HUMAN SOURCE MANAGEMENT PROJECT

VICTORIA POLICE

Review & Develop
Best Practice
Human Source Management
Policy

'Informers are the great corruptors.
They have shown their moral standing
by the mere act of informing.'

EXECUTIVE SUMMARY

For 151 years Victoria Police have been utilising 'human sources' to collect intelligence concerning the activities of criminals and criminal organisations. Sources, properly managed, offer unrivalled access to the criminal milieu.

As Victoria Police move towards a philosophy of 'intelligence led' policing it is essential that the organisation's ability to collect real time intelligence be maximised. The enhanced utilisation of human sources has the potential to substantially add to the intelligence pool required for intelligence led policing to occur.

Through the use of a central registration database, the ability to create a network of human sources capable of being deployed Forcewide exists. Such a database has the potential to be a powerful investigational tool.

Bitter experience has shown that the inherent value of human sources is offset by the high level of risk that comes with the use of these individuals. Poor management of human sources can result in the corruption of members, death or injury to human sources and exposure of the police organisation to civil liability and/or negative publicity.

The project team has concluded that the best chance of reducing those risks inherent in human source management will occur through:

- The implementation of training specific to human source management
- Application of risk assessment to the use of all human sources
- Recognition of the need to separate the management of 'high' risk human sources from the management of investigations (the 'sterile corridor')
- Selection of appropriate staff, properly resourced to perform the roles of dedicated Handlers, Co-handlers and Controllers.

Victoria Police has never adequately recognised that the cultivation, recruitment and running of human sources is a skilled business demanding the highest standards of integrity. It should be conducted by experienced, properly trained officers, working in a secure environment to the clear requirements of an informed and supportive management. Many Law enforcement agencies worldwide have achieved this through the creation of Dedicated Source Units.

It is the opinion of the project team that the implementation of Dedicated Source Units will result in higher standards of professionalism, enhanced source control, more focussed recruitment of human sources in support of force objectives and a reduction in crime.

Consultation clearly shows that the vast majority of investigators support the general concept of Dedicated Source Units and are craving for training in human source management. The project team believes that there is a very clear need for both. The alternative is that Victoria Police accept the risks and the consequences of doing so or discontinue the use of human sources altogether.

LIST OF RECOMMENDATIONS

Recommendation #1   Page 14

> The number of human source registrations be benchmarked regionally and departmentally for the year 2004 – 2005.   Regions and Departments then be assessed via COMSTAT against incremental improvements of the benchmarks set.

Recommendation #2   Page 14

> Victoria Police develop and implement a change management strategy aimed at encouraging members to actively seek out and cultivate potential human sources.

Recommendation #3   Page 15

> That a research project be undertaken to examine past cases whereby police investigators have formed corrupt relationships with criminal informers with a view to identifying causal factors and developing preventative tradecraft in human source management.

Recommendation #4   Page 20

> Where the implementation of a sterile corridor is deemed necessary, it occur preferably through the use of a dedicated full time handler.

Recommendation #5   Page 21

> A multi level tiered risk identification model be adopted whereby human sources are categorised either; low, moderate, significant or high level risk sources.

Recommendation #6   Page 22

> All parties involved in the management of human sources be trained in the risk assessment process.

Recommendation #7   Page 23

> The determination of the appropriate risk level will be made by the local registrar subject to final veto by the Central Registrar.

PROTECTED

Recommendation #8   Page 25

Dedicated handlers, co-handlers and controllers shall be compulsorily deployed for the management of all designated 'high' risk human sources ensuring the implementation of a sterile corridor.

Recommendation #9   Page 26

The Informer Management Unit retain functional control of Dedicated Source Unit/s which will be operationally tasked in accordance with local priorities.

Recommendation #10   Page 28

The maximum time in position for dedicated handlers be fixed at ▮▮▮ ▮▮▮▮▮ with no minimum time in position requirement.

Recommendation #11   Page 29

Members selected for duty at a Dedicated Source Unit enter into an Acknowledgment of Appointment memorandum providing for their removal from the position should they prove unsuitable.

Recommendation #12   Page 31

A training program be developed which includes the training of all parties involved in the supervision of human source relationships.

Recommendation #13   Page 32

The ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮ should be considered desirable, not compulsory, unless otherwise directed by a Controller, Local Registrar or Central Registrar after consideration of a risk assessment of the source or a particular ▮▮▮▮▮▮▮

Recommendation #14   Page 35

An investigator's ability to recruit and maintain human source relationships be recognised as a skill competency to be assessed for the purposes of the Performance Enhancement Program.

Recommendation #15   Page 35

All investigator's positions whether within a Crime Squad, Criminal Investigation Unit or a Regional Response Unit include as part of the key selection criteria, a 'proven' ability to recruit and manage human sources.

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Recommendation #16   Page 38

> That the Crime Department trial a 6 month pilot of a Dedicated Source Unit, staffed by four Detective Sergeants and one Detective Senior Sergeant in the roles of Handlers and Controller respectively.

Recommendation #17   Page 38

> That personnel for the trial be selected from diverse areas within Crime and that the personnel have credibility amongst their peers and a proven ability to manage human sources.

Recommendation #18   Page 38

> That the selected personnel attend advanced human source training either with the AFP or the ACC at the first available opportunity.

Recommendation #19   Page 38

> That the pilot DSU be housed within the Crime Department.

Recommendation #20   Page 38

> That the nominated Local Registrar for the pilot DSU be the Local Registrar of the Major Drug Investigation Division.

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TABLE OF CONTENTS

PROTECTED

LIST OF APPENDICES

A   Commissioning statement from Assistant
              Commissioner OVERLAND to initiate a project
              to 'Review and Develop Best Practice Human
              Source Management Policy'.

B   Victoria Police Informer Management Policy
              Chief Commissioner's Instruction 7/03

C   Drug Squad Review
              Informer Management Recommendations

D   Survey Guide for consultative interviews
              and forums

E   Condensed summary of consultation
              Feedback

F   Summary of existing Dedicated Source Units
              Nationally and Internationally

Background

On 27 July, 2003, Assistant Commissioner Crime OVERLAND provided a commissioning statement to Superintendent BIGGIN, the officer in charge of the Major Drug Investigation Division, to initiate a project to *'Review and Develop Best Practice Human Source Management Policy'*. (Appendix A)

The need to develop best practice in the management of informer handling was identified as a key issue in the development of the Crime Department's five year plan. The collection of real time criminal intelligence is recognised as a corner stone of the Crime Department's ability to contribute to the strategic plan key value area of Intelligent policing.

The Major Drug Investigation Division contains two proactive investigation units and is undoubtedly the biggest user of human sources in the Victoria Police. At the time of the writing of this report, 28% of all registered human sources for the Victoria Police were being managed by MDID handlers[1]. Approximately 80% of MDID investigations are driven by human source intelligence.

It is observed that the corruption which festered in the former Drug Squad was the direct result of improper relationships between police investigators and criminal human sources.

