



Investigatory Powers  
Commissioner's Office

PO Box 29105, London  
SW1V 1ZU

Ms. Alison Greenhill  
Chief Operating Officer  
Leicester City Council  
City Hall  
115 Charles Street  
Leicester  
LE1 1FZ

February 2022

Dear Ms. Greenhill

**Inspection of Leicester City Council**

*Please be aware that IPCO is not a “public authority” for the purpose of the Freedom of Information Act (FOIA) and therefore falls outside the reach of the FOIA. It is appreciated that local authorities are subject to the FOIA and that they may receive requests for disclosure of our reports. In the first instance the SRO should bring the matter to the attention of the IPCO Data Protection Officer (at: [@ipco.org.uk](mailto:info@ipco.org.uk)), before making any disclosure. This is also the case if you wish to make the content of this letter publicly available.*

Your Council was recently the subject of a video and desktop-based inspection by one of my Inspectors, Mr. [REDACTED]. This has been facilitated through your Senior Responsible Officer (SRO) and Head of Information Governance & Risk and Data Protection Officer, Ms. Lynn Wyeth who responded promptly to my Inspectors request and provided the supporting information required. Ms. Wyeth confirmed that there has been no use of the available covert powers since the last inspection.

The information provided has demonstrated a level of compliance which removes, for the present, the requirement for a physical inspection.

The last inspection was undertaken by Ms. [REDACTED] in April 2019. On this occasion several areas requiring remedial action were noted, as follows:

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

I am pleased to find that all matters have been attended to.



Training has been undertaken using an external trainer and your SRO has also ensured personally, that their competency to perform the role has been bolstered through continuous professional development (CPD) sessions. Further training has been scheduled to develop the skills of two new authorising officers, who will be appointed soon.

A full audit of the use of social media by your staff has been undertaken with a report produced for the benefit of the audit committee. The report, viewed by my inspector, clearly identifies the type of use made of this important investigative tool, when pseudonyms have been used and which departments are likely to utilise investigative techniques which may require the consideration of RIPA authorisations. The report's conclusions further identified a lack of awareness amongst some staff, which has been dealt with using corporate communications and through delivery of refresher training. Additionally, service area managers now have responsibility to audit the social media activity of their staff. My inspector was impressed with the way in which this important area of compliance has been reviewed and managed, by your SRO.

Your RIPA policy, as was found previously, is well formed and minor amendments to remove references to our precursor body, the Office of the Surveillance Commissioners (OSC) have been undertaken as requested by Ms. .

A specific focus for the inspection was the retention, review, and destruction (RRD) of data gathered utilising the covert powers available. Whilst your policy has sections allocated to advise on the management of records, my Inspector has advised that your policy should carry clear instructions on the need to undertake RRD of covertly gathered material and to comply with the safeguarding chapters within each code of practice. I hope the advice of my Inspector was helpful in identifying the minimum requirements in this regard.

Whilst my Inspector is satisfied that this matter will be promptly attended to, this area of compliance will continue to be focused upon in future inspections. Highlighting RRD responsibilities to new staff and weaving this into your refresher training inputs will ensure those persons likely to engage the covert powers are fully au fait with the safeguarding requirements.

The oversight provided by your SRO is of a high standard and is undertaken through regular interaction with representatives from departments more likely to engage the covert powers available. When SRO oversight meetings are held, to assess the use of RIPA or to identify training needs, it would be helpful if a record of these meetings is formed and retained for inspection purposes.

Your authority has been found to be in a good place with your SRO fully aware of her responsibilities.

I hope your authority has found this inspection to be of benefit. My Office is available to you should you have any further queries following this inspection, or at any point in the future. Contact details are provided at the foot of this letter.

I shall be grateful if you would acknowledge receipt of this letter within two months.

Yours sincerely,

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