



Investigatory Powers
Commissioner's Office

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28 January 2022

Dear Ms Hanson and Mr Galloway,

Inspection of Bolsover District 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: 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 remote inspection by one of my Inspectors, Mr Paul Gration. I am grateful to your outgoing Solicitor to the Council and Monitoring Officer, and nominated RIPA Senior Responsible Officer (SRO), Sarah Sternberg, for providing the appropriate documentation and for her active participation in the inspection discussion.

I am aware that in April 2011 Bolsover District Council entered into a strategic alliance with North East Derbyshire District Council. The alliance shared a Chief Executive and a strategic alliance management team. I understand you are now in the process of bringing the partnership to an end, and as a result you, as the Executive Directors of Bolsover District Council, will lead your own strategic management team. As part of this inspection, Mr Gration has examined arrangements to manage activity authorised under Part II of the Regulation of Investigatory Powers Act 2000 (RIPA) by the strategic alliance, and going forward, the individual councils concerned.

I understand that Sarah Sternberg has provided some helpful continuity, having acted as the Strategic Alliance SRO leading on individual authority arrangements going forward, and has undergone a detailed handover with your incoming interim Monitoring Officer and SRO, Mr Jim Fieldsend.

Although no activity has been conducted for some time across the strategic alliance, Mr Gration is satisfied that your authority is in a strong position going forward. Your policy has been redrafted and will be presented to Elected Members through your Standards Committee. Mr Gration has reviewed the draft policy and was impressed with its structure and content. He has made some minor suggestions to your SRO which can be incorporated into the current draft. I am pleased to see that you have provided clear guidance within your policy regarding the management of the product of surveillance. As the SRO, Mr Fieldsend and the governance team maintain a Central Record in line with the relevant Codes of Practice which, despite the absence of any activity, will also be reviewed on a regular basis.

As the Council moves away from the strategic alliance, Ms Sternberg as the outgoing SRO has identified the requirement to revisit RIPA training, particularly for those actively involved in the application and authorisation process. It falls to Mr Fieldsend as your interim SRO to assess and fulfil any training requirement.

In conclusion, while your organisation is a limited user of its surveillance powers, the requirement for an up to date and relevant policy and an awareness of RIPA across the organisation remains. I take the opportunity here to reiterate to you 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 and his team.

I hope that you find this letter to be helpful and constructive. My Office is available to you should you have any queries following the recent 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 the report within two months.

Yours sincerely,



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