



Investigatory Powers
Commissioner's Office

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Dr. Susan Priest
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29th August 2023

Dear Chief Executive,

Thank you for providing IPCO with your response to the matters identified at points 1 to 10 of my Inspector's letter, and for facilitating a physical inspection of your compliance by Me. John Coull on the 29th of August 2023.

Your RIPA compliance officer, Ms. Amandeep Khroud, Assistant Director Governance and Law, provided comprehensive and up to date records for policy, training, audit, and organisational decisions relating to surveillance and CHIS. It was clear to my inspector that Ms. Khroud takes her responsibilities seriously, and exercises this in a diligent manner.

Whilst you have not used your powers since 2012, there has been occasion for your council to seek advice in relation to unregulated taxi use, and the extent of unregulated surveillance that is permissible. Such issues are likely to reoccur. Your Legal Services team are aware of the thresholds around activity covered under RIPA. The other prominent compliance risk relates to monitoring of social media and other platforms. I am reassured that training and policy adequately covers this. It has been suggested by my Inspector that you implement a register of names / profiles subject of online research. This will ensure that managers have the ability to oversee checks and minimises the risk of status drift by the Council if different departments were to check on the same subject.

I am satisfied that your reply provides your assurance that ongoing compliance with RIPA 2000 and the Investigatory Powers Act 2016 will be maintained. As such, your Council will not require further inspection this year.

I would ask that you ensure that the key compliance issues continue to receive the necessary internal governance and oversight through yourself and your Senior Responsible Officer: policy refreshes; annual updates to your Elected Members; ongoing training and awareness raising; internal compliance monitoring by lead managers within their business areas; and the retention, review and destruction (RRD) of any product obtained through the use of covert powers (Records and Product Management in accordance with the Safeguards Chapters of the relevant Codes of Practice).

Your Council will be due its next inspection in 2026, but please do not hesitate to contact my Office if IPCO can be of assistance in the intervening period. Please bring this to the attention of your Chief Executive and any other parties whom you deem appropriate.

Yours sincerely,

Brian Leveson

The Rt. Hon. Sir Brian Leveson
The Investigatory Powers Commissioner