Victoria Police Manual – Policy Rules

Human sources

Context

For the purposes of investigating crimes, police use a number of means to obtain information and intelligence. One is the use of confidential human intelligence sources, referred to by Victoria Police as human sources. This policy has been developed to:

- Support the use of human sources in investigations and intelligence gathering
- Protect Victoria Police's reputation
- Protect Victoria Police's methodology
- Protect the integrity and safety of members and human sources
- To ensure the management of human sources is within legal and ethical boundaries.

Application

Policy Rules are mandatory and provide the minimum standards that employees must apply. Non-compliance with or a departure from a Policy Rule may be subject to management or disciplinary action. In making decisions that support compliance with Policy Rules, employees must consider the **Professional and Ethical Standards**.

These Policy Rules apply to all Victoria Police employees with the following exceptions:

- This policy does not apply to human source management procedures within Crime Stoppers, or to internal sources who are employees of Victoria Police providing information alleging corruption, criminality or serious misconduct. For further guidance on this, see VPMG Complaint management and investigations and VPMG Protected disclosures.
- In the case of Professional Standards Command (PSC), human sources must be managed internally by PSC in line with the requirements of this policy and utilising Interpose. PSC has an independent structure relevant to the management of human sources.

Rules and Responsibilities

1. Glossary and definitions:

1.1 Human source

For the purposes of this policy, a human source is an identified person who provides information to Victoria Police (or another law enforcement agency) with an expectation that their identity will be protected, and specifically where:

- they actively seek out further intelligence or information on the direction, request or tasking of police;
- they develop or maintain a relationship with other person/s for the purpose of providing that information;
- they are seeking or may be eligible for rewards or other benefits;
- there exists a threat or potential of danger or harm to a person as a result of the active relationship between the Human Source and Victoria Police;

1.2 Community source

Under this policy a community source is an individual who has volunteered information to the police with an expectation that their anonymity will be preserved. Typically the role of a community source will be confined to providing eyes and ears intelligence.

- A community source:
 - can be a public spirited person or someone who is providing one off information;
 - may provide information on a single occasion or on numerous occasions;
 - must not be requested or tasked to actively gather intelligence other than reporting on events they see and hear in the context of their everyday habits and routines;
 - may apply and can be considered for a reward;
 - must have the relevant risk assessment completed prior to their registration (further information about risk assessments can be found at section 4 below).
- The primary reason for registering a community source is to preserve their anonymity and ultimately the safety of those persons who assist the police.
- When dealing with a community source (or human source), all information must be recorded on a Source Contact Report. See section 7.4 below for information about Source Contact Reports. (REMOVE)

1.3 Juvenile sources

- Any person registered as either a human or community source who has not yet reached 18 years of age.
- Risk assessments for juvenile sources must always address their vulnerability specific to their age and maturity.

- Authorisation for juvenile sources is limited to one month with all subsequent renewals restricted to one month periods unless the source has reached their 18th birthday.
- The Local Source Registrar must review the initial registration application to register and use the juvenile source within 72 hours of the registration process commencing.
- A parent and or legal guardian (includes persons who are under State care)
 must give consent unless exceptional circumstances exist. If consent is not
 obtained, the grounds for not doing so must be properly established and
 approved by the Local Source Registrar.
- Juvenile sources should only be used to supply information about members of their immediate family in exceptional circumstances.

Where policy is applicable to all categories of source, they are collectively referred to as 'sources' or a 'source'.

1.4 Handling Team

- A handling team must contain a minimum structure as follows:
 - Local Source Registrar;
 - Officer in Charge (or Work Unit Manager/Supervisor); (REMOVE)
 - Controller;
 - Handler;
 - Co-Handler (may be multiple co-handlers).
- All members must have completed the Human Source Management
 Course as a minimum (information about human source management
 training can be found at section 1.17 below). The Central Source Registrar
 may determine that some or all handling team members require higher
 training levels. This decision will be made according to factors including:
 - the level of overall risk involved in the management of a particular source, and/ or;
 - the work group/team managing the source.
- Other factors not detailed above may be considered by the Central Source Registrar when determining whether handling team members require higher training.