Terms of Reference

This project was to examine the way in which the Crime Department currently uses human source information and compare this with national and if necessary international best practice in human source management, with an emphasis on:

- Using human source information as an organisational resource
- The identification and use of human sources in defined areas of need, based on intelligence and operational requirements,
- Tasking human sources with specific requirements to further tactical and operational objectives,
- The tradecraft required to leverage human source information as a major intelligence and investigation tool, and
- The consequences for current policy, practices, procedures and training that flow from the findings.

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[1] State Intelligence Division – March 2004 Monthly Report

is the subject of a separate project currently being undertaken by the Informer Management Unit.

The Drug Squad review documents identify serious corruption issues arising from informer police relationships.   This review document provided the impetus for the creation of the current informer management policy and Informer Management Unit. This in turn led to the creation of additional control measures designed to minimise the risks inherent with human source handling.

The document does not however delve deeply into the trade-craft of human source management nor does it extensively analyse the police/human source relationship.

Human Source Management Workshop

During September 3 and 4, 2003, members of the project team attended an Australasian workshop on human source management hosted in Adelaide by the South Australian Police.   Members of law enforcement from all states, territories, the Commonwealth, the Australian Crime Commission and New Zealand attended the workshop. This led to the formation of the Australasian Human Source Working Group, established under the governance of the Australasian Crime Commissioners Forum.

The aim of the workshop was to develop and recommend minimum standards of practice with respect to human source management. The project team contributed to the development of sixteen key human source management principles which will be used to set the framework for the development of minimum standards in the management of human sources, nationally.   (Folio 1 – Item A)

The project team was exposed to policy and procedures currently in place in law enforcement agencies across the nation and New Zealand.   (Folio 2)

International research

In 2003, ███████████████████████████████, a Victoria Police member currently on secondment to the ACC, undertook a Winston Churchill Fellowship to study informer management best practice internationally.   In his research, ████████ collected documents pertaining to the policy and guidelines in place in the England, Ireland, Canada and North America. (Folio 3)

The project team has researched this material as well as the final report submitted by ██████████████████████ for the benefit of the Churchill Foundation, (Folio 1 – Item 2).

The project team has also conducted personal interviews with members of numerous international law enforcement agencies including; ████████████████████ ████████████████

Interviews and Forums

Between December, 2003 and March, 2004, members of the project team undertook a consultation process within the Crime, Operations, Ethical Standards and Specialist Operations Departments.   This consultation was conducted either as one on one interviews or as open forums.   (Folio 4)

The individuals targeted for one on one interviews in this consultation process were persons who were identified as having extensive experience in the areas of crime investigation as well as human source handling.

Approximately 130 individuals were consulted during this process.   A standardised survey format was prepared to ensure consistency in approach.   (Appendix D)
The content of these interviews and forums has been condensed into one document (Appendix E) which encompasses the views of experienced members regarding the following three topics:

- Informer Risk Management
- Current Policy and Methodology
- Proposed alternative informer management methodologies.

Working Party Deliberations

The working party for this project consisted of all members of the project team except ██████████ from the ACC.   The working party members represented a cross section of the major interested parties of Victoria Police having extensive 'hands on' human source management experience, both administratively and operationally.

The working party met on four occasions to discuss the research.   Whilst not forming unanimous agreement on all issues discussed, there was majority consensus reached on all recommendations put forward in this paper.

Nomenclature

In recognition of contemporary practice and for the sake of consistency, informers shall be referred to as 'human sources' throughout this document.

Masculine pronouns should be read as including the feminine.

Findings

"As an organisation, we don't know what we don't know."[2]

Intelligence led policing

One of the aims of the Victoria Police 2003 – 2008 strategic plan is to reduce crime by 5% through the implementation of targeted and proactive policing strategies.[3] This can only occur if there exists an organisational strategic capability to identify emerging problems, issues and opportunities through the collection and analysis of real time intelligence. This is the basis of intelligence led policing.

The targeting of individual offenders and criminal organisations requires an ability to deploy securely a range of intelligence and investigative resources. Each of the techniques employed carries with it particular advantages and risks which may be more or less effective according to the sophistication of the subject, and the difficulty in gaining access to the subject or the ability to protect the technique from criminal attack or exposure.[4]

For more than two hundred years the courts have recognised that the employment of human beings to provide information is a vital tool in the law enforcement effort and one which should be protected. Sources, properly managed, offer unrivalled access to criminals and criminal enterprises. They enable investigators to focus their efforts on lines of enquiry which will produce the best possible evidence, the greatest chance of frustrating criminal activity and the greatest likelihood of securing and maintaining public safety.[5]

Current practice

In comparison with some international and even national law enforcement bodies, it is very apparent that the use of human sources by Victoria Police would be best described as primitive. Human sources are not currently considered Force resources and the identification and recruitment of human sources, long considered a core function of any investigator, occurs on an ad hoc basis, even within the Crime Department.

The organisation has no philosophy of encouraging the development of this resource and in fact, could be said to actively discourage it. The token training that exists does little more than lead members to believe that human sources are more trouble than they are worth.[6]

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[2] Superintendent Ian THOMAS – State Intelligence Division
[3] 'The Way Ahead' – Victoria Police Strategic Plan 2003-2008 Pg. 8
[4] ███
[5] Ibid
[6] Consultation summary – Training Pg 14

Members have traditionally undertaken the role of human source handling through personal choice rather than organisational practice. Skills in this area have developed via trial and error, often at a cost to the member, the Department or the human source. This aspect of an investigator's duties has never been supported organisationally through training.

The current Victoria Police Informer Management policy is generally considered so onerous and impractical that it has had the effect of actually stifling registrations which have fallen by as much as 80% in many areas.[7]

Human source information as an organisational resource

The enhanced utilisation of human sources has the potential to substantially add to the intelligence pool required for intelligence led policing to occur, yet the organisation has no strategic ability to identify and recruit potential human sources.

Potential

> *"It can work, it's the mindset of the current coppers that has to change.* ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮
> ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮"[8]

The human source database has tremendous potential to assist in the reduction of crime if embraced by investigators as an investigational tool or avenue of enquiry. Unfortunately, the general opinion of the database amongst source handlers is that it is there simply as a management and compliance tool.

International and even local ▮▮▮▮▮▮▮▮▮▮ practice has proven that a contemporary and secure database can be used to identify sources who can be tasked to aid investigations Force wide. The current VICPOL practice of human source deployment is limited to either simply receiving intelligence volunteered by sources or tasking in a manner relevant only to that specific handler's interest. i.e. - drug trafficking for MDID investigators.

The fact that the database, if contemporary and secure, could be used by investigators to obtain assistance in their investigations, is generally not understood. Most source handlers have little or no idea that they may have a source who can be used in investigations outside of his/her area of interest. Many investigators who are aware of a source's broad potential do not exploit it for fear of exposing the source's identity to other investigators.

