

HOUSING AND NEIGHBOURHOODS SCRUTINY PANEL Agenda

Place Committee Rooms 4 & 5, Town Hall, Wellington Street,
Woolwich SE18 6PW

Date Thursday, 10 April 2025

Time 6.30 pm

This meeting is open to the press and public and they are entitled to take photographs, film or record the proceedings.

Councillors

Leo Fletcher (Chair)	Labour and Co-operative
Majella Anning	Independent
Nas Asghar	Labour and Co-operative
John Fahy	Labour and Co-operative
Lakshan Saldin	Labour and Co-operative
Sandra Thomas	Labour and Co-operative
Miranda Williams	Labour and Co-operative
Roger Tester	Conservative

Tenant Representatives

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If you require further information about this meeting please contact the Scrutiny Officer:

Maya Yasunaga

Telephone: 0208 0921 5129

Email: scrutiny@royalgreenwich.gov.uk

Members are reminded that officer contacts are shown at the end of each report and they are welcome to raise questions in advance with the appropriate officer. This does not prevent further questioning at the meeting.

Agenda

1. Apologies for Absence

To receive apologies from Members of the Panel.

2. Urgent Business

The Chair to announce any items of urgent business circulated separately from the main agenda.

3. Declarations of Interest

Members to declare any personal and financial interests in items on the agenda. Attention is drawn to the Council's Constitution; the Council's Code of Conduct and associated advice.

4. Minutes

Members are requested to confirm as an accurate record the Minutes of the meeting held on 27 November 2024.

No motion or discussion may take place upon the Minutes except as to their accuracy, and any question on this point will be determined by a majority of the Members of the body attending who were present when the matter in question was decided. Once confirmed, with or without amendment, the person presiding will sign the Minutes

5. Regulation of Investigatory Powers Act 2000 Update

To consider this report on the use of powers under the Regulation of Investigatory Powers Act 2000 ("RIPA") for the period November 2023 – January 2025. and make recommendations to the Executive, if necessary.

6. Grounds Maintenance and Refuse

To consider this Grounds Maintenance and Refuse Report and make recommendations to the Executive, if necessary.

7. Responsive Repairs and Empty Homes Update

To consider the Repairs Update Report and make recommendations to the Executive, if necessary.

8. Leaseholder charges

To receive a verbal update on the Leaseholder Charges from the Assistant Director, Housing Needs & Tenancy.

Filming and Recording Meetings

Please be aware that this meeting will be recorded and broadcast on the internet as part of the support for democratic engagement under section 8(e) of the Data Protection Act 2018, and that by attending this meeting, you will be recorded. The recording will be uploaded on to the [Council's Youtube Channel](#).

If you have any queries regarding the recording of meetings, please contact the Corporate Governance Manager at committees@royalgreenwich.gov.uk

Safety

Fire and Emergency Procedures

Users of the Committee Rooms and the Council Chamber are asked to note the following fire and emergency procedures.

When you hear the continuous ringing of the fire alarm bells, please make your way out of the building in an orderly manner. The nearest exit from the Council Chamber and the Committee Rooms is through the main exit leading to Wellington Street (at the front of the building). Do not use the lift and do not stop to collect personal belongings. Once outside the Town Hall please make your way to the Assembly Point between Sainsbury's and The Vista via Market Street or Polytechnic Street.

HOUSING AND NEIGHBORHOOD SCRUTINY PANEL	
TITLE Declarations of Interests	ITEM NO 3
CHIEF OFFICER Chief Executive	

I. Decisions Required

The Panel is requested to:

- I.1 Note the list of Councillors' memberships (as Council appointed representatives) on outside bodies, joint committees and school governing bodies.
- I.2 Request that Members orally declare any personal or financial interests, including those detailed, in specific items listed on the agenda as they relate to matters under discussion.

2. Members' Interests

- 2.1 Appended to this report is a list of the outside bodies, joint committees and school governing bodies that each member of Council has been appointed to by the Council or the Leader. The list does not include bodies with which a Member is involved in a personal or private capacity.

Personal interests

- 2.2 A Member has a personal interest where any business is likely to affect:
 - (a) them, or
 - (b) a relevant person or a relevant body (where the Member is aware that they have the interest);

more than a majority of those in the ward you represent.

A **relevant person** is defined as the member's spouse or civil partner, a person who they are living with as husband and wife or as civil partners, or a person with whom they have a close association.¹

¹ See the guidance in Annex I of the Code of Conduct

A **relevant body** is defined as (a) any organisation, school governing body or outside committee or trust which they have been appointed to by the Royal Borough or by the Leader, or (b) any other voluntary organisation, school governing body or commercial organisation where you are a management committee member, school governor, trustee or director.

- 2.3 Members must declare the existence and nature of any personal interest at the start of the meeting, or when the interest becomes apparent. Members must say which item their interest relates to.
- 2.4 A Member who has a personal interest may stay, speak and vote, except where the business:
- (a) affects the financial position of the Member or any person or body described in paragraph 2.2 above, or
 - (b) relates to an interest that would be affected financially or relates to the determining to any approval, consent, licence, permission or registration in relation to the Member or any person or body described in paragraph 2.2 above

Financial Interests

- 2.5 A Member has a financial interest where any business relates to or is likely to affect an interest set out in paragraph 18 of the Code of Conduct, and which is the Member's interest or the interest of a person described in paragraph 2.2(a) above.
- 2.6 Members must declare the existence and nature of any financial interest at the start of the meeting, or when the interest becomes apparent. Members must say which item their interest relates to.
- 2.7 A Member who has a financial interest must leave the meeting, but may attend to make representations, answer questions or give evidence relating to the business, provided that the public are also allowed to attend the meeting for the same purpose, and provided they leave the meeting immediately after doing so. The Member must not participate in the discussion nor the vote.

General

- 2.8 The Code also requires Members to declare interests in relation to relevant bodies for six months after ceasing from being a member and take the appropriate action in relation to financial interests.

Background Papers

Agenda and Minutes of the Annual Meeting of the Council – 22 May 2024

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Councillor	Organisation	Role	Governorship
Anning	Trinity Laban	Member	
Asghar			
Fahy			
Fletcher	Blackheath Joint Working Party	Member	
Fletcher	John Roan Foundation	Member	
Fletcher	Meridian Homestart	Observer	
Saldin	Charlton Triangle Homes	Member	
Saldin	Royal Greenwich Heritage Trust	Member	
Tester			
Thomas	DG Cities Limited	Member	
Thomas	Greenwich Co-operative Development Agency	Member	
Thomas	Woolwich & Plumstead Relief in Sickness Fund	Member	
Williams	Eltham Crematorium Joint Committee	Member	Alderwood School
Williams	Greenwich Theatre Board	Member	Alderwood School

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ROYAL BOROUGH OF GREENWICH

HOUSING AND NEIGHBOURHOODS SCRUTINY PANEL

THURSDAY 21 NOVEMBER 2024 AT 6:30 PM

MINUTES

PRESENT:

Members:

Councillors Leo Fletcher (Chair), Roger Tester, Sandra Thomas, Majella Anning, Nas Asghar, John Fahy and Miranda Williams

Officers

Senior Assistant Director - Repairs and Investment Housing Services, Assistant Director, Housing Needs & Tenancy, Scrutiny officer

Under Standing Orders

Councillor Pat Slattery (Cabinet Member for Housing, Neighbourhoods and Homelessness)

The Chair made introductions and advised the attendees of the relevant procedures of the meeting.

Item No.

1 Apologies for Absence.

Apologies received from Councillor Lakshan Saldin.

2 Urgent Business.

There was no urgent business.

3 Declaration of Interest.

ITEM NO: 4

Councillor Fletcher stated that he was a council tenant Councillor.
Councillor Tester informed the Panel that he was a electrical contractor and carried out EICR reports professionally.

Resolved -

That the list of Councillors' memberships as Council appointed representatives on outside bodies, joint committees and school governing bodies be noted.

4 Minutes

The Panel

Resolved -

Confirmed as an accurate record the minutes of the meeting held on 9th July 2024

5 Annual Housing Compliance Report 2024

The Cabinet Member for Housing, Neighbourhoods and Homelessness introduced the item emphasising the importance of building safety for tenants was, that this issue was more critical than ever, especially in light of recent events. It was noted that the organisation self-reported to the regulator in May 2022 regarding non-compliance with certain building safety legislation however, significant progress has been made since, thanks to the dedicated efforts of officers, who engaged with the regulator to address these issues. The Cabinet member expressed a desire to maintain this momentum and ensure ongoing compliance, inviting feedback and recommendations from colleagues during the discussion.

Senior Assistant Director - Repairs and Investment Housing Services elaborated on the crucial aspects of the report, highlighting that tenant safety was the primary concern driving their actions. He pointed out the introduction of a new consumer regulation regime by the Regulator of Social Housing, which would involve proactive inspections over the next five years, who would assess compliance with established standards, and Senior Assistant Director referenced a recent judgment against another housing provider that

underscored the consequences of failing to meet health and safety standards, and ensured that the aim was to avoid similar pitfalls by ensuring robust systems and processes were in place to safeguard residents.

Senior Assistant Director detailed various initiatives undertaken over the past two years, including key performance indicators (KPIs) and updates on specific issues such as damp and mold. He explained that they are working on building safety cases for their 67 high-rise buildings, which required evidence-based statements confirming their safety. Senior Assistant Director concluded by inviting questions from members, emphasising that transparency and accountability were paramount in their ongoing efforts to enhance health and safety within the housing services.

In answering the question from the Panel, Senior Assistant Director provided an update on the Electrical Installation Condition Report (EICR) performance for the council's properties. He explained that Initially, it had around 7,000 outdated domestic EICRs, which was a significant compliance issue however, Over the past two years, it had made substantial progress, increasing the percentage of in-date domestic EICRs from a low starting point to 93% as of the last month, and this improvement represented the completion of approximately 12,000 EICRs in 18 months, which was a significant achievement given the time-consuming nature of the inspections.

Senior Assistant Director also explained that tier one contractors were large, well-known companies in the construction and refurbishment industry. These contractors often have some in-house labour but also subcontract much of their work however, he wasn't certain of the exact financial threshold that defines a tier one contractor.

Senior Assistant Director provided detailed responses in answering the questions from the Panel explaining that the Council had invested approximately one million pounds in damp and mold services over the past year, implementing significant improvements through a new triage service in the contact centre and establishing a dedicated team to handle these concerns. He further explained that the response timeline for addressing damp and mold had notably improved; for vulnerable residents, initial interventions are now completed within three working days, while non-vulnerable residents can expect an initial response within 10 to 15 working days; Following this, surveys to identify the underlying causes of damp and mold were conducted within five days. He further explained that although the time required to complete necessary repairs can vary based on the complexity of the issues, the key

enhancement lies in the much quicker response to eliminate immediate threats posed by mold.

The Senior Assistant Director noted that a response rate of 71% for the recent survey was commendable, that the council was performing favorably compared to other local authorities on many of the ten satisfaction measures, scoring above its peers in several areas, while the 26% satisfaction rate concerning complaint handling was lower than desired, it still exceeded the average for London. He highlighted that these comparative results were shared with tenants during a recent borough-wide housing panel meeting. He acknowledged that there was room for improvement, particularly in complaint handling, but emphasised that overall, the Council's performance on tenant satisfaction measures was encouraging and reflects positively against other authorities.

In answering another question from the Panel, the Senior Assistant Director stated that while there wasn't a single comprehensive model to address all issues at once, there were several approaches the housing department uses to tackle various problems; for damp and mold issues, a recently redesigned model included an effective triage system that prioritises vulnerability and ensures quick inspections, for responsive repairs like broken toilets, there was a system in place for individual fixes. The Senior Assistant Director explained that a new approach was being developed to address persistent leak problems, which often result in recurring issues and complaints. He further explained that while there wasn't a widespread system for comprehensive property assessments, there were Property Service Officers (PSOs) who conducted thorough inspections of properties with significant issues and these officers assessed multiple problems and determined necessary actions, including both immediate repairs and potential capital investments like kitchen replacement, however he noted that there were limited PSO resources available, with only a few permanent posts, some of which were currently vacant.

The Senior Assistant Director encouraged councillors to email him, the head of service, or the Cabinet member directly to arrange for a PSO to conduct a comprehensive property assessment so to "trigger" this process for tenants with multiple, persistent issues.

The Senior Assistant Director further provided a comprehensive update on several key areas of housing management and safety:

Asbestos actions: All high-risk asbestos actions had been completed. The stock was surveyed regularly, with no outstanding high-risk actions at present.

He further explained that the department had implemented a new structure with clear responsibilities with a head of service overseeing all safety aspects, with key delivery managers for each of the "big six" areas: asbestos, fire, water, gas, lifts, and electrical safety and these positions were crucial for ensuring accountability and proper management of safety issues.

Fire risk assessors: Recruiting and retaining fire risk assessors had been challenging due to market competition. To address this, the department was moving towards outsourcing fire risk assessments to a professional company while maintaining an internal clienting manager to oversee the process. This approach aimed to ensure consistent quality and mitigate risks associated with staff turnover.

High-risk buildings: The borough has 67 high-rise buildings (HRBs) under the purview of the Building Safety Regulator, with more expected in the future. Some buildings had cladding, specifically high-pressure laminate (HPL) cladding, which was currently deemed suitable. However, there was ongoing assessment of these buildings, and the department was prepared to respond to any future changes in guidelines or regulator opinions.

Stock condition surveys: While a major survey was conducted in 2017, the department recognised the need for more frequent and comprehensive stock condition surveys. They were currently validating their capital program and looking for Category I hazards during works. However, in light of recent regulatory judgments, there was an acknowledgment that they may need to accelerate and expand their stock condition survey efforts to ensure they have sufficient, up-to-date data on their housing stock.

The Senior Assistant Director further provided detailed explanations on several key points regarding mold remediation, electrical safety, and communal areas in response to questions from the Panel;

Mold Remediation Process:

The initial mold wash was typically completed within three days, which was crucial for removing the immediate health hazard posed by mold spores. Following this, a surveyor usually assessed the underlying causes within about five days. The time required for subsequent repairs varies depending on the nature of the problem. Simple fixes like installing an extractor fan might take around 20 days, while more complex issues requiring capital program interventions could take months or even a year. The department had invested significantly in this area, allocating about a million pounds for staffing and additional resources for contractors. Performance is regularly monitored and reported to senior management.

Electrical Installation Condition Reports (EICRs):

The Senior Assistant Director clarified that the reported 93% completion rate for EICRs refers only to satisfactory reports. Unsatisfactory reports were not counted in this figure; instead, issues were fixed, and the EICR was redone until a satisfactory result was achieved. This means the actual number of inspections conducted was higher than the reported figure.

Communal Areas:

For communal areas, there had been challenges with the initial contracts, which were not priced appropriately, leading to reluctance from contractors. However, significant progress had been made, with 85% of blocks now having satisfactory EICRs for communal areas. Importantly, all blocks had been surveyed, but 15% still require work to achieve a satisfactory EICR. The department was actively working on addressing these remaining issues.

The Senior Assistant Director addressed concerns about the general repairs process and asbestos management:

General Repairs Process:

The department had implemented improvements in their transformation program, particularly for non-health and safety repairs such as plumbing and carpentry. They had established a follow-on line where trade staff can immediately schedule follow-up appointments and provide this information to residents. This addressed a previous issue where tenants felt they were project managing their own repairs.

Asbestos Management:

The asbestos-related processes involve several steps: Initial surveys of communal areas to identify asbestos presence. If asbestos was found, re-surveys were conducted, typically annually, but this could vary based on risk levels.

The Panel

Resolved -

Considered the report on Compliance Building Safety Update

6 Homelessness and at-risk residents

The Assistant Director, Housing Needs & Tenancy provided a comprehensive overview of the current homelessness crisis in Greenwich, emphasising that the borough was performing well in preventing homelessness, ranking in the top third of London boroughs, however, he highlighted several significant challenges that hinder these efforts; an increasing number of refugees and asylum seekers were becoming homeless after receiving positive decisions, adding to the demand for housing, additionally, a substantial proportion of

homeless households—41.9%—have one or more support needs, indicating heightened vulnerability among this population and further more, the lack of genuinely affordable properties exacerbates the situation, creating a "triple whammy" effect: people in insecure housing cannot afford to rent or buy in the private sector, councils struggle to collaborate with landlords to secure properties, and evictions have risen as landlords seek higher rents.

To combat these challenges, the Assistant Director, Housing Needs & Tenancy explained that Greenwich had implemented a systematic approach to preventing homelessness which included providing better information about housing options through a Housing Support Finder and working to help residents maintain their tenancies with friends and family. He further explained that the council also assisted private renters in keeping their homes and supports homeless households in moving into the private rented sector when possible. Furthermore, they help residents find social housing options, including opportunities outside Greenwich. The Assistant Director emphasised the importance of collaborating more closely with other services to prioritise homelessness prevention, acknowledging that this was crucial for effectively addressing the complex issues at hand.

The Assistant Director noted that the ongoing homelessness crisis had forced the borough to focus more on managing the temporary accommodation budget crisis rather than on prevention strategies, recognising that this shift in focus was counterproductive and expressed a commitment to maintaining emphasis on prevention and housing options.

In answering the question from the panel, the Assistant Director emphasised the need for services to be geared towards addressing those specific challenges, including training outreach staff to work with men who may exhibit challenging behavior. He also highlighted a gap in services, which could contribute to ongoing cycles of homelessness for some men.

Action: Assistant Director, Housing Needs & Tenancy

In answering the question from the panel in terms of collaboration with other boroughs, the Assistant Director outlined several initiatives, which included high-level partnerships such as the London Council's Housing Director's Group and the Heads of Housing Needs and Homelessness Group, which facilitated information sharing and best practice exchange. He also mentioned joint funding bids for homelessness projects and the South London Southeast London Housing Partnership. He added that regarding resource pooling, while there were challenges in sharing housing stock between boroughs, there were attempts at reciprocal arrangements, particularly for families who need to relocate for safety reasons. The Assistant Director also detailed efforts to

prevent homelessness in the private rented sector, including a homeless prevention fund and the use of discretionary housing payments to bridge gaps between housing benefits and rent.

In answering the question from the Panel, the Assistant Director clarified that none of the 99 families as of September 30th are current asylum seekers, as it was illegal to accommodate them in temporary housing. However, some may be former asylum seekers who had received positive decisions on their right to remain in the country, although he could not provide an exact number.

The Assistant Director differed answering the question on use of hotels for temporary accommodation as it was better suited for item 7 where the topic is addressed in more details.

Action: Assistant Director, Housing Needs & Tenancy

The Panel

Resolved –

Considered the report on Homelessness and at-risk Residents

7 Temporary Accommodation

Assistant Director, Housing Needs & Tenancy highlighted the significant challenges faced by London councils in providing temporary accommodation (TA) for homeless families, particularly the alarming trend of families remaining in unsuitable hotel rooms for extended periods. He further stated that many families were staying in hotels for much longer than the legal limit of six weeks, with an average stay of 19 weeks. He added that due to hotel policies, these families often had to move between different rooms and even different hotel branches during their stay, which added to their instability and distress.

To address this crisis, the Assistant Director, Housing Needs & Tenancy stated that the council had set an ambitious goal to eliminate hotel placements entirely by March 2026 and to reduce the number of emergency overnight accommodation (EOA) placements located far from Greenwich. This initiative was visually represented through maps that displayed current hotel and EOA placements, underscoring the urgency of improving living conditions for homeless families. He further explained that the accommodations provided in hotels were described as highly unsuitable, lacking essential amenities such as cooking facilities, fridges, and bottle warmers, which complicated daily life.

