



Investigatory Powers
Commissioner's Office

PO Box 29105, London
SW1V 1ZU

Mr Andy Keeling
Chief Operating Officer
Leicester City Council
City Hall
115 Charles Street
Leicester
LE1 1FZ

15 April 2019

Dear Mr Keeling,

Inspection of Leicester City Council

Your Council was recently subject of a desktop based documentary inspection by one of my Inspectors, Samantha Jones. I am grateful to you for facilitating this through your Head of Information Governance and Risk, Data Protection Officer and RIPA SRO, Ms Lynn Wyeth who has provided the relevant materials and also spoke to my Inspector to provide further details.

The information you have provided has demonstrated a level of compliance that removes, for the present, the requirement for a physical inspection. It is anticipated that this will be undertaken when your authority's next three-yearly inspection is due.

Your Council was found to have a clear and comprehensive RIPA policy with only two minor adjustments to all remove references to the OSC (and replace with IPCO) and to include the statutory requirement in relation to necessity (S28(3)(b) RIPA as amended by the Protection of Freedoms Act 2012).

The following matters have been identified however, and require the appropriate remedial action:

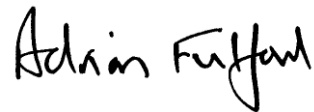
- Refresher training organised for key staff in relation to CHIS Management.
- The Non - RIPA procedures currently in place are extended to capture any 'status drift'.
- The use of Social Media profiles and access to the internet is regulated and auditable.
- Liaison with the Magistrates' Court to ensure that approval for authorisations are promptly sought.

I would be grateful if you could ensure these matters are addressed at the earliest opportunity and let me know your response within two months of receipt of this letter.

I take the opportunity here to remind you of the importance of regular, ongoing internal oversight of the actual or potential use of these powers, which should be managed through your Senior Responsible Officer, Ms Wyeth. Officers need to maintain their levels of training lest, however remote a possibility it may appear, the powers need to be used. I also draw attention to the increasing usefulness and accessibility of social media which can offer initial investigative leads and assist with your enforcement or other responsibilities, but it is important to ensure that such resources as these are used in a controlled, auditable, and well understood manner. The Home Office Covert Surveillance and Property Interference Code of Practice (August 2018) provides some helpful advice on this point.

My Office is available to you should you have any queries following the recent desktop inspection, or at any point in the future. Contact details are provided at the foot of this letter.

Yours sincerely,

A handwritten signature in black ink that reads "Adrian Fulford". The signature is written in a cursive, slightly slanted style.

The Rt. Hon. Lord Justice Fulford
The Investigatory Powers Commissioner