1.5 Handler

- A sworn member who has the primary responsibility for contact with the source and for the initial evaluation of information supplied by that source.
- No member can be assigned as a Handler (or to any other handling team role) unless they have completed the Human Source Management Course as a minimum.
- The functions of a handler include:

Victoria Police Manual – Policy Rules – Human sources

- initial evaluation of the source as to suitability;
- creation of the registration on Interpose;
- preparation of appropriate risks assessments in consultation with the controller;
- ongoing review of risks;
- operational management of the source;
- effective management of the source relationship;

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- preparation of Source Contact Reports and sanitized information reports;
- briefing of controller prior and post contact;
- ensuring compliance with Acknowledgment of Responsibilities Form;
- debriefing and deactivation of the source.

1.6 Co-Handler

- A sworn member who assists the handler or assumes management of a source where the Handler is unavailable.
- There may be multiple co-handlers on teams and these may include other line managers. In considering multiple handlers due weight must be given to the principle of "need to know" in order to maintain security of the source.

1.7 Controller

- A Sergeant or above who has direct supervision of a Handler. They must oversee the source's Interpose file which includes:
 - the full personal details of the source;
 - all management comments and directives;
 - copies of risk assessments;
 - copies of all Source Contact Reports and activities;
 - copies of the Acknowledgement of Responsibilities Forms;
 - copies of reward applications;
 - deactivation requests;
 - other documents determined to be relevant to the management of the source.

- Prior to a source registration being approved the controller must ensure the following takes place:
 - the acknowledgement of responsibilities is delivered and uploaded to Interpose as soon as possible;
 - the risk assessment is evaluated for potential and identified risks and ensure sufficient mitigation strategies are in place;
 - the completed risk assessment is uploaded to Interpose
- Once registration has been approved (for further information about registration of sources, see section 3 below) and a source code allocated, the Controller is to:
 - monitor and review all activities within the source's Interpose file;
 - where practical when the Handler and the source and ensure the AOR requirements are completed and that the source clearly understands their responsibilities. The source should not be tasked until this occurs; (REMOVE)
 - ensure the Acknowledgement of Responsibilities Form are forwarded to the Human Source Management Unit within of the meeting, unless exceptional circumstances exist (REMOVE)
 - review both the risk assessment and Acknowledgement of Responsibilities Form on a monthly basis;

1.8 Officer in Charge's (OIC) responsibilities

- A member in charge of a PSA, Squad, Unit etc. with line control over the human source handling team (referred collectively throughout document as 'OIC'). They will form part of the team and support the controller with advice, analysis of risk and oversight.
- The OIC, in consultation with the controller, is required to provide written advice to the Local Registrar and record that advice in the source's Interpose file under the source management section.
- Upon the commencement of an Interpose source registration/reactivation, the OIC will:
 - assess the suitability of the source and allocated handling team;
 - evaluate any risks identified in the initial preliminary risk assessment and consider risk management strategies;
 - consider operational priorities and duty of care issues;
 - update their recommendations on the Interpose human source file for review by the Local Source Registrar.

1.9 Local Source Registrar (LSR)

- The LSR is the Divisional Superintendent having line control of personnel who register sources in that division. The function may also be shared in work groups where multiple superintendents have operational functions, such as Crime Command.
- LSR access to source files may be granted to Operations Support
 Superintendents and Inspectors who have a support function relating to
 source management, crime management and intelligence in accordance
 with divisional or regional needs. The delegation of LSR functions to these
 members does not remove overall responsibility from the Divisional
 Superintendent.
- On receipt of the Registration/Reactivation Application Form, the LSR will:
 - assess the suitability of the source;
 - evaluate potential and identified risks and ensure sufficient mitigation strategies are in place;
 - ensure that the allocated handling team are appropriate;
 - ensure that the completed Acknowledgement of Responsibilities is uploaded to Interpose.
 - ensure that a comprehensive risk assessment is uploaded to Interpose
 - recommend approval or reject the application within the Interpose file.
- The CSR will not approve the registration until the LSR has endorsed the
 human source management tab within Interpose to indicate their
 satisfaction that all perceivable risks have been identified within the risk
 assessment document, that the risk controls are sufficient and that any
 change to risk profile must trigger a new risk assessment process.
- If the LSR rejects the application they must:
 - advise the Human Source Management Unit;
 - record the reason for rejection and action taken by the Handler,
 Controller and OIC on the of the Interpose human source file.
- If an application is recommended for approval, the LSR will:
 - recommend to the CSR that the source registration/reactivation be approved;

ensure the completed Acknowledgement of Responsibilities document are uploaded to the Interpose source file (REMOVE)

1.10 Central Source Registrar (CSR)

 The Detective Superintendent of the Covert Services Division, Intelligence and Covert Support Command (ICSC) shall assume the role of CSR (PSC has an independent CSR and structure). The CSR has oversight of all registrations and source activity. The CSR authorises all source disclosures Interpose. It is not necessary to complete an AOR; however a risk assessment is required as detailed at section 4.2 below.

