INTERCEPTION OF COMMUNICATIONS COMMISSIONER'S OFFICE

Inspections under Chapter II of Part I of the Regulation of Investigatory Powers Act (RIPA) by the Interception of Communications Commissioner's Office (IOCCO)

Name of Public Authority	West Midlands Police
Date/s of Inspection	3 - 5 May 2011
Inspector/s	[redacted]

Background to the Inspection: The Interception of Communications Commissioner's Office (IOCCO) is charged with undertaking inspections on behalf of the Interception of Communications Commissioner, Sir Paul Kennedy. IOCCO undertake a revolving programme of inspection visits to all relevant public authorities who are authorised to acquire communications data under Part I Chapter II of the Regulation of Investigatory Powers Act (RIPA), and produce a written report of the findings for the Interception of Communications Commissioner.

The primary objectives of the inspection were to ensure that the system in place for acquiring communications data is sufficient for the purposes of the Act and that all relevant records have been kept; ensure that all acquisition of communications data has been carried out lawfully and in accordance with the Human Rights Act (HRA), Part I Chapter II of RIPA and its associated Code of Practice (CoP); and, provide independent oversight to the process and check that the data which has been acquired is necessary and proportionate to the conduct being authorised.

Statistics:

Number of Notices requiring disclosure of communications data within the meaning of each subsection of section 21(4) of the Act during the last 6 months.	[redacted]
Number of Authorisations requiring disclosure of communications data within the meaning of each subsection of section 21(4) of the Act during the last 6 months.	[redacted]
Number of applications submitted to a Designated Person for a decision to obtain communications data which were rejected after due consideration (during last 6 months).	[redacted]
Number of times an urgent Notice has been given orally, or an urgent Authorisation has been granted orally during the last 6 months. If practicable please breakdown figures by the number of Grade 1 and 2 approvals.	[redacted]

Staffing:

Senior Responsible Officer (SRO)	[redacted]
SPoC Manager	[redacted]
Accredited Officers (AOs) (indicate if full time, part time, oncall etc)	[redacted]

Previous Recommendations:

West Midlands Police emerged well from the previous inspection conducted in July, 2009. Nine recommendations were made to fine tune the systems and procedures and assist the force to achieve the best possible level of compliance with the Act and Code of Practice. The Inspectors were pleased to find that the majority had been implemented.

Summary of Inspection Findings:

Overall West Midlands Police emerged well from this inspection and the Inspectors were satisfied that it is acquiring communications data lawfully and for a correct statutory purpose.

A reasonable standard of application is being produced across the board. The principles of necessity and proportionality are well justified but the quality could improve further if the applicants follow the question sets in relation to the proportionality considerations. This point needs to be re-emphasised to save applicants time in the future. [redacted]

Overall, the Accredited Officers (AOs) are performing their guardian and gatekeeper duties very effectively and are ensuring that West Midlands Police acts in an informed and lawful manner when it is acquiring communications data. [redacted]

Overall the Designated Persons (DPs) are discharging their statutory duties responsibly. Their written considerations are generally completed to a good standard. [redacted] I must also be questionable if the necessity and [redacted] For a number of reasons it is vitally important that applications are approved speedily, otherwise this may have an adverse impact upon the progress of the investigations. [redacted]

[redacted]

A number of recordable errors were identified during the inspection and these occurred due to the fact that some of the CSP templates on the Focus 112 system were incorrectly set to produce Section 22(4) Notices, when the DP had authorised conduct via a Section 22(3) Authorisation. It is important to make the point that these errors had no bearing on the actual justifications for acquiring the data. It is recommended that all of the CSP templates should be checked to prevent recurrence.

The Inspectors concluded that the urgent oral process is extremely well managed and the associated audit trail was maintained to an exceptionally high standard.

[redacted]

The inspection findings are outlined in more detail in the following sections of the report. A number of recommendations arise from the inspection but they are designed to tighten or fine tune parts of the systems and processes and assist the public authority to achieve the best possible level of compliance with Part I Chapter II of RIPA and its associated Code of Practice (CoP). The recommendations are shown in the last column of the inspection tables. Please note that they are shaded red, amber or green. IOCCO have adopted this practice to enable public authorities to prioritise the areas where remedial action is necessary. The red areas are of immediate concern as they mainly involve serious breaches and / or non-compliance with the Act or Code of Practice which could leave the public authority vulnerable to challenge. The amber areas represent non-compliance to a lesser extent. However remedial action must still be taken in these areas as they could potentially lead to breaches. The green areas represent good practice or areas where the efficiency and effectiveness of the process could be improved.

Summary of Recommendations: Red - 1; Amber - 6; Green - 3.

