
STATES OF JERSEY



REGULATION OF INVESTIGATORY POWERS (JERSEY) LAW 2005 AND POLICE PROCEDURES AND CRIMINAL EVIDENCE (JERSEY) LAW 2003: REPORT OF THE INVESTIGATORY POWERS COMMISSIONER 1ST JANUARY TO 31ST DECEMBER 2017

Presented to the States on 11th September 2018

STATES GREFFE

FOREWORD

In accordance with the requirement in Article 44(6) of the [Regulation of Investigatory Powers \(Jersey\) Law 2005](#) and Article 104(4) of the [Police Procedures and Criminal Evidence \(Jersey\) Law 2003](#), I am pleased to lay before the States the attached Annual Report for 2017 of the Commissioner appointed under those Laws.

Article 44(6) of the Regulation of Investigatory Powers (Jersey) Law 2005 requires the report to contain a statement indicating whether any matters have been omitted from it. Article 44(7) allows the Bailiff to exclude any matter from the report laid before the States if it appears to him, after consultation with the Commissioner, that the publication of any matter in an annual report would be contrary to the public interest or prejudicial to national security, the prevention or detection of serious crime, the economic well-being of Jersey; or the continued discharge of the functions of any public authority whose activities include activities that are subject to review by the Commissioner. I am able to inform Members that, on the advice of the Commissioner, I have omitted the confidential Annex referred to in the report.

Article 104(4) of the Police Procedures and Criminal Evidence (Jersey) Law 2003 contains a similar provision, requiring the report laid before the States to contain a statement indicating whether any matters have been omitted from it. Article 104(5) allows the Bailiff to exclude any matter from the report laid before the States if it appears to him, after consultation with the Commissioner, that the publication of any matter in an annual report would be prejudicial to the security of the British Islands or to the detection of crime. I am similarly able to inform Members that, on the advice of the Commissioner, I have omitted the confidential Annex referred to in the report.

I would like to thank Lord Anderson of Ipswich, K.B.E., Q.C., for all his work in 2017, his first year as the Investigatory Powers Commissioner. Lord Anderson was appointed under the Regulation of Investigatory Powers (Jersey) Law 2005 and Police Procedures and Criminal Evidence (Jersey) Law 2003 following the retirement of former Commissioner, Sir David Calvert-Smith.

BAILIFF OF JERSEY

REPORT

INTRODUCTION

1. The Investigatory Powers Commissioner [**“the Commissioner”**] is a judge of the Jersey Court of Appeal, appointed by the Bailiff under Article 43 of the [Regulation of Investigatory Powers \(Jersey\) Law 2005](#) [**“the 2005 Law”**] and Article 104 of the [Police Procedures and Criminal Evidence \(Jersey\) Law 2003](#) [**“the 2003 Law”**] to keep under review the exercise and performance of the powers and duties conferred and imposed under certain parts of those Laws.
2. The relevant powers and duties relate to the following investigatory techniques –
 - (a) interception of communications (2005 Law, Articles 5–15 and 19);
 - (b) acquisition and disclosure of communications data (2005 Law, Part 2, Chapter 2);
 - (c) directed surveillance, intrusive surveillance and covert human intelligence sources [**“CHIS”**] (2005 Law, Part 3);
 - (d) interference with property (2003 Law, Part 11).

The 2003 and 2005 Laws confer limited powers on specified persons to authorise the use of those techniques for stated purposes. They also regulate the use that can be made of material gained as a result.

3. The Commissioner is obliged to make an annual report to the Bailiff with respect to the carrying out of the Commissioner’s functions (2005 Law, Article 44(4); 2003 Law, Article 104(3)). That report is to be made as soon as practicable after the end of each calendar year, and a copy of it laid before the States together with a statement as to whether any matter has been excluded from it because it appears to the Bailiff, after consultation with the Commissioner, that publication of that matter would be –
 - (a) contrary to the public interest; or
 - (b) prejudicial to national security, the prevention or detection of serious crime, the economic well-being of Jersey, or the continued discharge of the functions of any public authority whose activities include activities that are subject to review by the Commissioner.¹
4. I was appointed as Investigatory Powers Commissioner in 2017, in succession to Sir David Calvert-Smith, who retired from the Court of Appeal upon reaching the statutory retirement age of 72. This is my first annual report, covering the calendar year 2017.

