

IPCO INSPECTION NOVEMBER 2022
RECOMMENDATIONS AND ACTION PLAN

IDENTIFIED IMPROVEMENT	ACTION	ACTION OWNER	DUE DATE	EVIDENCE
RIPA Policy and Procedure – Version control would be helpful to ensure correct version used with most recent changes	Add version control page to policy and procedure document	Information Rights Manager (DPO)	End February 2023	
RIPA Policy and Procedure – Para 5.11 – it is not just ‘good practice’ for Council Members to undertake a formal scrutiny role in respect of the use of RIPA powers and corresponding policy, it is a legal requirement, as set out in para 4.47 of the Covert Surveillance and Property Interference Code of Practice (2018)	Review and amend para 5.11 in accordance with CoP	Information Rights Manager (DPO)	End February 2023	
RIPA Policy and Procedure - The retention period of entries on the Central Record of	Review retention schedule and consult Information Asset Register. Carry out deletion exercise and	Information Rights Manager (DPO)	End March 2023	

<p>authorisations set out in paragraph 6.8, differs to that relating to investigation records which may include RIPA material, as per paragraph 6.2. It would seem sensible to align these periods in order to perform a single comprehensive review of case material.</p>	<p>ensure process in place for review and destruction of all case files. Amend paras 6.2 and 6.8 accordingly.</p>			
<p>Online Investigations Policy – Paras 3.6, 3.7 and 6.2 are somewhat contradictory and do not always align with the guidance contained within the Covert Surveillance and Property Interference Code of Practice (2018)</p>	<p>Review wording of paragraphs to ensure message is clear about one look being acceptable but more could be considered monitoring.</p>	<p>Information Rights Manager (DPO) with input from Trading Standards & Community Protection Manager and Acting Audit Manager</p>	<p>End March 2023</p>	
<p>Online Investigations Policy – Para 6.3 refers to ‘befriending’. Review wording to ensure not straying into CHIS.</p>	<p>Review wording of paragraph to ensure clear message not to stray into CHIS unless individual has relationship.</p>	<p>Information Rights Manager (DPO) with input from Trading Standards & Community Protection Manager and Acting Audit Manager</p>	<p>End March 2023</p>	
<p>Online Investigations Policy – The OSC Guidance (as cited at the end of the social media</p>	<p>Review policy and remove references to OSC Guidance</p>	<p>Information Rights Manager (DPO) with input from Trading</p>	<p>End March 2023</p>	

<p>policy) has been withdrawn in favour of the updated Code and should no longer be referred to.</p>	<p>and amend to updated Code of Practice</p>	<p>Standards & Community Protection Manager and Acting Audit Manager</p>		
<p>RIPA Policy and Procedure – surveillance for non-statutory activity, e.g. Family Court Proceedings. Non-RIPA surveillance can be used where no criminal link, e.g. care proceedings. Maintain central record and SRO oversight</p>	<p>Include guidance regarding use of non-RIPA surveillance and bring to attention of other service areas, e.g. Children’s Services. Restore central register of approved non-RIPA risk assessments</p>	<p>Information Rights Manager (DPO) Information Rights Manager (DPO)</p>	<p>End March 2023</p>	
<p>List of nominated Authorising Officers is to be updated in accordance with staffing changes and training requirements.</p>	<p>Review list and update with approved Authorising Officers. Arrange relevant training. Amended application forms to be used in training materials.</p>	<p>Information Rights Manager (DPO) Trading Standards and Community Protection Manager</p>	<p>End March 2023 End March 2023</p>	