ITEM NO: 4

Assistant Director, Housing Needs & Tenancy stated that in response to these challenges, the council was collaborating with organizations like Creating Ground to enhance support for those in temporary accommodation. Initiatives include providing free SIM cards for improved Wi-Fi access and addressing critical storage issues for residents' belongings. He further stated that the financial implications of relying on hotels for TA are substantial, with councils losing about £70 per night for each hotel room after housing benefit subsidy, highlighting the need for more sustainable solutions to this pressing issue.

In answering the question from the Panel, Assistant Director, Housing Needs & Tenancy explained the council's strategic asset review process, which was led by the Department for Regeneration, Enterprise and Skills. He stated that this process aimed to evaluate how best to utilise council-owned assets, particularly in relation to housing. When there were plans to dispose of a building, the housing department was consulted to determine if the asset could be repurposed for residential use. The Panel member commented that there may be opportunities to consider non-residential buildings for conversion into housing, encouraging a more creative approach to asset management.

Assistant Director, Housing Needs & Tenancy together with the Cabinet Member expressed frustration over Travelodge's strict policies that prohibit the use of electrical appliances like microwaves and bottle warmers in hotel rooms, citing safety concerns. The Cabinet Member explained that despite attempts to address these issues during a visit to a Travelodge in Woolwich, the national policy remains unchanged. The Panel member highlighted the impracticality of these restrictions, especially for families with young children who require such amenities. The Cabinet Member acknowledged that while they could advocate for change, the ultimate decision lies with Travelodge, making it difficult to improve the living conditions for families in temporary accommodation. Overall, there is a strong desire within the council to find more suitable solutions for housing vulnerable populations.

Action: Assistant Director, Housing Needs & Tenancy

In answering the question from the Panel, the Assistant Director explained that the council had set an ambitious goal to eliminate hotel use for temporary accommodation by March 2026. He explained that significant progress were already made, reducing hotel room usage from 291 in April to below 150 currently. He stated that this had been achieved through a comprehensive program of interventions, including:

1. **Acquiring properties:** The council has purchased 133 homes, including blocks at Grman Village and Sandy Hill Road. They've also bought about 600 properties from the open housing market to use as temporary accommodation.
2. **Converting existing stock:** 50 general needs housing voids were converted into temporary accommodation. There are plans to convert 100 more.
3. **Direct offers:** 100 direct offers of social housing were made to homeless households in temporary accommodation within 6 months. This initiative saved millions of pounds and helped move people out of hotels. The council plans to make 505 more direct offers by March 2026.

The Assistant Director stated that to reach zero hotel use by March 2026, the council would continue these strategies, acquiring more properties and making more direct offers. The aim was to not only eliminate hotel use but also reduce the number of households in emergency overnight accommodation by over 200. This approach involved collaboration across various council departments and services. He expressed that the council's ultimate goal was to achieve budget neutrality on temporary accommodation by 2026, although he acknowledge this may be challenging.

Action: Assistant Director, Housing Needs & Tenancy

The Panel

Resolved –

Considered the Temporary Accommodation Housing Report

8 Commissioning of Future Reports

The Panel

Resolved –

That the Commissioning of Future Reports be noted.

The meeting closed at 20:57.

(Chair)

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HOUSING AND NEIGHBOURHOODS SCRUTINY PANEL	DATE 10 April 2025	ITEM NO
SUBJECT Regulation of Investigatory Powers Act 2000 Update	WARD (S) All	
CHIEF OFFICER Interim Director of Legal & Democratic Services		
DECISION CLASSIFICATION <i>Scrutiny Report</i>		

I. Recommendations to decision maker:

- I.1 To consider this report on the use of powers under the Regulation of Investigatory Powers Act 2000 (“RIPA”) for the period November 2023 – January 2025. and make recommendations to the Executive, if necessary.
- I.2 To agree that the report and any recommendations be submitted to the Chief Executive.
- I.3 To note that the report and response to the recommendations of the Overview & Scrutiny Committee will be presented at the next meeting of the Committee.

2 Links to the Links to Our Greenwich Missions

2.1 This report relates to the Council’s agreed missions as follows:

- Everyone in Greenwich is safer, and feels safer
- Our Council is an adaptive organisation, enabling it to navigate the increasing number of challenges it faces while remaining financially sustainable
- Our Council works in the most efficient and effective ways possible

The use of powers under RIPA assists the Council in achieving its objectives in relation to crime, anti-social behaviour and Licensing. The purpose of this report is to set out the level and nature of the Council’s use of surveillance under RIPA.

3 Purpose and Executive Summary

3.1 The Regulation of Investigatory Powers Act 2000 (RIPA) regulates the manner in which the Council may conduct covert surveillance and access a person's electronic communications (Investigatory Powers Act 2016) to ensure that there is no breach of an individual's rights under the Human Rights Act 1998. The Regulation of Investigatory Powers Act (Directed Surveillance and Covert Human Intelligence Sources) Order 2010 imposes a duty on the Council to review the use of such powers and set the policy at least once a year. In accordance with that Order the Council agreed to receive reports periodically, such reports to include a summary of cases where surveillance activity had been authorised and details of individual cases.

4. The Report

Following the introduction of the Protection of Freedoms Act 2012 the Council is required to obtain the approval of a Magistrate before it can carry out any covert surveillance activity. In addition RIPA powers can only be used where the offence under investigation carries a custodial sentence of 6 months or more. The Director of Legal Services reviews all authorisations and makes the necessary application to the Magistrates Court for approval. The Council, however, rarely makes use of its powers under RIPA which are considered as a power of last resort when other means of obtaining the required information or progressing with an investigation have been exhausted or there is no other option.

4.2 This report advises Members that there were 2 RIPA Authorisations between November 2023 – 31st January 2025, both for Trading Standards. This reflects the fact that RIPA is a last resort and that officers make proactive use of alternative methods of obtaining information/evidence.

4.4 Overall responsibility for the use of RIPA lies with the Director of Legal & Democratic Services who acts as the Senior Responsible Officer, maintains the Central Record of all authorisations obtained by the Council and maintains a programme of training to officers involved in authorisation or operations to ensure they have the necessary knowledge. The last training for Officers took place on 12th March 2-25.

4.5 The Council is subject to inspection by the Office of the Investigatory Powers Commissioner (IPCO). There has been no inspection since the last report to

the predecessor of this Panel, on 14th March 2024, the last IPCO inspection took place in 2023. It is anticipated that the IPCO will inspect RBG in 2025.

A review of the RIPA Policy has been completed and a copy of the revised Policy is produced as Appendix A. The main changes being in respect of communications data, extraction of data from electronic devices and use of Social Media resources. .

5. Consultation

5.1 No consultation is required and none has taken place There are no alternative options available.

6. Next Steps

6.1 The use of RIPA powers across the Council will continue to be monitored and regular training will continue to be provided to the relevant officers

7. Cross-Cutting Issues and Implications

Issue	Implications	Sign-off
Legal , including Human Rights Act	The report raises no legal issues.	Kamaljit Jandu, Senior Lawyer, Legal & Democratic Services, 25 th March 2025
Finance and other resources, including procurement	<p>The report requests the decision maker to note the use of powers under the Regulation of Investigatory Powers Act 2000 (“RIPA”) for the period November 2023 – January 2025.</p> <p>There are no direct financial or resource implications arising from this report.</p>	Joanne Stark Head of Accounting & Business Change 26/03/2025
Equalities	<i>The decisions recommended in this report have a remote or low relevance to the substance of the Equality Act or the Councils Equality Objectives 2020 – 2024. There is no apparent equality impact on end users.</i>	Kamaljit Jandu, Senior Lawyer, Legal Democratic Services, 25 th March 2025
Climate Change	<i>There are no climate change implications in connection with this report and none arising from the Greenwich Carbon Neutral Plan dated 18 November 2020</i>	Kamaljit Jandu, Senior Lawyer, Legal Democratic Services, 25 th March 2025
Community Engagement	<i>No community engagement has been undertaken and none is appropriate given that this report</i>	Kamaljit Jandu, Senior Lawyer, Legal Democratic

	<i>relates to the Council exercising its crime prevention functions.</i>	Services, 25 th March 2025
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Report Appendices:

Appendix A : Updated RIPA Policy

Background Papers:

IPCO letter dated 7th September 2023

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The Regulation of Investigatory Powers Act 2000

Covert Surveillance and Covert Human Intelligence Sources

Royal Borough of Greenwich Policy and procedure manual

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Appendix 1 : List of Authorising Officers

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Appendix 4 : Flow Chart

I Introduction

This Policy and Procedure is for the carrying out of covert surveillance and use of human intelligence sources under Part II of RIPA 2000

Note:

The Investigatory Powers Act 2016, for

- i. General privacy protections
- ii. Unlawful Interceptions of Communications
- iii. Unlawful obtaining of communications data.

Section 3 of the 2016 Act makes it an offence to intercept a communication in the course of its transmission. Upon conviction a person is liable to 2 years imprisonment or a fine or both.

Section 60A of the 2016 Act permits the Council to apply to the Investigatory Powers Commissioner, as a relevant public authority, for an authorisation to obtain communications data. It must be necessary to obtain the data for an applicable crime purpose (s.60A(8)) being:

(a) where the communications data is wholly or partly events data, the purpose of preventing or detecting serious crime;

(b) in any other case, the purpose of preventing or detecting crime or of preventing disorder.

OR,

where the Council is a party to a collaboration agreement certified by the Secretary of State.

The conduct to be authorised must be proportionate and necessary to what is sought to be achieved.

See section 73 for definition of “relevant public authorities”.

Police, Crime, Sentencing and Courts Act 2022:-

Chapter 3 of the 2022 Act sets out requirements relating to the extraction of information from electronic devices, for the investigation of crime etc., and the criteria and threshold to be met, including proportionality and necessity.

The accompanying Code of Practice must be complied with.

Early consultation with Legal Services should be considered prior to any application to the Investigatory Powers Commissioner.

2 Definitions and Roles and Responsibilities

- 2.1 **RIPA** Regulation of Investigatory Powers Act 2000.
- 2.2 **The Policy** – RB Greenwich policy and procedure manual covert surveillance and human intelligence sources.
- 2.3 **Central Register** - Register of all RIPA authorisations cancellations and reviews
- 2.4 **The Senior Responsible Officer** (“SRO”) - is the Director of Legal Services The SRO is responsible for:
- The integrity of the process.
 - Compliance with the RIPA.
 - Engagement with the Surveillance Commissioners and Inspectors.
 - Overseeing the implementation of any post inspection action plans recommended by the Surveillance Commissioner.
 - Ensuring that all Authorising Officers and elected Members are aware of their duties and responsibilities and that all relevant staff are appropriately trained to ensure compliance.
 - Report to Overview & Scrutiny Committee.
- 2.5 **Members** – will review the Council’s policy and consider reports on the use of RIPA (via Overview & Scrutiny Committee) periodically to ensure compliance with the Council’s policy and that the policy remains fit for purpose.
- 2.6 **Authorising Officer** – must ensure familiarity with the relevant legislation, codes and the Council’s policy and procedures. The Authorising Officer must be “Operationally Independent” from any investigation they are asked to consider for approval. If this requirement cannot be shown to have been met OR if there is any uncertainty, then a different Authorising Officer who is independent, must consider the application. It is for Authorising Officers to ensure their operational independence in each case AND their ability to demonstrate this to the IPCO (Investigatory Powers Commissioners Office) if required.
- A list of the Council’s Authorising Officers is at Appendix I.
- 2.7 **The Magistrates Court** – The role of the Magistrates Court is set out in Section 32A RIPA. This section provides that an authorisation shall not take effect until a Magistrate has made an Order approving such an authorisation.

3 RIPA and The Human Rights Act

- 3.1 The Human Rights Act 1998 brought into UK law the European Convention for the Protection of Human Rights and Fundamental Freedoms. Article 8 of the Convention gives everyone the right to respect for their private and family life, home and correspondence. However, it recognises that there may be circumstances in a democratic society where it is necessary for the State to interfere with this right. Any interference may only be done in accordance with the law and for clearly defined purposes.
- 3.2 The Council has various functions which involve observing or investigating the conduct of others. These include reducing crime and disorder, dealing with anti-social behaviour, racial harassment and noise nuisance, investigating fraud and enforcing trading standards, licensing and food safety regulations.
- 3.3 In most cases, Council officers carry out these functions openly and in a way which does not interfere with a person's right to privacy. But if it is necessary to use covert techniques to carry out a specific investigation, and private information about anyone is likely to be obtained as a result, RIPA authorisation is required.
- 3.4 The Regulation of Investigatory Powers Act 2000 (RIPA) ensures that covert techniques are used in accordance with Article 8. It provides the legal basis for council officers to authorise and use covert surveillance, informants and undercover officers whilst safeguarding the public from unnecessary invasions of their privacy. Note also the Data Protection Act 2018 and the General Data Protection Regulation which have increased the safeguards and protection of privacy and processing of private information.
- 3.5 This Manual sets out the Council's policies and procedures on the use of covert techniques to obtain information. All Council departments seeking to obtain evidence by using covert surveillance, or by using informants or undercover officers, must follow these procedures.
- 3.6 It is important to emphasise that covert techniques may only be used where they are:
- necessary in a particular case to prevent or detect crime or to prevent disorder, and
 - proportionate to what is sought to be achieved by using them.
- 3.7 Accordingly, where the information required in a particular case can be obtained openly, covert techniques cannot be necessary and cannot therefore be used.

- 3.8 The government has published two Codes, Covert Surveillance and Property Interference revised Code of Practice 2018 (“the RIPA Code) and The Home Office Covert Human Intelligence Sources revised Code of Practice 2022 (“the CHIS Code”). Officers should also note the Regulation of Investigatory Powers (Directed Surveillance and Covert Human Intelligence Sources) Order 2010. The two Codes deal with:
- The purposes for which covert surveillance and covert human intelligence sources may be used
 - Who can authorise their use
 - What factors should be considered in deciding whether authorisation should be sought and granted
 - How long authorisations last, and how they can be renewed
 - What use can be made of the material gained
 - What records must be kept, where and for how long
 - Responsibility for compliance with the Act and the Codes
 - Oversight of reporting of errors
 - Implementation of post inspection action plans
 - The role of elected Members
- 3.9 Both Codes of Practice are on the Home Office website and supplement the procedures in this Manual. The Codes are admissible as evidence in criminal and civil proceedings. If a provision of these Codes appears relevant to any court or tribunal, it must be taken into account.
- 3.10 Note should be taken regarding the use of juveniles as a CHIS, as provided for within the Codes of Practice and the Regulation of Investigatory Powers (Juveniles) Order 2000.
- 3.11 The new power to allow a CHIS to engage in crime is not available to Local Authorities.

The RIPA and CHIS codes are available on the Home Office website, www.gov.uk

Interfering with the Right to Privacy

4.1 Everyone has the right to respect for their private and family life, their home and correspondence. Covert surveillance, and using agents and undercover officers, interferes with this right. Article 8 of the Convention permits this only where the interference:

- Has a basis in law
- Is for a permitted purpose
- Is necessary
- Is proportionate, and
- Is not discriminatory

Basis in law

4.2 RIPA provides the legal basis for officers to carry out covert surveillance and to use covert human intelligence sources. The procedures in this Manual are designed to ensure compliance with RIPA, avoid legal action against the Council and make sure any evidence we obtain can be used as evidence in court proceedings.

Permitted purpose

4.3 Officers may only carry out covert surveillance and use covert human intelligence sources to prevent or detect crime or to prevent disorder and with effect from 1st November 2012 meet the crime threshold, see paragraph 7 of the Magistrates' Courts (Regulation of Investigatory Powers) Rules 2012. Other purposes permitted by RIPA are not available to the Council.

Necessary

4.4 Covert surveillance and using covert human intelligence sources must be necessary (and not just reasonable) to achieve the prevention or detection of crime or to prevent disorder. Using covert techniques where the information could be obtained by overt methods would be unnecessary and therefore unlawful. Officers must, when applying for a RIPA authorisation, specifically state why covert surveillance is necessary as opposed to merely desirable.

Proportionate

- 4.5 Covert surveillance and use of covert human intelligence sources must be proportionate to what is sought to be achieved. This means RBG must use the least intrusive method. In addition, we must consider whether the use of covert surveillance in the particular circumstances is a proportionate response or measure, and whether alternative means of obtaining the information required are available. In all instances officers must consider the privacy of innocent members of the public who might be caught up in collateral intrusion. It is they who are most likely to complain and seek compensation if pictures or details of their activities and private life are misguidedly made public.

Discriminatory

- 4.6 Covert surveillance, and using covert human intelligence sources, must not be applied in a different way to different groups of people. Everyone has the right to privacy, regardless of their sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status. Article 14 of the human rights convention must be given full effect.

5 Surveillance

- 5.1 Surveillance includes monitoring, observing, listening to persons, watching or following their movements, listening to their conversations and recording anything monitored, observed or listened to. It includes intercepting post and telephone communications where the sender or recipient consents. It can be with or without the assistance of surveillance devices. It can be overt or covert.

Overt surveillance

- 5.2 Most surveillance carried out by the Council is overt, there is nothing secretive or hidden about it. In many cases, officers will behave in the same way as members of the public (e.g. in the case of most test purchases), and/or will go about Council business openly (e.g. a market inspector walking through markets).
- 5.3 Surveillance is overt even if equipment is used to reinforce normal sensory perception, such as binoculars. Routine surveillance by CCTV cameras which are visible and whose presence is signalled to the public is overt. While using other cameras could be overt, if it did not involve systematic surveillance of an individual, it would be wise to obtain RIPA authorisation if Officers go out intending to take photographs.
- 5.4 Surveillance will also be overt if the subject has been told it will happen. A resident might be warned that noise from their house will be recorded if the noise continues, or that their anti-social behaviour will be monitored. An entertainment license might be issued subject to conditions, and officers might visit without notice and without

identifying themselves to the owner/proprietor to check that the conditions are being met.

5.5 Overt surveillance does not require RIPA authorisation.

Covert surveillance

5.6 Covert surveillance may only be used in an investigation if the information required cannot be obtained by using overt methods.

5.7 Surveillance is covert only if it is carried out in a way that is designed to ensure that persons who are subject to the surveillance are unaware that it is or may be taking place. For example, an investigator may follow a benefit claimant from his home to his suspected workplace. Or a trading standards officer may carry a hidden camera or recording device which may obtain information about the private life of a shopkeeper.

5.8 Overt surveillance may become covert, and therefore need authorisation. For example, the controller of a CCTV system may be asked by an education officer to follow a child of school age through the town centre.

5.9 Covert surveillance requires RIPA authorisation for directed surveillance.

Directed surveillance

5.10 Directed surveillance is

- Covert surveillance, but not intrusive surveillance.
- Undertaken for the purposes of a specific investigation or a specific operation, and not by way of an immediate response to events or circumstances. For example, a trading standards officer on the way to work would not require an authorisation to conceal himself or herself and observe a market trader acting suspiciously.
- Likely to result in obtaining private information about a person, whether or not that person is specifically targeted for the purposes of the investigation or operation. Private information includes any information relating to a person's private or family life. The concept of private information should be broadly interpreted to include an individual's private or personal relationship with others. Family life should be treated as extending beyond the formal relationships created by marriage. In certain circumstances aspects of a person's business life may constitute private information. When in doubt consult with Legal Services.

5.11 Directed surveillance requires RIPA authorisation.

Intrusive surveillance

5.12 Intrusive surveillance is:-

- Covert surveillance
- Carried out in relation to anything taking place on residential premises or in a private vehicle. This may take place by means either of a person or device located inside residential premises or a private vehicle of the person who is subject to the surveillance, or by means of a device placed outside which consistently provides a product of equivalent quality and detail as a product which would be obtained from a device located inside.

5.13 The Council is **not** permitted to carry out intrusive surveillance, nor to enter on or interfere with property or wireless telegraphy.

CCTV

5.14 RIPA authorisation is not generally required for the use of our CCTV systems, as the public know they exist and are a means of detecting and deterring crime. The Council has a separate Manual dealing with the use of CCTV.