¹ 2005 Law, Article 44(7). The grounds for exclusion are formulated slightly differently in the 2003 Law, Article 104(5).

THE POWERS UNDER REVIEW

5. Legal definitions of the powers under review are to be found in the relevant Laws and are not repeated here. But for the benefit of those without detailed expertise in these matters, I indicate in this section in general terms what the use of these powers may involve in practice, and the nature of the constraints placed by the 2003 and 2005 Laws upon their exercise.

Interception of communications (2005 Law, Part 2, Chapter 1)

6. The interception of communications in the course of their transmission traditionally refers to the opening of mail, but in more recent times has taken the form of listening in to telephone conversations (phone-tapping).
7. The interception of such communications in the course of their transmission is normally a criminal offence in Jersey (2005 Law, Article 5), and it may also give rise to a civil action (Article 6).
8. Interception is, however, lawful when authorised by an interception warrant issued personally by H.M. Attorney General (Article 10). Warrants may be applied for by the Chief of Police, the Agent of the Impôts and the Chief Immigration Officer in Jersey, certain Heads of Security Services and the Armed Forces in the UK, and competent authorities of foreign states with which Jersey has a mutual assistance agreement (Article 11).
9. A warrant may only be issued if the Attorney General believes it is necessary in the interests of national security, for the purpose of preventing or detecting serious crime, for the purpose of safeguarding the economic well-being of Jersey, or to give effect to the provisions of international mutual assistance agreements (Article 10). The conduct authorised by the warrant must also be proportionate to what it is sought to achieve (Article 10(2)(b)).
10. Serious crime is defined, for the purposes of the 2005 Law, as offences which involve the use of violence, result in substantial financial gain, or are conducted by a large number of persons in pursuit of a common purpose, or for which a person over 21 with no previous convictions could reasonably be expected to be sentenced to imprisonment for three years or more (Article 1(1)). Detecting crime is defined in Article 1(2).
11. Detailed provision is made in the 2005 Law for the contents of warrants (Article 12), their duration, cancellation and renewal (Article 13), their modification (Article 14), and their implementation (Article 15). Safeguards for intercepted material are set out in Articles 19 and 20.
12. Disclosure of the issue of a warrant, the interception of a communication or the content of an intercepted communication (intercepted material or “intercept”) are generally prohibited (Articles 21–23). As in the UK, but in contrast to most of the rest of the world, intercept is therefore inadmissible as evidence in criminal trials in Jersey. This means that when intercept is sought in Jersey, the intention is generally to find not evidence but intelligence which can help build a picture of the criminality involved, or assist in planning a disruption or further intervention from which admissible evidence may be acquired.

13. The very limited circumstances in which interception is lawful without a warrant are set out in Article 8 of the 2005 Law.

Acquisition and disclosure of communications data (2005 Law, Part 2, Chapter 2)

14. Communications data are data about use made of a telecommunications service, excluding the contents of the communications themselves. They are sometimes described as the “who, how, when and where” of a communication. Communications data are generally obtained retrospectively from a communications service provider [“CSP”] that retains that information, such as a mobile phone company or broadband provider. When intercept is collected in the course of transmission pursuant to Part 2, Chapter 1 of the 2005 Law, the related communications data are also collected.
15. There is no power in Jersey law to compel CSPs to retain communications data: accordingly, the availability of such data depends on the practices of the various CSPs, which vary considerably as between themselves.
16. The different types of communication data, defined in Article 24 of the 2005 Law, are grouped for operational purposes under the following heads –
- (a) *subscriber information* held by Communication Service Providers [“CSPs”] in relation to their customers, e.g. address, phone number or e-mail address and bank account data; and
 - (b) *call data* held by CSPs in relation to the use made of their telecommunications (or postal) system, including data identifying the apparatus, location or address to or from which a communication is transmitted, and location data provided by mobile phones on the move, as they communicate with base stations or phone masts (cell-site data).
17. The acquisition of communications data is treated by the law as less intrusive than the interception of content, even though it is possible to tell a good deal about a person’s movements and contacts through analysis of communications data. Accordingly, the range of purposes for which communications data may be obtained (Article 26(2)) is considerably wider than in the case of interception. For example, communications data may be requested if necessary “for the purpose of preventing or detecting crime or of preventing disorder” (Article 26(2)(b)), not merely for the purpose of preventing or detecting *serious* crime (Article 10(3)). It may also be requested in the interests of public safety or public health, for the purpose of assessing or collecting taxes or, in an emergency, for preventing death or injury (Article 26(2)(d)–(g)).
18. The range of public authorities permitted to access communications data is also wider than in the case of interception (Schedule 1). Authorisations on behalf of the Income Tax Department, Social Security Department, Parishes and intelligence services may be issued only by the Attorney General. Authorisations for communications data required for police, customs and immigration purposes are issued by the Chief Officer of Police, Agent of the Impôts and Chief Immigration Officer without any requirement for prior approval by Law Officers.