- When a community source is registered/reactivated on Interpose, the OIC will:
 - assess and approve or reject the application. If the status meets the definition of a Human Source, ensure the proper registration process is initiated;
 - update the Interpose human source file with recommendations for review by the LSR;
 - allocate a suitable Handler and Co-Handler;
 - ensure a Confidential Code is allocated;
 - ensure all future documentation refers to the person by the code;
 - monitor the relationship and ensure the status of the Community Source does not change to a human source.

3.2 Human sources

- Upon identifying a person to be registered as a human source, the handling team must submit a registration application via the human source module on Interpose to their listed OIC for assessment.
- The generation by Interpose of a human source registration number only indicates that the details of the proposed human source have been registered on the system. The registration is not approved until such time as the CSR provides that approval.
 - The human source is not to be tasked until the registration has been approved.
 - The source registration number is not to be used in any manner until
 the registration has been approved by the CSR, including warrant
 applications. For urgent applications the HSMU can be contacted by
 phone see chapter 3.3 (after hours urgent registration).
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- Upon the initiating the registration process, the HSMU Unit will receive a notification via Interpose. The HSMU will immediately contact a handling team if the registration cannot be proceeded with at that time. This notification can be made on a 24 hour basis.
- Immediate notification will prevent relationships being formed with unsuitable human sources, human sources already registered and human sources that fall into a high risk category due to factors unknown to the prospective handling team.
- Registration approval may be provided verbally by the HSMU upon an urgent request. Such approval will only be given where a detailed risk

assessment (verbal or documented) is provided by the handling team. The LSR must approve such a request either verbally or in writing to the HSMU.

- Human sources must be provided with and accept simple guidelines for their behaviour whilst engaged with Victoria Police. The AOR must be understood and consented to by a human source before formal approval is granted.
- A documented risk assessment must be completed within registration by the Handler or Controller in accordance with the Human source risk assessment manual. If a risk assessment identifies a human source as high risk, the HSMU must be contacted for operational advice and assistance.
- A risk assessment must be completed for all human sources.
- Risk assessments for human sources must be updated every at minimum. The review must be conducted by the OIC in consultation with the controller (and other handling team members if desired).

3.3 After hour's urgent registration

- In cases where members receive intelligence outside normal business hours which necessitates the commencement of a human source registration and the immediate actioning of the intelligence, contact must be made with the on call HSMU sub officer for approval to action the intelligence.
- This approval process is in addition to any approval sought under VPMP Searches of Properties, paragraph 2.4.
- HSMU will conduct a thorough risk assessment in respect of the appropriateness of the proposed registration as well as the intended use of the intelligence.
- If approval is granted HSMU will record this fact in the management tab of the subject Interpose shell and forward an Interpose link to the responsible Local Source Registrar for their information and further consideration.

4. Risk assessment:

Risk assessment is the process of identifying risk, taking steps to reduce risk to an acceptable level and monitoring the level of risk.

4.1 Human sources

- A full risk assessment must be undertaken and uploaded to the Interpose human source file for review by CSR, LSR and HSMU within registration.
- Controllers must review the risk assessment monthly.
- Where it is decided that a source will not be used after the period, the Interpose must be completed outlining the reasons.

4.2 Community source

- Persons falling within the definition of community source must have the relevant risk assessment completed at the time of the commencement of the registration process.
- All of the available fields within the risk assessment tool must be addressed as well as any source specific risks.
- The registration of the community source must indicate the reason and purpose at the time of registration.

