

## **Tamworth Borough Council**

### **Action Plan following OSC Inspection 18<sup>th</sup> July 2011**

#### **Introduction**

Following a review of the Council's management of covert activities on 18<sup>th</sup> July 2011 the Chief Surveillance Commissioner indicated in his report that much had been done to meet previous OSC recommendations. The apparent inertia within the authority to deal with previous OSC recommendations had been reversed. This action plan proposes to improve the conduct of covert activities and to be used as a tool for the SRO and Authorising Officers.

The Authority uses performance management software named "Covalent". It is an effective management tool. The actions and milestones contained in this Action Plan will be populated on Covalent to assist in the management of the Policy and associated action arising therefrom.

The Action Plan is organised under 4 headings:

1. RIPA Policy
2. Applications
3. Central Record of Authorisations
4. Training

#### **Glossary of Terms/Abbreviations**

<b>OSC</b>	Office of Surveillance Commissioners
<b>RIPA</b>	Regulation of Investigatory Powers Act 2000
<b>SRO</b>	Senior Responsible Officer
<b>CSPI Code of Practice</b>	Covert Surveillance and Property Interference Code of Practice

## RIPA POLICY & PROCEDURES

### Action Plan

HEADING	OBJECTIVE	TIMETABLE & RESPONSIBILITY		MEANS OF VERIFICATION
RIPA Policy	Update policy to include paragraphs 3.5; 3.6; 5.10 and 3.7 of the CSPI Code of Practice	Mid September 2011	JMH	Policy to be approved by Full Council 13 September 2011. Copy sent to OSC once approved
	Officer Compliance 1. Raise awareness of requirements relating to content of an authorisation by updating policy and circulating relevant paragraphs from CSPI Code of Practice. 2. Raise awareness of requirements relating to self authorisation and involvement in surveillance activities Para 5.7 of CSPI Code of Practice	End September 2011  By January 2012	All Users & JMH	Policy to be out on Net Consent for all users to verify have read and understood content  Training session by SRO to include inter alia said requirements
Applications	1. More consideration required to be given to proportionality (more detail on application)	By January 2012	JMH & All users	Approval on Net Consent and training session by SRO

HEADING	OBJECTIVE	TIMETABLE & RESPONSIBILITY		MEANS OF VERIFICATION
	2. Effective Time Periods a) 3 months normal duration b) reviews c) cancellation	By January 2012	JMH & All users	Approval on Net Consent and training session by SRO
	3. Evidence of Practitioners having complied with parameters of authorisation a) agreed protocol with external service provider b) operatives aware of parameters of authorisation	By January 2012	JMH & All users	Approval on Net Consent and training session by SRO
	4. Authorising Officers properly manage the product from the surveillance. Para 9.3 CSPI Code of Practice	By January 2012	JMH & Authorising Officers	Approval on Net Consent and training session by SRO
	5. Core function requirements to be considered where appropriate. Paras 2.25 & 2.26 of the CSPI Code of Practice	By January 2012	JMH & Authorising Officers	Approval on Net Consent and training session by SRO
Central Records of Authorisations	Update spreadsheet to include columns for self authorisation detail of investigation/operation include brief description, name of subject(s) etc	Mid September 2011	JMH	Copy details of amended spreadsheet to OSC

HEADING	OBJECTIVE	TIMETABLE & RESPONSIBILITY		MEANS OF VERIFICATION
Training	Ensure regular training takes place and all users understand process involved	By January 2012	JMH & All users	<ol style="list-style-type: none"> <li>1. Formal training next due Oct 2012, biannually thereafter</li> <li>2. Six monthly reminders of Policy content and that of the CSPI Code of Practice for all users</li> <li>3. Training session by SRO no later than January 2012</li> </ol>