Areas Inspected:

1. Application Process

Acquisition of communications data under the Act involves four roles within a relevant public authority; the Applicant, the Designated Person (DP), the Single Point of Contact (SPoC) and the Senior Responsible Officer (SRO). The Act provides for two alternative means for acquiring communications data, by way of an Authorisation under Section 22(3) or a Notice under Section 22(4).

Baseline	Achieved (Yes / No / Partly)	Description of Procedures & Action Required (if applicable)	Rec No.
Random Sampling & Auditing information from the Communication Service Providers (CSPs)			
IOCCO obtained information from various CSPs outlining the requests for disclosure of data which the public authority had made during the last twelve months. These records were randomly checked against the	Yes	[redacted] In all cases the Inspectors were satisfied that the correct process	

application forms to verify that documentation was available to support the acquisition of the communications data from the CSPs. The inspection team also randomly examined a number of applications submitted by various divisions and departments in the force.		had been applied and that the data had been obtained lawfully, with the approval of a Designated Person (DP). Overall the applications are completed to a reasonable standard. The inspectors were also given an overview of one investigation by operational staff to ascertain what use had been made of the communications data acquired. A more detailed summary of this operation is appended to the report (Annex A).	
Applicant			
The applicant should complete an application form, setting out for consideration by the designated person (DP), the necessity and proportionality of a specific requirement for acquiring communications data. (Para 3.3 CoP)	**Yes**	**Application / System used:** Focus 112. This is due to be replaced with CycComms in June 2011.	
Applications must include all of the requirements specified in Paragraphs 3.5 and 3.6 of the Code of Practice.	**Yes**		
[redacted]	**Yes**	[redacted]	
Proportionality: Applicants should outline what is expected to be achieved from obtaining the data and how the level of intrusion is justified when taking into consideration the benefit the data will give to the investigation. The specific date/time periods requested should be justified i.e. how these are proportionate. An explanation as to how the data will be used, once acquired, and how this will benefit the investigation will assist the justification. (See Home Office and ACPO DCG application guidance document).	**Partly**	As stated above, many applicants had already addressed this principle in the necessity section. As a result the proportionality section tended to be repetitive or include unnecessary generic statements which did not add to the justifications. For example, applicants tended to focus upon the seriousness of the offence and the fact that this is the least intrusive method of achieving the objective. In reality these are not tests which need to be met and instead applicants should focus on what they are trying to achieve from obtaining the data and outline their objectives in clear	

		and simple terms. It is again **recommended that applicants should be encouraged to always follow the application question sets. This will save them time in future, improve the overall quality of the application forms and make them more focused and succinct. The AOs should provide appropriate advice where applicants do not follow the question sets.**	
Collateral Intrusion: Applicants should consider and, where appropriate, describe any meaningful collateral intrusion – the extent to which the privacy of any individual not under investigation may be infringed and why that intrusion is justified in the circumstance. Applicants should be aware that that there will only ever be minimal collateral intrusion in relation to subscriber data or that none will be identified at the time the application is made. (See Home Office and ACPO DCG application guidance document).	**Yes**	Collateral intrusion was well addressed by the majority of applicants particularly when requesting service use and/or traffic data. Applicants were outlining whether they are likely to obtain data which is outside the realm of their investigation and how they planned to manage it.	
[redacted]	**Yes**	[redacted]	
Single Point of Contact (SPoC)			
The SPoC should promote efficiency and good practice in ensuring only practical	**Yes**	The SPoC is working very efficiently and ensuring that the data is	

and lawful requirements for communications data are undertaken. (Para 3.16 CoP).		acquired and disclosed in a timely fashion. At the time of the inspection there was no backlog of applications waiting initial processing by the SPoC.	
The SPoC should provide objective judgement and advice to both the applicant and the DP. In this way the SPoC provides a "guardian and gatekeeper" function ensuring that public authorities act in an informed and lawful manner. (Para 3.16 CoP).	**Yes**	Overall good advice is provided to applicants. However, the report has already recommended that the AOs should ensure they always provide appropriate advice when they identify applicants who are not following the question sets or guidance. The AOs frequently include advice for DPs within the SPoC report section.	
The SPoC should engage proactively with applicants to develop strategies to obtain communications data and use it effectively in support of operations or investigations. (Para 3.17 CoP).	**Yes**	The AOs are in regular contact with investigation teams to assist them to develop strategies to use communications data effectively in support of operations.	
The SPoC should be in a position to fulfil the additional responsibilities outlined in Para 3.17 CoP. There should be a full audit trail of all of the actions taken by the SPoC.	**Yes**	[redacted]	
The SPoC may be an individual who is also a DP. The SPoC may be an individual who is also an applicant. The same person should never be an applicant, a DP and a SPoC. Equally the same person should never be both the applicant and the DP. (Para 3.19 CoP).	**N/A**		
Designated Persons (DPs)			
A DP shall not grant an authorisation or give notice unless they believe that obtaining the data in question by the conduct authorised is proportionate to what is sought to be achieved by obtaining the data. (Section 22(5) Act). A DP must consider the application and record his considerations at the time (or as soon as is reasonably practicable) in writing or electronically. (Para 3.7 CoP). The DP shall assess the necessity for any conduct to acquire or obtain data taking account of any advice provided by the SPoC. (Para 3.10 CoP).	**Yes**	[redacted]	