4.3 Risk categories

- All sources must be the subject of a risk assessment which will identify risks in following 5 categories:
 - Risk to the source of compromise;
 - Risk to the handling team;
 - Risk to the information/investigation;
 - Risk to Victoria Police;
 - Risk to the public.
- Risks are to be identified, analysed and a rating provided. Mitigation strategies are then to be listed and a residual rating applied. A source's overall risk rating will be at the same level as the highest risk remaining once mitigation strategies are in place.
- Risk cannot be assessed against one category alone and cannot be outweighed by the imperative of an operational objective. Risk is to be calculated against what is known, what is unknown, what is planned and what may occur in the future.
- The risk assessment process is not designed to prevent human source relationships but to provide the necessary framework for safe, effective management.
- The risk assessment must clearly articulate the purpose for engagement of the source and if there is any change in that purpose, or any movement from the original intent, then a full new risk assessment must be undertaken.
- Risk assessments will be in the format approved by the HSMU and uploaded to the Interpose file in the

4.4 High risk and extreme risk sources

- A source identified as high or extreme risk following a risk assessment must be managed by sufficient personnel
- Whenever a source is assessed as being high or extreme risk the HSMU must be notified for advice. The HSMU, on behalf of the CSR, will assist work units in determining their suitability to manage high risk sources.

Unless determined otherwise by the CSR, high-risk sources must be managed in a sterile corridor see section 1.15 above.

• In cases of high risk source the LSR, as a component of the monthly inspection process, must endorse current risk assessments to reflect that no new risks have arisen that would require a revised risk assessment being conducted and that the current risk assessment remains fit for the purpose. The LSR must also document the checks and inquires undertaken in order to make such a determination.

4.5 Legal, ethical, medical or psychological considerations

- Where complex legal, ethical or medical considerations are evident with a human source, such as the human source being occupationally bound by other duties, or there is (the presence of medical or mental health issues) advice must be sought from the HSMU.
- Where complex legal or ethical considerations are present with a potential human source, HSMU must seek advice from Legal Services Division prior to the completion of the risk assessment process. Such advice must be brought to the attention of both the LSR and CSR for consideration prior to registration being approved.



4.6 Professional privilege and other circumstances

- Members must be mindful that some sources as result of their occupations may have professional obligations regarding confidentiality eg. Lawyers, Doctors and Clergy.
- Handlers must consider the legal and ethical implications for the management of these sources and the information or intelligence they transmit in compiling their registration applications.
- Members must obtain advice from HSMU management as to the method of handling and recording of any such information or intelligence that may conflict with the professional obligations of the source.
- The source Interpose file is to accurately reflect the planning and methodology to be followed in managing such a source. HSMU advice is binding and may include the quarantine of information transmitted that may breach such an obligation or relationship.
- Where a human source, who is in a position to which professional privilege applies, voluntarily offers information that is or appears to be in breach of that privilege then the following is to occur at the earliest opportunity:

- The Interpose record is to be updated with a notation that the information appears to be in breach of professional privilege,
- The information is not to be acted upon or disseminated further,
- The HSMU must be advised at the earliest opportunity,
- The HSMU must obtain legal advice from Legal Services Division regarding the use of information or intelligence obtained which may breach a professional obligation,
- The HSMU will advise the CSR who in turn will advise the Human Source Management Ethics Committee,
- The Human Source Management Ethics Committee will review the information provided and make a recommendation as to how the information and the source will be treated.
- Handlers must not actively seek information from human sources to whom a
 professional obligation may apply if such information would cause the
 human source to breach such a duty knowingly.
- The strict adherence of this policy is not intended to discourage the use of high risk sources in such circumstances but to effectively manage the relationship and information obtained in accordance with acceptable legal and community standards.

5. Status of sources

Sources will be designated with the following statuses:

5.1 Draft

The source file is under assessment and awaiting the allocation of a handling team and local management approvals. Tasks must not be issued to a human source under assessment without approval by the OIC, documented in the human source's Interpose file.

5.2 Assign Team

Personnel have been added to the handling team and local management comments have been added. The source file is ready to be forwarded to the LSR for approval.

5.3 LSR Approval

The LSR is required to enter comments in the source management section, approving or not approving the registration, or seeking further advice from the handling team or CSR.

5.4 CSR Approval

The HSMU is required to assess the registration on behalf of the CSR and make appropriate directions.

5.5 Active

The source file is currently under management and appropriate approvals have been made at all levels up to and including the CSR. Whilst Active, the source file will not be formally approved if the risk assessment and AOR have not been uploaded and approved by the HSMU.

5.6 Unsuitable

The source will not be registered, re-registered or reactivated without HSMU approval. This will be influenced by the level of risk attached to that source. Upon being notified that a prospective source is unsuitable, handling teams should cease any tasking or deployment until the HSMU advises it is safe to do so. The HSMU may alter the unsuitable status after reviewing the application.

