

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	Completed 1/3/23 Page 1 of final policy v.7
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	Completed 1/3/23 Page 10 of final policy v.7
RIPA Policy and Procedure - The retention period of entries on the Central Record of authorisations set out in paragraph 6.8, differs	Review retention schedule and consult Information Asset Register. Carry out deletion exercise and ensure process in place for	Information Rights Manager (DPO)	End March 2023	Completed 16/3/23 Retention period aligned to six years for central record of applications and investigation case files.

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.	review and destruction of all case files. Amend paras 6.2 and 6.8 accordingly.			Page 10, para 6.2 of final policy v.7 Page 12, para 6.8 of final policy v.7 Detailed in Information Asset Register. Review and destruction of records to be completed annually at time of annual MO report to ensure timely destruction.
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)	Review wording of paragraphs to ensure message is clear about one look being acceptable but more could be considered monitoring.	Information Rights Manager (DPO) with input from Trading Standards & Community Protection Manager and Acting Audit Manager	End March 2023	Completed 5/4/23 Emails from Trading Standards & Community Protection Manager and Acting Audit Manager Page 4, paras 3.6 and 3.7 and Page 6, para 6.2 of final policy v.2
Online Investigations Policy – Para 6.3 refers to ‘befriending’. Review wording to ensure not straying into CHIS.	Review wording of paragraph to ensure clear message not to stray into CHIS unless individual has relationship.	Information Rights Manager (DPO) with input from Trading Standards & Community Protection Manager and Acting Audit Manager	End March 2023	Completed 6/4/23 Emails from Trading Standards & Community Protection Manager and Acting Audit Manager Page 6, para 6.3 of final policy v.2
Online Investigations Policy – The OSC Guidance (as cited at the end of the social media	Review policy and remove references to OSC Guidance	Information Rights Manager (DPO) with input from Trading	End March 2023	Completed 5/4/23

Appendix 1

policy) has been withdrawn in favour of the updated Code and should no longer be referred to.	and amend to updated Code of Practice	Standards & Community Protection Manager and Acting Audit Manager		Annex one replaced with extract from Code of Practice and link to full code - final policy v.2
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	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	Information Rights Manager (DPO) Information Rights Manager (DPO)	End March 2023	Completed 17/3/23 Pages 19-20 para 11 of final policy v.7 Completed 17/3/23 Held in shared drive accessible to Information Rights Team
List of nominated Authorising Officers is to be updated in accordance with staffing changes and training requirements.	Review list and update with approved Authorising Officers. Arrange relevant training. Amended application forms to be used in training materials.	Information Rights Manager (DPO) Trading Standards and Community Protection Manager	End March 2023 End March 2023	Completed 31/3/23 Updated schedule signed by Chief Executive 17/5/23 Dates confirmed – Investigating Officers – 22/8/23 Authorising Officers – 31/8/23 & 26/9/23 Completed – email from Trading Standards & Community Protection Manager 3/3/23