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[7] Results of consultative surveys
[8] Excerpt from consultative surveys

Strategic assessment

A human source database can be strategically assessed to identify weaknesses in an organisation's intelligence holdings. Such an assessment could then drive attempts to recruit human source in areas of strategic need.
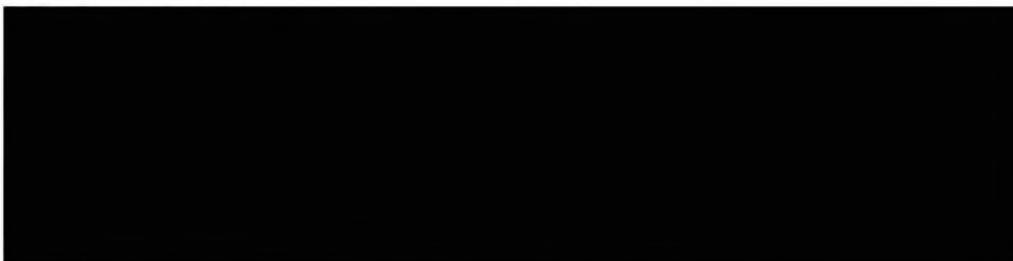
A human source database will only ever be effective if human sources are thoroughly debriefed, profiled and registered. There has to date been very poor compliance in regards to source registrations in Victoria.[9]

Recruitment

> "*Informers are a fact of life. We need them. Sometimes the perception from command is that it is a dirty business and we shouldn't go there. Fact of the matter is information is the lifeblood of an investigation and we really need it.*"[10]

There must exist within Victoria Police, an organisational philosophy of encouraging members to identify, recruit and register human sources. This is not currently the case. Those investigators that recognise the fact that every offender is a potential human source are certainly in the minority.

The importance placed on an investigator's ability to recruit and manage human source must be raised. This can occur in the following ways:

- Training
- Inclusion in position descriptions for investigators whether in the CIU or RRU
- Inclusion in Performance Enhancement Program as a component of competency assessment
- Awareness raising through presentations by IMU
- COMSTAT

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[9] Result of consultative surveys. Report to Informer management policy steering committee – 07.04.04.
[10] Excerpt from consultative surveys

Recommendation #1

The number of human source registrations be benchmarked regionally and departmentally for the year 2004 – 2005.   Regions and Departments then be assessed via COMSTAT against incremental improvements of the benchmarks set.

Recommendation #2

Victoria Police develop and implement a change management strategy aimed at encouraging members to actively seek out and cultivate potential human sources.

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[11] Informant Management Plan, chapter 7.4 - SAPOL

Ethics and Corruption

Corruption

The establishment of an ongoing relationship between a criminal and a police investigator is fraught with danger and presents great risk to the investigator, the police organisation and the source him/herself. Source handling must be considered amongst the highest risk functions of an investigator.

The reputation of the Victoria Police has been tarnished over recent years by the presence of serious corruption within the Crime Department. The former Drug Squad was the epicentre of this activity and as a result was disbanded.

Research reveals that in every instance of corruption within the former Drug Squad, a criminal informer can be found to be implicitly involved in the corrupt activities of the police member.

The project team has not reviewed each of these corrupt incidences in detail, however cursory examination raises the question – Who corrupted who? Were the police members already dishonest and simply using informers to further their corrupt activities, or did the informer corrupt the member during the course of the ongoing relationship?

Having regard for the fact that investigators receive negligible training in informer handling, it is clear that most are at a distinct disadvantage when undertaking the management of a career criminal who has spent his/her entire life learning how to manipulate people and circumstances to his/her personal advantage.

Recommendation #3

> That a research project be undertaken to examine past cases whereby police investigators have formed corrupt relationships with criminal informers with a view to identifying causal factors and developing preventative tradecraft in human source management.

Ethics

A common factor in all cases involving the corruption of a police investigator by a human source is the fact that the handler/source relationship changed from being a professional/business type relationship to a personal relationship. It is the development of this personal relationship that opens the door for corrupt practice to occur.

The development of a personal relationship between a handler and a source is almost inevitable. Great care must be taken to ensure that this type of relationship remains professional. The implementation and maintenance of appropriate selection processes, controls and training are the keys to minimising the risk of unhealthy relationships occurring.

The ethical dangers inherent in these relationships can be broken into four categories:[12]

- Failure to cope with Disclosure
- Loss of Identity
- Noble Cause Corruption
- Total Corruption

Failure to cope with Disclosure

The criminal justice system presents significant hurdles to the effective use of human sources by law enforcement. The criminal justice system is based on the concept on justice being transparent and open. This is the antithesis of the requirements of a human source system which is based on the covert collection of evidence and intelligence in a manner which will protect the identity of the human source and limit exposure of police methodology.

There is a great temptation by handlers to be economical with the truth by failing to properly disclose the role played by sources in police operations. Managers which condone this course of action or turn a blind eye to its existence fail to develop strategies designed to meet the requirements of a human source system and the court system.   This in turn leaves themselves and their organisations open to the risk of compromisation of the source system and\or total corruption.

Loss of Identity

The professional dividing line between a Handler and a source vanishes when the Handler develops an empathy for the source arising from a common frustration with the inability of the police organisation to implement seemingly effective strategy or to reward the source appropriately.   The ultimate result of the diminishing dividing line will be the dominance of a Stockholm Syndrome whereby the handler's loyalty will lie with the source rather than the law enforcement organisation.   A handler in this position will be ripe for manipulation by a source and open to total corruption.

Noble Cause Corruption

Put simply, noble cause corruption is the belief that the ends justifies the means, the noble cause being the putting of criminals behind bars. Participation in noble cause

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[12]

corruption often occurs incrementally, with the handler's moral barriers being broken down in small pieces. It may start with the turning of a blind eye to certain activities by the source in the name of achieving a result, but can ultimately end with a belief by the handler that any type of action is justifiable.

Total Corruption

Total corruption of a handler is typified by such actions as the receipt of payments from a source, the betraying of police operations by the handler or the participation in serious criminal activity by the handler with the source. It is the inability to manage handler/source relationships effectively that allows corruption to occur.

A certain culture of silence exists around the management of human sources whereby the relationships between handlers and human sources have been anything but transparent or even honest. Practices such as 'one on one' meetings between handlers and human sources and little or no scrutiny or supervision of these relationships allows corrupt practices to occur. History has shown that in most cases, managers are unlikely to be aware of the full extent of a corrupt relationship until overwhelmed by it.

Tenure

'I would have a very strong tenure clause on how long you can be a full time handler. You would put the handler at risk if you let that handler stay with some informers for more than that length of time. Ultimately your handler will end up being corrupted or insane if left in the role for too long.'[13]

Extended contact between a source and a particular handler will increase the chance that a strong personal relationship will develop. Police in the United Kingdom have found that the professional basis of the relationship between a source and a Handler is more likely to be sustained where both the Handler and source know that the post is subject to 'tenure'.

Experience has shown that one of the hardest things for a handler to do is to terminate a relationship with a human source. The temptation to get one more job out of a source overrides the ability to make an objective decision that enough is enough and it may be time to deregister that particular human source.

Conclusion

Each of these potential dangers is manageable. The development of appropriately selected, trained and resourced members to perform the roles of handlers and

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[13] Excerpt from consultative surveys

controllers working within a professional and accountable structure will minimise the risks associated with source handling substantially.

