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WESTERN AUSTRALIA POLICE

Submission to:

PARLIAMENT OF NEW SOUTH WALES

**Committee on the Office of the Ombudsman and the
Police Integrity Commission**

**Inquiry into Early Intervention Systems to Identify
Officers at Risk of Corruption**

**Risk Assessment Unit
Corruption Prevention and Investigation Portfolio
Western Australia Police**

May 2008

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Western Australia Police Corruption Prevention and Investigation Portfolio

The role of the Western Australia Police (WAPOL) Corruption Prevention and Investigation Portfolio (CP&I) is to proactively focus on corruption prevention, quality internal investigations and best practice complaint management through the Police Complaints Administration Centre (PCAC).

As a proactive focus, the Risk Assessment Unit (RAU, within CP&I) is responsible for the early identification of possible problem behaviour by officers; the development and implementation of early intervention strategies, at the local and corporate levels.

The Kennedy Royal Commission (KRC) Final Report (2004) reinforced the need for WAPOL to implement effective systems and appropriate resources to facilitate identifying and treating individuals and business units who represent a risk to WAPOL.

In this final report on the *Royal Commission into the Western Australia Police* Justice Kennedy stated that it is no longer acceptable “for a police service to deal with corruption by awaiting the receipt of allegations before embarking upon reactive investigations...it is necessary to adopt a proactive approach of identifying high-risk officers and activities through a process of target identification and profiling”. Justice Kennedy wrote “a mechanism to achieve this is through the implementation of an early warning system” (2004, p.147).

The KRC has been a key driver for WAPOL to progress Early Intervention (EI) strategies within its organisation. As a result, WAPOL undertook significant research with national and international Law Enforcement (LE) agencies to assess the current ‘best-practice’ for EI. Through our research we identified several LE agencies in the United States (US) had also completed such research and had implemented Early Intervention Systems (EIS) in response to major civil litigation, damaging publicity cases and for strategic monitoring of behavioural patterns.

As a consequence of our research, in January 2007 WAPOL implemented IA Professional (IAPro), manufactured by CI Technologies as its EI and Case Management software. IAPro is designed to assist LE agencies, Internal Affairs and Professional Standards Units in EI. It also contains an extensive analytical component with automated charts and reports to conduct research on trends and issues. IAPro has been recognised as a ‘best-practice’ EIS and is now the dedicated EI and Case Management system for all Internal Affairs investigations within WAPOL.

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Parliament of NSW Terms of Reference

The role of early intervention systems in managing vulnerable law enforcement officers and assisting in corruption reduction

'Early intervention systems attempt to systematically and comprehensively identify, record and assess all factors that may be predictive of future misconduct and develop interventions to prevent the misconduct occurring'.¹

The major contribution of an EIS is its capacity to identify behavioural patterns of performance therefore providing opportunities to intervene before problems lead to a serious incident/s, such as public complaints, civil writs, or some other public resentment involving LE agencies. An EIS should have the capacity to record a diverse range of information, both negative and positive, including; public & internal complaints, firearm discharges, pursuits, use of force, police vehicle crashes, work performance reports, training history, positive correspondence, EEO issues, information reports and any other statistical category considered appropriate.

EIS are an effective mechanism for enhancing accountability within LE agencies. An EIS is a database management tool designed to identify police officers whose performance requires remedial assistance via local management with EI assessments. These assessments address those identified issues and potential risks by analysing a number of EI indicators. Further, these assessments provide local management with numerous options to consider in addressing those behavioural issues.

Professor Samuel Walker's publication *Strategies for Intervening with Officers through Early Intervention Systems: A Guide for Front-Line Supervisors* (February 2006), is a guide that is essential reference material for WAPOL supervisors who are adopting the behaviour modification approach in the newly introduced *Managerial Discipline Model (MDM)*.