		[redacted]	
IOCCO recommends that DPs should tailor their written considerations to the individual applications to provide evidence that they have been given due consideration.	**Yes**	[redacted]	
DPs must ensure that they grant authorisations or give notices only for purposes and only in respect of types of communications data that a DP at their office, rank or position in the relevant public authority may grant or give. (Para 3.9 CoP).	**Yes**		
DPs should not be responsible for granting authorisations or giving notices in relation to investigations or operations in which they are directly involved, although it is recognised that this may sometimes be unavoidable, especially in the case of small organisations or where it is necessary to act urgently or for security reasons. Where a DP is directly involved in the investigation or operation their involvement and their justification	**Yes**	A good level of independence exists across the Force.	

for undertaking the role of DP must be explicit in their recorded considerations. (Para 3.11 CoP)			
[redacted]	Yes	[redacted]	
Content of Section 22(3) Authorisations and Section 22(4) Notices			
An authorisation must comply with all of the requirements outlined in Section 23(1) of the Act and Paragraphs 3.28, 3.43 & 3.44 of the Code of Practice.	Yes	Latest Home Office and DCG template in use.	
A notice must comply with all of the requirements outlined in Section 23(2) of the Act and Paragraphs 3.37, 3.43 & 3.44 of the Code of Practice.	Yes	Latest Home Office and DCG template in use.	
The 'giving of a notice' means at the point at which a DP determines that a notice should be given to a CSP (Para 3.35 CoP). A notice should emanate from the DP and be endorsed in a clear and auditable manner.	Partly	The DPs issue the notices at the same time as they approve the related application [redacted] Unfortunately it was identified that the template to acquire consequential subscriber information from [redacted] had been incorrectly set to a Section 22(4) Notice, when a Section 22(3) Authorisation is the conduct which is actually approved by the DP in such cases. As a result Notices were served on these CSPs that were not formally issued by the DPs. These are technical breaches of the Act and constitute 'recordable' errors. It is important to make the point that these errors had no bearing on the actual justifications for acquiring the data. As these CSPs templates had been incorrectly set up this error will have occurred on a number of occasions but it would be impractical for us to ask West Midlands Police to research the system to identify all of these errors. In the intervening period prior to the introduction of	

		CycComms, the templates must be checked for all CSPs to ensue that Section 22(3) Assurances of Authorisations are produced instead of Section 22(4) Notices when applying for consequential subscriber information [redacted]	
SPoCs should be mindful when drafting authorisations and notices to ensure the description of the required data corresponds with the way in which the CSP processes, retains and retrieves its data for lawful disclosure. A notice must not place a CSP under a duty to do anything which is not reasonably practicable for the CSP to do. (Section 22(7) Act, Para's 3.29 & 3.38 CoP)	**Yes**		
A DP may grant an authorisation for persons holding offices, ranks or positions with the same public authority as the DP to engage in any conduct to which Part I Chapter II applies. A notice shall not require the disclosure of data to any person other than the person giving the notice or such other person as may be specified in the notice so long as that person holds an office, rank or position within the same relevant public authority as the DP. (Sections 22(3) & 23(3) Act, Para's 3.24 & 3.39 CoP). The exception to this is where a public authority enters into a formal collaboration agreement under Sections 5 and 7 of the Policing and Crime Act 2009.	**Yes**	[redacted]	
Duration, Renewal & Cancellation of Section 22(3) Authorisations and Section 22(4) Notices			
Relevant to all authorisations and notices is the date upon which authorisation is granted or notice given. From that date, when the authorisation or notice becomes valid, it has a validity of a maximum of one month (see footnote 57 CoP). This means the conduct authorised should have been commenced or the notice served within that month. (Para 3.42 CoP).	**Yes**		
Any valid authorisation or notice may be renewed at any time before the end of the period of one month applying to that authorisation or notice, for a period of up to one month by the grant of a further authorisation or the giving of a further notice. A renewed authorisation or notice takes effect upon the expiry of the authorisation or notice it is renewing. (Sections 23(5), 23(6) & 23(7) Act, Para 3.46 CoP).	**Yes**	[redacted] does not allow a request to be generated after the expiry date.	