Research has shown that restricting handlers to the tasking and debriefing of a source, thereby prohibiting handlers from investigating intelligence generated by a source, contributes substantially to preventing the types of ethical situations described from occurring.

Sterile Corridors

"We do that (implement sterile corridors) PII *(sic) and it seems to work there, so why not. Again to me it assists with the objectivity and you don't get totally blind to what the informer is telling you. You have another set of eyes and ears."[14]*

One of the advantages to appointing dedicated handlers, is the ability to implement the concept of 'sterile corridors'. This means nothing more than the ability to separate the management of an investigation from the management of the human source that provides intelligence relevant to that investigation. This a concept that has been an essential and highly effective component of ▮▮▮▮ methodology for many years.

Advantages

When applied to informer management, the sterile corridor allows for:-

- The opportunity for an investigator to focus on an investigation without the distraction of source management issues, which often-times are not operationally relevant. (i.e. – welfare issues)
- The ability for the 'duty of care' relevant to the deployment of sources to receive the appropriate level of priority. As has been experienced in ▮▮▮▮ policing, investigators can be prone to 'tunnel vision', focussing on an end result and ignoring the collateral damage along the way.
- A more timely response to source requests and therefore collection of intelligence. An officer assigned specifically to the task of source management will have a greater opportunity to service a source and therefore collect what may be time critical intelligence
- The minimisation of compromisation of investigations and policing methodology. Appropriately trained members will be better able to guard against source 'fishing' expeditions for police methodology and/or investigation strategy. It would be possible for investigators to 'silo' the release of information so that a source handler may in fact never be aware

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[14] Ibid

of particular information relevant to an investigation and therefore be unable to inadvertently compromise that investigation.

- The minimisation of the risk of a 'loss of identity' by the handler who, because he/she does not have ownership of an investigation, can apply a higher degree of objectivity to the relationship, thereby keeping it professional.
- Maximum collection of source intelligence arising from the fact that the investigator will often focus only on that intelligence relevant to his/her investigation.

Disadvantages

During the consultation phase of this project, it became clear that the concept of 'sterile corridors' was the issue of greatest concern for investigators. Many investigators incorrectly believe the sterile corridor concept will 'rob' them of their ability to recruit and manage their own sources.

The sterile corridor means that an investigator cannot investigate intelligence his/her own source has provided. The investigator can however continue to recruit and manage informers. Should Victoria Police adopt this concept, the marketing of it will be critical.

Another concern held by investigators is the belief that the implementation of a sterile corridor will result in a loss of communication of intelligence to the investigator. Many investigators believe that a dedicated handler, who does not have ownership of an investigation, will fail to identify and explore relevant intelligence during the debrief of an informer.

It is the view of the project team that a well briefed and skilled handler will, in most cases, do a better job at thoroughly debriefing sources than most investigators.

MDID Trial

During September/October, 2003, the concept of a sterile corridor was trialed at the Major Drug Investigation Division for the management of a reliable but high maintenance human source. This source had an established close relationship with the original recruiter who, at the request of MDID management, conducted a handover of the source to a second designated handler for the purpose of the trial.

The second handler was known to the source and the handover itself was successful. The trial was however a failure, primarily because the designated handler found great difficulty in prioritising the demands of the source over the demands of his own ongoing investigations. The intelligence provided by the source diminished and ultimately ceased completely.

The trial although limited, clearly revealed the fact that for a sterile corridor to work properly, the handler must be dedicated to the role and cannot be distracted by other duties such as the performance of his or her own investigations.

The project team believes that the effective use of a sterile corridor can only occur if the handler is dedicated full time to the task. This belief is supported by the findings of a ███████████████████████████ ████████████████████ in 1998 which stated[15]:

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████████████████████████████

Recommendation #4

> Where the implementation of a sterile corridor is deemed
> necessary, it occur preferably through the use of a
> dedicated full time handler.

Criteria for implementation

The project team has considered the viability of enforcing the implementation of sterile corridors for the management of every human source within the Victoria Police.

This would be an extremely resource intensive process if the true sterile corridor were to be utilised in tandem with a dedicated handler, even assuming there existed a training regime to develop dedicated handlers in the required quantity.

Members must be encouraged to identify and recruit as many viable human sources as is possible. A belief amongst investigators that they will be compelled to handover all human sources to dedicated handlers will without doubt 'kill off' any incentive for investigators to recruit human sources.

For these reasons the project team does not support the implementation of sterile corridors for the management of all human sources.

The project team do however consider the use of a sterile corridor and dedicated handlers to be a control measure which could significantly reduce the risks of source management and believe that a risk assessment model can be adopted to determine when this control measure should be deployed.

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[16] ██████████████████████████████████

Risk Assessment

*"I would like to see a tiered process where the level
of risk would determine how the informer was managed and
what level of paperwork was involved."*[17]

In September, 2003, representatives from Australian and New Zealand law enforcement agencies attended a National workshop on human source management hosted in Adelaide by the South Australian Police. In October, 2003, the outcomes of this workshop were presented to the Australasian Crime Commissioner's Forum held in Sydney, New South Wales.

Arising from discussion on this issue, the ACCF resolved to convene a working group under the sponsorship of VICPOL to advance the following human source issues:

- Intra-agency human source intelligence exchange
- Training
- Development of a Human Source Risk Assessment model
- Specialist Human Source Management Teams

The Victoria Police Informer Management Unit (IMU) has responsibility for the carriage of these issues. Various risk assessment models are currently under consideration however it is most probable that the Risk Management Standard AS/ANZ4360:1999 will form the basis for the human source risk assessment model.

This form of risk assessment reflects the combination of likelihood and consequence in a level of risk matrix and is currently in use Force-wide for the preparation of Departmental risk registers. Four levels of risk are identified in this model, these being; Low, Moderate, Significant and High.

Recommendation #5

A multi level tiered risk identification model be adopted whereby human sources are categorised either; low, moderate, significant or high level risk sources.

Risk categories

Risks attached to human source management can be grouped into five categories. These include risks associated with the:

- Information
- Handler/Co-handler and Controller
- Source

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[17] Excerpt from consultative surveys

- Law enforcement agency
- Public

Having regard to the high level of risk inherent with human source management, it is imperative that a comprehensive risk assessment of every human source be undertaken prior to registration. It is equally important that this risk assessment be reviewed and updated on a regular basis.

Whilst the current Victoria Police Informer Management Policy recognises the need for risk assessment in the aforementioned areas[18], there is a general lack of understanding amongst investigators, handlers, controllers and local registrars as to how to conduct and document the risk assessment process.

In order for the risk assessment to be meaningful, members must be provided training in this function. The training should be available to all persons involved in the risk assessment process including; handlers, co-handlers, controllers, officers in charge and registrars.

Recommendation #6

> All parties involved in the management of human sources be trained in the risk assessment process.

Responsibility for risk assessment

> *"If you have a risk level system (as to whether an informer should be handed over or not), that is determined by the handler who would have to have the main input into it, it may not work because if he doesn't want to hand over the informer he will reduce the risk, making the risk assessment process a joke."[19]*

The consultation phase of this project determined that most members would support a risk assessment process that determined how a human source was to be managed and who would manage that human source. Few members however, supported a compulsory handover of a source without having input into this decision.