5.7 Deactivated

The source file is no longer in use and all material relating to the management of the source is either within the source's Interpose file or secured at the HSMU.

Requirements for deactivation

- A source is to be de-activated to the status of 'inactive' if:
 - there is no current operational need for the source;
 - the source moves out of the jurisdiction;
 - the source has not provided operationally reliable information for a period of at least
- Any member involved in the operational management of a source may recommend the de-activation of a source to the LSR.

Members of handling team requesting de-activation

- Members are to:
 - consult the Handler, Controller and OIC;
 - complete the Interpose human source deactivation.

Responsibilities of Controller

Once deactivation is approved the Controller must:



LSR responsibilities:

• On receipt of the source management file and human source De-activation Form the LSR is to:

- review the source file and add comments in the source management page;
- ensure the safe delivery of to the HSMU;
- ensure that no documents relating to the management of the source are retained outside HSMU.

5.8 Inactive Source

If the HSMU does not receive any Source Contact Reports from the Handler/Controller for a period of six months, a report will be forwarded to the LSR advising that the source status is 'inactive'. Further use of the source will require a reactivation application.

6. Managing and protecting sources

6.1 Requirements for managing (accountabilities)

- Appropriate members must be appointed to manage sources. All members
 of a source handling team must have completed the

 Human Source
 Management Course as a minimum requirement to be on a handling team.
 This includes the OIC, LSR and members delegated some functions of the
 LSR.
- Upon receipt of a new registration the HSMU will consider the various training competencies of the handling team and assess that against the source relationship. The CSR may direct that handling teams include members with higher training levels to manage identified risks.



6.2 Reassigning handlers, controllers or OIC

Circumstances may arise where it is necessary to re-assign the OIC, Controller, Handler or Co-Handler. This may include instances where:

- advice to re-assign the OIC, Controller, Handler or Co-Handler has been received from the CSR;
- the member is:
 - on leave;
 - no longer in the service of Victoria Police;
 - assigned duties that preclude contact with the source;

- found to be unsuitable;
- transferred to another work location;
- upgraded within their own office (i.e. cannot become Controller if also Handler);
- suspended from duty.

6.3 Responsibilities of the LSR:

In deciding to re-assign a member or receiving advice from the CSR, the LSR is to:

- direct the responsibility for managing the source to a nominated new OIC,
 Controller, Handler or Co-Handler, where the member is to be re-assigned immediately;
- personally inform both the existing Controller, Handler and Co-Handler and new Controller, Handler and Co-Handler of the re-assignment;
- notify HSMU of the change.

Where the reason for the re-assignment relates to deficiencies in the member's skills, the LSR is to inform the HSMU, who may assist with remedial training to correct the deficiencies.

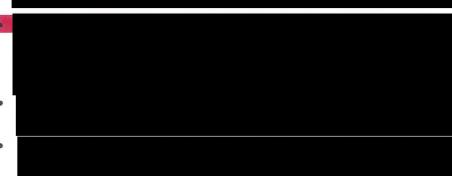
6.4 Document security

 Documents identifying sources must not be stored outside of the Interpose human source module other than by the HSMU.









6.5 Disclosure of information

- LSR's (or their delegate) must audit all human source activity quarterly (at 28 February, 31 May, 31 August & 30 November) to ensure that the information obtained from their sources is disseminated in a timely manner and to meet operational needs. Details of how information is disseminated must be recorded on the source's Interpose file.
- Human source intelligence should only ever be disseminated verbally in cases of where there is an operational imperative. All verbal disseminations must be recorded in the relevant source contact report and then reduced to an information report and disseminated expeditiously.
- The Handler and Controller must ensure that the identity of the source cannot be deduced from the information disseminated.
- In instances where disclosure for the purposes of investigation may place
 the source at an elevated risk, a record of this must be made on the Source
 Contact Report including a clear outline of the reasons for non-disclosure as
 a means of risk mitigation. Similarly, where it is determined that the
 information may be disseminated despite the risk, a record is to be made in
 the Source Contact Report.



