

COVERT SURVEILLANCE ACTION PLAN

JUNE 2013

Action	Lead Officer	Breakdown of activities	Action	Timeframe
Ensure an improved quality of application and authorisation by training all who may authorise and likely applicants. Such training should form part of a training programme commencing with training provided by an experienced external trainer.	Senior Responsible Officer	<p>Improve the quality of written applications by Investigating Officer to address all key areas in detail</p> <p>Improve quality and analysis of Authorising Officers written approvals</p> <p>Establish a robust gatekeeping and quality assurance exercise for all applications</p> <p>Commission an approved Trainer to deliver mandatory training to Investigating Officers, Authorising Officers and the Senior Responsible Officer in respect of directed surveillance activity</p>	<p>Commission approved external trainers PHF Training Ltd</p> <p>Develop a robust training strategy for the short and medium term</p>	<p>Training to be delivered by October 2013</p> <p>ACHIEVED: TRAINING DELIVERED ON 14TH & 15th OCTOBER 2013 BY PHF TRAINING</p>

Establish a more robust and pro-active process of oversight.	RIPA Co-ordinating Officer	<p>Establish a robust gatekeeping and quality assurance exercise for all applications</p> <p>Introduce an Internal Audit of RIPA procedures and report findings to Audit and Accounts Committee</p>	<p>Head of Governance and Assurance to undertake formal audit of RIPA procedures</p>	<p>Ongoing</p> <p>Establish internal audit procedure by April 2014</p>
Ensure that the Council is equipped to manage CHIS by the training of Controllers and Handlers.	Senior Responsible Officer	Deliver mandatory training to the Chief Executive and his Deputy, Senior Responsible Officer, Controllers and handlers	<p>Commission approved external trainers PHF Training Ltd</p> <p>Identify Controllers and handlers across the Council</p>	<p>Training to be delivered by December 2013</p> <p>ACHIEVED: TRAINING DELIVERED ON 15TH OCTOBER 2013 BY PHF TRAINING</p>
Reduce the number of Authorising Officers.	<p>Monitoring Officer</p> <p>Head of Governance and Assurance</p>	Reduce the number of Authorising Officers within the Council to a maximum of 3 (Director of Customer Management, Director of Younger Adults & Housing,	<p>Identify Authorising Officers</p> <p>Amendments required to the Council's</p>	<p>June 2013</p> <p>ACTION: Report amending the Constitution in respect of RIPA will be taken to</p>

		Director Environment & Regulatory Services)	Constitution	Full Council on 18 th December 2013
Amend the <i>Guidance to staff on surveillance under RIPA</i> .	RIPA Co-ordinating Officer	<ul style="list-style-type: none"> • Indicating that CHIS authorisations may be granted by an Authorising Officer; • Amend definition of private life; • Correcting reference to private life and CHIS; • Correction to list of offences; • Discussion/description of proportionality and necessity; • Amendments required due to changes in legislation; • Stipulating that only the CEO or Deputy can authorise CHIS; • Correcting the procedure for storage of original applications; • Outlining the requirements for Controller and Handler under CHIS; • Removing reference to threshold test provisions for CHIS; • Amending the roles and 	<p>Utilise iDerby to promote the existence of the RIPA Policy and Procedures</p> <p>Review and evaluate awareness during the gatekeeping exercise</p>	<p>September 2013</p> <p>ACTION: OCTOBER 2013 Following the training a Sharepoint area has been developed for RIPA documentation with access restricted to those who attended the training on 14th and 15th October 2013</p>

		details of the SRO and Co-ordinating Officer		
Reporting to Elected Members	Monitoring Officer/Senior Responsible Officer	<p>Audit & Accounts Committee to receive</p> <ul style="list-style-type: none"> • an annual report to consider the fitness for purpose of the Council's Policy • a quarterly report to consider the Council's usage of covert surveillance 	<p>Reports to be produced annually in respect of the Policy and quarterly in respect of usage to Audit & Accounts Committee</p> <p>Head of Governance & Assurance on behalf of Audit & Accounts Committee to review progress against this plan</p>	<p>Ongoing from Audit & Accounts Committee meeting on 27th June 2013</p> <p>Head of Governance & Assurance to report against this Action Plan in the Council's Governance Updates and Annual Governance Statement</p>

Note:

Plan updated on 24th October 2013 by Janie Berry