5.15 Normally CCTV would not be expected to be involved in any form of covert surveillance. General CCTV operations to observe public demonstrations or to respond to immediate police requests for observation do not need to be authorised.

5.16 However, a request may be received to observe a known subject without their knowledge as part of a pre-planned operation, or to watch the outside of specific premises or to observe disruptive neighbours. These actions would be directed surveillance. If CCTV officers receive such a request, the department or organisation making the request must confirm RIPA authorisation has been obtained to ensure that the surveillance is lawful.

5.17 No directed surveillance should be undertaken by the CCTV system unless details of the serial number of the authorisation certificate have been received, along with the name of the authorising officer and the duration of the operation. All requests for directed surveillance are to be directed to the CCTV Manager (or his or her line manager) in advance of the operation. The CCTV manager or his/ her line manager must ensure that they are aware of the parameters of the surveillance authorised. CCTV operators must not authorise or take part in directed surveillance without the express permission of the CCTV Manager (or his or her line manager).

- 5.18 Authorising Officers from the police will normally be a Superintendent or above and they may authorise operations for up to three months. In an emergency, the surveillance request may be authorised by an Inspector but the operation may only last for seventy-two hours unless counter-authorised by a Superintendent or above.

Authorising Officers from Council departments will be Chief Officers, or the officer responsible for the management of the investigation.

- 5.19 The Council's CCTV system should never become involved in any intrusive surveillance operation.

6 Human Intelligence Sources

- 6.1 A person is a Covert Human Intelligence Source (CHIS) if he or she:
- (a) establishes or maintains a personal or other relationship with a person for the covert purpose of facilitating the doing of anything falling within paragraphs (b) or (c);
 - (b) covertly uses such a relationship to obtain information or to provide access to any information to another person; or
 - (c) covertly discloses information obtained by the use of such a relationship or as a consequence of the existence of such a relationship.
- 6.2 A CHIS may include those referred to as agents, informants and officers working undercover.
- 6.3 The use of a CHIS involves inducing, asking or assisting a person to engage in the conduct of a source or to obtain information by means of the conduct of such a source.
- 6.4 Covert surveillance against a CHIS or a potential CHIS source maybe necessary , other than those acting in the capacity of a relevant source, but must be justifiable under Article 8(2) European Convention of Human Rights.
- 6.5 The covert use of a human intelligence source requires RIPA authorisation.

Covert

- 6.6 Under section 26(9)(b) of the 2000 Act a purpose is covert, in relation to the establishment or maintenance of a personal or other relationship, if and only if, the relationship is conducted in a manner that is calculated to ensure that one of the parties to the relationship is unaware of the purpose.
- Under section 26(9)(c) of the 2000 Act a relationship is used covertly, and information obtained as mentioned above is disclosed covertly, if and only if it is used or, as the case may be, disclosed in a manner that is calculated to ensure that one of the parties to the relationship is unaware of the use or disclosure in question.

Use

- 6.7 The use of a CHIS involves any action on behalf of a public authority to induce, ask or assist a person to engage in the conduct of a CHIS, or to obtain information by means of the conduct of a CHIS. In general, therefore, an authorisation for use of a CHIS will

be necessary to authorise steps taken by a public authority in relation to a CHIS (see the CHIS Code 2010 paragraph 2.5).

The Council **cannot** authorise a CHIS to engage in crime under s.29B of RIPA 2000

Establishing, maintaining and using a relationship

- 6.8 The word “establishes” when applied to a relationship means “set up”. It does not require, as “maintains” does, endurance over any particular period. Consequently, a relationship of seller and buyer may be deemed to exist between a shopkeeper and a customer even if only a single transaction takes place. Repetition is not always necessary to give rise to a relationship, but whether or not a relationship exists depends on all the circumstances including the length of time of the contact between seller and buyer and the nature of any covert activity (see the CHIS Code 2022 paragraph 2.18 and Examples 1 and 2).
- Officers should, however, be aware that in some circumstances an informant even though not tasked to obtain information may be a CHIS for example where an informant gives repeat information and it becomes apparent that the informant may be obtaining that information in the course of a relationship. Such cases should be referred to Legal Services for advice. This is because in reality the informant may in fact be a CHIS to whom a duty of care is owed if the information is then to be used.

Tasking

- 6.9 Tasking is the assignment given to the CHIS by the person who is responsible for the general oversight of the use made of the CHIS and/or by the person who has day to day responsibility for:
- dealing with the source on behalf of the Council;
 - directing the day to day activities of the source;
 - recording the information supplied by the source; and
 - monitoring the source’s security and welfare.
- 6.10 The assignment means asking the CHIS to obtain information, to provide access to information or to otherwise act, incidentally, for the benefit of the Council.
- 6.11 Authorisation for the use or conduct of a CHIS is required before any tasking which requires the CHIS to establish or maintain a personal or other relationship for a covert purpose.

- 6.12 In some instances, tasking will not require the CHIS to establish a personal or other relationship for a covert purpose. For example a CHIS may be tasked with finding out purely factual information about the layout of commercial premises. In such cases, it is for the authorising officer to determine where, and in what circumstances, such activity may require authorisation.
- 6.13 It is not the intention that authorisations be drawn so narrowly that a separate authorisation is required each time the CHIS is tasked. Rather, an authorisation might cover, in broad terms, the nature of the CHIS' task. If this changes, then a new authorisation may need to be sought.
- 6.14 It is difficult to predict exactly what might occur each time a meeting with a source takes place, or each time the source meets the subject of an investigation. There may be occasions when unforeseen actions occur. When this happens, the occurrence must be recorded as soon as practicable after the event. If the existing authorisation is insufficient it should either be updated and re-authorised (for minor amendments only), or it should be cancelled and a new authorisation obtained before any further such action is carried out.
- 6.15 Similarly, where it is intended to task a CHIS in a new way or significantly greater way than previously identified, officers must refer the proposed tasking to the authorising officer, who should consider whether a separate authorisation is required. This must be done in advance of any tasking, and the details of the referral must be recorded.

Juvenile sources

- 6.16 Special safeguards apply to the use or conduct of juveniles, that is, those under 18 years old, as sources. **On no occasion should the use or conduct of a CHIS under 16 years of age be authorised to give information against his parents or any person who has parental responsibility for him.** In other cases, authorisations should not be granted unless the special provisions contained within The Regulation of Investigatory Powers (Juveniles) Order 2000; SI No. 2793 are satisfied. In such circumstances prior consultation with the Head of Law and Governance is essential.

Collateral intrusion

- 6.17 The principles are essentially the same as for directed surveillance. See the CHIS Code 2022 paragraphs 3.18 to 3.21, See also *Authorisation Procedures for Directed Surveillance* above.

Confidential information

- 6.18 The same general considerations for covert directed surveillance and confidential information apply to the use or conduct of a CHIS and confidential information. However, the revised CHIS Code of Practice 2022 and the Covert Surveillance and Property Interference revised Code of Practice, provide guidance relating to deliberate, incidental and unintended obtaining, providing access to, or disclosure of matters subject to legal privilege.

Management responsibility

- 6.19 Chief Officers must ensure that arrangements are in place for the proper oversight and management of sources, including appointing the officers. The CHIS Code provides that the Council must have a Senior Responsible Officer for CHIS.
- 6.20 The Code provides that the senior responsible officer should be a member of the corporate leadership team and should be responsible for ensuring that all authorising officers are of an appropriate standard in light of any recommendations in the inspection reports prepared by the Office of Surveillance Commissioners (now IPCO). Where an inspection report highlights concerns about the standards of authorising officers, this individual will be responsible for ensuring the concerns are addressed (see the CHIS Code 2022). The Senior Responsible Officer is the Director of Legal Services
- 6.21 The officer responsible for the day-to-day contact between the Council and the CHIS will usually be of a rank or position below that of the authorising officer.

Handler

- 6.22 The person referred to in section 29(5)(a) of the 2000 Act (the handler) will have day to day responsibility for:
- the welfare and security of the CHIS
 - monitoring, directing their activities and recording information provided.

Controller

- 6.23 The person referred to in section 29(5)(b) of the 2000 Act (controller) will normally be responsible for the management and supervision of the “handler” and general oversight of the use of the CHIS (see the CHIS Code 2022).

Meetings

- 6.24 It is difficult to predict exactly what might occur each time a meeting with a CHIS takes place, or the source meets the subject of an investigation. There may be occasions when unforeseen action or undertakings occur. When this happens, the occurrence must be recorded as soon as practicable after the event and, if the existing authorisation is insufficient it should either be updated at a review (for minor amendments only) or it should be cancelled and a new authorisation should be obtained before any further such action is carried out..

Re-tasking

- 6.25 Similarly where it is intended to task a CHIS in a significantly greater or different way than previously identified, the handler or controller must refer the proposed tasking to the authorising officer, who should consider whether the existing authorisation is sufficient or needs to be replaced. This should be done in advance of any tasking and the details of such referrals must be recorded

Security and welfare

- 6.26 Any deployment of a source should take into account the safety and welfare of that source, when carrying out actions in relation to an authorisation or tasking, and the foreseeable consequences to others of that tasking. Before authorising the use or conduct of a source, the authorising officer must ensure that a risk assessment is carried out to determine the risk to the source of any tasking, and the likely consequences should the role of the source become known. The ongoing security and welfare of the source, after the cancellation of the authorisation, should also be considered at the outset.

7 Use of Social Media

7.1 The growth of the Internet and the increasing use of social media platforms for interaction and communication is a significant source of information for gathering information and assisting with the prevention and detection of crime, changing social trends, and for engaging with the public. The new revised Code of Practice, August 2018, Covert Surveillance and Property Interference, contains a specific section on the use of social media for surveillance and gathering information. The message is that even publically available information is likely to be subject to regulation where it involves obtaining private information about an individual or a group. It does not require the seeking of an authorisation for cursory examination of social media platforms or the internet in general, however, at the point where the online searches are about to become targeted, consideration must be given to seeking an authorisation for covert surveillance. It is to be noted that a single viewing of the internet platform could also require an authorisation if it is likely to involve the recording of specific information relating to an individual or the obtaining of private information or details of lifestyle. The new revised Code of Guidance provides very helpful examples to assist investigators of scenarios that may or may not require RIPA authorisations.

Extract from Code of Practice:-

7.2 The following factors may assist in determining whether a RIPA authorisation ought to be sought:

1. Whether the investigation or research is directed towards an individual or organisation;
2. Whether it is likely to result in obtaining private information about a person or group of people (taking account of the guidance at paragraph 3.6 of the revised Code);
3. Whether it is likely to involve visiting internet sites to build up an intelligence picture or profile;
4. Whether the information obtained will be recorded and retained;
5. Whether the information is likely to provide an observer with a pattern of lifestyle;
6. Whether the information is being combined with other sources of information or intelligence, which amounts to information relating to a person's private life;
7. Whether the investigation or research is part of an ongoing piece of work involving repeated viewing of the subject(s);
8. Whether it is likely to involve identifying and recording information about third parties, such as friends and family members of the subject of interest, or information posted by third parties, that may include private information and therefore constitute collateral intrusion into the privacy of these third parties.

Note 1: An internet search being conducted by a third party on behalf of the public authority is likely to require a formal authorisation.

Note 2: The directed surveillance must be necessary and proportionate to be capable of being authorised.

8 Applying for an authorisation

- 8.1 Authorisation must be obtained where the surveillance, or the use or conduct of a source, is likely to obtain private information from or about a person, and consequently interfere with their right to privacy. This applies whether or not that person is the subject of the investigation. Obtaining an authorisation will ensure that the surveillance, or the use or conduct of a source is carried out in accordance with the law and is subject to stringent safeguards against abuse. It is important when seeking an authorisation to provide as much information as possible and to set out clearly what precisely requires authorisation.. Where relevant attach maps or plans or other relevant documents/information.

The Regulations of Investigatory Powers (Directed Surveillance and CHIS) Order 2010 as amended, only permits a local authority to authorise the use of directed surveillance where the offence being investigated is:-

- (a) punishable on summary conviction or on indictment by a maximum term of at least 6 months prison
- or
- (b) The offence is an offence under
 - (i) Sections 146, 147, or 147A of the Licensing Act 2003,
 - (ii) Section 7, Children and Young Persons Act 1933.
 - (iii) Sections 91 and 92, Children and Families Act 2014

Directed Surveillance

- 8.2 An application for authorisation for directed surveillance must be in writing and record:

- the reasons why the authorisation is necessary in the particular case;
- the reasons why the surveillance is considered proportionate to what it seeks to achieve;
- the nature of the surveillance;
- the identities, where known, of those to be the subject of the surveillance;
- an explanation of the information which it is desired to obtain as a result of the surveillance;
- the details of all potential collateral intrusion and why the intrusion is justified;
- the details of any confidential information that is likely to be obtained as a consequence of the surveillance;
- the level of authority required (or recommended where that is different) for the surveillance; and

- a subsequent record of whether authority was given or refused, by whom and the time and date.

Covert Human Intelligence Source

8.3 An application for authorisation for the use or conduct of a CHIS must be in writing and record:

- the reasons why the authorisation is necessary in the particular case;
- the reasons why the authorisation is considered proportionate to what it seeks to achieve;
- the purpose for which the source will be tasked or deployed (e.g. in relation to a series of racially motivated incidents etc.);
- where a specific investigation or operation is involved, the nature of that investigation or operation;
- the nature of what the source will be tasked to do;
- the details of any potential collateral intrusion and why the intrusion is justified;
- the details of any confidential information that is likely to be obtained as a consequence of the authorisation;
- the level of authority required (or recommended, where that is different);
- a subsequent record of whether authority was given or refused, by whom and the time and date.

9 Granting an Authorisation

[Minimum requirement:
Director, Head of Service,
Service Manager or equivalent]

Authorising Officer

- 9.1 Where confidential information is likely to be acquired, or where a vulnerable individual or a juvenile is to be authorised as a source, the authorising officer must be the Chief Executive or, in her absence, a Chief Officer.
- 9.2 In all other cases the authorising officer must be one of the officers whose details are at Appendix I.
- 9.3 The authorising officer must not be responsible for authorising an investigation in which he or she is directly involved e.g. one in which he or she is to carry out the surveillance or task the source
- 9.4 Responsibility for authorising the carrying out of directed surveillance, or the use or conduct of a source, rests with the authorising officer and requires his or her personal authority.
- 9.5 When granting authorisation it is important to set out clearly what is being authorised by reference to the information provided in the request for authorisation.

Confidential information

- 9.6 Confidential information means matters subject to legal privilege, confidential personal information or confidential journalistic material. The Codes of Practice contain further information, and the Director of Legal Services can advise on how confidential information should be handled.
- 9.7 RIPA does not provide any special protection for confidential information. Nevertheless, particular care should be taken in cases where the subject of the investigation or operation might reasonably expect a high degree of privacy, or where confidential information is involved. So, for example, extra care should be taken where, through the use of surveillance, it would be possible to acquire knowledge of matters which involve medical or journalistic confidentiality or legal privilege.

Vulnerable individuals

- 9.8 Any person who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself, or to protect himself against significant harm or exploitation, should only be authorised to act as a source in the most exceptional circumstances.

Matters to be considered

- 9.9 An authorising officer may only grant an authorisation where he or she is satisfied:

- **That the authorisation is necessary in the circumstances of the particular case to prevent or detect crime or to prevent disorder.** Using covert means where the information can be obtained overtly means it would be unnecessary and therefore unlawful.
- **That the surveillance or the use or conduct of a CHIS is proportionate to what it seeks to achieve.** This involves balancing the intrusiveness of the activity on the target, and others who might be affected by it, against the need for the activity in operational terms. The activity will not be proportionate if it is excessive in the circumstances of the case, or if the information which is sought could reasonably be obtained by other less intrusive means. The activity should be carefully managed to meet the objective in question and must not be used in an arbitrary or unfair way.
- **That the risks of collateral intrusion have been properly considered.** Measures should be taken, wherever practicable, to avoid or minimise unnecessary intrusion into the lives of those not directly connected with the investigation. Those carrying out the surveillance or tasking a source must inform the authorising officer if the investigation or operation unexpectedly interferes with the privacy of individuals who are not covered by the authorisation. When the original authorisation may not be sufficient, consideration should be given to whether the authorisation needs to be amended and re-authorised, or whether a new authorisation is required.

- 9.10 Community Sensitivity

Any person granting or applying for an authorisation must also be aware of particular sensitivities in the local community where the surveillance is taking place, or where the source is being used. They must also be aware of similar activities being undertaken by other public authorities which could impact on the deployment of the surveillance or the source.

9.11 The authorising officer must always give authorisations in writing, including in urgent cases, and all authorisations require judicial approval by a magistrates' court.

Combined authorisations

9.12 A single authorisation may combine two or more different authorisations, but the provisions for each of them must be considered separately.

9.13 In cases where one agency is acting on behalf of another, it is usually for the tasking agency to obtain or provide the authorisation. For example, where the Council carries out surveillance on behalf of the Benefits Agency, the Benefits Agency would obtain the authorisation and provide the Council with a copy.

Duration of authorisations

9.14 Directed Surveillance authorisations are valid for 3 months. CHIS authorisations are valid 12 months, (4 months for a juvenile) unless renewed or cancelled following a review by the Authorising Officer.

9.15 The Authorising Officer must decide, when granting an authorisation, when it will be reviewed and how often a review should take place. This should be as frequently as is considered necessary and practicable.

Review of Authorisations

Para 9.15.1 Authorising officer must review authorisation and notify the SRO in writing that the review has been completed and outcome. *[if there is no confirmation from the authorising officer, the authorisation shall be cancelled by the SRO (within 5 working days from date for review.)]*

Para 9.15.2 Where the Authorisation is cancelled in default of notification by the SRO, the authorising officer and the requesting officer shall be informed in writing promptly.

Judicial approval

9.16 No authorisation can be given effect without approval by a Justice of the Peace in the

Magistrates Court. This is not part of the Council's procedure but a statutory requirement to ensure that RIPA authorisations are being granted appropriately following introduction of the Protection from Freedoms Act 2012.

Procedure

- 9.17 Once the Authorising Officer has authorised the surveillance the Council must apply to the Magistrates Court for judicial approval of the authorisation. The application to the Magistrates Court must be completed by the Authorising Officer, and submitted to Legal Services together with the authorisation. The Magistrates Court application will be completed and submitted to Court by Legal Services.

Before granting approval the Justice of the Peace (JP) must be satisfied as to the following:-

- there are reasonable grounds for the local authority to believe that the authorisation or notice was necessary and proportionate and there remain reasonable grounds for believing that these requirements are satisfied at the time when the JP is considering the matter;
- in the case of a CHIS authorisation, that there are reasonable grounds for the local authority to believe that arrangements exist for the safety and welfare of the source that satisfy section 29(5) RIPA and there remain reasonable grounds for believing that these requirements are satisfied at the time when the JP is considering the matter;
- in the case of a CHIS authorisation, that there were reasonable grounds for the local authority to believe that the requirements imposed by Regulation of Investigatory Powers (Juveniles) Order 2000 were satisfied and there remain reasonable grounds for believing that these requirements are satisfied at the time when the JP is considering the matter'
- the local authority application has been authorised by a designated person / Authorising Officer;
- the grant of the authorisation was not in breach of any restriction imposed by virtue of an order made under the following sections of RIPA:
 - 29(7)(a) (for CHIS),
 - 30(3) (for directed surveillance and CHIS):
- any other conditions that may be provided for by an order made by the Secretary of State were satisfied.

The same considerations apply where a local authority is seeking judicial approval to continue using a technique (i.e. a renewal). The JP will wish to examine whether the case still meets the principle of proportionality. In particular he or she will want to consider the content and value of the information obtained so far.