Renewal may be appropriate where there is a continuing requirement to acquire or obtain data that will or may be generated in the future. The reasoning for seeking renewal should be set out in an addendum to the application. Where a DP is granting a further authorisation or giving a further notice they should have considered why it is necessary and proportionate to continue with the acquisition of the data and record the date, and when appropriate, the time of the renewal. (Para 3.47 & 3.48 CoP).	**Yes**		
Where a DP is satisfied that it is no longer necessary or proportionate to acquire the communications data he shall cancel the notice or withdraw the authorisation. (Section 23(8) Act, Para's 3.49, 3.50, 3.52 & 3.53 CoP). Reporting of a cancellation to a CSP may be undertaken on a DPs behalf by the SPoC, but in such cases the DP must confirm the decision in writing or in a manner that produces a record of the notice or authorisation having been cancelled or withdrawn by the DP.	**Yes**		
A cancellation notice must include the details outlined in Paragraph 3.51 of the Code of Practice. A withdrawal of an authorisation must include the details outlined in Paragraph 3.54 of the Code of Practice.	**Yes**	The version of the cancellation document in use is in accordance with this baseline.	
National Priority Grading System (NPGS)			
Where relevant, the Data Communications Group (DCG) NPGS should be applied to requests for communications data correctly and fairly. (See Footnote 40 of the CoP). The emphasis within Grade 1 and Grade 2 is that the urgent provision of the specific communications data will have an immediate and positive impact on the investigation.	**Partly**	[redacted]	

		[redacted]	
Streamlining Procedures			
The streamlining procedure outlined in Paragraph 3.30 of the Code of Practice should be used to reduce unnecessary bureaucracy and speed up the collection of the data when acquiring subscriber data under Section 21(4)(c). This procedure assists with number porting issues and enables the AOs to be more proactive when acquiring subscriber information by widening the data capture. In these instances it may be pertinent to acquire the data in stages. Furthermore, it is often good practice to check with the applicant before the data capture is widened because the direction of the investigation may have changed since the application was submitted or the user of the phone or communications address may have been identified through some other means.	**Yes**	Good use was being made of this procedure to widen the data capture and when dealing with number porting.	
The streamlining procedure outlined in Paragraphs 3.31 and 3.32 of the Code of Practice which enable a DP to pre-authorise future subscriber checks at the same time as he or she is approving an application for service use or traffic data under Sections 21(4)(a) or (b) of RIPA, should be used to reduce unnecessary bureaucracy and speed up the collection of the data.	**Yes**	Full use is being made of this procedure.	
The applicant must outline why it is necessary and proportionate to either widen the data capture under Section 21(4)(c), or obtain the consequential 'future' subscribers in their application. In the latter case they should outline what analytical work they intend to conduct on the service use / traffic data to identify the relevant numbers. It is important that the SPoC gives appropriate advice to the DP and that the DP fully understands what he or she is approving in the application form.	**Yes**	The [redacted]n contains a question in relation to the consequential subscriber data and this is drawn to the attention of the DP. The AOs are providing the DPs with good advice in relation to the use of these procedures. The majority of the DPs were also referring to the fact that they were approving consequential subscriber data in their considerations which is regarded as good practice.	
The AOs should spot check the schedules to assure the integrity of the process, i.e. to check that the communications addresses derive from the original service use / traffic data requests and that secure open source checks have been conducted. This should provide a good safety net. Furthermore if an AO finds evidence that applicants or analysts are not following the correct procedures then this should be brought to the attention of the SRO.	**Yes**	**Have any breaches been identified by the AOs:** No **Schedules checked by Inspectors:** Yes. Random checks conducted against a number of the schedules to verify that the communications addresses derived from the original data requests. Satisfied with the process.	

2. Urgent Oral Process

In exceptionally urgent circumstances, application for the giving of a notice or the grant of an authorisation may be made by an applicant, approved by a DP and either notice given to a CSP or an authorisation granted orally.