Many investigators fear that human sources will be taken from them and with this in mind, the project team is of the belief that the responsibility for the preparation of a risk assessment should not lie with the handler. As is currently the case with the forced entry search criteria, there is a distinct possibility that some handlers may down grade a risk assessment to ensure that he/she could maintain management of a particular source.

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[18] Victoria Police gazette number 19 – Chief Commissioner's Instruction 7/03, chapter 23.
[19] Excerpt from consultative surveys

Whilst the input from the handler in this process will be essential, the controller and the local registrar will add further to the assessment and should provide a degree of objectivity to the process. The handler is unlikely, for example, to consider his/her own ability to manage a particular source.

The Local registrar should in most cases, determine the level of risk. It is however, recommended that the Central registrar of the Informer Management Unit have the final veto on the risk assessment, having regard for the fact that the registrar may hold information concerning a particular source which will be unknown to the Local registrar, controller or handler.

Recommendation #7

> The determination of the appropriate risk level will be made by the local registrar subject to final veto by the Central Registrar.

In view of the work being currently undertaken by the Informer Management Unit on this subject, the project team does not intend to make recommendations concerning the management structure to be applied to human sources who are not deemed 'high' risk.

Dedicated Source Units

"I actually like the concept. I have a couple of informers that I don't have time to dedicate to them. Two of them you could task with a whole heap of stuff and from them you could recruit more informers, but I just don't have the time. Again you must have the right blokes."[20]

The project team has concluded that the best chance of reducing those risks inherent in source management will occur through:

- The implementation of training specific to human source handling
- Application of risk assessment for the use of all human sources
- Recognition of the need for and implementation of the sterile corridor concept
- Selection of appropriate staff, properly resourced to perform the roles of Handlers, Co-handlers and Controllers

Many law enforcement agencies nationally and internationally have achieved this by creating 'Dedicated Source Units' (DSU's).

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[20] Excerpt from consultative surveys

International and national trends

The Victoria Police Informer Management Unit has undertaken extensive consultation with regards to the structure and functions of human source management both nationally and internationally.

A summary of the methodology utilised by particular countries is detailed as per Appendix F[21]

The creation of dedicated human source teams/units is rapidly becoming contemporary practice amongst international and national law enforcement agencies and such units now exist in the United Kingdom, Canada, Ireland, North America and even Australia. The ▮▮▮▮▮▮▮▮ Police, the ▮▮▮▮▮▮▮▮▮▮▮▮ and the ▮▮▮▮▮▮▮ Police all operate some form of Dedicated Source Unit.

Many law enforcement agencies recognise both the inherent value of human sources and the inherent high level of risk that comes with the management of these individuals. With this recognition is the realisation that the cultivation, recruitment and running of Covert Human Intelligence Sources is a skilled business demanding the highest standards of integrity. It should be conducted by experienced, properly trained officers, working in a secure environment to the clear requirements of an informed and supportive management.[22] This is the basis for a Dedicated Source Unit.

Models for DSU's

Research has shown that all law enforcement agencies having DSU's, insist that a dedicated handler be involved in the management of human sources at some level.

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[21] Prepared by Detective Sergeant Glenn OWEN – Victoria Police Informer Management Unit
[22]

The degree to which a dedicated handler is utilised varies amongst these organisations. [PII]

[redacted]

[redacted]

[redacted]

It is the opinion of the project team that the degree of deployment of dedicated handlers, co-handlers and controllers be dependant on a risk assessment of the human source.

Effect of risk determination

As the risk level of a source relationship increases, so too, should the control measures that are implemented. It may for example, be sufficient for 'Low' risk human sources to be managed by handlers who are not trained but who are controlled by trained controllers. 'Moderate' risk human sources could be handled by trained handlers and controllers and 'Significant' risk human sources may require input from either a dedicated handler or controller.

It is the opinion of the project team that the use of a sterile corridor via the deployment of a dedicated handler should be mandatorily applied to the management of all designated 'High' risk sources.

Recommendation #8

> Dedicated handlers, co-handlers and controllers shall be compulsorily deployed for the management of all designated 'high' risk human sources ensuring the implementation of a sterile corridor.

The deployment of dedicated staff to the management of non 'high' risk sources should be optional and could occur in consultation with the interested parties. It is envisaged that handlers of particularly high maintenance sources may desire that a

DSU take over the management of that source even though the source is not deemed 'high' risk.

Roles and function of Dedicated Human Source Unit

The DSU models currently in existence vary only slightly in terms of their responsibilities and functions. It is generally accepted that there should exist a separation of the operational focus of a DSU from the audit, management functions relevant to the registration database and intelligence analysis. In order to preserve the integrity of the audit and management processes, those members directly responsible for the administration oversight must not be involved in the operational management of human sources.

It is the belief of the project team that DSU's, whether centrally, regionally or departmentally located should be operationally tasked by line management in a local area. Functional control should however remain with a central body responsible for ensuring consistency in issues such as; training, ████████, intelligence management, legal processes, public interest immunity, etc.

The central body should also have responsibility for the management of the human source database, audit of human source management processes, compilation of strategic assessments, and co-ordination of human source reward process. The Victoria Police Informer Management Unit, (IMU), is currently performing these functions.

A DSU should be considered a resource for investigators to call upon. Dedicated handlers can:

- assist with the preparation of risk assessments
- provide training and advice to members
- act as a co-handler for lower risk sources if requested or considered necessary
- take on full time management of non high risk informers if requested
- attend any meeting with sources at the request of non DSU handlers or controllers

Recommendation #9

> The Informer Management Unit retain functional control of Dedicated Source Unit/s which will be operationally tasked in accordance with local priorities.

Selection of personnel

> *"You really have to get the quality of those handlers absolutely spot on. For this concept to be sold state-wide, the selection of those*

*people is paramount in order that members of the organisation
have total confidence in the handlers and or unit."[24]*

The strongest point made by those persons interviewed by the project team in regards
to the implementation of dedicated source units and the sterile corridor concept, is that
the selection of personnel for the role is critical.

The Australasian workshop on human source management convened in September,
2003, considered the skills and attributes necessary for personnel working as part of a
Human Source Management Section.

Skills considered essential include:

- High motivation
- Stress Tolerance
- Flexibility
- Lateral Thinking
- Capacity to correctly evaluate and manage risk
- Sound knowledge of source management policies, procedures and issues
- Integrity
- National security clearance (minimum level secret)
- Knowledge of information management, processes and protocols
- Knowledge of relevant legislation

Additional skills considered desirable for those members actually handling human
sources include:

- A demonstrated capacity to undertake human source management
  activities as a high level
- Previous experience in a law enforcement environment
- Previous human source management experience
- Willingness to undertake advanced or further training
- Proven investigative ability

The project team considers one additional skill to be critical to the successful
deployment of dedicated handlers, that being the possession of excellent
communication skills.