10 Review, renewal and cancellation of authorisations

Review

- 10.1 The Authorising Officer must carry out regular reviews of authorisations to assess whether the surveillance or the use of a source should continue, or whether the authorisation should be cancelled. The authorising officer must record the results of a review on the authorisation record and copy the review to the Head of Legal Services, who will record it on the central record of authorisations.
- 10.2 Where the investigation provides access to confidential information or involves collateral intrusion, authorisations must be reviewed frequently.
- 10.3 Where the authorisation is for the use of a CHIS the review should include the use made of the CHIS during the period authorised, the tasks given to the CHIS and the information obtained from the CHIS .

Renewal

- 10.4 Before an authorising officer renews an authorisation, he or she must be satisfied that a review has been carried out.
- 10.5 If, before an authorisation would cease to have effect, the authorising officer considers it necessary for it to continue for the purpose for which it was given, he or she may renew it in writing for a further period of three months.
- 10.6 A renewal is subject to the same requirement for judicial approval as an initial authorisation. Any person who would be entitled to grant a new authorisation can renew an authorisation. An authorisation may be renewed more than once, provided it continues to meet the criteria for authorisation. The renewal should be kept and recorded as part of the authorisation record.
- 10.7 All applications for the renewal of an authorisation must record:
- Whether this is the first renewal, or every occasion on which the authorisation has been renewed previously;
 - Any significant changes to the information provided in the application;
 - The reason why it is necessary to continue with the surveillance or to use the source;

- The content, and value to the investigation or operation, of the information obtained by the surveillance or the use of the source;
- The use made of the source since the grant or latest renewal of the authorisation, and the tasks given to the source during that period;
- the results of regular reviews of the investigation or operation.

Cancellation

10.9 The Authorising Officer who granted or last renewed the authorisation must cancel it if he or she is satisfied:

- That the surveillance no longer meets the criteria upon which it was authorised;
- That the use of the CHIS no longer meets the criteria upon which it was authorised;
- That satisfactory arrangements for the CHIS' care no longer exist.

11 Records of authorisations

Records authorising directed surveillance

11.1 Records authorising directed surveillance must contain the following information:

- the type of authorisation;
- the date the authorisation was given;
- name and grade of the Authorising Officer;
- the unique reference number of the investigation or operation;
- the title of the investigation or operation, including a brief description and names of subjects, if known;
- if the authorisation is renewed, when it was renewed and who authorised the renewal, including the name and grade of the authorising officer;
- whether the investigation or operation is likely to result in obtaining confidential information as defined in this code of practice;
- the date the authorisation was cancelled.

Records authorising the use of a source

11.2 Records authorising the use of a source must contain the following information:

- the identity of the source;
- the identity, where known, used by the source;
- any relevant investigating authority, other than the Council;
- the means by which the source is referred to within the Council and any other relevant investigating authority;
- any other significant information connected with the security and welfare of the source;
- any confirmation made by a person granting or renewing an authorisation for the conduct or use of a source that the means by which the source is referred to within the Council and any other relevant investigating authority have been considered, and that any identified risks to the security and welfare of the source have where appropriate been properly explained to and understood by the source;
- the date when, and the circumstances in which, the source was recruited;
- the identities of the persons who have day-to-day responsibility for dealing with the source on behalf of the Council and for the source's security and welfare, who have general oversight of the use made of the source and who have responsibility for maintaining a record of the use made of the source;
- the periods during which those persons have discharged those responsibilities;
- the tasks given to the source and the demands made of the source in relation to his or her activities;

- all contacts or communications between the source and a person acting on behalf of the Council;
- the information obtained by the Council by the conduct or use of the source;
- any dissemination by the Council of information obtained in that way;
- in the case of a source who is not an undercover operative, every payment, benefit or reward and every offer that is made or provided by or on behalf of the Council in respect of the source's activities for the benefit of the Council or any other investigating authority.

11.3 The record must be maintained in such a way as to preserve the confidentiality of the CHIS and the information provided by the CHIS .

Central record

11.4 Authorising Officers must send a record of each authorisation, review, renewal and cancellation promptly to the Director of Legal Services. The Head of Legal Services will keep a centrally retrievable record and check that each authorisation has been reviewed, renewed or cancelled. The centrally retrievable record will be made available to the relevant Commissioner or an Inspector from the Investigatory Powers Commissioners Office upon request. All records must be kept for at least three years from the ending of the authorisation.

12 Retention and destruction of the product

- 12.1 Where the product of surveillance or from a source could be relevant to pending or future criminal or civil proceedings, it should be retained in accordance with established disclosure requirements for a suitable further period, commensurate to any subsequent review.

- 12.2 Attention is drawn to the requirements of the code of practice issued under the Criminal Procedure and Investigations Act 1996. This requires that material which is obtained in the course of a criminal investigation and which may be relevant to the investigation must be recorded and retained.

- 12.3 There is nothing in RIPA which prevents material obtained from properly authorised surveillance or use of a source from being used in other investigations. Each department must ensure that arrangements are in place for the handling, storage and destruction of material obtained through the use of covert surveillance or the use of a CHIS. Authorising Officers must ensure compliance with the appropriate data protection requirements and any relevant codes of practice relating to the handling and storage of material.

13 Appendices

Appendix 1 Forms:

List of Authorising Officers

Appendix 2: Forms:

Application for Directed Surveillance Authorisation

Review of Directed Surveillance Authorisation

Cancellation of Directed Surveillance Authorisation

Renewal of Directed Surveillance Authorisation

Application for CHIS Authorisation

Review of CHIS Authorisation

Cancellation of CHIS Authorisation

Renewal of CHIS Authorisation

Application forms for Magistrates Court Approval and Guidance

Appendix 3:

Specimen Direct Surveillance Application Form

Appendix 4:

Flow Chart

Appendix I

The following officers are designated to authorise surveillance :-

Designation	Officer
Chief Executive	Debbie Warren
Director of Legal Services	
Assistant Director of Finance – Governance and Audit	Brendan Costello
Head of Trading Standards	
Head of Safer Communities	Charlene Noel
Assistant Director of Community Safety and Environment	Leanna Minahan

Appendix 2

Unique Reference Number	
-------------------------	--

Part II of the Regulation of Investigatory Powers Act 2000

Authorisation Directed Surveillance

Public Authority <i>(including full address)</i>			
Name of Applicant		Unit/Branch /Division	
Full Address			
Contact Details			
Investigation/Operation Name <i>(if applicable)</i>			
Investigating Officer (if a person other than the applicant)			

Unique Reference Number	
--------------------------------	--

DETAILS OF APPLICATION

1. Give rank or position of authorising officer in accordance with the Regulation of Investigatory Powers (Directed Surveillance and Covert Human Intelligence Sources) Order 2010 No. 521. ¹

--

2. Describe the purpose of the specific operation or investigation.

--

3. Describe in detail the surveillance operation to be authorised and expected duration, including any premises, vehicles or equipment (e.g. camera, binoculars, recorder) that may be used.

--

4. The identities, where known, of those to be subject of the directed surveillance.

Name: Address: DOB: Other information as appropriate:
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5. Explain the information that it is desired to obtain as a result of the directed surveillance.

--

Unique Reference Number	
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¹ For local authorities: The exact position of the authorising officer should be given. For example, Head of Trading Standards.

C:\Users\Philippa.Murrey\AppData\Local\Microsoft\Windows\INetCache\Content.Outlook\ZWDGJRH3\covert_surveillance_policy_and_procedure_manual.rtf

6. Identify on which grounds the directed surveillance is necessary under Section 28(3) of RIPA. Delete those that are inapplicable. Ensure that you know which of these grounds you are entitled to rely on (SI 2010 No.521).

The only ground applicable to the Council is:-
For the purpose of preventing or detecting crime or of preventing disorder.

7. Explain why this directed surveillance is necessary on the grounds you have identified [Code paragraph 3.3].

8. Supply details of any potential collateral intrusion and why the intrusion is unavoidable. [Bear in mind Code paragraphs 3.8 to 3.11.]

Describe precautions you will take to minimise collateral intrusion.

9. Explain why this directed surveillance is proportionate to what it seeks to achieve. How intrusive might it be on the subject of surveillance or on others? And why is this intrusion outweighed by the need for surveillance in operational terms or can the evidence be obtained by any other means [Code paragraphs 3.4 to 3.7]?

10. Confidential information [Code paragraphs 4.1 to 4.31].
INDICATE THE LIKELIHOOD OF ACQUIRING ANY CONFIDENTIAL INFORMATION:

Unique Reference Number	
-------------------------	--

11. Applicant's Details			
Name (print)		Tel No:	
Grade/Rank		Date	
Signature			

12. Authorising Officer's Statement. [Spell out the "5 Ws" - Who; What; Where; When; Why and HOW- in this and the following box.]

I hereby authorise directed surveillance defined as follows: *[Why is the surveillance necessary, whom is the surveillance directed against, Where and When will it take place, What surveillance activity/equipment is sanctioned, How is it to be achieved?]*

**13. Explain why you believe the directed surveillance is necessary [Code paragraph 3.3].
Explain why you believe the directed surveillance to be proportionate to what is sought to be achieved by carrying it out [Code paragraphs 3.4 to 3.7].**

--

Unique Reference Number	
--------------------------------	--

14. (Confidential Information Authorisation.) Supply detail demonstrating compliance with Code paragraphs 4.1 to 4.31.

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<i>Date of first review</i>	
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Programme for subsequent reviews of this authorisation: [Code paragraph 3.23]. Only complete this box if review dates after first review are known. If not or inappropriate to set additional review dates then leave blank.

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Name (Print)		Grade / Rank	
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Signature		Date and time	
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Expiry date and time [e.g.: authorisation granted on 1 April 2005 - expires on 30 June 2005, 23.59]	
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Unique Reference Number	
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15. Urgent Authorisation [Code paragraph 5.9]: Authorising officer: explain why you considered the case so urgent that an oral instead of a written authorisation was given.

--

16. If you are only entitled to act in urgent cases: explain why it was not reasonably practicable for the application to be considered by a fully qualified authorising officer.

--

Name (Print)		Grade/ Rank		
Signature		Date and Time		
Urgent authorisation Expiry date:		Expiry time:		
<i>Remember the 72 hour rule for urgent authorities – check Code of Practice.</i>	e.g. authorisation granted at 5pm on June 1 st expires 4.59pm on 4 th June			

**PART II OF THE REGULATION OF INVESTIGATORY
POWERS ACT (RIPA) 2000**

REVIEW OF A DIRECTED SURVEILLANCE AUTHORISATION

Public Authority	London Borough of Greenwich Town Hall Wellington Street London SE18 6PS		
Name of Applicant		Department/Division	
Full address			
Contact details			
Investigation/operation name (if applicable)			
Date of authorisation or last renewal			
Expiry date of authorisation or last renewal			
Review number			

1	Review number and dates of any previous reviews.	
	Review number	Date

2	Summary of the investigation/operation to date, including what private information has been obtained and the value of the information so far obtained.

3	Detail why it is necessary to continue with the directed surveillance.
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4	Explain how the proposed activity is still proportionate to what it seeks to achieve.
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5	Detail any incidents of collateral intrusion and the likelihood of any further incidents of collateral intrusions occurring.
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--

6	Give details of any confidential information acquired or accessed and the likelihood of acquiring confidential information.
----------	--

--

7	Applicant's details
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Name (print)		Tel No	
Grade		Date	
Signature			

8	Review officer's comments explaining why in his/her view the directed surveillance should continue. This box must be completed.

9	Authorising officer's statement.		
I, _____ hereby agree that the directed surveillance investigation/operation as detailed above [should/should not] continue [until its next review/renewal][it should be cancelled immediately].			
Name (print)		Tel No	
Grade		Date	
Signature			

10	Date of next review	
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**PART II OF THE REGULATION OF INVESTIGATORY
POWERS ACT (RIPA) 2000**

**CANCELLATION OF A
DIRECTED SURVEILLANCE AUTHORISATION**

Public Authority	London Borough of Greenwich Town Hall Wellington Street London SE18 6PS		
Name of Applicant		Department/Division	
Full address			
Contact details			
Investigation/operation name (if applicable)			

1 Explain the reasons for the cancellation of the authorisation.

2 Explain the value of surveillance in the operation.

3 Authorising officer's statement.			
I, _____ hereby authorise the cancellation of the directed surveillance operation detailed above.			
Name (print)		Tel No	
Grade		Date	

Signature	
------------------	--

4 Time and date when the authorising officer instructed the surveillance to cease.			
Time		Date	

5 Authorisation cancelled.			
Time		Date	

**PART II OF THE REGULATION OF INVESTIGATORY
POWERS ACT (RIPA) 2000**

**APPLICATION FOR RENEWAL OF A
DIRECTED SURVEILLANCE AUTHORISATION**

Public Authority	London Borough of Greenwich Town Hall Wellington Street London SE18 6PS		
Name of Applicant		Department/Division	
Full address			
Contact details			
Investigation/operation name (if applicable)			
Renewal number			

1	Renewal numbers and dates of any previous reviews.	
	Renewal number	Date

2	Detail any significant changes to the information as listed in the original authorisation as it applies at the time of the renewal.

3	Detail why it is necessary to continue with the directed surveillance.

4	Detail why the directed surveillance is still proportionate to what it seeks to achieve.
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--

5 Indicate the content and value to the investigation or operation of the information so far obtained by the directed surveillance.

--

6 Detail the results of regular reviews of the use of the investigation or operation.

--

7 Applicant's details

Name (print)		Tel No	
Grade		Date	
Signature			

8 Authorising officer's comments including whether the directed surveillance should continue. This box must be completed.

--

--

9 Authorising officer's statement.

I, _____ hereby authorise the renewal of the directed surveillance operation detailed above.

The renewal of this authorisation will last for 3 months unless further renewed in writing. This authorisation will be reviewed frequently to assess the need for the authorisation to continue.

Name (print)		Tel No	
Grade		Date	
Signature			

Date of first review	
Date of subsequent reviews of this authorisation	

**PART II OF THE REGULATION OF INVESTIGATORY
POWERS ACT (RIPA) 2000**

**APPLICATION FOR AUTHORISATION OF THE USE OR CONDUCT OF
A COVERT HUMAN INTELLIGENCE SOURCE**

Public Authority	London Borough of Greenwich Town Hall Wellington Street London SE18 6PS		
Name of Applicant		Department/Division	
Full address			
Contact details			
Investigation/operation name (if applicable)			

1	Give position of authorising officer in accordance with the Regulation of Investigatory Powers (Directed Surveillance and Covert Human Intelligence Sources) Order 2003. (Assistant Chief Officer, Assistant Head of Service, Service Manager or equivalent. Where confidential information is likely to be acquired, or where a vulnerable individual or a juvenile is to be authorised as a source, the authorising officer must be the Chief Executive or, in her absence, a Chief Officer)

2	The grounds on which the action is <u>necessary</u> under Section 29(3) of RIPA are:
For the purpose of preventing or detecting crime or of preventing disorder	

3 Explain why the use or conduct of a human intelligence source is necessary in this particular case.

4 Explain why the authorised conduct or use of a source is proportionate to what it seeks to achieve.

5 Details of the purpose for which the source will be tasked or deployed.

6 Where a specific investigation or operation is involved, details of that investigation or operation.

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7	The nature of what the source will be tasked to do.
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8	Details of the risk assessment on the security and welfare of using the source.
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9	Collateral intrusion. Indicate the potential for collateral intrusion on persons other than those targeted. Include a plan to minimise collateral intrusion.
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10 Confidential information. Indicate the likelihood of acquiring any confidential information

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11 Anticipated start

Date

Time

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12 Applicant's details

Name (print)		Tel No	
Grade		Date	
Signature			

13 Authorising officer's comments explaining why in his/her view the directed surveillance is necessary and proportionate. This box must be completed.

--

14 Authorising officer's statement.

I, _____ hereby authorise the conduct or use of a covert human intelligence source as detailed above.

This written authorisation will cease to have effect at the end of a period of 12 months unless renewed (see separate form for renewals).

This authorisation will be reviewed frequently to assess the need for the authorisation to continue.

Name (print)		Tel No	
Grade		Date	
Signature			

Date of first review	
Date of subsequent reviews	

15 Confidential information authorisation (to be given by the Chief Executive or, in her absence, by a Chief Officer).	
I, _____ hereby authorise the directed surveillance investigation/operation as detailed above in circumstances where confidential information is likely to be acquired.	
This written authorisation will cease to have effect at the end of a period of 3 months unless renewed (see separate form for renewals).	
This authorisation will be reviewed frequently to assess the need for the authorisation to continue.	

16 Urgent authorisation. Give details of why the application is urgent.			
Name (print)		Tel No	
Grade		Date	
Signature			

17 Authorising officer's statement. This must include why the authorising officer or the person entitled to act in their absence considered the case urgent			
Name (print)		Tel No	
Grade		Date and time	
Signature			

**PART II OF THE REGULATION OF INVESTIGATORY
POWERS ACT (RIPA) 2000**

**REVIEW OF A COVERT HUMAN INTELLIGENCE SOURCE
(CHIS) AUTHORISATION**

Public Authority	London Borough of Greenwich Town Hall Wellington Street London SE18 6PS		
Name of Applicant		Department/Division	
Full address			
Contact details			
Investigation/operation name (if applicable)			
Date of authorisation or last renewal			
Expiry date of authorisation or last renewal			
Review number			

1	Review number and dates of any previous reviews.	
	Review number	Date

2	Summary of the investigation/operation to date, including what information has been obtained and the value of the information so far obtained.

3 Detail why it is necessary to continue using a covert human intelligence source.

4 Explain how the proposed activity is still proportionate to what it seeks to achieve.

5 Detail any incidents of collateral intrusion and the likelihood of any further incidents of collateral intrusions occurring.

6 Give details of any confidential information acquired or accessed and the likelihood of acquiring confidential information.

--

7 Give details of the review of the risk assessment on the security and welfare of using the source

--

8 Applicant's details

Name (print)		Tel No	
Grade		Date	
Signature			

9	Review officer's comments including whether the use or conduct of the source should continue. This box must be completed.

10 Authorising officer's statement.			
I, _____ hereby agree that use or conduct of the source detailed above [should/should not] continue [until its next review/renewal][it should be cancelled immediately].			
Name (print)		Tel No	
Grade		Date	
Signature			

11	Date of next review	
-----------	----------------------------	--

**PART II OF THE REGULATION OF INVESTIGATORY
POWERS ACT (RIPA) 2000**

**CANCELLATION OF AN AUTHORISATION FOR THE USE OR
CONDUCT
OF A HUMAN INTELLIGENCE SOURCE**

Public Authority	London Borough of Greenwich Town Hall Wellington Street London SE18 6PS		
Name of Applicant		Department/Division	
Full address			
Contact details			
Investigation/operation name (if applicable)			

1	Explain the reasons for the cancellation of the authorisation.

2	Explain the value of the source in the operation.

3 Authorising officer's statement.			
I, _____ hereby authorise the cancellation of the use or conduct of the source detailed above.			
Name (print)		Tel No	
Grade		Date	
Signature			

4 Time and date when the authorising officer instructed the use of the source to cease.			
Time		Date	

5 Authorisation cancelled.			
Time		Date	

**PART II OF THE REGULATION OF INVESTIGATORY
POWERS ACT (RIPA) 2000**

**APPLICATION FOR RENEWAL OF A
COVERT HUMAN INTELLIGENCE SOURCE
(CHIS) AUTHORISATION**

Public Authority	London Borough of Greenwich Town Hall Wellington Street London SE18 6PS		
Name of Applicant		Department/Division	
Full address			
Contact details			
Investigation/operation name (if applicable)			
Renewal number			

1	Renewal numbers and dates of any previous reviews.	
	Renewal number	Date

2	Detail any significant changes to the information as listed in the previous authorisation.

3	Detail any significant changes to the information as listed in the original authorisation as it applies at the time of the renewal.