Baseline	Achieved (Yes / No / Partly)	Description of Procedures & Action Required (if applicable)	Rec No.
Circumstances in which an oral notice or authorisation may be appropriate are outlined in full in Paragraph 3.56 of the Code of Practice. Briefly the process may be used for the following circumstances; an immediate threat to life; an exceptionally urgent operational requirement where the data will directly assist the prevention or detection of a serious crime and the making of arrests or the seizure of illicit material; a credible and immediate threat to national security. Applicants must demonstrate how the opportunity will be lost if the application procedure were undertaken in writing from the outset.	**Yes**	The Inspectors concluded that the urgent oral process is extremely well managed.	
The use of the urgent oral process must be justified for each application within an investigation. The fact that any part of an investigation is undertaken urgently must not be taken to mean that all requirements to obtain communications data in connection with that investigation be undertaken using the urgent oral process.	**Yes**	The requests examined were justified and there was no evidence found of unnecessary or continued use of the urgent grades once the period of urgency had ended.	
After the period of urgency a written process must be completed demonstrating the consideration given to the circumstances and the decisions taken. The applicant or the SPoC shall collate details or copies of contemporaneous records of the considerations given to the acquisition of data, decisions made by the DP and the actions taken in respect of the decisions. (Para's 3.61 & 3.62 CoP)	**Yes**	The SPoC log sheets were maintained to an exceptionally high and consistent standard. There was a full audit trail in place of the decisions made and actions taken. The DPs were also being given the opportunity to endorse their considerations by email after the period of urgency.	
Written notice (or assurances of authorisations) must be given to the CSP retrospectively within one working day (see footnote 67 of CoP) of the oral notice being given. Failure to do so will constitute an error which may be reported to the Commissioner by the CSP and must be recorded by the public authority. (Para 3.60 CoP).	**Yes**		
When in a matter of urgency a DP decides that the oral giving of a notice or grant of an authorisation is appropriate, that notice should be given or the authorised conduct undertaken as soon	**Yes**		

as practicable after the making of that decision.			

3. Training

It is important for all persons involved in the process to receive training and guidance to ensure that communications data is acquired lawfully in accordance with the Act and Code of Practice and used effectively in support of investigations.

Baseline	Achieved (Yes / No / Partly)	Description of Procedures & Action Required (if applicable)	Rec No.
The SPoC is either an accredited officer (AO) or group of AOs trained to facilitate lawful acquisition of communications data. All AOs must complete a course of training and have been issued a SPoC PIN number. (Para 3.15 CoP). When an AO leaves the SPoC their PIN number should be removed from the list of approved AOs.	**Yes**	**PIN list checked:** Yes. There were three members of staff still on the Accredited PIN list who had left the SPoC. This was an oversight and the SPOC supervisor contacted the Home Office during the inspection to request that these persons are removed from the PIN list. All AOs had attended accreditation training and various tradecraft events. However, owing to financial constraints they have been prevented from attending tradecraft seminars if hotel costs would be incurred. IOCCO supports the view that AO's should attend these events whenever possible as it will ensure that they stay abreast of developments in the communications data community. West Midlands Police may therefore wish to reconsider its position in relation to attendance at these courses.	
DPs must have current working knowledge of human rights principles, specifically those of necessity and proportionality, and how they apply to the acquisition of communications data under Chapter II of Part I RIPA and its associated CoP. (Para 3.8 CoP).	**Yes**	Training is provided by the SPoC Supervisor to all newly promoted Inspectors and Superintendents.	
SPoCs should make efforts to ensure applicants are appropriately trained in the acquisition of communications data.	**Yes**	As previously mentioned it is evident that some of the applicants do not fully appreciate the requirements when completing the application forms. With the introduction of the CycComms system, training will be required across the force and it will be an ideal time to reinforce the advice provided within this report.	