Human sources have long been considered an individual resource for many
investigators. The handover, (sometimes compulsory), of this resource will in many
cases be resisted by investigators. Dedicated handlers must have the ability to ease
an investigator's greatest concern, that being a loss of control over what was
considered his/her resource.

Occasions will arise whereby the handler will be required to exert strong influence
over the tactical deployment of a human source and this will bring the handler into
conflict with some investigators. As in the case of the ▮▮▮▮▮▮ from the

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[24] Excerpt from consultative surveys

██████████ source handlers will require a great deal of diplomacy in these situations.

The project team strongly believes that members below the rank of Sergeant cannot adequately perform the role of a dedicated source handler. Whilst it is conceded that there are some very good Senior Constable source handlers in the organisation, the rank of Sergeant carries additional authority necessary to assist the handler in performing his/her role properly.

Tenure

Research suggests that a maximum tenure of ████████ is the optimal period for time in position for dedicated handlers. Whilst a dedicated handler could conceivably maintain a continuous relationship with a human source over this period of time, management should not, except in exceptional circumstances allow this to occur.

A dedicated handler may maintain the primary contact with a source over a lengthy period of time, however the co-handler could and would vary allowing for additional independent assessment of the ongoing relationship.
The actual maximum length of time a handler could maintain continuous management of a particular human source would be dependent on the ongoing risk assessment of that relationship. Time should be a crucial component of the risk assessment process.

Recommendation #10

> The maximum time in position for dedicated handlers be fixed at ████ ████ with no minimum time in position requirement.

Selection Process

The current selection processes utilised by the ████████████ provide distinct advantages for personnel management. Firstly the selection of ████████████ ██ ██

The ability to select appropriate human source handlers can be simplified by reference to the human source database once it is being utilised properly. This database will contain a great deal of information which will identify those members who are skilled and interested in human source recruitment and management.

The second advantage held by the ████████████████████████████ positions have no minimum tenure. This allows management the flexibility to terminate an individual's attachment to the position in certain circumstances.

Through the use of an Acknowledgment of Appointment memorandum, ████████ sign an undertaking to perform duty at ████████████ subject to certain

conditions. One such condition is that the appointment to the unit may be revoked at the discretion of the officer in charge for any breaches of discipline or any other issue that may impact on the unit ████████████

████████ also agree that their appointment may be terminated if they are found to be no longer suitable for the position.

It is considered essential that a similar appointment process should apply to the staff of a DSU having regard to the considerable 'high' risk to all parties should a human source handler prove to be unsuitable for the position.

Recommendation #11

Members selected for duty at a Dedicated Source Unit enter into an Acknowledgment of Appointment memorandum providing for their removal from the position should they prove unsuitable.

Tradecraft

The implementation of DSU's will deliver minimum standards of practice applicable to human source management. The overarching principle of successful human source management worldwide is control. The control of the handler/human source relationship arises from:

- Adherence to Policy
- Appropriate selection and training of personnel
- Application of risk assessment principles
- Intrusive supervision
- Application of best practice trade craft

Policy

The current Victoria Police informer management policy is considered by the project team to be sound and viable. It is a framework which provides for sufficient levels of supervision and accountability.

Feedback received during the consultation phase of the product revealed a great degree of dissatisfaction with the policy amongst investigators across the State. This dissatisfaction was focussed on the requirement for sources to sign an Acknowledgment of Responsibilities form and more specifically the content of the form. These issues have directly contributed to the general lack of acceptance of the policy and therefore lack of registrations of human sources.

On 7 April, 2004, these issues were raised before the policy steering committee and amendments made to rectify this situation.

Should DSU's be adopted in any shape or form, there will be a need to further amend the policy to suit. The Informer Management Unit is well advanced in considering the necessary changes to the policy should DSU's be created. Consequently the project team has not addressed these policy issues.

Supervision

> *"You need someone independent who can assess the relationship and is not blinded by potential results. That person has to have a great operational focus and can relate to the investigators. I see this often from the surveillance side of things. You notice how investigators are dealing with informer and can see that they are getting too friendly with them. Some of them start to think that they owe the informer something."[25]*

Feedback received by the project team on the role of the Controller clearly indicates a poor understanding of the role by the majority of members.

Controllers are the primary supervisors in the chain of supervision provided by the system. Policy currently requires the Controller ███████████████████ █████████ and to also attend meetings between the Handler and Informer when their presence is deemed appropriate.[26]

Many members see the Controller's role as nothing more than the manager of an informer management file, i.e. a paper shuffler. The management of the file is only one of the methods by which the Controller can get a feel for the handler/human source relationship.

Controllers must intrusively supervise and manage relationships between sources and handlers.[27] ████████████████████████████

████████████████████████████████████

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[25] Excerpt from consultative surveys
[26] Victoria Police Chief Commissioner's Instructions 7/03 – Informer Management Policy – Para. 14
[27] Winston Churchill Fellowship Report – ████████████████

The policy provides for sufficient supervision by the Controller however those persons performing the role need to be educated as to how they can achieve an effective level of supervision.

Many Controllers have stated that they simply do not have the time to take a 'hands on' approach to the role. This is yet another benefit of a DSU in which the Controller's role is a dedicated function.

Recommendation #12

> A human source management training program be developed which includes the training of all parties involved in the supervision of human source relationships.
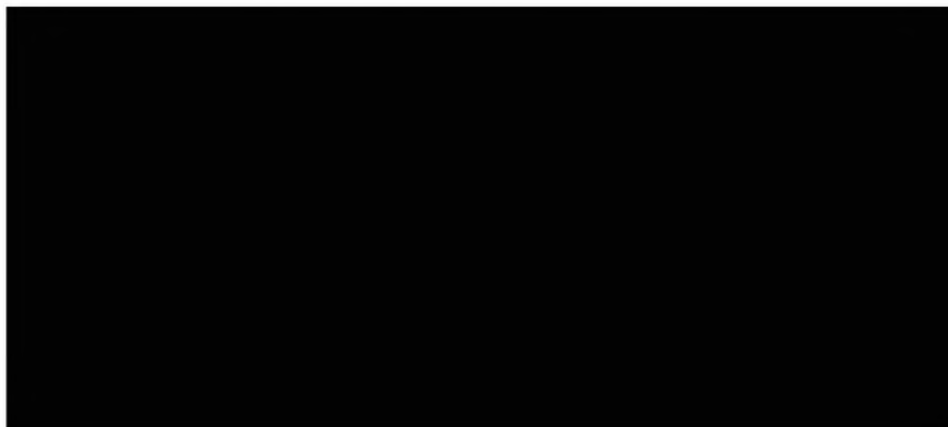
Field practices

The creation of a full time undercover police unit in 1993 resulted in the development of field practices that can be loosely termed as tradecraft.   Minimum standards of operation were implemented to make undercover policing safer and more professional.
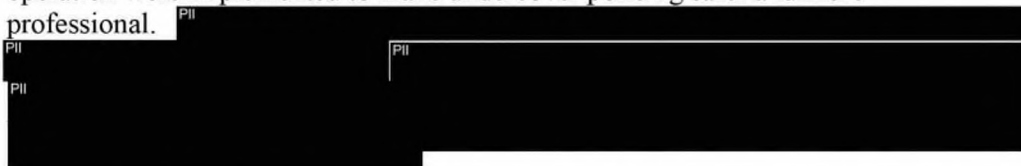
In much the same way the professional management of human sources has been overlooked thereby exposing members, the organisation and human sources to great risk.   Practice in the field is inconsistent and sloppy.   Examples of members using their own mobile phones as contact points, arranging regular meetings and even utilising their own vehicles to meet with human sources, are common.