19. Communications data can be obtained by the giving of notices to a postal or telecommunications operator, requiring the operator to obtain and/or disclose relevant data (Article 26(4)). As in the case of interception warrants, such notices may be issued by a designated person only when the requirements of necessity and proportionality are satisfied.
20. Provision is made in the 2005 Law for the form and duration of authorisations and notices (Article 27), and for the reimbursement in whole or in part of costs incurred by service providers in complying with notices (Article 28).
21. Communications data, unlike intercept, are admissible as evidence in legal proceedings, and indeed often form a significant part of the prosecution case in relation to organised crime or conspiracy.

Directed and intrusive surveillance (2005 Law, Part 3)

22. Surveillance is defined by the 2005 Law, Article 31 as including “monitoring, observing or listening to persons, their movements, their conversations or their other activities or communications”, and recording the product. For the purposes of Part 3 of the 2005 Law, surveillance does not include the use of CHIS or warranted interception.
23. To be classed as intrusive, surveillance must be covert, and carried out in relation to anything taking place on any residential premises or in any private vehicle (Article 32(2)). Though it may involve the presence of an individual, it has traditionally taken the form of a surveillance device: for example, a “bug” attached to a vehicle or dwelling. Surveillance carried out by a device designed or adapted principally for the purpose of providing information about the location of a vehicle is not intrusive (Article 32(3)(a)).
24. Because of its capacity to intrude into the private spaces of vehicle and home, intrusive surveillance may be authorised only on the application of the same persons entitled to apply for interception, for the same limited purposes and on satisfaction of the same conditions as to necessity and proportionality. It requires a warrant from the Attorney General (Article 37).
25. Covert surveillance that is not intrusive but that is undertaken for the purposes of a specific investigation or operation, in such a matter as is likely to result in the obtaining of private information about a person, is known as directed surveillance (Article 32(1)). A classic form of directed surveillance is static, foot or mobile surveillance in the street. The use of tracking devices, and targeted open source research, may also class as directed surveillance. Directed surveillance assists in the prevention and detection of a wide range of crimes, from drugs offences to harassment. Though generally targeted on a particular suspect, it can and does identify the associates of known targets, as well as criminal activity not previously known. Like other forms of surveillance, it may also help decide the most propitious moment to launch executive action.
26. Directed surveillance is controlled in a manner analogous to the acquisition of communications data. The range of grounds on which the obtaining of communications data may be authorised (Article 34(3)) and the range of public

authorities permitted to authorise it (Schedule 2) is similarly wide. Directed surveillance required for police, customs and immigration purposes is authorised by the Chief Officer of Police, Agent of the Impôts and Chief Immigration Officer without any requirement for prior approval by Law Officers; the Attorney General is designated to authorise surveillance for other public authorities. The usual requirements of necessity and proportionality apply.

27. Rules for the grant, renewal, duration and cancellation of authorisations are in Articles 40 and 51 of the 2005 Law.

Covert human intelligence sources (2005 Law, Part 3)

28. A person is deemed to be a CHIS if they establish or maintain a person or other relationship with a person for the covert purpose of obtaining information, or if they covertly disclose information obtained from such a relationship (2005 Law, Article 32(7)). CHIS may be paid for their work by the public authorities that use them.
29. The public authorities entitled to use CHIS are the same as those authorised to use directed surveillance (Schedule 2). The system for authorisation, and the range of grounds for which CHIS may be authorised, are also the same. Additional requirements are spelled out in Article 35. In particular –
- (a) An officer must have day-to-day responsibility for contact with the CHIS and for his or her welfare.
 - (b) Another officer must oversee the use of the CHIS.
 - (c) A record must be kept of such use.
 - (d) There must be restricted access to details of the source’s identity.