4. Keeping of Records

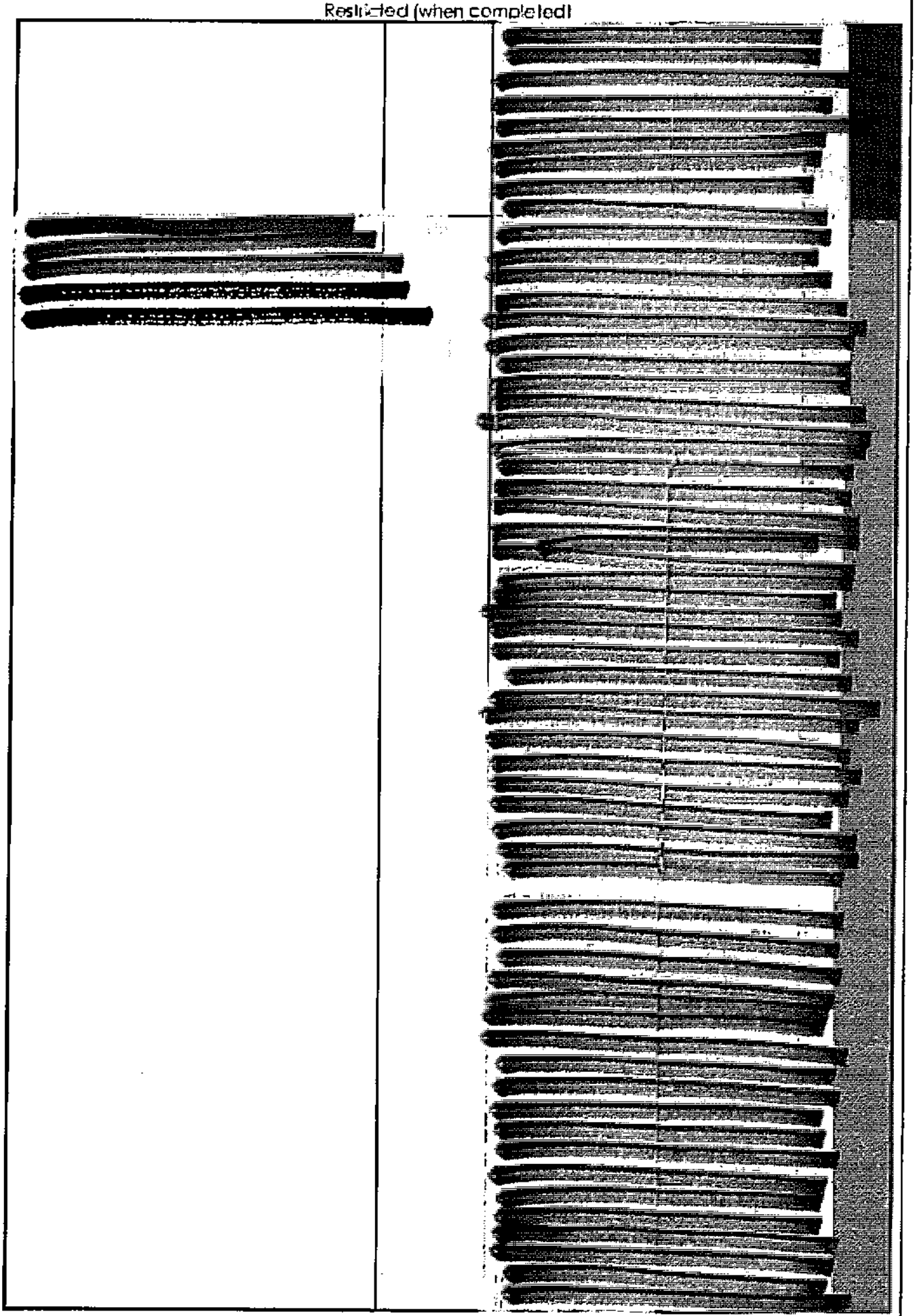
There are clear rules which must be followed in relation to the keeping of records and these procedures include the recording and reporting of errors. See Chapter 6 of the Code of Practice (CoP) for further information.