- If there is any dispute over the dissemination of information from a source the CSR will make the final decision.
- The HSMU must be notified immediately if legal process is served to produce any record that may directly or indirectly identify a source. The HSMU may then co-ordinate the involvement of other bodies such as the VGSO and OPP. Costs for engaging counsel to represent Victoria Police will be met by the Region/Commands where the handling team resides.
- Employees who are requested to provide information in response to an FOI application or subpoena or any other legal or administrative proceeding and who become aware that such information may contain material tending to confirm or deny the existence or use of a source, must only release such documents with the approval of the CSR. This approval process will be facilitated by the HSMU.
- Members being asked or directed to confirm or deny the existence of a source in a court, irrespective of whether being directed to do so from the judge/magistrate or whether under oath, are not to disclose such

information until they have sought legal advice. If directed to answer, an immediate adjournment is to be requested for the purpose of seeking independent legal advice and the HSMU contacted. The OPP is not responsible for this representation.

 Members must ensure any disclosure they make does not breach their obligations under s.226-228 Victoria Police Act 2013.

6.6 Affidavits for warrants

- Where a member is applying for a warrant to search premises or obtain electronic surveillance based upon the information of a source, the affidavit must contain the registered number of that source.
- If the source of information is not registered their identity must be documented and verified in the affidavit.
- In all applications for search warrants, the authorizing officer must be satisfied that the identity of the source providing such information is verifiable and the use of that source complies with this policy.
- If the involvement of a source is not to be divulged within an affidavit (e.g.
 "... intelligence holdings suggest ..." as the only reference), the reason must
 be recorded in the source's Interpose file. This must only occur where the
 risk of identifying source involvement in an affidavit is too high to be safely
 mitigated.
- Where information derived from a source is to be used in an affidavit
 where the source is being handled in a 'sterile corridor', the handling team
 must be consulted prior to the sworn affidavit being provided to the court
 or relevant authorizing entity.
- In any unresolved dispute between a handling team and investigators over the contents of an affidavit where a source is the subject of such dispute, the CSR will determine the outcome.

6.7 Interpose Investigation Shells



7. Contact with sources

7.1 Operational security

 Members responsible for handling any information from sources must ensure that the identity of the source is not compromised.





7.2 Planned meetings

Approval

The Controller must approve any planned meeting between a handler and a source. Where a controller is unable to be contacted, a supervisor of equivalent rank to the controller or the nominated OIC of the handling team is to provide that approval.



7.3 Recording and reporting contact

- As soon as practicable following any contact with a source the Handler or Co Handler must complete a Source Contact Report. This period must not exceed 72 hours.
- If a chance meeting with an active source occurs, on or off duty, the Handler or Co handler must advise the Controller as soon as practicable and submit a Source Contact Report.
- Where as a result of information provided by a source post contact verbal advice is provided to another work area, such actions must be the subject of the submission of an information report as soon as practicable.
- Following contact with a source and on completion of the Source Contact Report, the handler or co handler must brief the controller.
- Controllers are to review the relevant Source Contact Reports on Interpose following any source contact briefing.
- Controllers must review any information report generated from a source contact to ensure that it is appropriately sanitized and does not contain any information that could identify the source.
- After reviewing any information report the controller is to circulate same, including providing a soft copy to the HSMU.



7.4 Source Contact Report

- Will contain all relevant information about a source's contact with a
 handling team, whether by phone, face-to-face or other means. The report
 is to contain a comprehensive précis of the meeting and link all operational
 information obtained. Click here for a sample contact report.
- Separate issues in the report are to be the subject of separate paragraphs and those paragraphs are to be sequentially numbered for purposes of cross referencing in other documents.
- Issues of significance within a report should be highlighted and drawn to the attention of appropriate levels of management within the handling structure.



8. Rewards

related to sources

8.1 Requirements

- Payments for expenses or reward must only be given to a source that is registered and formally approved, and then only where they provide important information or assistance.
- The HSRC must approve all reward payments.
- Members must not give any undertaking to a source about a proposed reward prior to HSRC approval.
- A reward payment is any cash, goods, judicial assistance (Letter of assistance) or other like benefit given to a source as reward for information provided to police. This includes letters of assistance which are documents informing a court about assistance provided to Victoria Police by a source.



Victoria Police Manual – Policy Rules – Human sources



 Where a source becomes a witness, payments to meet the costs associated with the witness appearing in court must be made in accordance with VPMG Court Processes.