Interference with property (2003 Law, Part 11)

30. Part 11 of the 2003 Law (under the misleading title “Control of Intrusive Surveillance”) renders lawful “entry on or interference with property or wireless telegraphy”, if authorised by the Attorney General in accordance with the Law. The concept of interference with property is not closely defined. It includes, for example, the damage to the fabric of a dwelling that may be required to insert a surveillance device: with this in mind, Article 38 of the 2005 Law provides for the Attorney General to issue combined authorisations under Part 3 of the 2005 Law and Part 11 of the 2003 Law.
31. Property interference may be authorised only where the Attorney General believes that it is necessary for the purpose of preventing or detecting serious crime, or in the interests of the security of the Island, and that the taking of the action is proportionate to what it seeks to achieve (2003 Law, Article 101(2)).
32. In contrast to the powers governed by the 2005 Act, no list of public authorities entitled to seek authorisation for property interference appears in the 2003 Act.

In practice, such authorisations are sought only by Jersey Police and by the Jersey Customs and Immigration Service.

Codes of Practice

33. Article 51 of the 2005 Law provides for the issue of codes of practice. Five such codes – on accessing communications data, CHIS, covert surveillance, interception of communications and interception of communications (postal) – were brought into operation pursuant to the [Regulation of Investigatory Powers \(Codes of Practice\) \(Jersey\) Order 2006](#).

CONDUCT OF THE ANNUAL REVIEW

34. After my appointment as Commissioner, I held a day of preliminary meetings in September 2017 with Law Officers, Police and Customs and Immigration. At those meetings I was briefed on current conditions regarding crime and immigration, and the role of investigatory powers in supporting investigations, operations and prosecutions.
35. I also had the opportunity to review the reports of my predecessor, Rt. Hon. Sir David Calvert-Smith, together with their Confidential Appendices, for the last two years. Jersey was extremely fortunate to have the services of such a senior judge and former Director of Public Prosecutions. His reports seemed to me, with respect, to be as thorough and conscientious as any senior Judge working alone could have hoped to produce.
36. For several years now, the equivalent inspections in the UK have, however, been physically conducted on the ground not by judges at all, but by specialised inspectors from the Investigatory Powers Commissioner's Office ["**IPCO**"]. Often from a law enforcement, intelligence or civil service background, these inspectors have a close familiarity with the capabilities and procedures employed. Because they spend the entire year inspecting various authorising bodies, they also have a deep knowledge of constantly-evolving good practice. Much of this practice relates to matters outside the normal experience of a judge: for example, the considerable complexities and risks that attend the handling of CHIS; the procedures for investigation of criminality within public authorities; the optimal methods of deploying a variety of covert means at different stages of an investigation; and the operation of the various available systems for data management. With the best will in the world, it is always possible for practices to develop in an island jurisdiction that depart from those in play elsewhere.
37. Having come to know IPCO and two of its predecessor bodies, the [Office of Surveillance Commissioners](#) ["**OSC**"] and the [Interception of Communications Commissioner's Office](#) ["**IOCCO**"], in particular by the delivery to and receiving from them of training, I was conscious of the significant value that their inspectorate would be able to add to the inspection process. Accordingly and at my request, Rt. Hon. Sir Adrian Fulford, the Investigatory Powers Commissioner in the UK and a serving Lord Justice of Appeal, agreed to make available to me the services of an IPCO inspector for the purposes of my first inspection.

38. On 21–22 February 2018, I conducted my annual inspection for the 2017 calendar year, with the assistance of Clare Ringshaw-Dowle, a Chief Inspector of the [Investigatory Powers Commissioner’s Office](#) [“IPCO”] in the UK.² Mrs. Ringshaw-Dowle is a UK Civil Servant who regularly inspects the whole range of authorities making use of investigatory powers in England, Wales, Scotland and Northern Ireland. Particularly in relation to her specialist areas of intrusive and directed surveillance, CHIS and property interference, she brought knowledge and understanding to the task that no senior Judge could be expected to possess. The result was a series of illuminating discussions and recommendations which Jersey Police and Jersey Customs and Immigration [“JCIS”] undoubtedly found very useful.
39. It might have been preferable to conduct this first inspection over a period of three days rather than two. But the value added to my inspection by an IPCO Chief Inspector speaks for itself, and I hope that in the future a way will be found to maintain an element of IPCO input into the inspections that it is my function to carry out. I should like to place on record my gratitude to IPCO and Sir Adrian Fulford for their generous assistance to date, both in the provision of a Chief Inspector without charge to the Jersey taxpayer, save in relation to her travel and subsistence while in the Island, and in making available to the Jersey Law Officers, again without charge, the same training that was offered to the authorising judges in the UK.
40. Though Clare Ringshaw-Dowle reported to me shortly after the close of the inspection in Jersey, I chose to prepare this report after making an equivalent inspection visit to Guernsey in April 2018, so as to ensure that my own understanding was informed by experience in both jurisdictions.