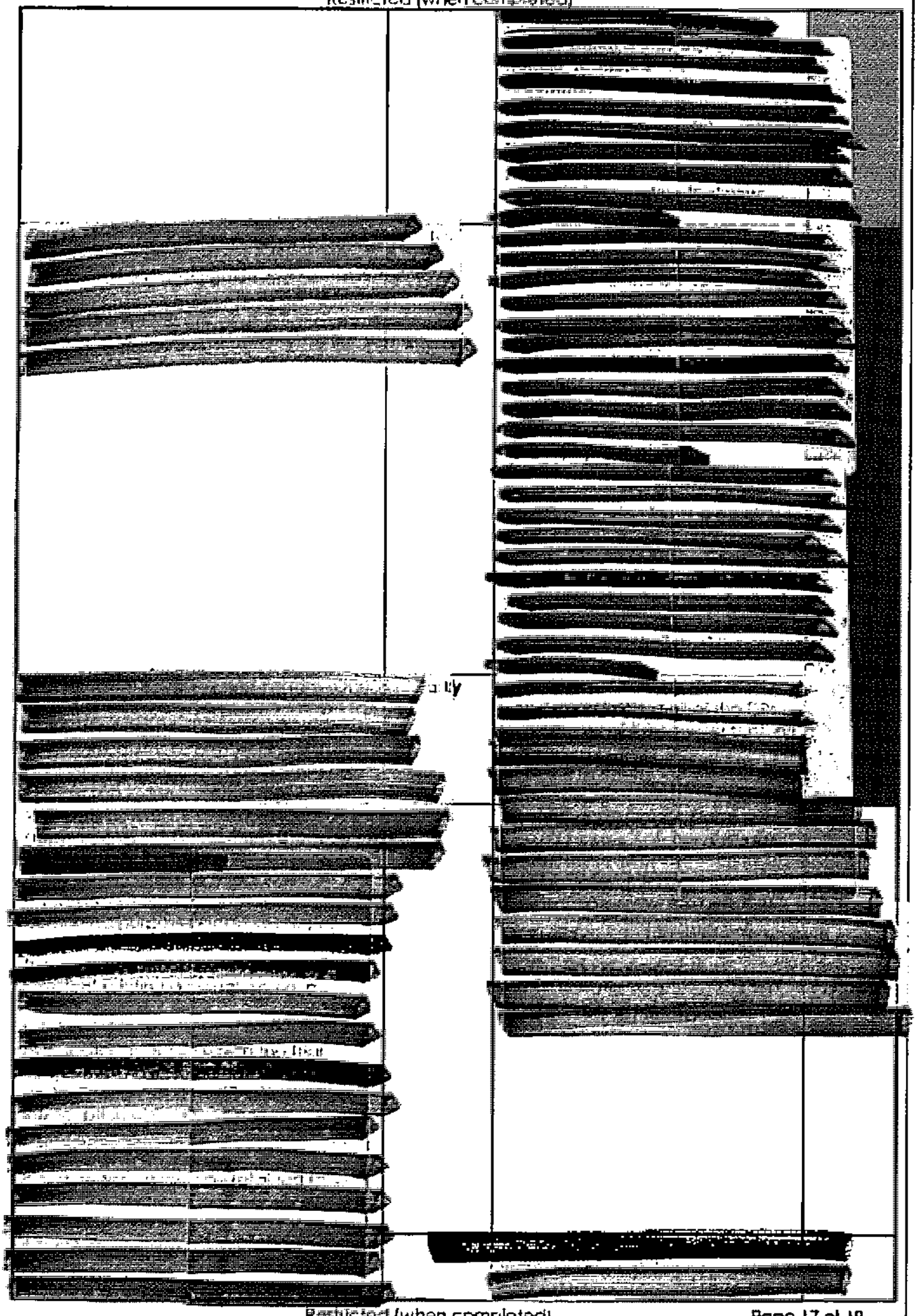
Baseline	Achieved (Yes / No / Partly)	Description of Procedures & Action Required (if applicable)	Rec No.
Records to be kept			
Applications, authorisations, copies of notices, and records of the withdrawal of authorisations and the cancellation of notices, must be retained by the public authority in written or electronic form, and physically attached or cross-referenced where they are associated with each other. The public authority should also keep a record of the date, and where appropriate the time, when each notice or authorisation is given or granted, renewed or cancelled. (Para 6.1 CoP).	**Yes**	The [redacted]m meets the requirements set out in the CoP	
Records kept by the public authority must be held centrally by the SPoC or in accordance with arrangements previously agreed with the Commissioner. There records must be available for inspection by the Commissioner (Para's 6.1 & 6.2 CoP).	**Yes**		
Errors			
Where communications data is acquired or disclosed wrongly a report must be made to the Senior Responsible Officer (SRO) and then to the Commissioner ("reportable error") using the Error Reporting Form within no more than five working days of the error being discovered. (Para's 6.13 & 6.17 CoP). The error report must contain all of the details outlined in Para 6.18 of the CoP.	Yes	**No. errors 'reported' in previous 6 months:** 14- Satisfied not caused by any inherent failings in systems and procedures.	
In cases where an error has occurred but is identified by the public authority or the CSP without data being acquired or disclosed wrongly, a record will be maintained by the public authority of such occurrences ("recordable error"). These records must be available for inspection by the Commissioner (Para 6.14 CoP). The records must include the details outlined in Para 6.20 of the CoP.	**Yes**	**No. errors 'recorded' in previous 6 months:** 49 - Mainly due to initial incorrect transposition of communications addresses by applicants – but no data acquired. Satisfied that errors were not caused by any inherent failures within the system. Two of these 'errors' did not actually constitute errors as the SPoC had not begun to acquire the data. As mentioned earlier in the report, a number of further recordable errors have occurred owing to some of the CSP templates on the [redacted] system being incorrectly set as Notices rather than Authorisations.	
Where material is disclosed by a CSP in	**Yes**	The AOs understand the	