8.2 Applications for payment

- The Request for Human Source Reward form must be completed by the Handler and submitted to the Controller. The Controller is to update the source management file and forward the request to the OIC.
- The OIC is to assess the request, provide a written recommendation and forward all documentation to the LSR.
- The LSR is to review the request on Interpose and make appropriate recommendations to the (HSMU) for consideration by the HSRC.
- The HSMU is responsible for coordinating all requests to the HSRC. All
 letters of Assistance will be prepared by the HSMU from the information
 provided in the reward application.

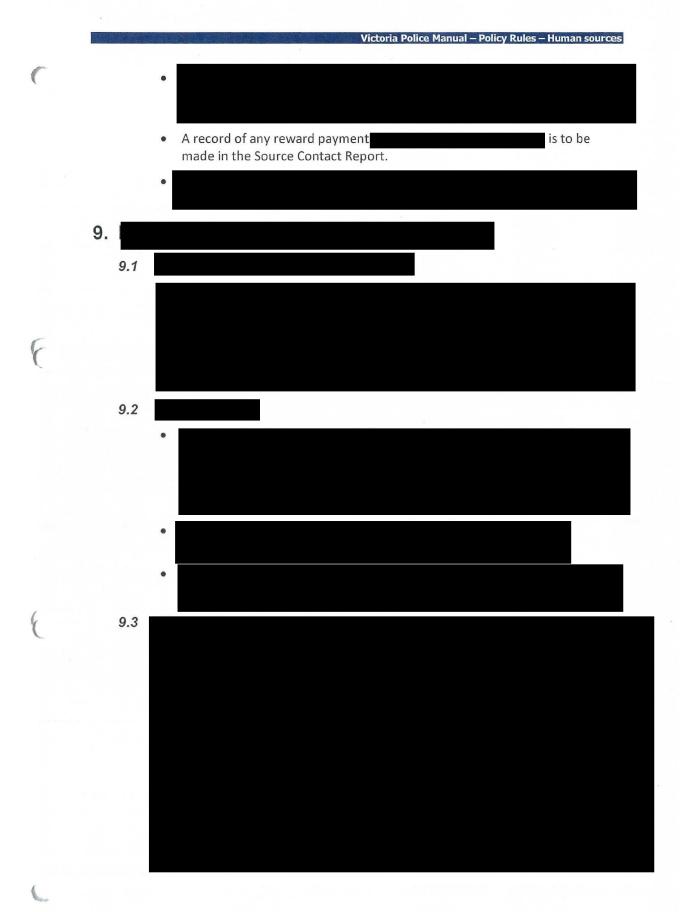
8.3 Recording payment



8.4 Making reward payments

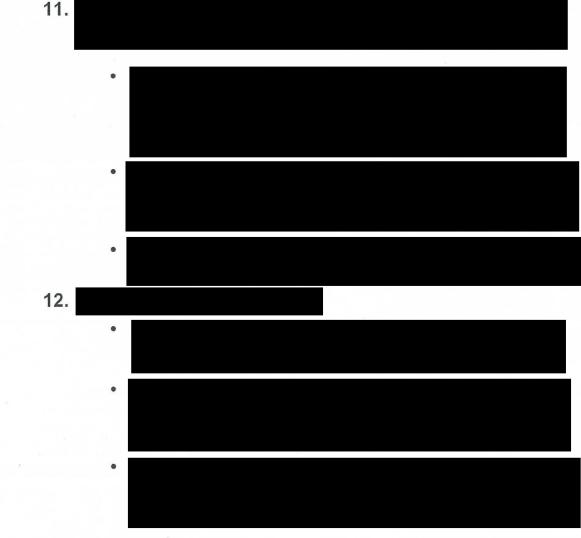
• All reward payments must be made as directed by the HSRC.