Where human sources provide information or assistance to the Victoria Police on a confidential basis, every effort must be made not to compromise the links between that source and Victoria Police.

Many members fail to realise that today's human source is potentially tomorrow's target. Many handlers inadvertently educate human sources in police methodology. It is not uncommon for handlers to identify surveillance vehicles to sources or provide sources with information concerning undercover strategies.

Whilst far from exhaustive, the following points should be regarded as the minimum standard of professional practice to be adhered to for the management of 'high' risk human sources 'in the field':

- Only trained handlers and controllers be deployed to manage 'high' risk human sources
- ███ ███████████████████
- Meetings between handlers and human sources should never occur at or in the ███████████████████████
- Handlers must attend all meetings with human sources ███████████████ ████████ unless exceptional circumstances require otherwise and the meeting has been sanctioned by a Controller
- Handlers are to provide appropriate ████████ to sources for meetings and contacts
- Sources are to be provided with ████████ contact details for handlers and co-handlers
- Contact details provided to sources should be ███████████████ ████████████████████████████████
- Vehicles utilised to meet human sources should be ████████████ ████████████████████████████████████
- Handlers must not meet with human sources ████████████████
- Sources must be appropriately instructed in matters relevant to their own security
- Every effort must be made to minimise the exposure of ████████ ████████████████████████████████
- Handlers must not become socially or emotionally involved with the human source or his/her family
- ████████████ measures should be undertaken prior to and immediately after all meetings between human sources and handlers, co-handlers.
- ██ ██ ██

The tradecraft of human source management is a skill that requires a high level of training, experience, communication skills and intelligence. The deployment of tradecraft necessary for the management of 'high' risk human sources also requires a high level of resource support.

For example, an appropriately ████████ mobile telephone and vehicle should be considered essential items of equipment for a dedicated human source handler.

Meetings with some 'high' risk sources should be planned to such an extent that ███
███

Training

> *"...It is self taught or relying of others with experience or relying on others in the organization who are respected for their experience. There's no tuition other than what's in the policy. These people will play you on a break and they are professionals in their area. You only learn by trial and error which is a very ad hoc approach to it."[28]*

At the time of the writing of this report, the Informer Management Unit are researching and developing a training package for members involved in the management of human sources as part of the ACCF resolutions for the National Working Group on Human Source Management.

It is generally agreed that training needs to be aimed at ████████████

████████████████████ Policy and procedures
████████████████ – Managing informers
████████████ – Dedicated handling teams

It is worth noting that the during the consultation phase of the project, participants were very vocal in expressing a strong desire for training and a dissatisfaction with the organisation for failing to provide training in what is essentially a high risk function. This positive attitude to training will provide opportunities for exploitation and the promotion of a change management strategy.

Change Management

The concepts proposed in this project paper represent significant change not only for those members who currently seek to establish relationships with human sources, but for all members of the Victoria Police. A change in culture will be required and an extensive change management strategy is necessary.

The consultation phase of this project revealed that concepts such as sterile corridors and the recognition of human sources as force resources are concepts that when sold properly, appeal to the majority of investigators. The ability to utilise a source database (with appropriate safeguards) as a tool for investigators, is the best argument for encouraging human source registration and policy compliance.

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[28] Excerpt from consultative surveys

Members must see that the informer management system is more than just a management tool, it is also an aid to an investigation with the advantage that it provides protection to both them and their source.

The organisation can encourage members to embrace the proposed concepts or it can 'bludgeon' them into compliance via policy. The implementation of the current informer management policy has not been successful with the number of source registrations drastically falling. The fact that many members are not registering human sources places the organisation at significant risk.

Recent changes to the policy in response to members' concerns have substantially improved the policy. This should assist in encouraging members to adopt the policy requirements. The project team believe that training, awareness raising, and assessments of an individual member's ability to recruit and manage human sources tied to position descriptions, will also help to drive the cultural change required for an enhanced human source network to exist.

Recommendation #14

> An investigator's ability to recruit and maintain human source relationships be recognised as a skill competency to be assessed for the purposes of the Performance Enhancement Program.

Recommendation #15

> All investigator's positions whether within a Crime Squad, Criminal Investigation Unit or a Regional Response Unit include as part of the key selection criteria, a 'proven' ability to recruit and manage human sources.

It is also the opinion of the project team that the implementation of a pilot trial of a Dedicated Source Unit based within the Crime Department will substantially aid in the acceptance of the concepts discussed in this paper.

Pilot Project

> *"Sounds really good, practicalities need to be worked out. Why don't we use this (S.A. model) on a trial basis to refine procedures and handling. Would like a Crime department Dedicated Human Source Unit to look after informer nightmares with Purana."*[29]

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[29] Excerpt from consultative surveys

The project team strongly supports the implementation of a pilot project as a trial of a dedicated source unit. It is recommended that this pilot occur within the Crime Department primarily because it is this area of police operations that generates the majority of the 'high' risk sources.

It is considered essential that a trial DSU be adequately resourced. Failure to do so will impact on a final assessment of the value and viability of such a concept. Handlers must have the equipment necessary to respond to human source requirements, i.e. vehicles after hours, mobile telephones, etc.

A funding stream for the support of this project must be identified. An attempt to operate a DSU on a shoe string budget or by robbing over-stretched squads of resources, (personnel excepted), is most likely to fail.

Personnel

The project team suggests that four Detective Sergeants and one Detective Senior Sergeant be selected from the Crime Department to perform the roles of dedicated handlers and controller, respectively. It is considered essential that the handlers be selected from a cross section of crime squads that rely on human source intelligence, in order that the handlers can be utilised to 'sell' the message across a broad cross section of members within the Crime Department.

Office Location

A secure office within the Crime Department building at 412 St. Kilda Rd. is considered the best option for office location. Many crime department members believe that the handlers should be very accessible to investigators in order that communication can occur swiftly and directly.

It is also the view of the project team that the handlers should be very visible within the crime department, exploiting their access to crime department members to generate cultural change and recognition of the advantages of dedicated source handlers. Removal from the Crime Department will minimise the opportunities for this to occur.

Vehicles

It is recommended that four vehicles be made available for use by the four handlers. There will be an expectation that the handlers be able to respond to source or investigator requests after hours. This capability is critically important. There will undoubtedly be occasions when source intelligence must be actioned swiftly otherwise opportunities will be missed. Poor service by the handlers for any reason, will have a negative impact on the pilot.

The vehicles must be ███ and professionally ████████ with ███████████ details in order to reduce the risk of compromise of a source. The ████████

███ could assist in this area. ███████████████████████████

███████ is considered the minimum necessary to cater for the professional deployment of ████████ ████████████████ will require the use of ████████ to conduct a single meeting with a 'high' risk source on occasions.

