Regulation of Investigatory Powers Act (RIPA) action plan – March 2024

Objective 1. Policy, procedures and documents:

Action	Action owner	Target date	Comments	Completed date
1.1 Add the escalation in the authorisation level for Juvenile and Vulnerable CHIS and the variation of the authorisation period for a Juvenile CHIS (May 2021 action)	RIPA Senior Responsible Officer (Head of Legal and Democratic)	Revised to April 2024	Added into revised policy and procedures which is to be presented to Joint Audit and Governance Committee 15 th April 2024	
1.2 Add fuller explanation of IPCO's full oversight role (May 2021 action)	RIPA Senior Responsible Officer (Head of Legal and Democratic)	Revised to April 2024	Added into revised policy and procedures which is to be presented to Joint Audit and Governance Committee April 2024	
1.3 Add explanation of FOI Act and requests for disclosure of IPCO inspection reports needing IPCO DPO consultation, as per IPCO Spring 2023 newsletter		Present to April 2024 JAGC for policy review.	Added into revised policy and procedures which is to be presented to Joint Audit and Governance Committee April 2024	
1.4 Ensure policy covers data handling, retention, review and destruction (see IPCO annual report page 94)		Present to April 2024 JAGC for policy review.		

includes compliance		
assurance to JAGC		
annually		

Objective 2. Training and awareness:

Action	Action owner	Target date	Comments	Completed date
2.1 Deliver RIPA update training for investigating and legal officers (May 2021 action)	RIPA Co-ordinator (Deputy Head of Legal (Operational)	May 2021	Training delivered by Ben Fullbrook of Landmark Chambers. Invitations extended to approximately 30 investigating and legal officers who either attended the online session or (along with other officers) have the opportunity to watch the recording. Further training for officers being arranged with Cornerstone Chambers for April 2024	13 May 2021
2.2 Deliver training specifically for RIPA authorising officers	RIPA Co-ordinator (Deputy Head of Legal (Operational)	December 2021 Revised to April 2024	Dependent upon the review and confirmation of new authorising officers by the Strategic Management Team	
2.3 Deliver refresher training for investigating and legal officers and authorising officers	RIPA Co-ordinator (Deputy Head of Legal (Operational)	January 2025 and annually		

2.4 Develop a plan for raising RIPA awareness across the organisation to improve compliance and prevent unauthorised activity, including consideration of targeted briefings of relevant teams and general staff updates	RIPA Co-ordinator (Deputy Head of Legal (Operational))	April 2024 and annually	Signposting policy and procedures to all via Intranet and staff news letter April 2024	
2.5 Ensure service areas are clear in what actions are acceptable before RIPA should be considered for use of internet as part of investigations. (see page 93 of IPCO annual report from march 2023)	RIPA Co-ordinator (Deputy Head of Legal (Operational)	April 2024 and annually		

Objective 3. Records management:

Action	Action owner	Target date	Comments	Completed date
3.1 Add the product of directed surveillance to the corporate/services guidance on data	RIPA Senior Responsible Officer	April 2024		

management, records of processing activities and retention policies and update the RIPA policy and procedures as required.	(Head of Legal and Democratic)			
3.2 Consider incorporating the management of such product within the Central RIPA Register	RIPA Senior Responsible Officer (Head of Legal and Democratic)	March 2024	Discussed and agreed draft changes now being prepared	