

Report to: Governance, General Purposes & LGR Committee – 5 February 2026

Director Lead: Sanjiv Kohli, Deputy Chief Executive, Director - Resources & S151 Officer

Lead Officer: Lisa Ingram Principal Legal Officer, Deputy Monitoring Officer and RIPA Co-ordinator

| Report Summary | |
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| Report Title | Regulation of Investigatory Powers Act 2000 (RIPA) - Annual Report |
| Purpose of Report | To provide an update for Members on activity by the Council under RIPA from January 2025 to December 2025; and on mandatory training for Officers. |
| Recommendations | That the Governance, General Purposes and LGR Committee note the contents of the report and agree the minor amendment to the policy. |
| Reason for Recommendations | To ensure the Council fulfils its statutory obligations and keeps up to date with policy and training. |

1.0 **Background**

- 1.1 The Regulation of Investigatory Powers Act 2000 (RIPA) gives the Council certain powers to undertake covert surveillance in relation to some investigations undertaken by the Council. Since 2017 the Investigatory Powers Commissioner's Office (IPCO) has been responsible for the oversight of the use of RIPA.
- 1.2 There is a strict authorisation process set out in the legislation requiring that all applications are considered by designated members of the Council's Senior Leadership Team before final authorisation is sought in the Magistrates Court. The Council is required to submit an annual statistical return to the IPCO on the number of authorisations made and the Council is also subject to periodic inspections by the IPCO.
- 1.3 The Council is also able to obtain certain communications data (i.e. data about electronic communications) through the National Anti-Fraud Network (NAFN) who are an expert provider accredited by the IPCO and the Home Office. NAFN submits an annual statistical return to the IPCO of the number of submissions made by the Council requesting information from NAFN.
- 1.4 A programme of monitoring and review is set out in the Council's RIPA policy and guidance. Annual reports of RIPA authorisations are made to the Audit & Governance Committee.

1.5 Annual Activity

There has been 0 authorisations sought by the Magistrates court during this period. The Council's use of authorised RIPA surveillance has always been and remains extremely low. This is in line with the majority of other authorities; particularly those who do not have services such as Trading Standards or Consumer Protection teams.

- 1.6 The Council has already submitted the annual statistical return to the IPCO for 2025 which is a NIL return. There have been Nil returns to the IPCO since 2016.

2.0 Training

- 2.1 Appropriate training is provided to all Authorising officers. The last training was provided in July 2024. Ongoing advice and training is provided to investigating officers on a case-by-case basis throughout the year. More formal training is planned to be completed by April 2026 to investigating officers in relevant teams.

- 2.2 RIPA is also discussed at the 6 weekly Corporate Enforcement Group meetings to ensure consistency of application of the policy across the Council.

3.0 Policy

Sue Bearman was the named Senior Responsible Officer (SRO) for the purposes of RIPA. Following her departure, Sanjiv Kohli was appointed the new SRO. Appendix A has been updated with this change.

4.0 Implications

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate.

| Implications Considered | | | |
|---|-----|----------------------|----|
| Yes – relevant and included / NA – not applicable | | | |
| Financial | NA | Equality & Diversity | NA |
| Human Resources | NA | Human Rights | NA |
| Legal | Yes | Data Protection | NA |
| Digital & Cyber Security | NA | Safeguarding | NA |
| Sustainability | NA | Crime & Disorder | NA |
| LGR | NA | Tenant Consultation | NA |

Financial Implications - FIN25-26/5516

- 4.1 There are no financial implications arising from this report.

Legal Implications - LEG2526/7314

- 4.2 This committee has responsibility and oversight for matters falling within Regulation of Investigatory Powers Act.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

None