Equipment

Equipment such as mobile telephones, computers and ████████ covert ████ ████ will be essential equipment. Mobile telephones must also be adequately ████ with ████████ details.

████████████████████████ will be required to provide security and ████████████ handler source meetings.

Security

Having regard to the highly sensitive nature of the intelligence to be gathered by the handlers, office security will be critical. Safe style filing systems and office alarm systems will be essential.

Duration of pilot

The project team considers that a six month trial period should be sufficient time for an assessment of the success or otherwise of a dedicated human source unit.

Operational expenses

Sufficient funding for operational expenses must be allocated to allow for such expenses as:

- ████████████ source debriefs if necessary
- Cost of mobile telephones or SIM cards for sources (where necessary)
- Expenses for source tasking i.e. refreshments ████████████ petrol money for vehicles, etc.
- Expenses for handler/human source meetings i.e. coffee, food
- Travel and accommodation costs for handlers

It is suggested that a cash float imprest system such as that employed by MDID and the ████████████ will be required to allow for cash payments to be made for such operational expenses in a manner which will cannot be linked to the Police Department.
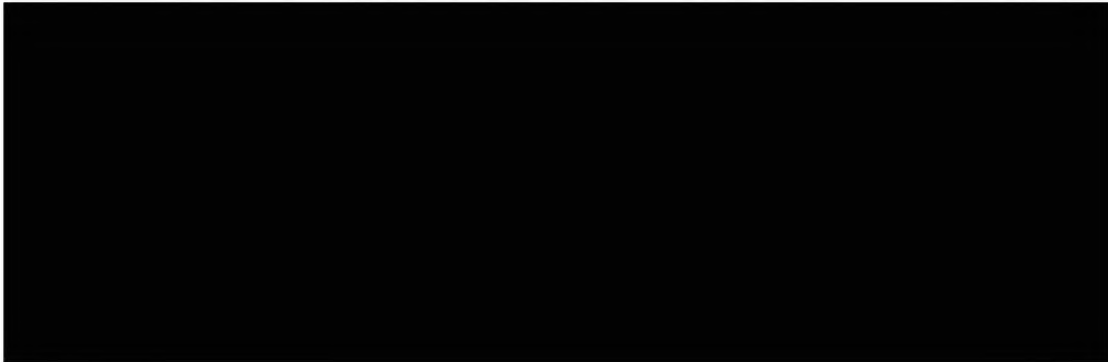
Recommendation #16

> That the Crime Department trial a 6 month pilot of a Dedicated Source Unit, staffed by four Detective Sergeants and one Detective Senior Sergeant in the roles of Handlers and Controller respectively.

Recommendation #17

> That personnel for the trial be selected from diverse areas within Crime and that the personnel have credibility amongst their peers and a proven ability to manage human sources.

Recommendation #18

> That the selected personnel attend advanced human source training either with the AFP or the ACC at the first available opportunity.

Recommendation #19

> That the pilot DSU be housed within the Crime Department.

Recommendation #20

> That the nominated Local Registrar for the pilot DSU be the Local Registrar of the Major Drug Investigation Division.

Conclusion

"If another one of us dies, two of them will die."

On the 12th October, 1988, two police Constables, Stephen TYNAN and Damien EYRE, were murdered in the course of their duty, whilst checking an abandoned motor car in the Streets of South Yarra. These members were ambushed by a group of well known and violent Melbourne criminals as a payback after a gang member was shot and killed by members of the Armed Robbery Squad the previous day.

Subsequent investigation revealed the fact that a pact had been formed between these criminals to kill two policeman for every one of them that was shot by police.

This pact was not a secret and was known to numerous people many months prior to the murder of TYNAN and EYRE.

It could be argued that had the Victoria Police possessed a determined and focussed approach to the development of an effective human source network, capable of being tasked into areas of strategic need, the organisation may have been aware of the immediate threat to its members that day.

Victoria Police now has the ability to build such a network by drawing on proven systems and methodology currently being utilised by some of the most professional and progressive law enforcement agencies in the world.

The recent well publicised allegations of corruption against members of the Victoria Police and the Australian Crimes Commission, arising from improper law enforcement/human source relationships, highlights the exposure law enforcement agencies have through the poor management of human sources.

A unique set of circumstances currently exists within Victoria Police whereby members are calling out for training and guidance in this area.

Organisational support and the will to drive cultural change focussed on developing a highly professional and effective regime of human source cultivation and management can produce the twin outcomes of minimising risk exposure and substantially contributing to an 'intelligence led' policing model.

HUMAN SOURCE MANAGEMENT PROJECT

Recommendations

Recommendation #1   Page 14

The number of human source registrations be benchmarked regionally and departmentally for the year 2004 – 2005.   Regions and Departments then be assessed via COMSTAT against incremental improvements of the benchmarks set.

Recommendation #2   Page 14

Victoria Police develop and implement a change management strategy aimed at encouraging members to actively seek out and cultivate potential human sources.

Recommendation #3   Page 15

That a research project be undertaken to examine past cases whereby police investigators have formed corrupt relationships with criminal informers with a view to identifying causal factors and developing preventative tradecraft in human source management.

Recommendation #4   Page 20

Where the implementation of a sterile corridor is deemed necessary, it occur preferably through the use of a dedicated full time handler.

Recommendation #5   Page 21

A multi level tiered risk identification model be adopted whereby human sources are categorised either; low, moderate, significant or high level risk sources.

Recommendation #6   Page 22

All parties involved in the management of human sources be trained in the risk assessment process.

Recommendation #7   Page 23

The determination of the appropriate risk level will be made
by the local registrar subject to final veto by the Central Registrar.

Recommendation #8   Page 25

Dedicated handlers, co-handlers and controllers shall be compulsorily
deployed for the management of all designated 'high' risk human
sources ensuring the implementation of a sterile corridor.

Recommendation #9   Page 26

The Informer Management Unit retain functional control of Dedicated
Source Unit/s which will be operationally tasked in accordance with
local priorities.

Recommendation #10   Page 28

The maximum time in position for dedicated handlers be fixed at █████
█████ with no minimum time in position requirement.

Recommendation #11   Page 29

Members selected for duty at a Dedicated Source Unit enter into an
Acknowledgment of Appointment memorandum providing for their
removal from the position should they prove unsuitable.

Recommendation #12   Page 31

A training program be developed which includes the training of all
parties involved in the supervision of human source relationships.

Recommendation #13   Page 32

The ███ should be
considered desirable, not compulsory, unless otherwise directed by a
Controller, Local Registrar or Central Registrar after consideration of a
risk assessment of the source █████████████████████

Recommendation #14 Page 35

An investigator's ability to recruit and maintain human source relationships be recognised as a skill competency to be assessed for the purposes of the Performance Enhancement Program.

Recommendation #15 Page 35

All investigator's positions whether within a Crime Squad, Criminal Investigation Unit or a Regional Response Unit include as part of the key selection criteria, a 'proven' ability to recruit and manage human sources.

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