SCOPE OF THIS REPORT

41. There is an obvious public interest in legislators, and indeed the people of Jersey, understanding at least in outline how the intrusive powers conferred by law upon the public authorities translate into capabilities which are exercised on their behalf. That is the means by which those entrusted with these intrusive powers are rendered accountable to those whom they serve. Accordingly, in the body of this report, I have endeavoured to publish as fully as possible the conclusions of my review.
42. The trend in recent years in the UK and across northern Europe has been towards fuller disclosure of the use made of investigatory powers. An outstanding example is the work of IOCCO, one of the predecessor bodies of the UK’s IPA, whose last annual report covering interception and communications data was published in December 2017.³
43. In advising the Bailiff on what material should and should not be placed in the public domain, I have been guided by the practice of my predecessor

² Mrs. Ringshaw-Dowle was invited to Jersey pursuant to the 2005 Law (Article 43(5)), which allows the Commissioner to be provided with “staff”.

³ The Rt. Hon. Sir Stanley Burnton, [Report of the Interception of Communications Commissioner – Annual Report for 2016](#), December 2017. See also the [Annual Report of the Chief Surveillance Commissioner for 2016–2017](#), December 2017, which includes informative graphs showing the frequency of use of various kinds of surveillance over time.

Sir David Calvert-Smith, and by the developing practice of other oversight bodies. I have noted, in particular, that reports of the Interception of Communications Commissioner ([Susie Alegre](#)) and the Surveillance Commissioner for the Isle of Man ([Brendan O’Friel](#)) specify how many warrants and authorisations under the various powers of which they have oversight have been granted during the review period.⁴

44. I am also conscious, however, that there are special factors in a small jurisdiction such as Jersey that make it difficult to disclose information as comprehensive as that which is released in the UK. To take two examples –
- (a) The last IOCCO report broke down figures for requests relating to criminal activity by crime type. Bearing in mind the low level of serious criminality in Jersey, this is not a course that could safely be taken without giving at least a hint of the extent to which investigatory powers may have been used in specific operations or investigations.
 - (b) The lengthy Annex D to the last IOCCO report sets out the facts of 29 error investigations in considerable detail. Once again, to take a similar course would risk the identification of specific individuals and operations.
45. In this, my first report, I have sought (above) to describe a little more fully the nature of the powers under review, and also to give an indication of how much each power has been used. I have not given a detailed breakdown for the use of investigatory powers by the different public authorities in Jersey, so as to avoid any risk of the use of powers in specific operations being identified. It should however be noted that each of the authorisations and warrants of which I was made aware was –
- (a) in support of the activities of Jersey Police or JCIS; and
 - (b) for the purpose of preventing or detecting crime.
46. Further detail is reserved to the Confidential Appendix provided to the Bailiff, whose contents I hope will be of value to users of investigatory powers so as to inform their training and pursuit of good practice. It is for the Bailiff to determine, after consultation with the Commissioner, the extent to which it would be prejudicial or contrary to the public interest for material to be published in the open version of this annual report (2005 Law, Article 44(7)). The Bailiff consulted me in a full and entirely satisfactory manner prior to making that determination.

INTERCEPTION

47. A total of 57 warrants for interception were issued during 2017, relating to the subjects of 18 investigations managed by Jersey Police and/or JCIS. Overwhelmingly, these investigations concerned drug trafficking into Jersey and associated money laundering offences.

⁴ The latest Isle of Man reports available online as of April 2017 are the [Interception of Communications Commissioner’s annual report for 2015](#) (GD 2016/0020) and the [Surveillance Commissioner’s annual report for 2016](#) (GD 2017/0007).

48. I made a detailed examination of the use of interception warrants in three of the investigations in which they were used, and reviewed the others in outline.
49. Some learning points were identified and passed on to those concerned. The overall picture was a positive one, of intrusive but valuable powers being used in a lawful, proportionate and conscientious manner.