4	Detail why it is necessary to continue with the authorisation, including details of any tasking given to the source.
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5	Detail why the use or conduct of the source is still proportionate to what it seeks to achieve.
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6	Detail the use made of the source in the period since the grant of authorisation or, as the case may be, latest renewal of the authorisation.
----------	--

--

7	List the tasks given to the source during that period and the information obtained from the conduct or use of the source.
----------	--

--

8 Detail the results of regular reviews of the use of the source.

--

9 Give details of the review of the risk assessment on the security and welfare of using the source

--

10 Applicant's details

Name (print)		Tel No	
Grade		Date	
Signature			

11 Authorising officer's comments including whether the use or conduct of the source should continue. This box must be completed.

--

12 Authorising officer's statement.

--

I, _____ hereby authorise the renewal of the use or conduct of the source detailed above.

The renewal of this authorisation will last for 12 months unless further renewed in writing.

This authorisation will be reviewed frequently to assess the need for the authorisation to continue.

Name (print)		Tel No	
Grade		Date	
Signature			

Date of first review	
Date of subsequent reviews of this authorisation	

Application for judicial approval for authorisation to obtain or disclose communications data, to use a covert human intelligence source or to conduct directed surveillance. Regulation of Investigatory Powers Act 2000 sections 23A, 23B, 32A, 32B.

Local authority:.....
Local authority department:.....
Offence under investigation:.....
Address of premises or identity of subject:.....
.....
.....

Covert technique requested: (tick one and specify details)

- Communications Data
- Covert Human Intelligence Source
- Directed Surveillance

Summary of details

.....
.....
.....
.....
.....

Note: this application should be read in conjunction with the attached RIPA authorisation/RIPA application or notice.

Investigating Officer:.....
Authorising Officer/Designated Person:.....
Officer(s) appearing before JP:.....
Address of applicant department:.....
.....
Contact telephone number:.....
Contact email address (optional):.....
Local authority reference:.....
Number of pages:.....

NAFN Court Hearing Guidance

You may already be familiar with making applications to the Magistrates for orders in connection with the investigation of offences. All courts have local practices and if the practice at your local court is different you should follow the local practice.

1. Before the hearing

Read through the authorisation and the application form for Judicial Approval thoroughly. You are welcome to amend the application form supplied by NAFN but the authorisation itself should not be amended once it has been approved by the Designated Person.

Ensure you have: **The original authorisation plus one copy.**
 Two copies of the application for Judicial approval
 One copy of the Court Order form.

Be prepared to explain everything to the Magistrate – remember they may never have seen an application like this before. Try and anticipate what questions the Magistrate might ask.

Check if it is necessary for your Head of Legal Services to authorise you to appear in Court.

Make sure the Court know you are coming in advance.

2. At the hearing

You should address the Magistrate as 'Sir' or 'Ma'am'. They may be accompanied by a legal adviser who will be a lawyer. The public should not be present during the application. This is important because anything heard by the public might get back to the person you are investigating.

After introducing yourself you may be asked to swear an oath (or make an affirmation). This is a matter for the Magistrate's discretion. In general it is necessary to be sworn in if what you say is going to be treated as formal evidence. If, however, what you say is a presentation about the authorisation then it is not strictly necessary for you to be sworn in. Leave this to the Magistrate. If you are asked to swear an oath you can choose to affirm

instead if you object to swearing on the Bible/Holy book. Legally there is no difference between an oath or an affirmation. It is a matter of your own personal preference/religious belief. Magistrates should be able to accommodate all religious requirements.

The Magistrate may not be familiar with RIPA. It is helpful if you offer to talk them through the application, or the entire authorisation. The Magistrate may not find this necessary but they will generally appreciate the offer.

3. If everything goes well

Ask the Magistrate to sign the order. You need to keep the original authorisation and the original signed order. The Magistrate keeps a copy of everything for the Court records. Ensure that the scanned signed application form and order are returned to NAFN.

4. If the Magistrate is not happy to approve the authorisation

In most cases it is likely that the Magistrate will be happy to approve the authorisation.

However, if the Magistrate is not happy to authorise try to get as much information as possible as to why. It might be helpful to ask them if there is any further information which can be provided in support to help persuade them in future. You cannot amend the authorisation without getting it approved again by the Designated Person, but you can amend the application for Judicial approval. You can also provide further evidence to the Magistrate outside the application – if they agree to this.

If the Magistrate considers quashing the authorisation they must adjourn the application for at least two working days to give you a chance to make further representations. Although this isn't in RIPA, it is a strict legal requirement in the Criminal Procedure Rules (rule 6.28).

Whatever the outcome you should take the original authorisation with you when you leave.

5. Need further advice

If you are not sure of what to do next or need further advice contact NAFN who will be able to assist and direct your query accordingly.

NAFN UK North NAFN UK South

Telephone: 0161 342 3727 Telephone: 01273 291322

Email: spoc@nafn.scn.gov.uk Email: spoc@nafn.scn.gov.uk

Appendix 3

Specimen Directed Surveillance application form

Part II of the Regulation of Investigatory Powers Act 2000

Authorisation Directed Surveillance

Sample Form with Notes To Assist Completion

This form is to be completed by an officer of the local authority seeking authorisation to carry out Directed Surveillance. If granted, authorisation will last for a period of up to three months.

Code of Practice: References to the “Code” or “Code of Practice” are to the RIPA Covert Surveillance Code of Practice.

Unique Reference Number (URN): This is a reference unique to each individual form but which also allows the form to be matched with other forms in the same investigation or which are issued by the same department. The idea is that, during an OSC inspection, the inspector can see which forms relate to each other. A URN also allows the form relating to each investigation to be kept together in the Central Record. Some organisations devise a URN which comprises of the year, department initials, applicant initials and investigation number. There are no hard and fast rules.

Public Authority (including full address)			
Name of Applicant		Unit/Branch /Division	
Full Address			
Contact Details			

Investigation/Operation Name (if applicable)	
Investigating Officer (if a person other than the applicant)	

DETAILS OF APPLICATION
1. Give rank or position of authorising officer in accordance with the Regulation of Investigatory Powers (Directed Surveillance and Covert Human Intelligence Sources) Order 2003; No. 3171. ¹
<p>Insert the name and position of the Authorising Officer. This is the person who will decide whether or not Directed Surveillance should be authorised and he/she will countersign this form.</p>
2. Describe the purpose of the specific operation or investigation.
<p><i>For example:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> To investigate acts of crime or disorder e.g. racially aggravated criminal damage and racist verbal abuse <input type="checkbox"/> To investigate and gather evidence of a potential benefit fraud <input type="checkbox"/> To investigate instances of illegal dumping of waste <p><i>If possible, include the relevant legislation that would be used to prosecute offenders and/or which gives you the power/duty to investigate the matter</i></p>
3. Describe in detail the surveillance operation to be authorised and expected duration, including any premises, vehicles or equipment (e.g. camera, binoculars, recorder) that may be used.
<p><i>The key phrase here is "in detail." Therefore a response, which merely states, "Video camera and recording equipment will be installed at a fixed point", will not be adequate.</i></p> <p><i>Your statement here needs to include what is going to be done, who is going to do it, when they are going to do it, where they are going to do it and how they are going to do it. Other points to address here include:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> How long will the surveillance last? <input type="checkbox"/> Specific details about dates and times i.e. is it 24/7, at specific times of the day or at random times? <input type="checkbox"/> Which premises are to be used and/or targeted? <input type="checkbox"/> Which vehicles are to be used? Are they public or private? <input type="checkbox"/> What type of equipment is to be used? <p><i>Note that, if the Authorising Officer approves this surveillance, your authorisation will only cover you to do what you have stated here (subject to any amendments made by the Authorising Officer in box 12). Consequently you can only rely on section 27 "the RIPA Shield/Defence" only in so far as you were undertaking the activities set out in this section (as amended). Therefore it pays to include lots of detail.</i></p>
4. The identities, where known, of those to be subject of the directed surveillance.
<ul style="list-style-type: none"> <input type="checkbox"/> Name: <input type="checkbox"/> Address: <input type="checkbox"/> DOB: <input type="checkbox"/> Other information as appropriate: <p><i>Include as much information as you have. If you do not know the identity say so. Other information could include a general description of the possible target(s).</i></p>
5. Explain the information that it is desired to obtain as a result of the directed surveillance.

¹ For local authorities: The exact position of the authorising officer should be given. For example, Head of Trading Standards.

Your statement here should be more detailed than in Box 2. You should give details of the precise information sought by doing the surveillance. For example:

- To ascertain what time the suspect enters and leaves the building
- Or to capture images of the perpetrators of anti social behaviour at (place/address)
- To find out who is delivering the goods to the suspect's premises etc (place/address)

6. Identify on which grounds the directed surveillance is necessary under Section 28(3) of RIPA. Delete those that are inapplicable. Ensure that you know which of these grounds you are entitled to rely on.(SI 2003 No.3171)

~~In the interests of national security;~~

For the purpose of preventing or detecting crime or of preventing disorder;

~~In the interests of the economic well being of the United Kingdom;~~

~~In the interests of public safety;~~

~~for the purpose of protecting public health;~~

~~for the purpose of assessing or collecting any tax, duty, levy or other imposition, contribution or charge payable to a government department;~~

Since 5th January 2004, local authorities can only authorise Directed Surveillance for the purpose of preventing or detecting crime or of preventing disorder.

Therefore all other grounds should be deleted.

7. Explain why this directed surveillance is necessary on the grounds you have identified [Code paragraph 2.4]

State why Directed Surveillance is needed to obtain the information that is sought.

The most important question to address is – why is it necessary to use covert surveillance?

How will doing the Directed Surveillance lead to prevention or detection of crime or prevention of disorder? Factors to include will be:

- The offence or disorder you are investigating
- Seriousness of the offence
- Impact on victims
- What other means you have tried/considered to obtain the information and why are those impracticable

8. Supply details of any potential collateral intrusion and why the intrusion is unavoidable. [Bear in mind Code paragraphs 2.6 to 2.10.]

Describe precautions you will take to minimise collateral intrusion

When doing Directed Surveillance you may be invading the privacy of those who are not your target e.g. third parties, passers by etc. RIPA requires you to think about their rights and what you can do to minimise the impact on them of your surveillance.

Paragraph 2.6 of the Code of Practice states:

“Before authorising surveillance the authorising officer should also take into account the risk of intrusion into the privacy of persons other than those who are directly the subjects of the investigation or operation (collateral intrusion). Measures should be taken, wherever practicable, to avoid or minimise unnecessary intrusion into the lives of those not directly connected with the investigation or operation”.

People who may be the subject of collateral intrusion include:

- Customers or workers at a business premises
- Visitors to a property
- Friends or relatives of the suspect

Firstly, identify here who else may be caught by the surveillance.

Secondly, state why it is unavoidable. This could be because of the nature of the premises (e.g. restaurant) or because of what the person is doing (e.g. visiting other subject/target premises) that there will always be third parties around who will be captured on film or whose activities will be recorded/observed in some way.

Thirdly set out what steps you have taken to minimise collateral intrusion. This may include:

- Using a still camera as opposed to a video camera
- If installing hidden cameras, only switching them on at specific times rather than all the time
- Narrowing the field of vision or the place where the cameras are cited
- Reducing the amount of surveillance done at busy times e.g. shops or places of worship

If you cannot minimise collateral intrusion you still need to show you have considered it. You may wish to add that you cannot do anything to minimise it but you will not be making any decisions on the information gathered about third parties unless it shows them committing a criminal offence.

9. Explain why this directed surveillance is proportionate to what it seeks to achieve. How intrusive might it be on the subject of surveillance or on others? And why is this intrusion outweighed by the need for surveillance in operational terms or can the evidence be obtained by any other means? [Code paragraph 2.5]

Paragraph 2.6 of the Code of Practice states:

“This involves balancing the intrusiveness of the activity on the target and others who might be affected by it against the need for the activity in operational terms. The activity will not be proportionate if it is excessive in the circumstances of the case or if the information which is sought could reasonably be obtained by other less intrusive means. All such activity should be carefully managed to meet the objective in question and must not be arbitrary or unfair”.

This requires you to justify the need for the surveillance and the methods used and balance those with the impact on the privacy of the subject. The DCA guide on Human Rights (page 55) states:

“When taking decisions that may affect any of the qualified rights, a public authority must interfere with the right as little as possible only going as far as is necessary to achieve the desired aim.”

To demonstrate proportionality you must consider the following elements,

Is this use proposed use proportionate

- To the seriousness of the offence or the mischief**
- To the degree of intrusion on the target and other people**
- Have other overt means been considered and discounted**

the following issues must be addressed here

- Can you get information using less intrusive means/other methods?
- What other means have you tried?
- What have you done to try and lessen the impact on the target? Factors to set out include:
 - Amount of information to be gathered during the surveillance
 - Impact of surveillance on the subject

- Timing of the surveillance

At the same time, the above must be balanced with the need for the activity in operational terms. To demonstrate this balance you should set out:

- What you are seeking to achieve?
- Seriousness of the offence
- Impact of the offence on the victims, others/wider community and on the public purse

10. Confidential information. [Code paragraphs 3.1 to 3.12]

INDICATE THE LIKELIHOOD OF ACQUIRING ANY CONFIDENTIAL INFORMATION:

This is defined in the Code of Practice as communication involving confidential personal information (including health and religious counselling information), confidential journalistic material or communications subject to legal professional privilege.

Local authorities are unlikely to come across the kind of information during routine surveillance operations. However you have to be alive to the possibility and add include wording here to show how you have thought about it. For example, where you will be following someone who may end up at a church, mosque or doctor’s surgery.

Note that in cases where you will be obtaining confidential information, the authorisation has to be granted by the Chief Executive or, in his/her absence, a chief officer.

11. Applicant’s Details.

Name (print)		Tel No:	
Grade/Rank		Date	
Signature			

12. Authorising Officer's Statement. [Spell out the “5 Ws” - Who; What; Where; When; Why and HOW- in this and the following box.]

I hereby authorise directed surveillance defined as follows: [Why is the surveillance necessary, whom is the surveillance directed against, Where and When will it take place, What surveillance activity/equipment is sanctioned, How is it to be achieved?]

This section is for the Authorising Officer to complete. It should not be pre completed by the investigating officer. Sufficient detail must be included here to demonstrate that he/she has considered thoroughly. Reference can be made to the boxes above but “cut and paste” should be avoided.

The five “Ws” stated above must be addressed in detail. This is important so that investigating officers are clear as to what they can and cannot do and the means that they can adopt. The Authorising Officer should not be afraid to reject the application if it lacks clarity or detail.

--

13. Explain why you believe the directed surveillance is necessary. [Code paragraph 2.4]
Explain why you believe the directed surveillance to be proportionate to what is sought to be achieved by carrying it out. [Code paragraph 2.5]

You may refer to box 7 and 9 when completing this section. You can also add any additional factors you have considered. However, to demonstrate that you have given the issues due to thought, if it important not to cut and paste that wording or to just state "see box 7 and 9".

14. (Confidential Information Authorisation.) Supply detail demonstrating compliance with Code paragraphs 3.1 to 3.12

This box should only be completed if you are likely to obtain Confidential Information (see box 10) through Direct Surveillance.

Date of first review	
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Programme for subsequent reviews of this authorisation: [Code paragraph 4.22]. Only complete this box if review dates after first review are known. If not or inappropriate to set additional review dates then leave blank.

Regular reviews are stressed by the Code of Practice. Where a surveillance operation is going to last more than one month then, the Surveillance Commissioners have suggested, there should be at least a review once a month. Shorter or time limited operations may not require a review.

During a review consideration will have to be given to whether the surveillance is still necessary and proportionate. A standard form is available to record the review.

Name (Print)		Grade / Rank	
Signature		Date and time	
Expiry date and time [e.g.: authorisation granted on 1 April 2005 - expires on 30 June 2005, 23.59]			

15. Urgent Authorisation [Code paragraphs 4.17 and 4.18]: Authorising officer: explain why you considered the case so urgent that an oral instead of a written authorisation was given.

Paragraph 4.13 of the Code of Practice states:

“A case is not normally to be regarded as urgent unless the time that would elapse before the authorising officer was available to grant the authorisation would, in the judgement of the person giving the authorisation, be likely to endanger life or jeopardise the investigation or operation for which the authorisation was being given. An authorisation is not to be regarded as urgent where the need to for an authorisation has been neglected or the urgency is of the authorising officer’s own making.”

In urgent cases this section still has to be completed as soon as reasonably practicable. It will be rare for a local authority to be able to claim that an authorisation was so urgent that it had to be obtained verbally.

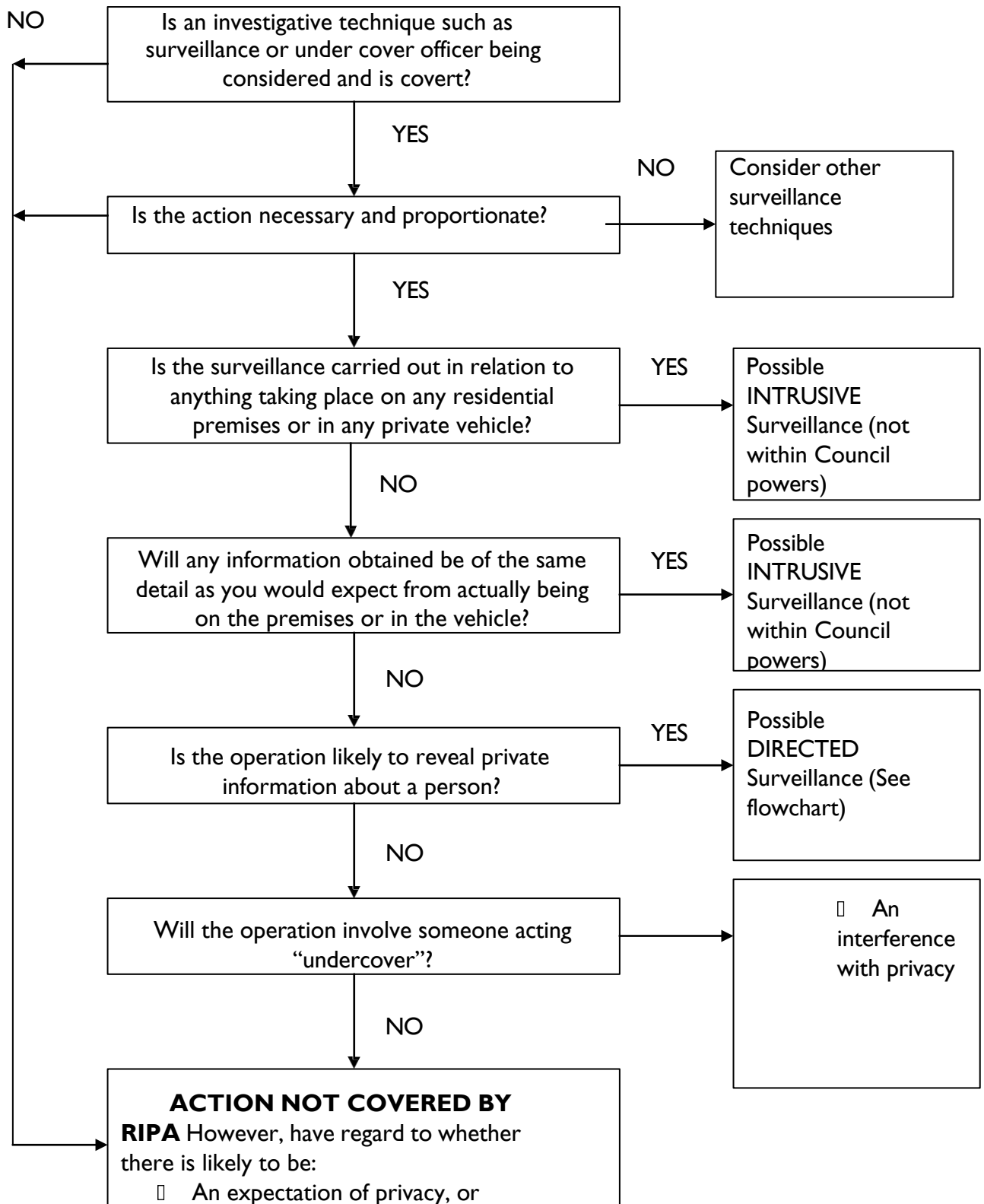
16. If you are only entitled to act in urgent cases: explain why it was not reasonably practicable for the application to be considered by a fully qualified authorising officer

This section is only to be completed where an urgent verbal authorisation was given by an Authorising Officer only entitled to act in urgent cases. This will usually not be appropriate for local authorities.

