<b>Border Control Posts – Animal Feed</b>
<b>Priorities</b>	Highland Council Programme- <ul style="list-style-type: none"> <li>• A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.</li> <li>• Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.</li> </ul>

<b>Objective</b>	<p>To conduct new duties in respect of being a Port Health Authority for Animal Feed and related products.</p> <p>To conduct phytosanitary checks to ensure imported product is compliant with quality standards.</p> <p>To liaise with other agencies as necessary on BCP matters, e.g. DEFRA, APHA, FSS.</p>
<b>Details</b>	<p>Including:</p> <ul style="list-style-type: none"> <li>• Completing agreed documentary, physical inspection and sampling checks on imported product.</li> <li>• Responding to feed importation incidents.</li> <li>• Preventing non-compliant feed from entering the inland arena.</li> </ul>

## Appendix 4 - Product Safety Financial Benefit Calculator

The impact figures reported for unsafe consumer products are based on an established “harm avoided” methodology commonly used in regulatory and economic impact assessments. For each intervention, the number of products prevented from sale or withdrawn from the local market is multiplied by a nationally recognised valuation for the relevant harm outcome (fatality, serious injury or injury), derived from central government and regulatory guidance, and then adjusted by a probability factor to reflect the estimated likelihood of that harm occurring. This produces an indicative financial value representing the reduction in risk to consumers achieved through enforcement action. These figures are not a prediction of actual injuries, but a consistent way of illustrating the relative scale and preventative impact of Trading Standards work in protecting the public from unsafe products.

Financial Benefit Calculator				<b>PRISM TRIAGE METHOD</b>			
			Fatality	Hardly ever - the event hardly ever occurs (>1/1,000,000)			
			Serious Injury	Very rare - an extremely unlikely event (>1/100,000)			
			Injury	Rare - a highly unlikely event (>1/10,000)			
				Unusual - an unlikely event (>1/1,000)			
				Occasional - it would not be surprising if the event occurred (>1/100)			
				Often – a less than 50% chance, but still quite probable (>1/10)			
				Unusual – an unlikely event > 1/1,000			

Description: Screenshot from PSFBC Excel