The guide reflects five basic principles²:

1. Front-line supervisors are the real lynchpin of EI.
2. Supervisors fill such a vital role within EI, they will be required to handle responsibilities that previously may have not been

¹ 'Early Warning Systems: Responding to the Problem Police Officer.' Walker, Alpert and Kenney. National Institute of Justice, Research Brief, July 2001

² Walker, Samuel, Stacy Osnick Milligan with Anna Berke. 2006. Guiding Principles, Strategies for Intervening with Officers through Early Intervention Systems: A Guide for Front-Line Supervisors. Washington, D.C: Office of Community Orientated Policing Services. [pp.4-5]

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considered as part of their job (e.g. analysing EIS data, proactively engaging officers about potential personal and professional problems that may be affecting their work and assessing and pairing intervention options with officers needs)

3. For EI to be effective, supervisors will need intervention options that vary to meet the wide range of officers' needs. Flexibility in the intervention options will increase the likelihood of improving officer performance. Targeted or specialised interventions are more likely to help the officer achieve need improvements (rather than a generic training course). It is also important to provide supervisors with the ability to commend officers for positive behaviours such as receiving complimentary letters from the community or by receiving an award for going above and beyond the call of duty.
4. An EIS should be part of an agency's larger approach to supporting officers. EIS functions most effectively when they are used to help identify and address problems before officers get into serious trouble that results in disciplinary action, formal complaints or civil lawsuits. The key is to view and promote the system as non-disciplinary. EIS are most successful when the agency as a whole reinforces a culture that supports both the community and the officers who protect and serve the community.
5. An EIS is a valuable administrative tool that can enhance accountability and integrity in a law enforcement agency. They can identify officer performance problems and provide the means for correcting them. EIS can also enhance the quality of routine supervision, which in turn may reduce incidents, for example; unnecessary officer involved shooting, inappropriate use of force, etc. EIS can reduce costs arising from civil litigation and improve relations with the community. And they can help improve the well-being of officers and their families.

Current early intervention initiatives by Western Australia Police

WAPOL were the first Australian police agency to implement IAPro as its EIS, which is renowned internationally as a 'best-practice' model. IAPro was commissioned in the first week of January 2007 which coincided with the successful transfer of all historic complaint and internal investigation holdings since 1 January 2000 from the PCAC and the Internal Affairs Unit (IAU) databases.

IAPro is also linked to the WAPOL Human Resource database which automatically updates all WAPOL employee records daily. This is relevant to

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maintain timely information with regards to the status of all WAPOL employees including transfers and resignations.

CP&I has the capacity to now record a number of information types within the one database, rather than the traditional approach of recording information in separate 'silos'. CP&I currently record the following incident types/performance indicators within IAPro:

- 'Blue Line' files³
- Death/injury in custody
- Early Intervention Assessments (compiled by the RAU on individual officers and assessed using the AS/NZS 4360:2004⁴)
- External complaints
- Folios (IAU investigations)
- Gift Register
- Information Only (IAU)
- Information Only (Service Delivery complaints)
- Information Reports
- Internal complaints
- Positive Correspondence
- Use of Force incidents
- Register of Associations
- Risk Assessment Reports (compiled by the RAU on individual officers and assessed using the AS/NZS 4360:2004⁵)
- Secondary employment applications

IAPro also has the capacity to produce Peer Analysis reports which enables the System Administrator to allocate 'thresholds' against the various incident types/performance indicators. These 'thresholds' then activate an 'automatic alert' when officers have reached, or exceeded a threshold limit. The alert is activated immediately the officer is linked to any new incident, provided that incident type is included as a threshold indicator. This information, along with other relevant information is then analysed to assess the risk to the officer involved, assigned work unit, his/her peers, the community and the agency as a whole.

3 'Blue Line' is a confidential, dedicated telephone line for employees who are concerned about the ethical conduct of any WAPOL employee. Callers can choose to remain anonymous if they wish. Complaints received are entered on IAPro and are 'locked' to preserve confidentiality.

4 Australian & New Zealand Standards, 4360:2004, recognised as a world's 'best practice' methodology to assess and rate risks.