Name (Print)		Grade/ Rank		
Signature		Date and Time		
Urgent authorisation Expiry date:		Expiry time:		
Remember the 72 hour rule for urgent authorities – check Code of Practice.	e.g. authorisation granted at 5pm on June 1 st expires 4.59pm on 4 th June			

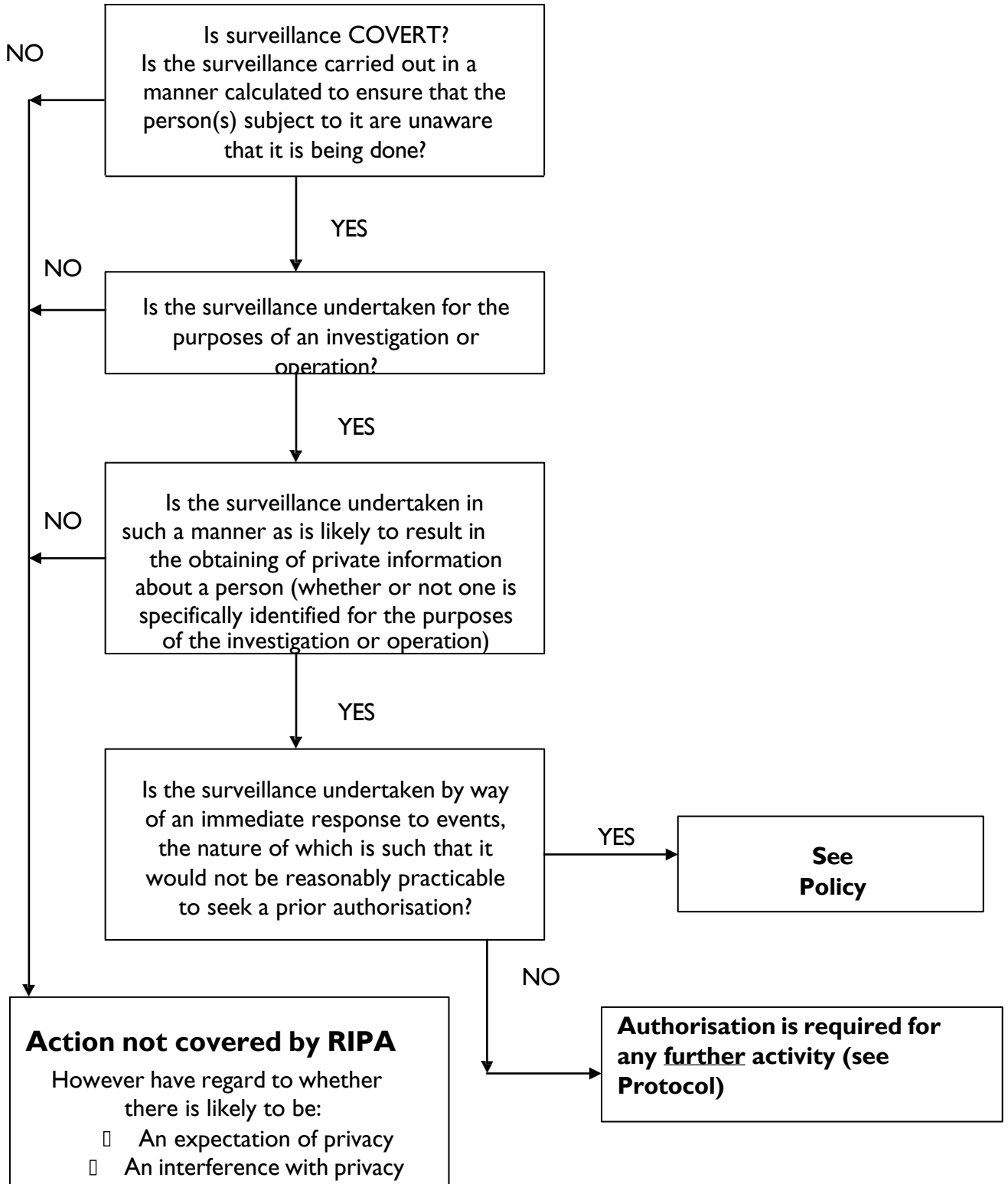
Appendix 4

TABLE I FLOW CHART - IS AUTHORISATION REQUIRED?

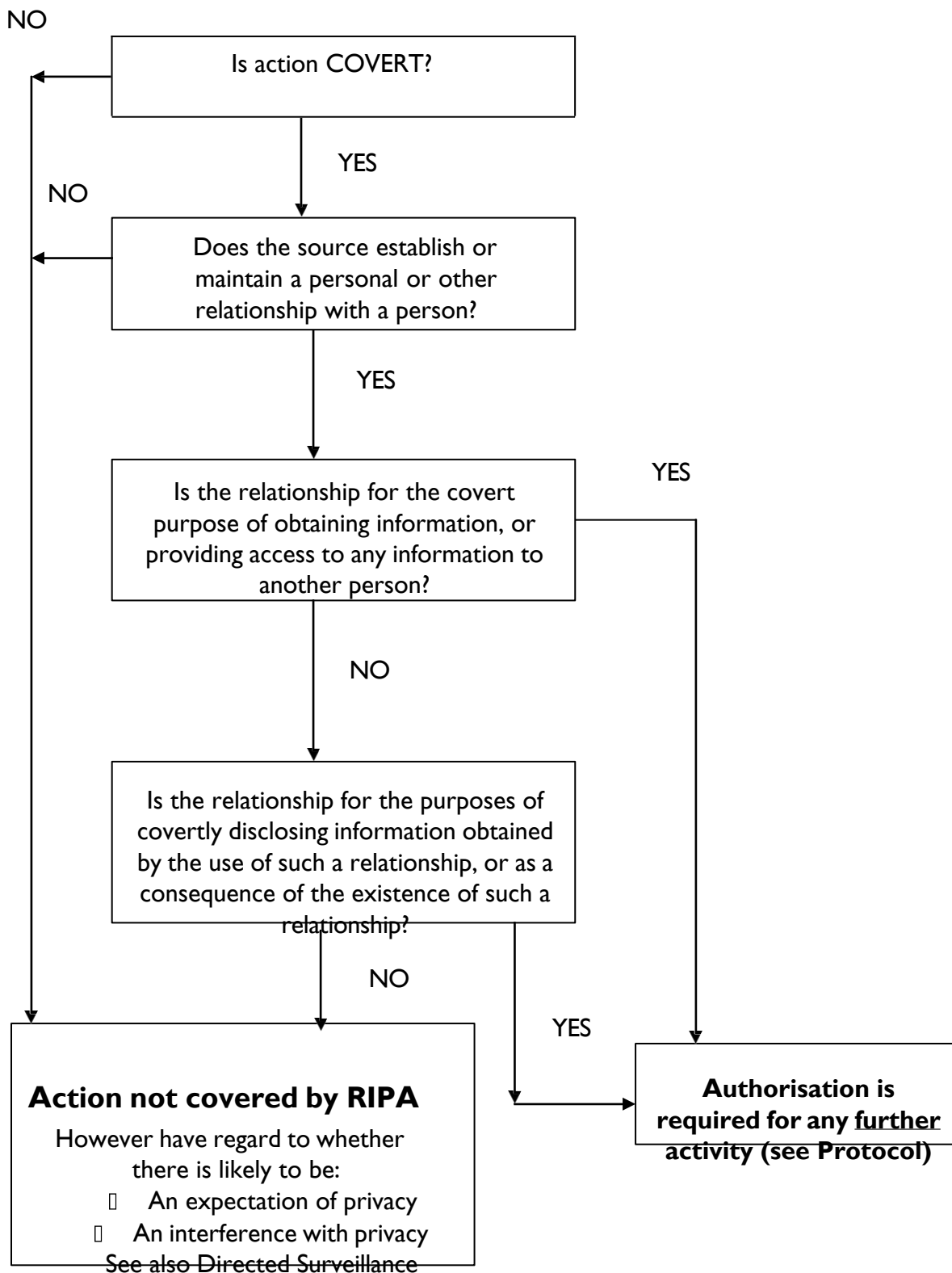


YES Possible COVERT HUMAN INTELLIGENCE
SOURCE (CHIS) Surveillance
(See flowchart)

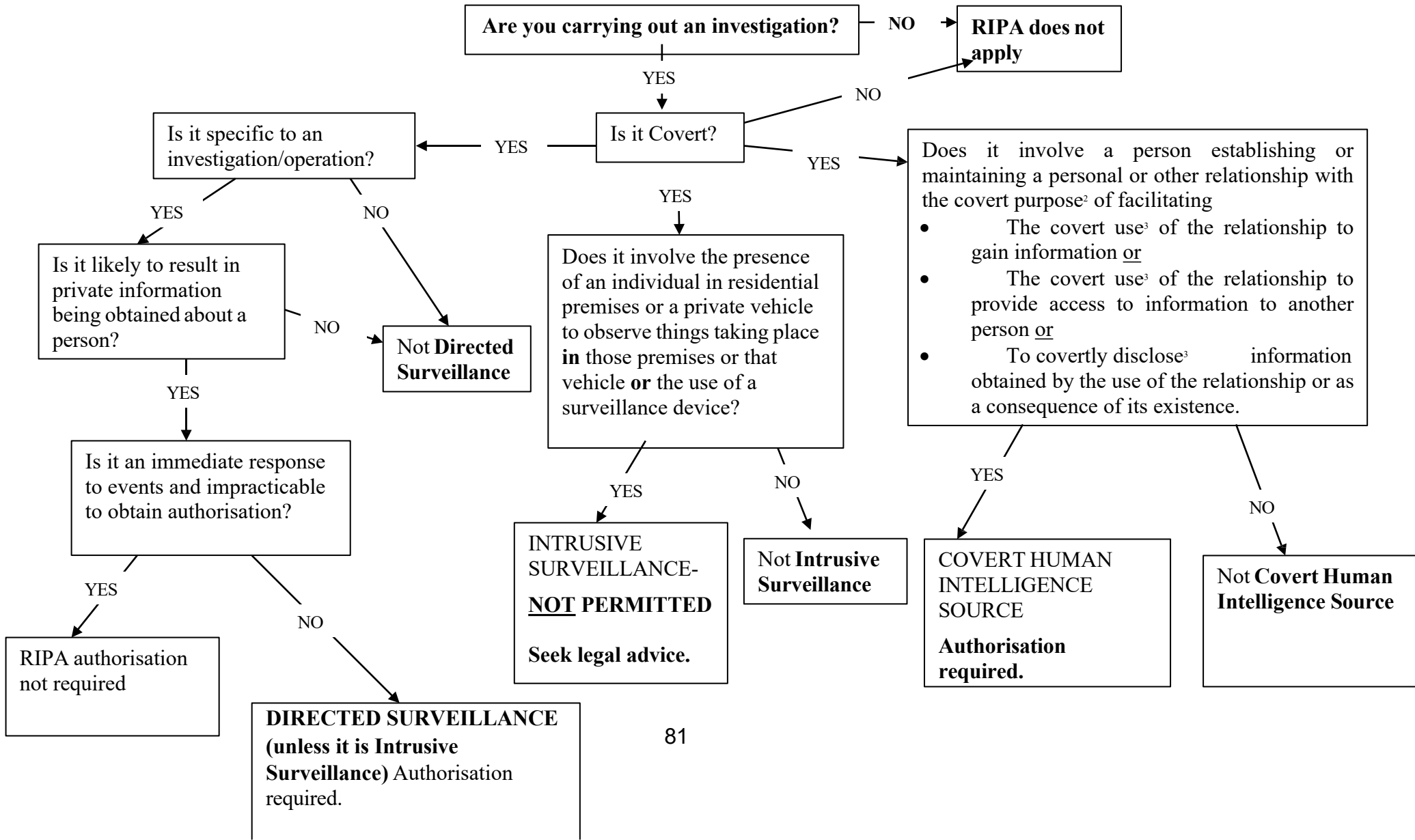
DIRECTED SURVEILLANCE



COVERT HUMAN INTELLIGENCE SOURCES



RIPA 2000 - Do you need Authorisation?



HOUSING AND NEIGHBOURHOODS SCRUTINY PANEL	DATE 10 April 2025	ITEM NO 6
SUBJECT Grounds Maintenance and Refuse	WARD (S) All	
CHIEF OFFICER Director of Communities Environment and Central	CABINET MEMBER	
DECISION CLASSIFICATION Scrutiny Report	IS THE FINAL DECISION ON THE RECOMMENDATIONS IN THIS REPORT TO BE MADE AT THIS MEETING? There are no recommendations requiring decisions	

SECTION I

1. Recommendations to decision maker:

- 1.1 To consider this Grounds Maintenance and Refuse Report and make recommendations to the Executive, if necessary.
- 1.2 To agree that where appropriate, the report and any recommendations be submitted to the Chief Executive.
- 1.3 To note that where possible, the report and responses to the recommendations be presented at the next meeting of the Panel.

2. Links to Our Greenwich Missions

- 2.1 This report relates to the Council's agreed missions as follows:

Mission 6 - People in Greenwich have access to a safe and secure home that meets their needs

Mission 9 - Neighbourhoods are vibrant, safe and attractive with community services that meet the needs of local residents

Mission 10 – Greenwich plays an active role in tackling the climate crisis and improving environmental sustainability, in line with our commitment of being carbon neutral by 2030

3. Purpose of Report and Executive Summary

- 3.1 This report was commissioned as part of the Housing and Neighbourhoods Scrutiny Panel’s 2024-2025 work programme to receive an update on the Grounds Maintenance and Refuse.
- 3.2 The commissioned brief for the report was as follows:
- To provide an update on grounds maintenance and refuse, including Current situation, approach, challenges and initiatives.

SECTION 2

4. The Report

- 4.1 The purpose of this report is to provide an update on grounds maintenance and refuse collections on RBG Housing estates within the Borough, including the current situation and approach in terms of service provision, the challenges faced by the services and initiatives that are currently underway in an effort to address some of the challenges being experienced.
- 4.2 **Grounds Maintenance – Background**
- 4.2.1 The Parks, Estates and Open Spaces (PEOS), estates grounds maintenance teams, carry out the maintenance of the soft landscaping across RBG Housing Estates in the Borough. References within this report to “estates” and “tenants” relate to RBG Housing Estates in the Borough.
- 4.2.2 The grounds maintenance teams are organised across three geographic operational areas, East, West and South, and work between 7.30am and 3.30pm, Monday to Friday.
- 4.2.3 The teams carry out a range of works on each estate including, grass cutting, strimming, edging, shrub, hedge and rose bed maintenance and leaf clearing. Keeping the soft landscape areas clear of litter is

undertaken by colleagues in the caretaking teams but the grounds maintenance staff will clear litter from grass areas prior to them being cut.

4.2.4 The frequency of the works is as follows:

Task	Frequency	When
Grass cutting	Every 3 weeks	March – October
Strimming	Every 3 weeks	March – October
Shrub base maintenance	Twice per annum	January & August
Shrub cutting	Twice per annum	January & August
Hedge base maintenance	Twice per annum	January & August
Hedge cutting	Twice per annum	January & August
Rose bed maintenance	Twice per annum	January & August
Rose pruning	Twice per annum	January & August
Leaf clearance	Monthly	November - January

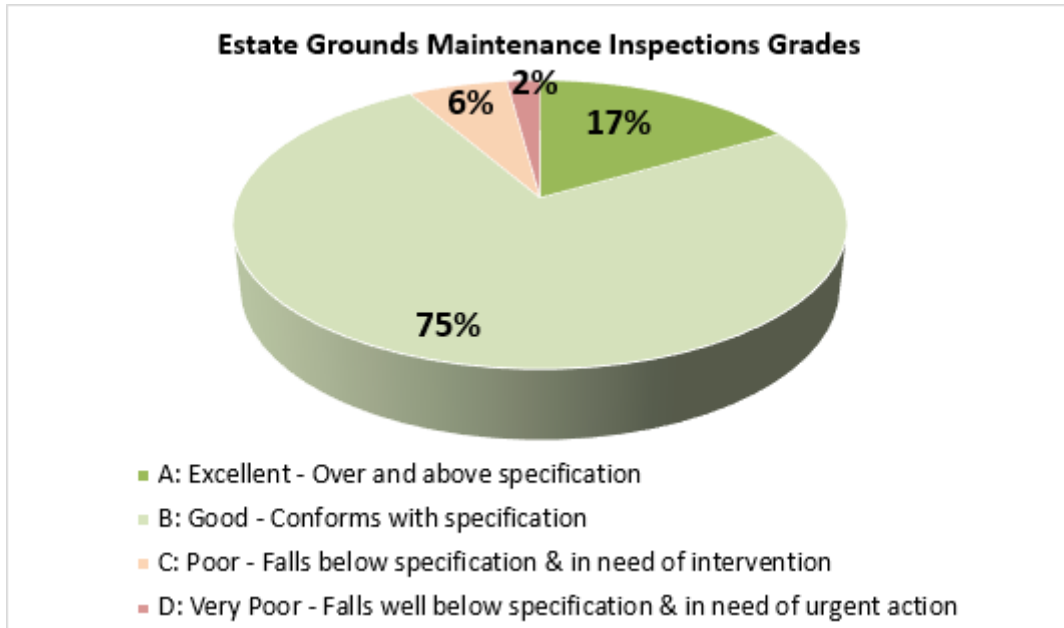
4.2.5 Occasionally, ad-hoc works are arranged outside the programme of work, for example an additional prune of a shrub area that may be obstructing a path or access point.

4.2.6 All works are risk assessed, and all substances used are assessed according to the Control of Substances Hazard to Health Regulations.

4.2.7 Appropriate PPE is issued to staff and staff wear corporate clothing, so they are identifiable as RBG workers when working on estates.

4.2.8 PEOS use the Good Parks for London Quality Inspection regime to check on the quality of work undertaken. Random quality checks are carried out on works undertaken and corrective action taken if needed.

4.2.9 The results of the work quality inspections are shown in the chart below for the period 01/03/24 to 28/02/25:



4.2.10 The PEOS vehicle fleet have Bronze Fleet Operators Recognition Scheme (FORS) accreditation, which confirms that we employ good practice and comply with the requirements laid out by the FORS Standard. This includes demonstrating dedication to driver and vehicle safety, combined with improving operating practices through effective monitoring of fuel and tyre usage.

4.2.11 Green Waste generated from grounds maintenance activities is taken to the PEOS Holbrooke Yard and is left to decompose and is then screened, shredded and used as mulch on Estates and Parks shrub beds.