COMMUNICATIONS DATA

50. As in the UK (where no fewer than 754,559 items of communications data were acquired by public authorities in 2016), communications data requests were the most widely used of the investigatory powers in Jersey. During 2017 there were 162 applications for communications data, of which three were refused.
51. Communications data is useful not just for linking individuals with electronic devices, but for tracing their patterns of organisation, communication and movement. It can be of value not only for piecing together criminal networks and activities, but for supporting the alibis of innocent suspects and tracing, e.g. missing persons. Another use is in “*resolving*” IP addresses, a technique which can be of value for example in identifying which of a number of possible devices has been accessing indecent images of children from a server.
52. Accordingly, communications data was used during the period under review not only to target drug trafficking networks, but in support of investigations into a range of other crimes, as well as in a missing persons investigation.
53. Communications data formed part of so many investigations, in conjunction with so many other types of evidence and intelligence, that it would be a difficult or impossible task to attribute any particular number of arrests, convictions or seizures to its use.
54. I was however briefed on a number of operations where communications data were successfully used, and conducted my own examination of a number of cases in which authorisations were sought and granted. I also looked at the procedures which are used to recover communications data relating to persons who have been in contact with or otherwise associated with the subjects of interception.
55. A total of six administrative errors were drawn to my attention by Jersey Police and JCIS. Such errors may be attributable to the requesting authority or to the responding CSP, and typically take the form e.g. of a request being addressed to the wrong CSP, or a CSP returning data that was not asked for. None of the errors recorded in 2017 is likely to have had significant consequences for the privacy of the individual, but it is right that they are carefully logged and brought to my attention.
56. It appeared to me on the basis of my examination that these powers were used during the period under review in a generally lawful, proportionate and conscientious manner.

INTRUSIVE SURVEILLANCE / PROPERTY INTERFERENCE

57. Six authorisations for intrusive surveillance and 16 for interference with property were applied for and granted in the period under review.
58. They were reviewed by Clare Ringshaw-Dowle, who found that the applications reached a good overall standard, with clear consideration of such matters as necessity, proportionality and collateral intrusion, and made various recommendations aimed at further improving the clarity of the process and its outcome.

DIRECTED SURVEILLANCE

59. A total of 37 directed surveillance authorisations were granted in the period under review. These were, once again, reviewed by Clare Ringshaw-Dowle, who found the applications to be generally satisfactory, but identified specific cases where there could have been greater attention to detail, and made a number of suggestions to assist with learning and future training needs.

COVERT HUMAN INTELLIGENCE SOURCES (CHIS)

60. During the reporting period, Jersey Police and JCIS used the services of registered CHIS.
61. My predecessor was satisfied last year that the relevant Articles of RIPL had been properly applied, that authorisations granted had been properly made, and that the continuation or cancellation of such authorisations had been kept under proper review.
62. This remained true in the year under review, though Clare Ringshaw-Dowle was able to use her extensive practical knowledge of CHIS operation to make a number of recommendations aimed at the improvement of practice.

CONCLUSION

63. The investigatory powers under review were, so far as I was able to judge, exercised during 2017 in a lawful, proportionate and generally conscientious way. They made a major contribution to the prevention and detection of serious crime in Jersey, particularly though not exclusively in relation to drug trafficking and associated money laundering. While it would be inappropriate to give details that might allow the use of these powers to be traced to particular cases, operations in which Jersey Police and/or JCIS used the powers under review resulted during the course of 2017 in –
- (a) the seizure of drugs and cash worth several millions of pounds,
 - (b) the removal from the market of substantial quantities of Class A and Class B drugs, and
 - (c) numerous arrests, and a number of convictions which were followed in some cases by substantial terms of imprisonment.

64. I express my gratitude to Jersey Police and JCIS for the thorough and well-presented preparatory materials that were given to us, and for the impressive frankness and co-operation that they, together with the Law Officers, displayed towards us throughout our visit.
65. Clare Ringshaw-Dowle and I observed a number of examples of good practice, from both Jersey Police and JCIS, and from Law Officers. The few errors that were drawn to our attention had been promptly corrected, and without serious detrimental effects. We were able to make a number of suggestions for practical improvements, which those concerned indicated their willingness to implement.
66. Overall, I derived a satisfactory impression from my first inspection as Investigatory Powers Commissioner. The people of Jersey can be confident that these intrusive powers were in 2017 used wisely and productively on their behalf.

Lord Anderson of Ipswich, K.B.E., Q.C.
29 August 2018