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These thresholds can also be set on specific allegations (those of a more serious nature such as corruption, drugs, sexual assault, etc) and the various Use of Force options used by police officers (such as Taser, OC Spray, etc).

An additional feature is the 'monitored' status within IAPro. This 'monitored' feature can be activated as an additional indication that a particular officer requires closer scrutiny with respect to the number of incidents in which they may become involved. Examples include:

- officers currently stood down from all duties or stood aside from operational duties;
- officers who have an extraordinarily high number of complaints; or
- officers who have complaints containing particularly serious allegations which may indicate a course of conduct requiring a higher level of immediate intervention.

When WAPOL implemented its EIS, careful considerations were given to the performance indicators and the respective 'threshold numbers' to be used. At present there are no national or international standards in relation to how thresholds are determined. This is a developing area for EI strategies and presents challenges for all LE agencies.

The utility and further development of an early intervention system for Western Australia Police

The provider of IAPro, CI Technologies, undertook extensive modifications of the original software in order to meet Australian standards with respect to date and telephone number formatting. Further, CI Technologies included features unique to WAPOL's procedures, processes and strict reporting requirements.

With respect to EI strategies, it is important that the automatic alerts activated within IAPro provide relevant and accurate information. As there are no national or international standards in place, constant monitoring and review is undertaken in regard to the incident thresholds. Analysis of work unit strengths, incident counts, local environment, etc all plays an integral role in this process. The RAU is currently reviewing all thresholds and appropriate amendments to those thresholds are being currently undertaken.

The refinements to our thresholds will provide the RAU with the ability to risk manage individual officers transferring between work locations. This will result in tracking their behavioural traits from one work location to the next and identify possible trends in that new work location where historically they have been non-existent. For example:

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- an officer performing frontline policing duties is more likely to be the subject of a complaint (due to his/her higher contact with the public) however, dependant on the work location that complaint threshold may alter (i.e. large metropolitan police station compared to a small country police station);
- also, an officer performing frontline policing duties is more likely to be the subject of a complaint (due to his/her higher contact with the public) than an officer in an administrative environment. Therefore, officers assigned to frontline duties are subject to a higher threshold for public complaints, use of force incidents, etc.

Other additional advancements have been made in relation to analytical reporting. RAU are now capable of providing reports immediately regarding the early identification of organisational performance issues: (IC)

- to analyse organisational units by number of complaints verses the number of currently assigned officers. The work units are ranked by a ratio of selected incidents by headcount.
- to analyse quarterly trends of incidents for organisational units at any level of the organisation, based on the organisational assignment of involved officers that is stored at the snap-shot level.
- to analyse quarterly trends of Use of Force for organisational units at any level of the organisation, based on the organisational assignment of involved officers that is stored at the snap-shot level.

Any other matter the Committee considers relevant to the inquiry

RAU's EI assessments are provided to local District/Divisional Officers (Superintendents) by the Superintendent, RAU, where recommendations for possible managerial action for the officer concerned are discussed. RAU seeks feedback with respect to the success, or otherwise, of any action taken, and monitors the subject officer within IAPro for future behaviour. (IC)

Managerial action recommended can include refresher training, closer supervision, or mentoring for example. Local managers are also encouraged to develop relevant managerial action based on the information provided by RAU, taking into account the local environment and their own knowledge of the subject officer's individual circumstances.

The use of IAPro has achieved the following benefits for WAPOL:


- The only agency in Australia recording 15 different 'Professional Standards' information types within one system.

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- An efficient one-stop information repository providing a variety of information types immediately.
- Increased administrative efficiency and streamlined processes across the CP&I Portfolio.
- Immediate identification of trends and patterns relating to employee behaviour providing options for EI.
- Timely notification to local supervisors and managers on behavioural issues relating to their employees.
- Statistical analysis charts can be produced immediately from within IAPro, for every information type recorded.
- 'At-risk' police employees monitored due to their complaint history, work assignment, role, and behavioural characteristics.



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