4.3 Grounds Maintenance – Challenges

No.	Challenge	Impact	Actions Taken
1	Prolonged or heavy wet weather	<ul style="list-style-type: none"> Very wet or waterlogged ground conditions means areas can't be cut 	<ul style="list-style-type: none"> Works rescheduled when grounds conditions have improved
2	Building maintenance	<ul style="list-style-type: none"> Scaffolding can restrict or prevent areas being maintained Building materials/ equipment left on grass areas can damage mowers 	<ul style="list-style-type: none"> Works rescheduled when works complete Areas inspected before cutting/equipm

			ent repaired if damaged
3	Fly tipping	<ul style="list-style-type: none"> Fly tipping on areas can mean works can't be undertaken 	<ul style="list-style-type: none"> Report to colleagues in caretaking for removal Reschedule work
4	Staffing turnover	<ul style="list-style-type: none"> Temporarily reduced staffing levels 	<ul style="list-style-type: none"> Staff recruited once authorised

4.4 Grounds Maintenance – Initiatives

No.	Initiative	Impact	Progress
1	Fleet renewal programme – 6 new ride-on mowers	<ul style="list-style-type: none"> Maintain service standards Improved fuel efficiency Reduced emissions 	<ul style="list-style-type: none"> Mowers purchased and delivered and will be in operational use early in the new mowing season
2	Review 2025/26 equipment budget to replace near end of life 2 stoke hand-held equipment with electric	<ul style="list-style-type: none"> Supports the Council's Carbon Neutral Plan No emissions at point of use Reduced noise levels from electric machinery 	<ul style="list-style-type: none"> Planned to be undertaken in the first half of 2025/26
3	Improved communication and joint working with caretaking	<ul style="list-style-type: none"> Co-ordinated service delivery leading to 	<ul style="list-style-type: none"> On-going

		improved service for residents	
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4.5 Waste Collections - Background

4.5.1 Street Services carry out the waste and recycling collections to domestic properties and some business across the borough. This includes collections from around 25,000 properties comprising RBG Housing homes and leaseholder properties and approximately 3,150 communal bins.

4.5.2 Street Services provides weekly collections for recycling and garden & food waste from houses and fortnightly general waste, including houses on estates. Recycling collections take place in the morning and general waste collections in the afternoon. Communal blocks receive a weekly collection of recycling and a minimum of one general waste collection per week, depending on the size of the block and the bin storage space.

4.5.3 House to house waste collections are scheduled in geographical areas, as follows:-

- Monday – Greenwich, Charlton (parts)
- Tuesday – Blackheath, Kidbrooke
- Wednesday – Eltham, New Eltham
- Thursday – Plumstead (parts, Woolwich, Charlton (parts)
- Friday – Abbey Wood, Thamesmead, Plumstead (parts)

Communal collections are scheduled according to area and frequency of collections required.

4.5.4 Street Services does not collect Housing-specific performance data as communal collection rounds contain both Housing and private blocks. The same applies to house-to-house collections. However, missed collection data remains consistently low. The service KPI for missed collections is 0.058% (58 uncollected bins per 100,000 collections). The service carries out over 860,000 collections per month and reported missed collections since April 2024 have ranged on average between 250-350 (0.025-0.035%) which is positively below the KPI.

4.5.5 In respect of communal missed collections, Caretaking Services has recorded the number of missed collections reported to Street Services for the past 3 years:-

- 2022/23 - 1366
- 2023/24 - 1363
- 2024/25 - 910 (As of 13th March 2025)

The trend shows an improvement year on year, and this is as a result of the partnership working between the operational teams in both services.

4.5.6 Street Services carried out around 3,800 bulky collections from Council houses in 2024. Unlike residents in private houses, housing tenants do not pay directly for the bulky collections, so the cost is covered in the service charge. Bulky collections from communal blocks are carried out by Caretaking Services.

4.5.7 A small team of Waste & Streets Advisors engage with residents across the borough, including on Council estates to encourage recycling and to help maximise the benefits of the waste and recycling services available to them. This includes door-knocking, attending residents' meetings and providing advice and support on waste related issues to other Council services, including Caretaking.

4.5.8 A small team of Enviro-Crime Enforcement Officers also provide support in dealing with incidents of fly-tipping on RBG housing estates where the perpetrators normally drive onto the estate to dump their waste illegally. There are a number of CCTV cameras that have been sited on Council estates in an effort to catch the offenders. This provides a good source of evidence when it comes to taking enforcement action.

4.5.9 From April 2026 as part of the Government's 'Simpler Recycling' changes, all properties in Royal Greenwich will need to receive separate food waste collections. This will mean that the c.25,000 Council estate properties will need to have food waste bins installed. This is anticipated to be challenging due to the layout and bins storage on estates not being built to cater for waste separation.

4.6 **Waste Collections – Challenges**

Street Services faces a number of challenges generally in terms of waste collections and encouraging separation for recycling and positive behaviours in terms of waste management generally, including on Council estates.

The team works closely with colleagues in Tenancy Services and Caretaking in particular, in an effort to address these and ensure that service provision is maintained and disruption to residents kept to a minimum.

No.	Challenge	Impact	Actions Taken
1	Low resident engagement in recycling	<ul style="list-style-type: none"> • Low recycling rate • Contaminated bins • High cost of residual waste disposal • Reduced accessibility to communal recycling facilities 	<ul style="list-style-type: none"> • Improvement of some bin infrastructure (e.g. comms, padlocks) • In person engagement from Waste Advisor • Reviewed bin infrastructure on Barnfield Estate
2	Contaminated communal recycling bins	<ul style="list-style-type: none"> • Lower recycling rate • Bins removed if contamination is persistently high (clear sacks offered to those who want to continue to recycle) • Resident disenfranchisement with recycling • Missed collections • Impact on local community • Reputation of service 	<ul style="list-style-type: none"> • High security level padlock for communal recycling bins • Waste Advisor engagement • Plan for update to EMS

		<ul style="list-style-type: none"> • Increase in casework/complaints 	
3	Access issues (eg; inconsiderately parked vehicles, bin store blocked by fly-tipping)	<ul style="list-style-type: none"> • Missed collections • Inefficient waste collection service • Impact on local community • Reputation of service • Increase in casework • Environmental impact due to additional vehicle having to return 	<ul style="list-style-type: none"> • Articles in Talk Housing • Windscreen notice cards for crews to leave on offending vehicles • Closer liaison with Housing Tenancy, Highways around yellow lines, CPZ's • Improved partnership working between Caretaking & Enviro-Crime Team to investigate and remove fly-tips
4	Stolen communal bins	<ul style="list-style-type: none"> • Inconvenience to residents through reduced capacity for waste disposal whilst waiting for replacement bins to be provided • Negative impact to the public realm due to uncontained dumped waste • Additional cost to Housing for replacement bin 	<ul style="list-style-type: none"> • Incidents reported to Police • Caretakers stencilling bins with RBG ownership markings

5	Rubble fly-tipped within communal bins	<ul style="list-style-type: none"> • Caretakers and collection crews unable to move bins • Inconvenience to residents as bin capacity is reduced for a period of time 	<ul style="list-style-type: none"> • Specialist vehicle required to remove entire bin and contents - at additional cost to the Council
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4.7 Waste Collections - Initiatives

Street Services continues to work with Caretaking and Tenancy Services on a number of issues to improve waste management on Council housing estates and to address other wider issues that impact on our crews' ability to carry out the collections efficiently as well as the wider cleanliness of the local community.

No.	Initiative	Impact	Progress
1	Partnership working with Caretaking colleagues	<ul style="list-style-type: none"> • Improvement in the capture of fly-tipping offenders on estates • Joined up approach to dealing with and resolving missed communal collections on Council housing estates 	<ul style="list-style-type: none"> • CCTV cameras located on Housing estates with successful prosecutions • Close liaison between waste and caretaking teams has improved communication and the efficiency in dealing with communal collection issues on Council housing estates
2	Need for behavioural change	<ul style="list-style-type: none"> • Improved local environment for residents with 	

		<p>reduction in fly-tipping</p> <ul style="list-style-type: none"> • Improved participation in and quality of recycling material which will contribute positively to the Council's recycling performance • Creation of a sense of civic pride 	
3	<p>Statutory services changes imposed by central Government – separate food waste collections for residents in flats (implementation around November 2025)</p>	<ul style="list-style-type: none"> • Additional communal bins will need to be provided on estates to collect separated food waste where space for bin storage can be limited • Levels of contamination are expected to be high 	<ul style="list-style-type: none"> • Early engagement with Tenancy and Caretaking colleagues to discuss impact and ways to accommodate • Early engagement to let them know of the imminent service change and to be prepared

5. **Consultation**

5.1 There is no requirement to consult on the issues raised in this report and none has been undertaken.

6. **Next Steps**

6.1 The Chair will set out closing remarks and make recommendations to the relevant decision maker as required at the meeting and these will be

published as an appendix. The Relevant decision maker will respond to the recommendations in a separate published appendix and both will be brought back to the next meeting of the Committee/Panel.

7. Cross-Cutting Issues and Implications

<p>Legal including Human Rights Act</p>	<p>The Scrutiny Panel is requested to note the contents of this report which provides an update on grounds maintenance and refuse collections on Council housing estates within the Borough.</p> <p>There are no direct legal implications arising from this report.</p>	<p>Eleanor Penn, Assistant Head of Legal Services (Planning & Procurement), 21st March 2025</p>
<p>Finance and other resources</p>	<p><i>This report makes the following recommendations to the Housing & Neighbourhoods Scrutiny Panel:</i></p> <ul style="list-style-type: none"> • <i>To consider the Grounds Maintenance and Refuse Report and make recommendations to the Executive, if necessary.</i> • <i>To agree that where appropriate, the report and any recommendations be submitted to the Chief Executive.</i> • <i>To note that where possible, the report and responses to the recommendations be presented at the next meeting of the Panel.</i> 	<p>Joanne Stark Head of Accounting & Business Change 17/03/2025</p>
<p>Equalities</p>	<p>The decisions recommended through this paper have a remote or low relevance to the substance of the</p>	<p>Jo Oliver, Head of Street</p>

	<p>Equality Act. There is no apparent equality impact on end users.</p> <p>This report does not make a contribution to the Council's Equality and Equity Charter and the Council's Equality Objectives 2020-2024.</p>	<p>Services, 12/03/2025</p>
Climate change	<p>This report makes a small contribution to the Greenwich Carbon Neutral Plan agreed by Cabinet on 18 November 2020 through transition from two-stroke handheld grounds maintenance machinery to electric.</p>	<p>Jo Oliver, Head of Street Services, 12/03/2025</p>
Community Engagement	<p>No community engagement has taken place in relation to this report, which provides an update to the Housing and Neighbourhoods Scrutiny Panel on Grounds Maintenance and Refuse.</p>	<p>Jo Oliver, Head of Street Services, 12/03/2025</p>

8 . **Report Appendices**

8.1 Appendices:-

- None.

8.2 The following documents will be published after the meeting:-

- *Appendix (): Recommendations of the Overview & Scrutiny Committee*
- *Appendix (): Response to the recommendations of the Overview & Scrutiny Committee*

9. **Background Papers**

There are no background papers.

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HOUSING AND NEIGHBOURHOODS SCRUTINY PANEL	DATE 10 April 2025	ITEM NO
SUBJECT Responsive Repairs and Empty Homes Update	WARD (S) All	
CHIEF OFFICER Director of Housing and Safer Communities	CABINET MEMBER Housing Management, Neighbourhoods and Homelessness	
DECISION CLASSIFICATION Non-exempt Non-key	IS THE FINAL DECISION ON THE RECOMMENDATIONS IN THIS REPORT TO BE MADE AT THIS MEETING?	

SECTION I

1. Recommendations to decision maker:

- 1.1 To consider the Repairs Update Report and make recommendations to the Executive, if necessary.
- 1.2 To agree that where appropriate, the report and any recommendations be submitted to the Chief Executive.
- 1.3 To note that where possible, the report and responses to the recommendations be presented at the next meeting of the Panel.

2. Links to Our Greenwich Missions

- 2.1 This report relates to the Council's agreed missions as follows:
 - Mission 6 - People in Greenwich have access to a safe and secure home that meets their needs
- 2.2 By providing an improved repairs service we increase tenants and residents satisfaction with the homes they live in.

3. Purpose of Report and Executive Summary

3.1 This report was commissioned as part of the Housing and Neighbourhoods Scrutiny Panel's 2024-2025 work programme to receive an update on the Repairs.

3.2 The commissioned brief for the report was as follows:

- To provide an update on practices, approach and efficiency of repairs across the borough, steps being taken to improve retail quality, speed and responsiveness across the Royal Borough of Greenwich.

4. Repairs Service Update

4.1 The Responsive Repairs and Voids Team have seen significant operational changes over the previous 3 years which has seen restructuring of the teams, new ways of working and a signification transformation programme supporting the service for improvements. The focus for the previous few years has been:

- a) Reducing the number of empty homes within our housing stock.
- b) Reduction the number of overdue responsive repairs jobs within the service.
- c) Improving the processes for the services.
- d) Restructuring the teams to ensure we have a service fit for the needs of our customers.
- e) Ensuring the Direct Labour Organisation (DLO) is on a firm financial footing.
- f) Ensure that Damp and Mould is prioritised and managed well.
- g) Ensure that our Subcontractors are managed well.

Repairs Transformation

4.2 Alongside operational management of the service we have had a significant Transformation Programme in partnership with the Digital team. This Transformation Programme aims to improve, modernise, and transform our service to better meet the needs of both our residents and staff.

4.3 The programme was launched following a deep dive research project where we engaged with 80 residents and staff to understand how we could improve the service. As a result, the priorities and needs of our residents and staff have been central to the design and implementation of the programme from the very beginning and throughout delivery, having conducted a range of research, co-design and engagement activities with 250 residents and over 190 members of staff so far, which have helped us achieve the following:

- a) Designed and implemented a new inhouse damp, mould and condensation (DMC) specialist team into operation, improving the speed at which residents can have these issues dealt. So far, the team is projected to complete 2,700 more jobs this year than last, having completed 3,856 jobs. As part of this, we have designed and implemented a new triage model to ensure our highest priority residents get a faster response, triage and intervention. Since its launch over 750 cases have been raised using our new guidance and call scripts and over 350 high priority cases have been sent directly to the DMC specialist team via our new webform pathway. The new team is also following new service level agreement targets and achieving timescales which go above and beyond industry standards set out in Awaab's Law.
- b) Launched a dedicated 'follow on' phone line service for Plumbing, Carpentry and Plastering jobs to ensure residents know exactly what's happening with their repair next and when we will be back. This decision was based on research with residents and an analysis of complaints data, which revealed that communication gaps causes our residents most frustration. As a result, we have booked 5,000+ follow on jobs that would otherwise have been 'lost', receiving excellent feedback from residents and operational staff, with ~85-90% consistently getting booked in and completed within the month (and other jobs being actively co-ordinated).
- c) Developed and started rolling out a new "outcarding" process for plumbing, carpentry and plastering with clear guidance for staff on how to handle different situations to reduce no access visits. For example, for large jobs booked further in the future, we are measuring the impact of reminder calls to residents the day before their appointment. In

plastering, we are monitoring the impact of tradespeople calling residents before they set off for a property, with a view to reducing outcards and avoidable repeat visits.

- d) Re-designed and launched two new, user-friendly webforms for residents to report a new repair or request an update, which capture better information for us and signpost residents to the right places, this includes the ability for residents to upload a photo of their problem. We also launched 36 pages of new and improved web content to set clearer expectations about what we can and can't repair, including information about damp, mould and condensation.
- e) Merged the Repairs contact centre into the corporate contact centre and set up a team to re-design our contact centre operating model with the aim of streamlining channels and simplifying the overall resident journey in direct response to feedback from residents.
- f) Built a repairs performance management dashboard to help managers and the service make more informed, real-time decisions and effectively manage performance. This dashboard has improved the quality and accuracy of our data, putting it directly in the hands of the service team. Additionally, we've created other data tools, such as one that helps us better assess the status of overdue jobs and groups residents addresses onto a map of the borough. This tool assists in planning travel routes for our trade workers, allowing them to complete more jobs for residents each day and work more efficiently.
- g) Completed multiple restructures and team changes, throughout this pay parity and equal grades have been addressed, and all job descriptions and specifications have been refreshed including Greenwich Council values and a resident focus, with expectations and responsibilities outlined clearly of our workforce.
- h) Completed research with staff members from the Repairs service to identify key strengths, weaknesses, opportunities, and establish a long-term vision to attract, retain, and develop an inclusive, future-ready workforce. Next, we will co-design solutions and write up our findings into a workforce strategy and implementation plan to align the service

around a shared mission, ensuring improved services and outcomes for residents.

- i) Recruited and onboarded a Training team responsible for designing and implementing a refreshed department wide training offer and delivering high priority training sessions to ensure the service has access to the skills and knowledge needed to deliver now and into the future.
- j) Completed an initial research phase on our current leaks offer by spending time with residents, trade staff and the wider sector to identify areas of improvement and opportunities. Next, taking a similar approach to our Damp, Mould and Condensation project we will be co-designing a future offer with residents and the service that aims to increase resident satisfaction, reduce Ombudsman cases and damage and costs associated with Leaks.

4.4 Integral to the success of the programme has been strong collaboration and ways of working between Repairs and Digital services with each team within the programme being a mix of Digital and Operations. Operational colleagues have embraced experimental approaches such as pilots and operational trials in tandem with Digital which has empowered them to try new things, take more of a data led approach to decision making and increased collaboration across trades.

4.5 There has been significant governance to oversee delivery progress and risks of the transformation programme with regular updates and scrutiny at the Repairs Improvement Board, Housing and Safer Communities Digital Board and Members Repairs Transformation Board. Alongside this, the team attends the services' monthly management team meetings to provide updates to managers and holds face to face briefing sessions with trade staff when required.

Empty Homes (Voids)

4.6 There has been significant investment into our empty homes which has delivered improvements to both the backlog number of vacant homes and the time taken to make them available for occupation.

4.8 Between 22/23 and 24/25 the number of empty homes has been reduced by approximately half. This has made available much needed housing supply available for let for households in need of alternative accommodation while additionally ensuring that HRA rental income is maximised.

No. of Void Properties at Year End
2022-23: 352
2023-24: 192
2024-25: 174 (YTD to 28/02/25)

% Rent Loss to Void Properties
2022-23: 2.14%
2023-24: 1.59%
2024-25: 1.28% (YTD to 31/12/24)

4.9 Operational efficiencies have also achieved improvements in the void period. Defined as the time in calendar days from the date when the tenancy is ended up to and including the date when the new tenancy starts), the number of days has consistently fallen in the last three years.