Version 1.17 – 9th June 2015

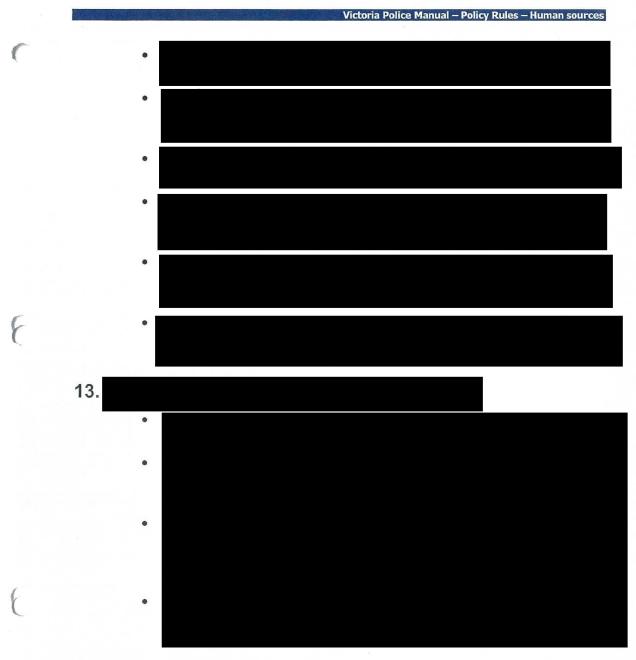


10. Death of or serious harm caused to sources

- When a handling team becomes aware of the death of an active source the LSR and HSMU must be notified immediately and the circumstances of the death noted within the source's Interpose file.
- Where the circumstances surrounding the death of an inactive source is the
 result of murder/manslaughter, suicide or other suspicious circumstances,
 the handling team upon becoming aware must inform the HSMU. The
 HSMU will advise on appropriate action including any information to be
 recorded on the source's Interpose file.
- Similarly, if a source is physically harmed through circumstances which could reasonably be linked to their relationship with Victoria Police, the HSMU must be advised as soon as practicable.
- Where it is reasonably believed the death of, or harm to, a source occurs as a result of an unauthorised or inadvertent disclosure, the LSR must contact PSC following the HSMU notification.



Version 1.17 – 9th June 2015



14. Disclosure of source identity

 Maintaining the confidentiality of a source is a duty of care that rests with members of the handling team. The identity of a source must never be divulged to a person outside the handling team without the approval of the CSR (via HSMU). When a member becomes aware that the confidentiality of a source's identity has been or may be compromised, the HSMU is to be notified immediately.



15. Reporting inappropriate behaviour

Version 1.17 – 9th June 2015

Victoria Police Manual - Policy Rules - Human sources

- Where a member reasonably forms the view that another member involved in a handler—source relationship has, in the context of that relationship, acted in a manner that calls into question their professional integrity, the member must act in accordance with their obligations under the *Victoria Police Act 2013*. Further guidance can be found in the Victoria Police Code of Conduct.
- Where a source supplies information alleging inappropriate or unlawful conduct by a police member, that information must be dealt with according to VPMP Complaints and Discipline and VPMG Complaints and Discipline.

16. Audit and compliance

- Controllers must complete a monthly review of the source relationship, risk assessment and information gained.
- Controllers and their OIC must record a summary of activity in the source's Interpose file within the
- OIC's must review active registrations every 3 months.
- Source Contact Reports must be controller reviewed within 7 days.
- In cases of high risk source the LSR, as a component of the monthly inspection process, must endorse current risk assessments to reflect that no new risks have arisen that would require a revised risk assessment being conducted and that the current risk assessment remains fit for the purpose. The LSR must also document the checks and inquires undertaken in order to make such a determination.
- The LSR must conduct an audit of each source management file within their division at the time of deactivation. Each audit must cover procedural, ethical and value aspects of the registration.
- The HSMU is to notify the LSR when:
 - source files are inactive for longer than the review periods stipulated in this policy;
 - Risk assessments or AOR's are not provided/updated;
 - An incident occurs whereby a source is harmed as a result of their relationship with Victoria Police;
 - Other management issues exist which should be brought to his/her attention.

Refer to the Workplace Inspections Manual for further details about conducting inspections and audits generally.

Quick Links

- Human Source Practice Guide
- Human source risk assessment manual
- VPMP Investigation support
- VPMG Investigation support
- VPMG Rewards
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Further Advice and Information

For further advice and assistance regarding these Policy Rules, contact the HSMU.

Update history

Date of first issue Date updated	22/02/10	
	Summary of change	Force File number
14/02/11	Section 6 amended to include requirement that payment of human source who becomes a witness must be in accordance with VPMG Court Processes	061937/10
28/04/11	Sections 4, 5 and 9 amended to reflect use of Interpose system for the management of Human Sources.	067083/11
16/01/13	Updated to reflect organisational governance and structural changes.	FF-074790
04/02/14	References to redundant instruments following IMSSD review have been updated with corresponding new instruments.	069562/11
9/6/15	Multiple amendments to meet recommendations of IBAC review	TBA