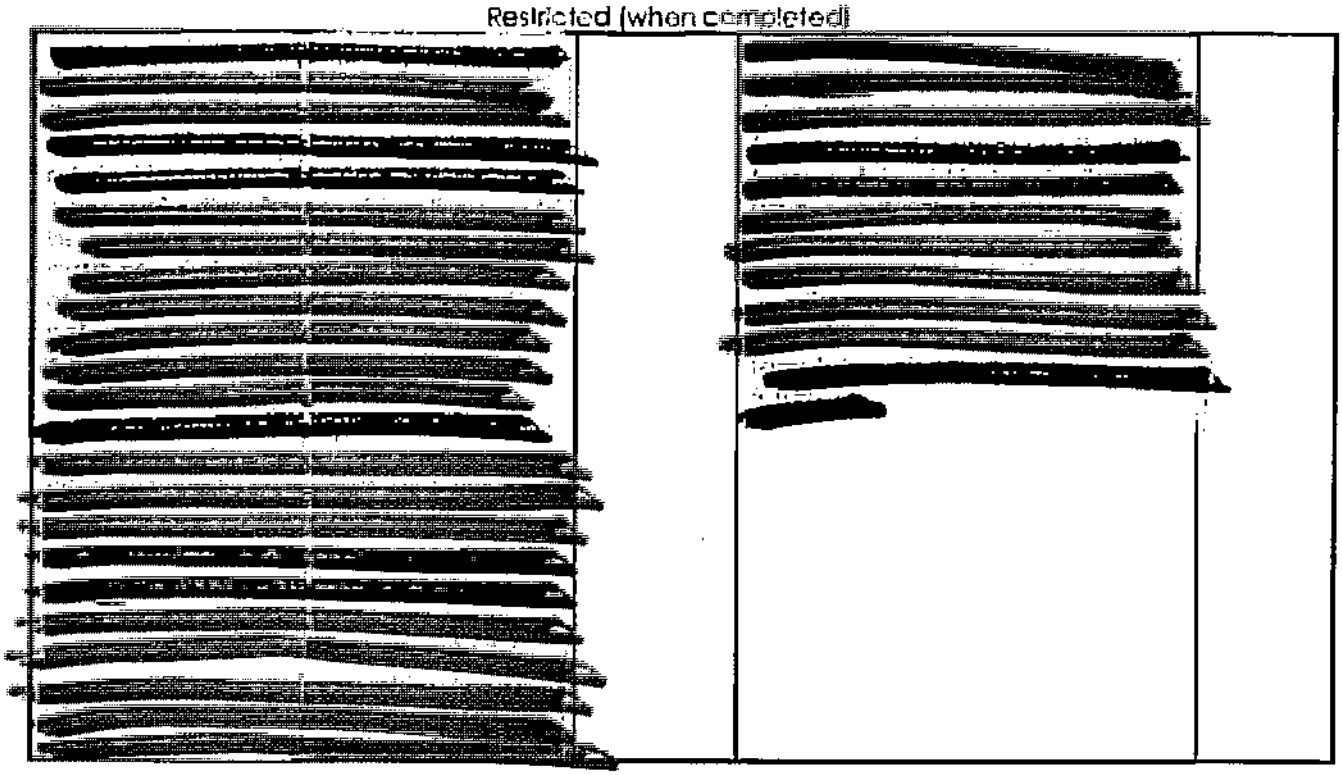
error which has no connection or relevance to any investigation or operation undertaken by the public authority receiving it, the material and any copy of it should be destroyed as soon as the report to the Commissioner has been made. (Para 6.21 CoP).		requirements.	
Excess Data			
Where authorised conduct by a public authority results in the acquisition of excess data, or its disclosure by a CSP in order to comply with the requirement of a notice, all the data acquired or disclosed should be retained by the public authority. If having reviewed the excess data it is intended to make use of it in the course of the investigation an applicant must set out the reason(s) for needing to use that material in an addendum to the original application. The DP will then consider the reason(s) and consider whether it is necessary and proportionate for the excess data to be used in the investigation or operation. (Para's 6.23 to 6.25 CoP).	**Yes**	[redacted]	

5. Confidential Unit

	ved No /	Description of Procedures & Action Required (if applicable)	Rec No.
[redacted]		[redacted]	







Freedom of Information Act (FOIA)

IOCCO is not a "public authority" for the purpose of the FOIA. It is therefore outside the reach of the Act, but it is appreciated that police forces are not and that they may receive requests for disclosure of our reports. In the first instance the SRO should follow the procedure which is outlined in Paragraph 8.5 of the Code of Practice (Part I Chapter II of RIPA) and also bring the matter to the attention of the ACPO FOI Central Referral Unit (acpo.advice@foi.police.pnn.uk). No disclosure should take place until both parties have been fully consulted as it is very important that requests under the FOIA are dealt with in a consistent manner.

Conclusion & Requirement for Action:

IOCCO are extremely grateful for the excellent assistance and cooperation received during this inspection. The recommendations from this inspection are appended to the report in a schedule. It would be appreciated if you would ensure that the Senior Responsible Officer (SRO) oversees the implementation of the recommendations and ensures the schedule is completed and returned electronically to [redacted] by 8th August 2011. In light of the good level of compliance it will not be necessary to conduct a further inspection for at least 18 months.