Average Re-let Times
2022-23: 87.69 days
2023-24: 86.50 days
2024-25: 61.13 days (YTD Feb 25)

Pay and Reward

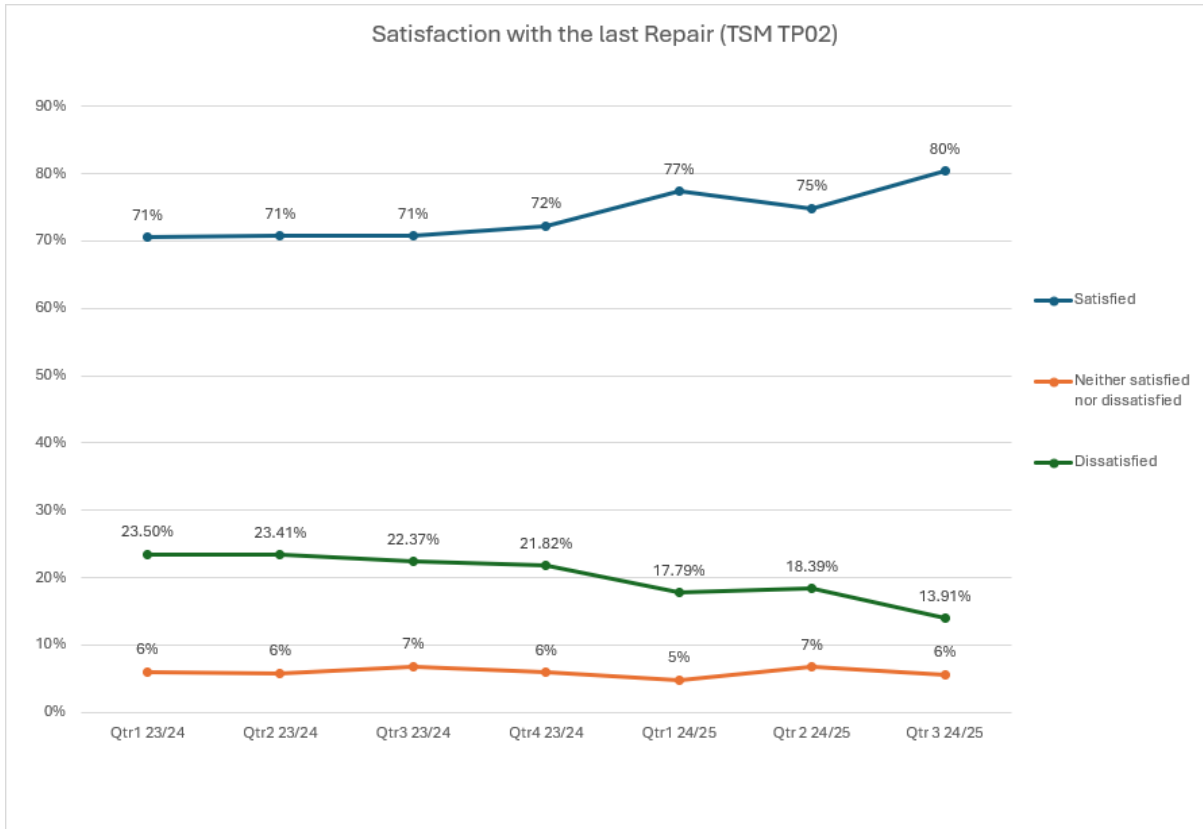
- 4.10 Recently there has been the conclusion of over 12 months of negotiations with Trade Unions over the remuneration for our Trade Operatives within the DLO. This agreement moved staff from a “productivity based” salary scheme to a flat rate salary for trade groups. The agreement will lead to a number of improvements for the service:
- a) Bring salaries closer to the industry standard for the trades we provide, leading to greater value for money for residents and the council.
 - b) Ensure that Trade Staff are not incentivised to close jobs that aren’t complete so they are able to claim the productivity minutes
 - c) Implement structures where more senior positions attract greater salaries than the staff members they manage.
 - d) Allow RBG to position itself in the market as having one of the best, if not the best, overall salary package in England
- 4.11 There are risks to the new agreement which the service is cognisant of and will look to mitigate:
- a) Given that staff may see a pay reduction or stagnation over the coming 3 years we may see a large percentage (estimated as “up to” 30%) leaving the service. 35% of staff are over 55 and would be able to take early retirement, their pensions may be affected by the changes.
 - b) Moving from a productivity-based scheme to flat salary scheme may lead to a reduction in productivity in the short term. “I get paid however many jobs I completed per day”.
- 4.12 To tackle the workforce issue the service have already recruited many apprentices (currently 15 within the services) and are looking to recruit more over the coming years. Equally with the new pay agreement the service will be able to attract experienced Trade Operatives externally as the salary ranges are above the market benchmarks.
- 4.13 The productivity issue will be addressed by strong management of our services, as mentioned under paragraph 4.1 with the support of our dedicated HR business Partner reference below. Key will be that all Trade Operatives are giving targets that they are expected to achieve and will be held accountable for those targets.

Human Resources Support

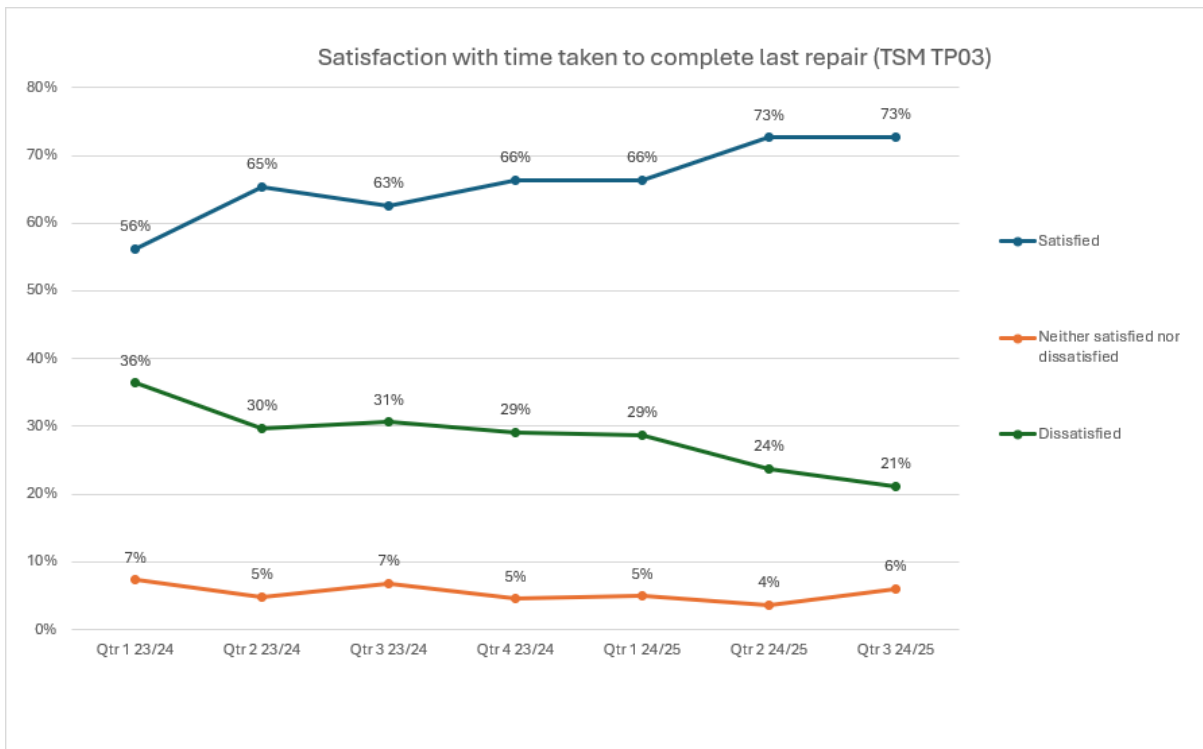
- 4.14 One of the initiatives which has really helped improve the Repairs Service over the previous 18 months has been having a direct HR Business Partner on site within Birchmere for the service. Working with Corporate HR services, Repairs and Investment expressed the need for support for our management and supervisors in being able to progress sickness, employment and performance issue for their staff. Many of the managers over the years had been promoted for their skills in trades and not necessarily their administrative abilities.
- 4.15 Having a HR Business Partner directly on site has allowed for supervisors and managers to have support in managing their teams and led to many long term sickness and performance issues being addressed and managers now having a greater understanding of HR Processes. This has led to a significant culture change within the teams.
- 4.16 Some of the outcomes we have seen are:
- a) 105 Stage one sickness meetings
 - b) 45 Stage Two sickness meetings with 9 leading to “employee at risk” conversations, 2 dismissals, 3 pending Stage Three reviews.
 - c) 8 Ill health retirements in progress
 - d) 10 Verbal Warnings
 - e) 1 dismissal for disciplinary
 - f) 5 performance improvement plans (increasing regularly)

Performance

- 4.17 The Regulator of Social Housing’s Consumer standards set out expectations for social housing providers to ensure quality services and compliance. Part of these suite of standards involve a set of tenant satisfaction measures (TSMs) that social housing landlords must report on, with the intent to make landlords’ performance more visible to tenants and help them hold their landlord to account. For the Repairs service the key TSMs are: Satisfaction with your last repair in the last 12 months; and Satisfaction with the time taken to receive the repair. Below are the results for the period Qtr 1 23/24 to Q3 24/25:



4.18 Satisfaction with the last repair has improved over the second year of TSM and a reduction in tenants feeling dissatisfied.



4.19 There has been a demonstrable increase in the levels of satisfaction with the time taken to complete tenant's repairs. Driving this will be the operational measures the service has implemented including a greater understanding of repairs at a trade by trade level, increased management focus, and use of additional DLO resource for high demand trades.

4.20 TSMs enable comparisons of RBG's performance against the regulator's data for London landlords, both Council and Housing Association, RBG is in the top quartile for all measures except for complaints handling and maintenance of communal areas, which are in the second quartile. Comparing the performance measures at the end of year 23/24 to Q3 2024/25 shows a continued progression, with the Repairs Service itself deemed to be performing well and representing the biggest driver of positive resident sentiment, at 80.4%

RSH - All London Landlords

	TP01- Overall Sat	TP02- Repairs Service	TP03- Time Taken	TP04 - Well Maintained	TP05- Safe	TP06 - Listen	TP07- informed	TP08 - Treated Fairly	TP09 - Complaints	TP10 - Communal	TP11 - Neighbourhood	TP12 -ASB
RB Greenwich Q3 2024/25	68.6%	80.4%	72.7%	68.3%	78.7%	58.7%	74.6%	76.1%	31.0%	66.1%	71.8%	62.4%
RB Greenwich 23/24	63.5%	71.1%	62.6%	64.9%	70.6%	52.6%	71.2%	71.1%	28.7%	65.5%	68.8%	60.4%
Upper Quartile	65.1%	67.7%	63.5%	65.7%	71.6%	57.4%	71.7%	74.7%	31.2%	70.4%	69.0%	61.2%
Regulator Median	59.7%	63.2%	60.2%	60.8%	67.3%	51.4%	66.0%	70.2%	26.9%	63.3%	62.2%	57.8%
Lower Quartile	53.2%	56.7%	55.2%	55.1%	62.7%	45.5%	61.7%	61.7%	22.3%	57.5%	55.6%	51.3%

4.21 Comparing RBG's Q3 TSM performance specifically against other London Councils, RBG performs even more favourably, with just communal areas remaining the lower quartile. The repairs service continues to be the best performing area, followed by providing a safe home, which is closely linked to the quality of the repairs service.

RSH- All London Councils												
	TP01- Overall Satisfaction	TP02- Repairs Service	TP03- Time Taken	TP04 - Well Maintained	TP05- Safe	TP06 - Listen s	TP07- informed	TP08 - Treat ed Fairly	TP09 - Compl aints	TP10 - Com mual	TP11 - Neighbo urhood	TP12 -ASB
RB Greenwich Q3 2024/25	68.6 %	80.4%	72.7 %	68.3%	78.7 %	58.7 %	74.6%	76.1%	31.0%	66.1%	71.8%	62.4 %
RB Greenwich 23/24	63.5 %	71.1%	62.6 %	64.9%	70.6 %	52.6 %	71.2%	71.1%	28.7%	65.5%	68.8%	60.4 %
Upper Quartile	64.3 %	67.0%	63.5 %	64.9%	71.5 %	55.8 %	71.7%	73.7%	28.7%	67.5%	69.5%	60.6 %
Regulator Median	60.3 %	63.5%	61.7 %	60.9%	66.8 %	51.4 %	66.7%	70.1%	26.0%	62.4%	62.5%	58.3 %
Lower Quartile	52.8 %	58.1%	54.9 %	55.0%	62.9 %	44.4 %	61.8%	61.7%	21.9%	57.5%	57.9%	52.9 %

4.22 Satisfaction scores captured in Transaction survey results, which are completed after residents have had a recent repair in their home, show a higher score and have been broadly consistent over the past three years.

Satisfaction with Repairs	
2022-23	89.25%
2023-24	85.48%
2024-25 (up to Jan 25)	87.40%

4.23 The politeness and helpfulness of repairs staff, homes being left clean and tidy after repairs and the quality of the repair score highest from these surveys.

Areas requiring continued focus

4.24 The Repairs service has invested in reducing the backlog of outstanding repairs. Over the past three years the number of overdue, outstanding responsive repairs (not including gas and electrical) has continued to reduce from c11,800 in March 23, to c8,000 in March 24 to c4,800 in March 25. While this reduction represents a key achievement of recent progress made, it is recognised that some residents are still waiting far too long for their repair to be completed. This is reflected in in the satisfaction scores, with the length of time taken before works are started the key driver of resident dissatisfaction. The other key driver of

dissatisfaction is the ease of reporting the repair including works started but not finished, which requires the resident to have to follow up to have this remaining work completed. Addressing this a key focus for the service.

- 4.25 The need to address the length of time taken to complete repairs is also reflected in the percentage score to completing non-urgent repairs. While the repairs service delivers well in completing emergency repairs, performance of non-emergency repairs, is not at the desired levels.

Urgent Repairs Completed Within Target Time	Non-urgent Repairs Completed Within Target Time
2022-23: 94.81%	2022-23: 67.42%
2023-24: 95.78%	2023-24: 57.20%
2024-25: 94.08%	2024-25: 66.83%

- 4.26 As the repairs service works through the backlog there is a consequential impact of the performance of non-urgent repairs as those jobs are completed outside target. Of particular note is plumbing and leak work orders, which represent the largest volume of outstanding works orders, followed by plastering and roofing related works.

Contact Centre Performance

- 4.27 Supported by the training teams at both Contact Centres, pools of Tech admins and Contact Centre agents have undergone cross-training and shadowing. By sharing expertise across teams and standardising what training staff get, residents should receive a similar level of service, whoever they call.
- 4.29 The transformation team and staff at Birchmere have been tackling callbacks, with a view to increasing the number of queries that technical administrators (who answer the responsive repair line) can answer first time. By implementing easy to follow training and processes and building in continuous feedback loops with staff across the service, together we

reduced callbacks by almost 30% (from 843 to 592) in our first month – and they continue to reduce.

4.30 This can be seen reflected in the Avaya data for Responsive Repairs. For example, in October 2024 the responsive repairs line saw 198 more calls than in the year previous. This is mirrored by looking at February 2025 compared with February 2024, where we saw 392 fewer calls to the responsive repairs line.

Responsive Repairs performance - This year 01/04/2024 - 31/12/2024

Responsive Repairs	Total Calls	Total Abandoned	% Abandoned	% Handled	Ave Wait To Answer	Maximum Wait to answer
Year to date	50,503	6,257	12.4%	87.6%	04:31	00:57:51
Last Month (December 2024)	4,954	973	19.6%	80.4%	07:46	00:39:24

Members Repairs Board

4.31 Following the initial “Deep Dives” completed in the service in 2022 and presented to Members that year a “Members Repairs Transformation Board” was created and chaired by Cllr Slattery to continue to monitor the progress of the Repairs Transformation Programme. To date there have been at least 9 of these Boards. Each Board consists of a general overview of the transformation programme and a deep dive into specific areas of improvement within the repairs service. Members have helped to shape the future service offer and have been asked to provide feedback on areas such as Damp and Mould, the Workforce Strategy, Website and Webforms and use of Data.

4.32 The Board is a consultative board helping to shape the future of the repairs service and giving their feedback and opinion, from experience, of where improvements are needed within the service.

Capital Programme

4.33 A new Asset Management Strategy has been written and will be presented to the council's Cabinet in the coming months. This strategy will be supplemented with a delivery programme whereby Members and resident will be able to see what Capital Programmes are being completed within their blocks and homes over the coming 3 years. This strategy has been built using previous years repairs data so we are able to prioritise ongoing and recurring issues for Capital investment. This should lead to a reduction in the requirement for responsive repairs with our homes and an overall saving to the Housing Revenue Account.

5. Consultation

5.1 We consult with residents through various approaches to help shape our services, tailored to the area of improvement, user group and specific context. These include both formal and informal activities, such as:

- a) Presentations and research at the Borough-Wide Housing Panel events
- b) Presentations and research at the Resident Housing Performance and Improvement Panel
- c) Spending time in community spaces, conducting pop up research and testing sessions across the borough to get quick feedback from residents on their experiences or our work in progress such as prototypes and design concepts.
- d) Offering paid research opportunities for residents to take part in 30-60 minute interviews and attend workshops eliciting their ideas, experiences and feedback.
- e) Arranging to speak with residents while shadowing trade operatives to hear what matters most to them.
- f) Collaborating with charities and organisations across the borough to help reach residents with access needs to ensure our improvements meet accessibility standards and are inclusive.
- g) Written updates in Talk Housing.
- h) Channelling updates through the Neighbourhood community champions and putting messages on our webform and Contact Centre/responsive

repairs phone lines asking residents to sign up to upcoming research opportunities to expand our reach.

5.2 As a result of these methods and our ongoing engagement with residents, we are focusing on the areas they consider most important and co-designing solutions with them throughout our delivery process. A clear example of this approach is our transformation programme, where (as previously mentioned) we've engaged with 250 residents so far.

6. **Next Steps**

6.1 The Chair will set out closing remarks and make recommendations to the relevant decision maker as required at the meeting and these will be published as an appendix. The Relevant decision maker will respond to the recommendations in a separate published appendix and both will be brought back to the next meeting of the Committee/Panel.

7. **Cross-Cutting Issues and Implications**

Issue	Implications	Sign-off
<p>Legal including Human Rights Act</p>	<p>The purpose of the report is to i) consider the Repairs Update Report and make recommendations to the Executive, if necessary; ii) agree that where appropriate, the report and any recommendations be submitted to the Chief Executive; and iii) note that where possible, the report and responses to the recommendations be presented at the next meeting of the Panel.</p> <p>The Landlord and Tenant Act 1985 requires the Council to keep properties in good repair, include the structure, exterior and essential services.</p>	<p>Karen Mitchell, Assistant Head of Legal Services, 28th March 2025.</p>

	<p>The Housing Act 2004 introduced the Housing Health and Safety Rating System to assess potential hazards in residential properties. The Council has an obligation to adhere to and ensure the enforcement of these standards.</p> <p>The Council is obligated to comply with the established under the Homes (Fitness for Human Habitation) Act 2018.</p> <p>The Regulator of Social Housing has set the consumer standards relating to Home Standard; Tenant Involvement and Empowerment and Neighbourhood and Community with which the Council is required to comply.</p> <p>The report details the actions undertaken by the Council to ensure compliance with these requirements.</p>	
<p>Finance and other resources</p>	<p>The report requests the Housing & Neighbourhoods Scrutiny Panel:</p> <ul style="list-style-type: none"> • To consider the Repairs Update Report and make recommendations to the Executive, if necessary. • To agree that where appropriate, the report and any recommendations be submitted to the Chief Executive. • To note that where possible, the report and responses to the recommendations be 	<p><i>Joanne Stark</i> <i>Head of</i> <i>Accounting &</i> <i>Business Change</i> <i>17/03/2025</i></p>

	<p>presented at the next meeting of the Panel.</p> <p>As this is an information report, there are no direct financial implications arising from the recommendations.</p>	
Equalities	<p><i>The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no apparent equality impact on end users.</i></p> <p><i>This report makes no contribution to the Council's Equality and Equity Charter.</i></p>	<p>Richard Parkin – Senior Assistant Director of Repairs and Investment 17/03/2025</p>
Climate change	<p><i>This report is an update report so has no climate change implications</i></p>	<p>Richard Parkin – Senior Assistant Director of Repairs and Investment 17/03/2025</p>
Community Engagement	<p><i>Community engagement can be seen in the "Consultation" section of this report.</i></p>	<p>Richard Parkin – Senior Assistant Director of Repairs and Investment 17/03/2025</p>

8 . **Report Appendices**

8.1 There are no appendices for this report.

9. **Background Papers**

9.1 No background papers

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HOUSING AND NEIGHBOURHOODS SCRUTINY PANEL	DATE 10 April 2025	ITEM NO 8
SUBJECT Leaseholder Charges	WARD (S) All	
CHIEF OFFICER Director of Housing and Safer Communities	CABINET MEMBER	
DECISION CLASSIFICATION Scrutiny Verbal Update	IS THE FINAL DECISION ON THE RECOMMENDATIONS IN THIS REPORT TO BE MADE AT THIS MEETING?	

SECTION I

I. Recommendations to decision maker:

- I.1 To receive a verbal update on the Leaseholder Charges from the Assistant Director, Housing Needs & Tenancy.

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